

**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: Johor Corporation
Client company Address: Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim
Certification Unit: Kulim (M) Berhad- Sedenak Palm Oil Mill Location of Certification Unit: Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia
Date of Final Report: 09/03/2022

TABLE of CONTENTS	Page No
Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	5
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	6
10. Summary of Certified Tonnage (not applicable for ISS)	7
11. Summary of Actual Volume sold	8
12. Independent Smallholders Certified Tonnage / Volume	11
13. Independent Smallholders Actual Sold Tonnage / Volume	11
Section 2: Assessment Process	12
2.1 Assessment Methodology, Programme, Site Visits.....	12
2.2 BSI Assessment Team	13
1.3 Assessment Plan.....	15
Section 3: Assessment Findings	19
3.1 Multiple Management Units and Time Bound Plan.....	19
3.2 Progress of scheme smallholders and/or outgrowers.....	21
3.3 Details of Nonconformities	24
3.3.1 Status of Nonconformities Previously Identified and Observations.....	36
3.3.2 Summary of the Nonconformities and Status	43
3.4 Stakeholders and previous land owner / user consultation.....	43
3.5 Impartiality and conflict of interest	45
Formal Signing-off of Assessment Conclusion and Recommendation	46
Appendix A: Summary of Findings	47
Appendix B: GHG Reporting Executive Summary	162
Appendix C: Location Map of Certification Unit and Supply bases.....	164
Appendix D: Estate Field Map.....	165
Appendix E: List of Smallholder Registered and sampled.....	169
Appendix F: List of Abbreviations.....	170

Section 1: Scope of the Assessment

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

2. Certification Information			
Certificate Number	RSPO 537873	Certificate Start Date	23/01/2019
Date of First Certification	23/01/2009	Certificate Expiry Date	22/01/2024
Scope of Certification	Production of Palm oil and Palm Kernel		
Visit Objectives	To conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_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"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	90 Mt/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 697947	MS 2530-4:2013	BSI Services (Malaysia) Sdn Bhd	29/03/2024
MSPO 697948	MS 2530-3:2013	BSI Services (Malaysia) Sdn Bhd	29/03/2024
BVC-MSPO/SC-0027	MSPO SCCS:2018	Bureau Veritas Certification	10/03/2025
EU-ISCC-cert-PL214-20220221	ISCC EU	Bureau Veritas Certification	24/04/2022
ISCC-PLUS-cert-PL214-20220221	ISCC PLUS	Bureau Veritas Certification	24/04/2022
A158820	MS 1500:2009	JAKIM	15/09/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Sedenak Palm Oil Mill	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia	1° 43' 47.41" N	103° 32' 21.97" E
Sedenak Estate	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia	1° 42' 48.79" N	103° 31' 36.24" E
Ulu Tiram Estate	PTD 105763, Mukim Tebrau, Daerah Johor Bahru, Johor, Malaysia	1° 37' 28.02" N	103° 47' 26.40" E
Kuala Kabong Estate	PTD 35021, Mukim Bukit Batu, Daerah Kulai, Johor, Malaysia	1° 41' 20.10" N	103° 26' 00.87" E
Basir Ismail Estate	Lot 1419, Mukim Sg. Tiram, Daerah Johor Bahru, Johor, Malaysia	1° 37' 47.84" N	103° 54' 52.07" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sedenak Estate	2,617.47	26.39	164.14	2,808.00	93.19
Ulu Tiram Estate	478.08	23.11	196.86	698.05	68.48
Kuala Kabong Estate	1,622.70	12.01	83.61	1,718.32	94.43
Basir Ismail Estate	2,906.77	50.69	239.17	3,196.63	90.93
Total	7,625.02	112.20	683.78	8,421.00	90.54

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sedenak Estate	155.36	147.91	1,514.98	799.22	0	2,462.11	155.36
Ulu Tiram Estate	3.30	211.91	0	24.15	238.72	474.78	3.30
Kuala Kabong Estate	0	0	1,622.70	0	0	1,622.70	0
Basir Ismail Estate	208.05	1,422.42	782.71	493.59	0	2,698.72	208.05
Total (ha)	513.60	1,944.14	3,751.90	922.64	238.72	6,857.40	513.60

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021)	Actual (Oct 2020 – Oct 2021)		Forecast (Jan 2022 – Dec 2022)
		Previous license period (Oct – Dec 2020)	Current license period (Jan – Oct 2021)	
Sedenak Estate	68,730.00	13,001.51	46,879.34	57,827.00
Ulu Tiram Estate	9,890.00	2,484.030	8,138.03	8,321.00
Kuala Kabong Estate	31,446.00	6,308.030	20,828.48	26,458.00
Basir Ismail Estate	72,590.00	15,942.32	45,920.28	61,073.00
Total	182,656.00	159,502.02		153,679.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021)	Actual (Oct 2020 – Oct 2021)		Forecast (Jan 2022 – Dec 2022)
		Previous license period (Oct – Dec 2020)	Current license period (Jan – Oct 2021)	
Siang Estate		0	7,475.84	
Rengam Estate		475.04	2,629.17	
Sungai Papan Estate		781.76	3,202.68	
Rem Estate		0	1,168.06	
Bukit Layang Estate		0	1,057.41	
Total		16,789.96		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021)	Actual (Oct 2020 – Oct 2021)		Forecast (Jan 2022 – Dec 2022)
		Previous license period (Oct – Dec 2020)	Current license period (Jan – Oct 2021)	
3 rd Party FFB Supplier	NA	59,504.52	211,404.00	NA
Total	NA	270,908.52		NA

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Oct 2020	14,068.56	19,420.67	33,489.23
2	Nov 2020	13,163.97	20,973.10	34,137.07
3	Dec 2020	11,760.16	19,110.75	30,870.91
4	Jan 2021	13,229.210	15,114.12	28,343.33
5	Feb 2021	5,141.690	13,368.94	18,510.63
6	Mar 2021	11,991.320	18,560.93	30,552.25
7	April 2021	12,140.240	22,714.05	34,854.29
8	May 2021	12,944.170	24,428.78	37,372.95
9	June 2021	18,189.570	26,236.31	44,425.88
10	July 2021	16,109.500	25,066.67	41,176.17
11	Aug 2021	16,205.190	24,708.51	40,913.70
12	Sept 2021	13,996.040	21,151.13	35,147.17
13	Oct 2021	17,352.36	20,054.56	37,406.92
	TOTAL	176,291.98	270,908.52	447,200.50

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Jan 2021 – Dec 2021)	Actual (Oct 2020 – Oct 2021)		Forecast (Jan 2022 – Dec 2022)
	<i>Previous license period (Oct – Dec 2020)</i>	<i>Current license period (Jan – Oct 2021)</i>	
FFB (mt)	FFB (mt)		FFB (mt)
182,656.00	38,992.69	137,299.29	153,679.00
	176,291.98		
CPO (mt) (OER: 21.80 %)	CPO (mt) (OER: 20.13 %)		CPO (mt) (OER: 21.70 %)
39,824.72	8,075.78	27,470.12	33,356.00
	35,545.90		
PK (mt) (KER: 6.67%)	PK (mt) (KER: 5.22 %)		PK (mt) (KER: 5.40 %)
12,178.00	2,006.09	7,180.36	8,300.00
	9,186.45		

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Oct 2020	2,952.27	737.25
2	Nov 2020	2,704.75	673.07
3	Dec 2020	2,418.76	595.77
4	Jan 2021	2,529.41	678.75
5	Feb 2021	1,072.24	273.20
6	Mar 2021	2,450.67	663.78
7	Apr 2021	2,432.55	660.39
8	May 2021	2,597.79	694.25
9	June 2021	3,667.17	860.09
10	July 2021	3,161.70	837.66
11	Aug 2021	3,231.03	865.93
12	Sept 2021	2,779.81	761.26
13	Oct 2021	3,547.75	885.05
	TOTAL	35,545.90	9,186.45

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

11. Summary of Actual Volume sold					
Current License period (Jan – Oct 2021)					
	RSPO Certified	Other Schemes Certified		Conventional ¹	Total
		ISCC	Others		
CPO (MT)	8,708.97	1,970.31	-	12,797.37	23,476.65
PK (MT)	5,141.03	-	-	43.78	5,184.81
Credits	3000	-	-	-	3000
Previous License period (Oct – Dec 2020)					
CPO (MT)	5,982.23	-	-	-	5,982.23
PK (MT)	3,859.01	-	-	-	3,859.01 ²
Credits	-	-	-	-	-

Notes:

¹Conventional is RSPO certified material but sold as non-RSPO.

²PK was oversold during the Oct – Dec 2020 period and identified during the internal audit. A Major Non-conformity has been raised to the mill by the Internal Audit Team on this matter as detailed out under indicator 3.8.6. The mill have therefore identified the quantity of oversold PK and recovered the negative stock to show positive stock in the mass Balance Records.

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1.	XXX	TR-264a4446-0a2e	159.38	-
2.	XXX	TR-b0b54427-cafa	153.23	-
3.	XXX	TR-8ba5046d-0397	703.65	-
4.	XXX	TR-f29cb78b-4adc	76.63	-
5.	XXX	TR-1ee6d6da-ffd8	219.7	-
6.	XXX	TR-784f2198-3e07	162.59	-
7.	XXX	TR-3ebb1a0a-6adc	291.34	-
8.	XXX	TR-392cf9e1-3392	878.87	-
9.	XXX	TR-dd0ba5f3-bf7f	491.94	-
10.	XXX	TR-f9266168-a87c	417.46	-
11.	XXX	TR-3a2285af-47a0	0.96	-
12.	XXX	TR-6b499b26-314d	215.54	-
13.	XXX	TR-08701ace-03a8	679.91	-

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

14.	XXX	TR-516dc8a1-2431	1071.95	-
15.	XXX	TR-d806af61-b5fa	172.04	-
16.	XXX	TR-142180d3-6665	147.4	-
17.	XXX	TR-9bcfc620-4534	162.52	-
18.	XXX	TR-31226c92-327e	149.65	-
19.	XXX	TR-ec58ade3-38ea	61.97	-
20.	XXX	TR-5c77e3ca-83e1	898.87	-
21.	XXX	TR-48ecfa29-0d0a	141.81	-
22.	XXX	TR-672df820-ff0f	489.15	-
23.	XXX	TR-09c1a9a7-9ff3	279.73	-
24.	XXX	TR-f8f6fdf3-c8b6	126.7	-
25.	XXX	TR-44251e5a-5ce3	498.03	-
26.	XXX	TR-7c1967bc-2cc8	328.03	-
27.	XXX	TR-2b4e77c4-bb48	299.13	-
28.	XXX	TR-c15f56aa-24ab	10.85	-
29.	XXX	TR-4658aac6-a1fd	160.46	-
30.	XXX	TR-8adb52a5-4256	591.18	-
31.	XXX	TR-0b201302-bf4b	151.67	-
32.	XXX	TR-50a5650b-6a60	200	-
33.	XXX	TR-98ec4712-f7d8	200	-
34.	XXX	TR-6e9b7bab-68da	999.9	-
35.	XXX	TR-1f36a7c9-26be	1850.89	-
36.	XXX	TR-257fa0b8-1300	849.65	-
37.	XXX	TR-5529af89-b1bb	398.42	-
38.	XXX	TR-d8995e5c-f69c	-	40.64
39.	XXX	TR-dfc63683-38b4	-	201.43
40.	XXX	TR-d47c6f7a-aa07	-	249.73
41.	XXX	TR-1f3e8f2a-5d06	-	68.31
42.	XXX	TR-d7276ad7-0a21	-	26.65
43.	XXX	TR-ade7d0ba-2dda	-	169.83
44.	XXX	TR-29a25c19-16e9	-	380.76
45.	XXX	TR-24afb0fb-8cd7	-	101.64
46.	XXX	TR-c41418d9-bcb5	-	605.76
47.	XXX	TR-e2151d68-9336	-	607.07

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

48.	XXX	TR-bd854e98-c2c9	-	381.8
49.	XXX	TR-f3cb8b14-9e9c	-	605.66
50.	XXX	TR-135e7cf9-68b4	-	405.49
51.	XXX	TR-c4e160cd-1eba	-	76.15
52.	XXX	TR-31e6b231-2962	-	376.16
53.	XXX	TR-9c88f444-24bd	-	317.86
54.	XXX	TR-2e7658e8-b5e5	-	352.41
55.	XXX	TR-492624fc-55a1	-	119.39
56.	XXX	TR-0e9efcfe-a62f	-	77.19
57.	XXX	TR-27bedc01-5110	-	613.67
58.	XXX	TR-62ada8ff-1bb8	-	534.87
59.	XXX	TR-d709e0bf-8490	-	233.22
60.	XXX	TR-4ef655a4-dc35	-	512.34
61.	XXX	TR-fb81104c-6df0	-	321.77
62.	XXX	TR-671ce74d-e83f	-	412.72
63.	XXX	TR-c47dc01d-77d3	-	621.73
64.	XXX	TR-64639f60-c004	-	348.54
65.	XXX	TR-995618e4-0e76	-	237.25
TOTAL			14,691.20	9,000.04

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	XXX	ISCC	1,970.31	0
TOTAL			1,970.31	0

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	XXX	12,797.37	-
2	XXX	-	43.78
TOTAL		12,797.37	43.78

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1.	ACT Commodities	ST-TR-fc25b101-52ed	3,000
TOTAL			3,000

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

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

Section 2: Assessment Process

Certification Body:

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **28/11/2021- 2/12/2021**. 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 **13/02/2022**. The audit programs are included in Section 2.3.

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

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. 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.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Sedenak Palm Oil Mill	✓	✓	✓	✓	✓
Sedenak Estate	✓	✓	✓	✓	✓
Ulu Tiram Estate	✓	✓	✓	✓	✓
Kuala Kabong Estate	✓	✓	✓	✓	✓
Basir Ismail Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: November 29, 2022 - December 3, 2022

Total Number of Mandays: 15 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p>Education: Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia, 2010.</p> <p>Work Experience: 10 years working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad prior to joining BSI as a Client Manager.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, Endorsed RSPO P&C Lead Auditor Course in October 2019, Endorsed RSPO SCCS Lead Auditor Course in August 2020, Endorsed MSPO Lead Auditor Course in November 2019 and attended SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupational, Health & Safety, Estate Best Practises and supply chain requirements.</p> <p>Language proficiency: He is fluent in English, Bahasa Malaysia, Tamil languages.</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

<p>Hu Ning Shing (HNS)</p>	<p>Team Member</p>	<p>Education: Bachelor Degree in Science majoring in Applied Chemistry from University of Malaya, 2011.</p> <p>Work Experience: 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body.</p> <p>Training attended: She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012, Endorsed RSPO SCCS Lead Auditor Course in 2015 and also trained in SMETA Requirement Training in April 2021.</p> <p>Aspect covered in this audit: During this assessment, she assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill.</p> <p>Language proficiency: She is fluent in Bahasa Malaysia and English languages.</p>
<p>NorHalis AbuZar (NHA)</p>	<p>Team Member</p>	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara, 2012.</p> <p>Work Experience: 6 years' experience as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations and sustainability implementation. He is a qualified Lead Auditor for MS2530:2013 and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed ISO IMS 9001 and 14001 Lead Auditor Course in January 2019, MSPO 2530:2013 Lead Auditor Course in February 2019, Endorsed RSPO Lead Auditor Course in October 2020, CQI and IRCA Certified ISO 45001 Lead Auditor Course in June 2021, ISO 9001:2015 Lead Auditor Course in April 2019, MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training in April 2021.</p> <p>Aspects covered in this audit: During this assessment, he assessed on the aspects of compliance to environment and Estate Best Practises.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>

Accompanying Persons:

Name	Role
-	-

1.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	VKP	HNS	NHA
Saturday, 27/11/2021	1500 - 1900	Auditors travel to Johor Bahru.	✓	✓	✓
Sunday, 28/11/2021 Basir Ismail Estate	0800 - 0900	Travel from Johor Bahru to Basir Ismail Estate	✓	✓	✓
	0900 - 0930	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).	✓	✓	✓
	0930 - 1230	Basir Ismail Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) – Basir Ismail Estate & Ulu Tiram Estate.	-	✓	-
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
		0800 - 0900	Travel from Johor Bahru to Kuala Kabong Estate	✓	✓

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Date	Time	Subjects	VKP	HNS	NHA
Monday, 29/11/2021 Kuala Kabong Estate	0900 - 1230	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.	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) – Kuala Kabong Estate.	-	✓	-
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Tuesday, 30/11/2021 Sedenak Palm Oil Mill	0800 - 0900	Travel from Johor Bahru to Sedenak Palm Oil Mill	✓	✓	✓
	0900 - 1230	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) – Sedenak POM & Sedenak Estate.	-	✓	-
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	✓	✓

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Date	Time	Subjects	VKP	HNS	NHA
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Wednesday, 01/12/2021 Ulu Tiram Estate	0800 - 0900	Travel from Johor Bahru to Ulu Tiram Estate	✓	✓	✓
	0900 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Thursday, 02/12/2021 Sedenak Estate	0800 - 0900	Travel from Johor Bahru to Sedenak Estate	✓	✓	✓
	0900 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1600 - 1630	Verify any Outstanding Issues and Preparation for Closing Meeting	✓	✓	✓
	1630 - 1700	Closing Meeting	✓	✓	✓

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Date	Time	Subjects	VKP	HNS	NHA
	1700	Auditors travel back to Johor Bahru	✓	✓	✓

Critical NC Close Out Assessment Plan

Date	Time	Subjects	VKP
Sunday, 13/02/2022	0900 – 0930	Opening Meeting at Ulu Tiram Estate : <ul style="list-style-type: none"> - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan 	✓
	0930 – 1230	1. Verification on Critical NC: <ul style="list-style-type: none"> - 2139646-202111-M1 - 2139646-202111-M2 - 2139646-202111-M3 - 2139646-202111-M4 - 2139646-202111-M5 2. Site observation, workers interview 3. Document review – implemented evidence	✓
	1230 – 1300	Closing Meeting	✓

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes, the plan includes all current subsidiaries, estates and mills that is under management control.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. Only Indonesian units, PT RAJ & PT TPR have not been certified yet and is proposed to be certified in 2023 as stated in RSPO ACOP 2020.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No. There have not been any new acquisitions.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No. There have no any deviations from the maximum periods requires approval by the RSPO Secretariat.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	There have been no changes to the time bound plan since all the estates and mill currently under Johor Corporation are already RSPO certified. This is consistent with the RSPO ACOP 2020 reporting. The link provided below: https://rspo.org/members/310/JohorCorporation	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to the mill	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	There has been no fundamental failure to proceed with the implementation of the plan.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	As of to date there are no new plantings that replace primary forest under Johor Corporation.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	There are no new plantings since January 1st 2010 at Johor Corporation estates.	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,	No land conflict under all certification units as verified in the RSPO RaCP Tracker, updated 01/02/2022.	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

4.6, 4.7 and 4.8.		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute within all certification units.	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 within all certification units.	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.	RSPO internal audit assessment for all uncertified units been conducted and the report had been submitted to all unit for improvement plan. The report indicated no systematic failures to proceed with implementation that should be raised as major Nonconformities.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No. There is no any Critical (Major) non-compliance raised during the last internal audit.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	None noted. No stakeholder comments or complaints received	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

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

LIST OF ESTATE MANAGE BY KULIM				
MILL BASE	KULIM/ JCORP ESTATE	ESTATE	STATUS	REMARKS
TEREH MILL		TEREH UTARA		* Merged Estates effective on 01 Jan 2021 as follows: 1. Selai & Enggang under under the name of Selai Estate. 2. Mutiara & Sg. Sembrong under the name of Mutiara Estate.
		TEREH SELATAN		
		*SELAI		
		*ENGGANG		
		*MUTIARA		
		*SG. SEMBRONG		
		SG. TAWING		
		SEDENAK		
		RENGAM		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

SEDENAK MILL	KULIM ESTATE	**BASIR ISMAIL	CERTIFIED RSPO IN JAN 2009	<p>3. REM & Ulu Tiram under the name of Rem Estate.</p> <p>4. Mungka & Sepai Loi under the name Mungka Estate.</p> <p>5. Palong & Kemedak under the name of Palong Estate</p> <p>6. Pasir Panjang & Bukit Payong under the name of Pasir Panjang Estate.</p> <p>** Changes and additional of supply base for Sindora Certification Unit as follows.</p> <p>1. Basir Ismail Estate</p> <p>2. Ulu Tiram Estate</p>
		**ULU TIRAM		
KUALA KABONG				
*REM				
SINDORA				
SUNGAI PAPAN				
*SEPANG LOI				
UMAC				
LABIS BAHRU				
*MUNGKA				
*KEMEDAK				
*PALONG				
PASIR PANJANG MILL	KULIM ESTATE	*PASIR PANJANG	CERTIFIED RSPO IN MARCH 2017	
		*BUKIT PAYUNG		
		SIANG		
		BUKIT KELOMPOK		
		TUNJUK LAUT		
		PASIR LOGOK		

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were Five (5) Critical; One (1) Minor nonconformities and One (1) Opportunity For Improvement raised. The Sedenak 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 #	2139646-202111-M1	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	3.3.2 - Critical – Reoccurrence of Minor		
Statement of Nonconformity:	The implementation of procedures was not comprehensively checked in the operating units.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<ol style="list-style-type: none"> 1. Ladang Basir Ismail; <i>Standard Operating Procedure; Lubricant & Petrol Store; No.4. Semua bahan kimia hendaklah disimpan didalam bekas yang betul.</i> During the site visit it was noticed that unlabelled plastic bottles were used to store lubricants on the tractor. 2. <i>Work Instruction: General Store; Document Number: UTE-EMS-OP-W31; No.4. No chemicals are allowed to be stored here.</i> <ul style="list-style-type: none"> - Ulu Tiram Estate; Visit to the General Store, it was noticed that Chemical: Calcium Hypochlorite was stored without proper containment tray and hazard signages. There were no SDS (Safety Data Sheet) available for the mentioned chemical as well. - Ulu Tiram Estate; Visit to the General Store, it was noticed that there was a 20 Litres white unopened chemical container with no label or SDS placed on the floor of the store. 		
Corrections:	<u>Ladang Basir Ismail</u> <ol style="list-style-type: none"> a. Briefing conducted on company SOP done immediately to the Contractors' drivers involved. <u>Ulu Tiram Estate</u> <ol style="list-style-type: none"> a. Transfer the Calcium Hypochlorite to the chemical store with proper containment tray and hazard signage and SDS, was carried out immediately b. Upon further checking, the unopened 20 litre container is not a chemical but it is a soap, container has been labelled accordingly. 		
Root Cause Analysis:	<ol style="list-style-type: none"> a. New contractor driver was not adequately briefed on company SOP. b. Inadequate monitoring at general store by Estate management. 		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Corrective Actions:	<p><u>Ladang Basir Ismail</u></p> <ol style="list-style-type: none"> a. Continual briefing and awareness to be conducted during muster roll-call to also involve Contractors' workers. b. Assistant manager and staff in charge to carry out periodical inspection during work activities of the workers. <p><u>Ulu Tiram Estate</u></p> <ol style="list-style-type: none"> a. Continual briefing and awareness during muster/roll-call. b. Assistant manager and staff in charge to do inspection during the work activities in general store, to ensure no chemical allowed to be stored in general store.
Assessment Conclusion:	<p>Critical Nonconformity Close Out verification was conducted for the certification unit on 13/02/2022. During the visit, the following were verified:</p> <p><u>Basir Ismail Estate</u></p> <ol style="list-style-type: none"> 1. Briefing was done for all workers including contractors workers on the company's SOP on chemical management on 01/12/2021. Records were available for verification. 2. The estate have established a "Senarai Pemeriksaan Harian Traktor" where all tractors and tractor drivers are inspected every morning to ensure compliance towards the SOPs. Sighted the checklist dated 25/11/2021 available for verification. <p><u>Ulu Tiram Estate</u></p> <ol style="list-style-type: none"> 1. Briefing was conducted for the storekeepers and related personals on Store Management on 04/12/2021. 2. A weekly checklist have been established entitled "Checklist – General Store" where the management monitor the stores on a weekly basis to ensure compliance to the SOP. Sighted the Checklist available for the month of December 2021. <p>Based on the evidence provided the Critical Nonconformity is successfully closed on 13/02/2022.</p>

Non-conformity			
NCR Ref #	2139646-202111-M2	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	3.6.1 Critical		
Statement of Nonconformity:	Hazards were inadequately identified, assessed and controlled in the operating units		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

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

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>c. HIRARC for works on the ramp platform, working at height, FFB tractors unloading FFB, back bucket works had been updated on 30/11/2021.</p> <p>d. Ramp attendant had immediately been provided with safety shoes on 30.11.2021. Workers were also briefed on the right PPE for respective work station and PPE used compliance.</p> <p>e. HIRARC for blower had been updated on 30/11/2021.</p> <p><u>Ulu Tiram Estate</u></p> <p>a. Awareness training on safety harness conducted for ramp attendant on 02/12/2021.</p> <p><u>Basir Ismail Estate</u></p> <p>a. Briefing provided to the contractor and driver on company safety policy.</p> <p>b. Contractor to provide the safety boots to all driver.</p>
<p>Root Cause Analysis:</p>	<p><u>Kuala Kabong Estate</u></p> <p>a. Inadequate understanding on hazard identification at workshop by estate PIC</p> <p>b. Inadequate understanding on hazard identification at ramp platform, working at height, FFB tractors unloading FFB, back bucket works by estate PIC</p> <p>c. Ramp attendant was not provided with safety shoes as stated in HIRARC</p> <p>d. HIRARC was not properly update to include the usage of blower.</p> <p><u>Ulu Tiram Estate</u></p> <p>a. Insufficient awareness and training for the operation at the ramp activities to the ramp attendant.</p> <p><u>Basir Ismail Estate</u></p> <p>a. New contractor driver was not adequately brief on company Safety Policy</p>
<p>Corrective Actions:</p>	<p><u>Kuala Kabong Estate</u></p> <p>b. Annual refresher training on HIRARC to be provided to all operating unit tentatively on 07/02/2022.</p> <p>c. HIRARC of “flashback arrestors” for workshop will be updated as per legal requirement and whenever necessary.</p> <p>d. HIRARC updated as per requirement and whenever necessary.</p> <p>e. Weekly PPE inspection by the estate management in order to ensure correct PPE being provided and used by the workers at concerned work stations.</p> <p><u>Ulu Tiram Estate</u></p> <p>a. Annual refresher training on HIRARC to be provided to all operating unit tentatively on 07/02/2022.</p> <p>b. Review on the HIRARC and identify all the related activities at respective station.</p> <p>c. Update all the activities in HIRARC report.</p>

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

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Non-conformity			
NCR Ref #	2139646-202111-M3	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	2.1.1 Critical		
Statement of Nonconformity:	Compliance with legal requirement was not demonstrated effectively.		
Requirement Reference:	The Unit of Certification complies with legal requirements		
Objective Evidence:	<p><u>Basir Ismail Estate</u> Verified the Overtime record book for weighbridge operator (Employee No.: 602030) in Basir Ismail Estate found that he has worked more than 104 hours of overtime in May 2021 (120 hours), June 2021 (135 hours), July 2021 (136 hours), August 2021 (144 hours) and October 2021 (139 hours) without approval from authority. Besides, reviewed the payslips for the respective months found that he was only paid for 104 hours of overtime.</p> <p><u>Kuala Kabong Estate</u> Sampled the Overtime Form for May 2021 and Checkroll G23, G26 and G21 for the weighbridge operator (Employee No.: 604899) in Kuala Kabong Estate found that she has worked 53 hours of overtime on May 2021. However, verified the payslips found that she only paid for 44.50 hours of overtime.</p>		
Corrections:	<p>a. Conduct briefing to staff and workers on overtime limit at 104 hours monthly.</p> <p>b. Payment of underpaid Overtime had been done on 01.12.2021.</p>		
Root Cause Analysis:	Inadequate monitoring over compliance to legal requirement.		
Corrective Actions:	<p>a. Strictly monitoring on accumulate overtime hours for respective staff and workers overtime time record on weekly basis. Assistant manager to notify respective staff should the accumulate overtime hours expected to be over 104 at month end.</p> <p>b. Clerk to print overtime summary record after completion of key in process for respective staff verification. Upon verification obtain by respective staff, proceed with payment.</p>		
Assessment Conclusion:	<p>Critical Nonconformity Close Out verification was conducted for the certification unit on 13/02/2022. During the visit, the following were verified:</p> <p><u>Basir Ismail Estate</u></p> <ol style="list-style-type: none"> Briefing on Overtime Payment were conducted by the management for the office staffs on 01/12/2021. Records of briefing were available for verification. Sample Payslip for worker ID# 11110858 for the month of Dec 2021 and Jan 2022 indicated that the workers overtime did not exceed 104 hours. <p><u>Kuala Kabong Estate</u></p>		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<ol style="list-style-type: none"> 1. The estate has established a Monitoring Overtime Records where the over time of workers is monitored on a monthly basis to avoid any underpayments in the future. 2. The underpayment for the worker have been reimbursed in December 2021. Sighted the Petty Cash Reimbursement for the month December 2021 which was acknowledged by the worker <p>Based on the evidence provided the Critical Nonconformity is successfully closed on 13/02/2022.</p>
--	--

Non-conformity			
NCR Ref #	2139646-202111-M4	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	2.2.2 Critical – Reoccurrence of Minor		
Statement of Nonconformity:	Due diligence of contractors was not available.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p><u>Basir Ismail Estate</u></p> <p>Reviewed the employment contract, payslips and SOCSO contribution Form 8A of contractors found the following issues:</p> <ol style="list-style-type: none"> 1. Employment contract signed by the workers of Gunalash Enterprise was incomplete. Terms and conditions such as annual leave and medical leave entitlement, reason of dismissal and notice period was not available. 2. SOCSO contribution made was not in accordance to Employees’ Social Security Act 1969 (Act 4) for the workers of Gunalash Enterprise and Sri Thilakkumar Enterprise. 3. There is no mention of the wages’ rate in the employment contract signed by the workers of Sri Thilakkumar Enterprise. 4. There was no payment of wage for public holiday on February 2021 to the workers of Soko SK Enterprise as verified in the payslips. 5. During interview in the field found there were 4 foreign workers employed by Soko SK Enterprise as harvesters. However, there was no employment contract, permit and payslips sighted during the time of audit. <p><u>Kuala Kabong Estate</u></p> <p>Reviewed the records of contractors’ workers found the following issues:</p> <ol style="list-style-type: none"> 1. Reviewed the payslips and FFB Ticket Report for May 2021 and August 2021 found that the FFB Lorry Drivers (Eco Lane Enterprise) have worked 		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>on rest day. However, no payment of wages as per Employment Act 1955, Section 60 (3) (d).</p> <table border="1"> <thead> <tr> <th>I/C No.</th> <th>Dates of Work on Rest day</th> </tr> </thead> <tbody> <tr> <td>700913-71-50XX</td> <td>22/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021</td> </tr> <tr> <td>730507-01-61XX</td> <td>14/08/2021</td> </tr> </tbody> </table> <p>2. EPF contribution made by Eco Lane Enterprise for the workers were not in accordance to Employees Provident Fund Act 1991, Third Schedule.</p> <p><u>Ulu Tiram Estate</u></p> <p>Reviewed the records of contractors’ workers found the following issues:</p> <p>1. Reviewed the payslips and productivity reports for May 2021, August 2021 and October found that the FFB Loader & Driver and harvesters (TBK Plantation Works and Perusahaan Mewah Hijau) have worked on rest day. However, no payment of wages as per Employment Act 1955, Section 60 (3) (d).</p> <table border="1"> <thead> <tr> <th>Passport No.</th> <th>Dates of Work on Rest day</th> </tr> </thead> <tbody> <tr> <td>C2748457 (Harvester)</td> <td>22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021</td> </tr> <tr> <td>C6902851 (Harvester)</td> <td>22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021</td> </tr> <tr> <td>C3811881 (FFB Loader & Driver)</td> <td>08/05/2021, 22/05/2021, 29/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021, 02/10/2021, 09/10/2021, 23/10/2021, 30/10/2021</td> </tr> </tbody> </table> <p>2. Employment contract signed by the worker of TBK Plantations Works (Passport No.: C3811881) was incomplete. Terms and conditions such as annual leave and medical leave entitlement, reason of dismissal and notice period was not available.</p> <p><u>Sedenak Estate</u></p> <p>Reviewed the payslips of contractor’s workers (Yap Aun Kok) (Passport No.: C5719809 and C7521687) found that the contractor only paid 1 day of public holiday wage instead 3 days on May 2021. This has confirmed through interviewed with the contractor.</p>	I/C No.	Dates of Work on Rest day	700913-71-50XX	22/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021	730507-01-61XX	14/08/2021	Passport No.	Dates of Work on Rest day	C2748457 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021	C6902851 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021	C3811881 (FFB Loader & Driver)	08/05/2021, 22/05/2021, 29/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021, 02/10/2021, 09/10/2021, 23/10/2021, 30/10/2021
I/C No.	Dates of Work on Rest day														
700913-71-50XX	22/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021														
730507-01-61XX	14/08/2021														
Passport No.	Dates of Work on Rest day														
C2748457 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021														
C6902851 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021														
C3811881 (FFB Loader & Driver)	08/05/2021, 22/05/2021, 29/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021, 02/10/2021, 09/10/2021, 23/10/2021, 30/10/2021														
Corrections:	<p><u>Basir Ismail Estate</u></p> <p>a. Estate to provide sample of said document for Contractors to amend the employment letter.</p> <p>b. The list of the employee has been updated in the list of estate contract employees.</p> <p><u>Kuala Kabung Estate</u></p> <p>a. Payment of wages regarding working on rest day to be done.</p>														

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p><u>Ulu Tiram Estate</u></p> <ul style="list-style-type: none"> a. Estate immediately to provide and brief relevant Contractors on legal requirement on 12 December 2021. b. Arrears will be paid for the underpaid work on rest day for the month of May, August and October 2021. <p><u>Sedenak Estate</u></p> <ul style="list-style-type: none"> c. The contractor immediately paid to their harvesters on the miss payment of two public holidays in May 2021. It was paid on 3rd December 2021.
<p>Root Cause Analysis:</p>	<p>Estate’s lack of understanding on the requirements of Due Diligence on contractors.</p>
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> a. Estate Management to conduct periodical due diligence and briefing with regards of all legal requirement that need to be complied with contractors as per term and condition on contract agreement. b. Monthly checking on all contractor’s workers documents i.e., payslip should be carried out for monitoring purposes to ensure fully compliance by the contractor
<p>Assessment Conclusion:</p>	<p>Critical Nonconformity Close Out verification was conducted for the certification unit on 13/02/2022. During the visit, the following were verified:</p> <p><u>Basir Ismail Estate</u></p> <ul style="list-style-type: none"> 1. Briefing was conducted for the contractor on the requirements of the contract agreement on 01/12/2021. The contractor was provided with a sample of Kulim Plantation’s Worker’s Contract Agreement. 2. The Contractor has amended the contract agreement to include all legal requirements. Sighted the Contract agreement for the workers of the 3 contractors available for verification to include the requirements such as terms and conditions for annual leave and medical leave entitlement, reason of dismissal and notice period, etc. 3. The estate have established a Checklist Document of Contract Workers to monitor the legal compliance and payslips of the contractors workers. Sighted the checklist for the month of January 2022 available for verification. <p><u>Kuala Kabong Estate</u></p> <ul style="list-style-type: none"> 1. Briefing Contractor’s Due Diligence was conducted on 07/12/2021 for all contractors in the estate. The records of briefing were available for verification. 2. The reimbursement of the underpayment for Work on Rest Days has been done December 2021. Verified the reimbursement for Eco Lane Enterprise’s workers for the month of May 2021 and Aug 2021 paid in December 2021 and acknowledged receive by the worker. 3. The estate have established a Checklist Document of Contract Workers to monitor the legal compliance and payslips of the contractors workers. Sighted the checklist for the month of December 2021 available for verification. <p><u>Ulu Tiram Estate</u></p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<ol style="list-style-type: none"> 1. The reimbursement of the underpayment for Work on Rest Day was done on December 2021. Sighted the <i>Resit Bayaran</i> dated 08/12/2021 for the sampled workers available for verification. 2. Briefing on relevant legal requirements for the contractor was done on 12/12/2021 at the estate. 3. The contractor have emended the contract agreement to include all legal requirements. Sighted the contract agreement for Perusahaan Mewah Hijau available for verification. 4. The estate have established a Checklist Document of Contract Workers to monitor the legal compliance and payslips of the contractors workers. Sighted the checklist for the month of December 2021 available for verification. <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"> 1. The underpayment of Public Holiday has been reimbursed to the respective workers on 03/12/2021. Sighted the Payment Voucher for the reimbursement dated 03/12/2021, acknowledged by the workers. 2. The contractors have been briefed on matters pertaining to the workers such as public holidays, minimum wages, leave, rest day work payments, etc during the Contractors Meeting dated 23/12/2021. The contractors have also been provided a list of yearly public holidays to ensure their workers are paid according to the established public holidays. Records of training and attendance were available for verification. 3. The estate have established a Checklist Document of Contract Workers to monitor the legal compliance and payslips of the contractors workers. Sighted the checklist for the month of January 2022 available for verification. <p>Based on the evidence provided the Critical Nonconformity is successfully closed on 13/02/2022.</p>
--	---

Non-conformity			
NCR Ref #	2139646-202111-M5	Date Issued	02/12/2021
Due Date	01/03/2022	Date of nonconformity Closure	13/02/2022
Clause & Category (Critical / Minor)	5.1.6 Critical		
Statement of Nonconformity:	The payments for FFB suppliers were not made in a timely manner.		
Requirement Reference:	Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.		
Objective Evidence:	As refer to the agreement, under Clause 3, "Monthly payments shall be made in three (3) instalments. The first instalment payment being made on or before 15th of the month in payment of FFB delivered in the first 10 days of the same month at a price per tonne based on 80% of the previous month's price calculated in accordance with the agreement..." Verified the payment records of FFB suppliers found the payment was not made within the agreed period as per the agreement		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>of Purchase of FFB. Records of payment vouchers, payment memo and transaction record as below:</p> <ul style="list-style-type: none"> i) Payment Memo dated 15/11/2021; Payment Voucher# PV2102130 dated 18/11/2021 for first payment; Transaction No.: 202111170110230613 dated 18/11/2021. ii) Payment Memo dated 15/11/2021; Payment Voucher# PV2102142 dated 18/11/2021 for first payment; Transaction No.: 202111170110230613 dated 18/11/2021. <p>FFB suppliers have informed during stakeholder consultation that the payment was late in the past four months and they have brought this matter to the Head Office. However, the issue has yet to be resolved.</p>
Corrections:	<ul style="list-style-type: none"> a. Mill management will notify to CFD and Outside Crop Purchase (OCP) Department on each due date of the payment shall be made to FFB supplier b. Mill Management will ensure all data of "FFB Received" is send to CFD within 2 days on each instalment period.
Root Cause Analysis:	<p>As per discussion with CFD, there is no issue about the payment since the payment transaction is clearly made but due to new additional policy implementation since July 2021, there are some issue in payment approval that need to be improved.</p>
Corrective Actions:	<p>CFD improvement on SOP regards to payment approval and remittance is being revised as follows:</p> <ul style="list-style-type: none"> 1. The FFB data must be submitted to HO on working days after FFB delivered to Mill (i.e. 1st advance on 11th. And 2nd. Advance on 21st. of the month) 2. The payment should been done within 5 working days after the FFB data received from mill : <ul style="list-style-type: none"> a. 1st Advance: <ul style="list-style-type: none"> i. FFB calculation and Payment Preparation on 12th of the month and memo for approval submitted. ii. FFB payment approval on 13th of the month. iii. FFB payment remittance should be on 14/15th of the month. b. 2nd Advance <ul style="list-style-type: none"> i. FFB calculation and Payment Preparation on 23th of the month. ii. FFB payment approval on 24th of the month. iii. FFB payment remittance should be on 25th of the month. 3. The payment process will be made earlier but after 10th and 25th if the date falls on weekend or public holiday. 4. FFB Payment process approval will be in separate memo from the other payment based on the values and level of approval limit
Assessment Conclusion:	<p>Critical Nonconformity Close Out verification was conducted for the certification unit on 13/02/2022. During the visit, the following were verified:</p> <p><u>Sedenak POM</u></p> <ul style="list-style-type: none"> 1. The mill henceforth sends a memo to the Corporate Finance Department (CFD), stating the total FFB received from outside sources. The memo will be sent thrice a month, for the period 01st to 10th, 11th to 20th and 21st to 31st. Verified the memo dated 21st January 2021 and 11th January 2021 sent to Corporate Finance Department.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>2. The CFD then releases a Memo for FFB Advance Payment for the particular Month which is done within 5 days of receiving the above mentioned memo from the mill. Sighted the 1st FFB Advance Payment for December 2021 dated 13/12/2021 and 2nd FFB Advance Payment for December 2021 dated 21/12/2021.</p> <p>3. Sighted the payment records for Pertubuhan Peladang Negeri, Asam Bubok and Che Yu Trading payments done on 15th December 2021, which is within the date stated in the agreement. 2nd payment was done on 23/12/2021 as sighted the payments for the suppliers as well.</p> <p>Based on the evidence provided the Critical Nonconformity is successfully closed on 13/02/2022.</p>
--	---

Non-conformity			
NCR Ref #	2139646-202111-N1	Date Issued	02/12/2021
Due Date	Next Surveillance Audit	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	6.5.4 Minor		
Statement of Nonconformity:	Grievance mechanism was not implemented effectively.		
Requirement Reference:	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.		
Objective Evidence:	Kulim (M) Berhad has established Panel Complaint for WOW in all the operating units as a grievance mechanism to make complaint related to sexual harassment and violence. However, during interview with the workers, found that they do not understand the process to make complaints when there were sexual harassment case that has happened.		
Corrections:	Briefing to the WOW members regarding grievance reporting and process to make complaints when there were sexual harassment occurred, had been carried out by estate management on 30/11/2021.		
Root Cause Analysis:	Inadequate briefing on Grievance mechanism and sexual harassment.		
Corrective Actions:	<p>a. WOW members will be updated and re-fresh regarding the process each time during the WOW meeting.</p> <p>b. Conduct compliance engagement visit to operating unit in 2022</p>		
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	<p><u>OFI Ref #: 2139646-202111-I1</u></p> <p>Clause: 7.8.2</p> <p>Monitoring of HCV can be further improved by ensuring no activities such as fishing is conducted in the water course located within the certification unit.</p>

Positive Findings	
PF #	Description
PF 1	Good and positive feedback given by internal and external stakeholders.
PF 2	Good implementation of Agronomic Procedures.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1971716-202010-M1	Date Issued	15/10/2020
Due Date	14/01/2021	Date of nonconformity Closure	10/01/2021
Clause & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	Evidence of legal compliance for overtime was not effectively demonstrated.		
Requirement Reference:	<ol style="list-style-type: none"> 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 Employment Act 1955, section 60 (4) (a); No employer shall require or permit an employee to work overtime exceeding such limit as may be prescribed by the Minister from time to time by regulations made under this Act. Employment (Limitation of Overtime Work) Regulations 1980; Overtime limit shall be a total of 104 hours per month. 		
Objective Evidence:	<p>Based on check roll for August 2020 for workers ID; 615611 - 22/8/20 (14.5 hours of overtime), 20/08/20 (7.5 hours of overtime) with total of 106 hours per month.</p> <ol style="list-style-type: none"> 615544 - 22/8/20 (14.5 hours of overtime), 12/08/20 (10.5 hours of overtime) with total of 95.5 hours per month. 615632 - 31/8/20 (7 hours of overtime), 20/08/20 (5.5 hours of overtime) with total of 112 hours per month. 		
Corrections:	<ol style="list-style-type: none"> Mill to continue applying permission from Jabatan Tenaga Kerja (JTK) to offer overtime more than 104 hours. Mill & HCMD to have a discussion with JTK in relation to the application for OT at 140 hours/months on 2nd November 2020. 		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Root Cause Analysis:	Inadequate monitoring over overtime works by mill management.
Corrective Actions:	<p>Mill to conduct proper preventive planning that includes:</p> <ol style="list-style-type: none"> 1. Conduct Mill manpower planning by reviewing back the required OT, potential leave, absent and sick leave on weekly basis to ensure adequate manpower for mill processing for coming operational week. 2. Increase manpower requirement per shift base on weekly analysis to ensure the shift having enough manpower without requesting workers to do OT and OT limit not to be offended.
Assessment Conclusion:	<p><u>Major NC Close Out Verification:</u></p> <p>Workers Overtime Hour Monitoring Form has been implemented starting in November and December 2020. Overtime limit capped at 104 hours maximum. Based on Attendance Summary Mill report for November and December, maximum OT recorded at 101.5 hours per month and not exceeding 104 hours.</p> <p>Based on interview with union representative and workers, it was confirmed that none of them has worked more than 104 hours per month. They are fully aware on the limitation which according to Malaysian Law @ Employment Act 1955.</p> <p>Application for overtime permit submitted on 7th October 2020 to Labor Department and still pending for approval. Related documents required have been resubmitted on 2nd November 2020 and awaiting for final approval from Labor Department, Putrajaya.</p> <p>Based on verification audit, it was confirmed that corrective action has been effectively implemented. Thus, the major NC is closed on 10/1/21 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance assessment.</p> <p><u>ASA 3 Verification</u></p> <p>Sedenak POM has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for overtime limit to maximum 130 hours. Permit with Ref. No.: BHG. PU/9/134 Jld 34 (14) dated 09/12/2020 was sighted. Verified the records of Workers Overtime Hour Monitoring Form from October 2020 to October 2021 found that no worker has exceeded 130 hours per month. The monitoring was conducted on each of the workstations weekly basis. Assistant Manager will check on a weekly basis to ensure no overtime exceed limit.</p> <p>The implementation of corrective action found effective and thus, the major non-conformance remained closed.</p>

Non-conformity			
NCR Ref #	1971716-202010-N1	Date Issued	15/10/2020
Due Date	02/12/2021	Date of nonconformity Closure	Escalated to Critical Non-Conformity due to Reoccurrence of Non-Compliance.
Clause & Category (Critical / Minor)	2.2.2 (Minor)		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Statement of Nonconformity:	Specific clauses on meeting applicable legal requirements cannot be demonstrated.
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.
Objective Evidence:	Tenancy agreement dated 10th September 2010 between Mahamurni Plantations Sdn Bhd (landlord) and Kulim Nursery Sdn Bhd (tenant) under "Tenant's covenants and undertakings" clause 3.1 (b) has not clearly included specific legal requirements on UBBL, OSHA 1994, FMA 1967 and EQA 1974 - Scheduled Waste Regulations 2005. Observed at site, the above laws and regulations was not effectively demonstrated.
Corrections:	<ol style="list-style-type: none"> 1. Property Department and Procurement and Contract Department (PCD) will insert relevant addendum on related new clauses in Kulim Nursery Sdn Bhd Tenancy Agreement as per addendum produced by PCD to all contractors. 2. The meeting with Kulim Nursery Sdn Bhd (KNSB) was conducted on 18.10.2020. to address all requirements and compliances that need to be complied by Kulim Nursery 3. KNSB agreed with all corrective action plan highlighted during the meeting and ensure that they will abide by the improvement plan discussed.
Root Cause Analysis:	Kulim Nursery Sdn. Bhd. is managed by Project Management & Intrapreneur Venture Department. On the other hand, the Tenancy Agreement and other contracts is handled respectively by Property Department and Purchasing Department. The situation leads to improper monitoring of all contracts signed by Kulim Nursery as it is managed separately by few relevant departments not centered at IV Div
Corrective Actions:	<ol style="list-style-type: none"> 1. OU to initiate regular monitoring of 3rd party activities in their compound and to report at each Environmental Committee meeting and during OSH Committee meeting. 2. IV department to monitor IV compliances to all company policies and procedure inclusive of related compliance to all laws and regulation abide by OUs and respective site of activities.
Assessment Conclusion:	<p><u>ASA 3 Verification</u></p> <p>There was a meeting conducted on 18/10/2020 to discuss the compliance. Meeting minutes was sighted. However, the top management has decided to terminate the tenancy agreement and handover to each of the operating units. Seen the termination of tenancy agreement dated 25/03/2021.</p> <p>Due to this being a recurrence of minor non-conformity of the same indicator, thus the minor non-conformity is escalated to critical non-conformity. Details refer to Indicator 2.2.2 in Appendix A.</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Non-conformity			
NCR Ref #	1971716-202010-N2	Date Issued	15/10/2020
Due Date	02/12/2021	Date of nonconformity Closure	02/12/2021
Clause & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Disposal of waste material was not according to Scheduled Waste management Guidelines by SPO Team dated January 2016.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Kulim Nursery Sdn Bhd 1. Sighted traces of oil spillage in nursery during site visit. From interview with workers not aware during interview regarding to Scheduled waste. 2. Used gloves (Contaminated with oil) was not properly disposed/stored at site.		
Corrections:	1. Oil spillage and used gloves have been cleared and stored at Sedenak Estate SW store and will be disposed accordingly per SW requirement. 2. Schedule Waste Training being conducted for all Kulim Nursery workforce at Sedenak site (Attendance as attached) 3. Respective signage on SW treatment installed at site.		
Root Cause Analysis:	Inadequate inspection and management control by the estate management on activities at Kulim Nursery sites. Insufficient awareness and training on Scheduled Waste Management		
Corrective Actions:	1. OU to initiate regular monitoring of 3rd party activities in their compound and to report at each Environmental Committee meeting and during OSH Committee meeting. 2. IV department to monitor IV compliances to all company policies and procedure inclusive of related compliance to all laws and regulation abide by OUs and respective site of activities. 3. Compulsory muster/roll-call of Kulim Nursery workers at Sedenak Estate effectively from 15.10.2020 in order to have better understanding and communication of any training and sharing information given by the management.		
Assessment Conclusion:	<u>ASA 3 Verification</u> 1. Verification through site visit found that there is no evidence of spillage of oil. SW has been disposed accordingly based on verification of - Swiss Inventory and disposal record evidence. There is no storage of SW more than 180 days. SW storage found in order with evidence of labelling based on SW categories. Interview conducted to person in charge found have good awareness on no disposal SW matters. 2. Sighted evidence of monitoring on 3 rd parties' activities has been discussed in the OSH Meeting. Refer Minutes of meeting OSH 04/2020 dated 13/12/2020 section (f) "Laporan Wakil KNSB & Kluang Praktikal". 3. Agreement of Kulim Nursery Sdn Bhd has been terminated. As at 25/03/2021, Nursery operation was fully under Sedenak Estate management. Due of that,		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>all monitoring of nursery activities related compliance to RSPO was under Sedenak Estate. Refer letter "Penamatan Perjanjian Sewa Antara Kulim Nursery Sdn Bhd Dan Kulim Malaysia Berhad, Mahamurni Plantation Sdn Bhd & Sindora Berhad" dated 23/03/2021 with reference letter PROP/KNSB/INTRAPRENEUR (413)/10-20/1.</p> <p>4. Compulsory muster/rollcall of Kulim Nursery workers at Sedenak Estate has been implemented as per evidence of photo. Training and awareness session have been conducted to nursery workers. Refer Training Nursery dated 16/10/2020. Sighted evidence of training material related SW Management.</p> <p>CAP Evidence has been found sufficient thus Minor NC was effectively closed on 02/12/2021.</p>
--	--

Non-conformity			
NCR Ref #	1971716-202010-N3	Date Issued	15/10/2020
Due Date	02/12/2021	Date of nonconformity Closure	02/12/2021
Clause & Category (Critical / Minor)	7.3.3 (Minor)		
Statement of Nonconformity:	Open fire was used for waste disposal.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	Sighted trace of burning waste such as plastic at oil palm nursery (Kulim Nursery Sdn Bhd) which operated within Sedenak estate.		
Corrections:	<ol style="list-style-type: none"> Trace of burning have been cleared immediately. Briefing on Zero Burning Policy to all Nursery Workers and supervision will be done by LSD management. Respective signage on ZERO BURNING policy and treatment installed at site. 		
Root Cause Analysis:	<p>Inadequate inspection and management control by the estate management on activities at Kulim Nursery sites.</p> <p>Insufficient awareness and training on Zero Burning Policy conducted for KNSB workers.</p>		
Corrective Actions:	<ol style="list-style-type: none"> OU to initiate regular monitoring of 3rd party activities in their compound and to report at each Environmental Committee meeting and during OSH Committee meeting. IV department to monitor IV compliances to all company policies and procedure inclusive of related compliance to all laws and regulation abide by OUs and respective site of activities. Compulsory muster/roll-call of Kulim Nursery workers at Sedenak Estate effectively from 15.10.2020 in order to have better understanding and communication of any training and sharing information given by the management. 		
Assessment Conclusion:	<u>ASA 3 Verification</u>		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<ol style="list-style-type: none"> 1. Verification through site visit to all sampled estate found there is no evidence of open burning activities has been conducted. Interview conducted to person in charge found have good awareness on no open burning matters. 2. Awareness signage on No Open Burning sighted at Nursery compartment. 3. Sighted evidence of monitoring on 3rd parties' activities has been discussed in the OSH Meeting. Refer Minutes of meeting OSH 04/2020 dated 13/12/2020 section (f) "Laporan Wakil KNSB & Kluang Praktikal". 4. Agreement of Kulim Nursery Sdn Bhd has been terminated. As at 25/03/2021, Nursery operation was fully under Sedenak Estate management. Due of that, all monitoring of nursery activities related compliance to RSPO was under Sedenak Estate. Refer letter "Penamatan Perjanjian Sewa Antara Kulim Nursery Sdn Bhd Dan Kulim Malaysia Berhad, Mahamurni Plantation Sdn Bhd & Sindora Berhad" dated 23/03/2021 with reference letter PROP/KNSB/INTRAPRENEUR (413)/10-20/1. 5. Compulsory muster/roll-call of Kulim Nursery workers at Sedenak Estate has been implemented as per evidence of photo. Training and awareness session have been conducted to nursery workers. Refer Training Nursery dated 16/10/2020. Sighted evidence of training material related No Open Burning. <p>CAP Evidence has been found sufficient thus Minor NC was effectively closed on 02/12/2021.</p>
--	---

Non-conformity			
NCR Ref #	1971716-202010-N4	Date Issued	15/10/2020
Due Date	02/12/2021	Date of nonconformity Closure	Escalated to Critical Non-Conformity due to Reoccurrence of Non-Compliance.
Clause & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	The procedure for checking is not comprehensive.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<ol style="list-style-type: none"> 1. Ladang Basir Ismail sprayers did not change their street clothing to work clothing as street clothing boxes provided at the changing room were empty. 2. Plastic bags, polystrene food containers and plastic bottles were found in all estates field visited. 		
Corrections:	Awareness training on Prosedur Kerja Selamat Meraacun conducted for sprayers on 19/10/2020. (Attendance/ Photo attached).		
Root Cause Analysis:	<p>SOP "Prosedur Kerja Selamat" does not stated details on requirement to change working attire to clean attire after completed daily work.</p> <p>Inadequate enforcement by the respective estate on the requirement.</p> <p>Inadequate awareness on waste management</p>		
Corrective Actions:	KSTS to revise SOP "Prosedur Kerja Selamat" on practices after spraying activities.		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>Socialization of the revised SOP to all workers to be done by respective estate. Inspection on Sprayers will be carried out prior to their mobilization to field.</p> <ol style="list-style-type: none"> 1. Continues briefing and awareness during muster/roll-call. 2. Mandore to do inspection during the work activities in the field, to ensure all waste being collected and disposed at designated area.
Assessment Conclusion:	<p>The implementation of procedures was not comprehensively checked in the operating units as detailed out under indicator 3.3.2 (Appendix A). Due to this being a recurrence of minor non-conformity of the same indicator, thus the minor non-conformity is escalated to critical non-conformity. Details refer to Indicator 3.3.2 in Appendix A.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	Not Applicable

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1692792-201809-M1	Major	SCCS E4.2	11/10/2018	Closed out on 10/01/2019
1692792-201809-M2	Major	4.6.6	11/10/2018	Closed out on 10/01/2019
1692792-201809-N1	Minor	2.1.3	11/10/2018	Closed out on 03/10/2019
1830966-201906-M1	Major	2.1.1	03/10/2019	Closed out on 24/12/2019
1971716-202010-M1	Major	6.2.3	15/10/2020	Closed out on 10/01/2021
1971716-202010-N1	Minor	2.2.2	15/10/2020	Escalated to Critical Non-Conformity due to Reoccurrence of Non-Compliance.
1971716-202010-N2	Minor	7.3.2	15/10/2020	Closed out on 02/12/2021
1971716-202010-N3	Minor	7.3.3	15/10/2020	Closed out on 02/12/2021
1971716-202010-N4	Minor	3.3.2	15/10/2020	Escalated to Critical Non-Conformity due to Reoccurrence of Non-Compliance.
2139646-202111-M1	Critical	3.3.2	02/12/2021	Closed out on 13/02/2022
2139646-202111-M2	Critical	3.6.1	02/12/2021	Closed out on 13/02/2022
2139646-202111-M3	Critical	2.1.1	02/12/2021	Closed out on 13/02/2022
2139646-202111-M4	Critical	2.2.2	02/12/2021	Closed out on 13/02/2022
2139646-202111-M5	Critical	5.1.6	02/12/2021	Closed out on 13/02/2022
2139646-202111-N1	Minor	6.5.4	02/12/2021	"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 Sedenak Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal Stakeholders - Union	NUPW Representative	Face to Face
Internal Stakeholders	Gender Committee Representative	Face to Face
Contractors	FFB Suppliers	Face to Face
Government Department	School Representatives	Face to Face
Communities	Local Community Representative	Face to Face

Stakeholders comment	
1	<p>Feedbacks: NUPW Representatives (local and foreign workers) – They informed that they were elected by the workers freely. There was no issue reported by the workers during the time of audit. If there is any issue, they will discuss with management and action will be taken to resolve the issue. The workers were paid according to Minimum Wage Order 2020. There is no discrimination happened in the operating units as the management treated everyone the same. Overtime was offered voluntarily basis.</p> <p>Audit Team verification and response: Reviewed the meeting minutes found issues reported were incorporated into action plan. Verified the payslips found the sampled workers were paid as per legal requirements.</p>
2	<p>Feedbacks: Female workers – They informed that there was no discrimination happened in the operating units. They were treated equally and wages were paid according to Minimum Wage Order 2020. The management has consulted the new mothers on their needs. The management respects the rights of reproductivity. There was no sexual harassment or violence case reported. However, some of them do not understand the mechanism to report sexual harassment and violence case.</p> <p>Audit Team verification and response: Non-compliance was raised and details refer to Indicator 6.5.4.</p>
3	<p>Feedbacks: FFB Suppliers – They informed that they have signed FFB agreement and they have been briefed on the pricing mechanism. However, they informed the payment was delayed in the last 4 months. They have raised the concern to the Head Office but no improvement yet.</p> <p>Audit Team verification and response: Details refer to Indicator 5.1.6.</p>
4	<p>Feedbacks: Local Community Representative – He informed that there was no land dispute issue reported. Clear demarcation of boundary was available such as the boundary was separated by the railway track. No encroachment by Kulim. The company also provide job opportunity to the local communities. He has been invited to attend stakeholder meeting and briefed on the complaint procedure and company’s policies.</p> <p>Audit Team verification and response:</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	Verified the workers' list and stakeholder meeting records found that the community has attended the meeting.
5	<p>Feedbacks: Contractors – They informed that they have signed agreement with the company before providing any services. Terms and conditions were briefed to them such as the compliance of legal requirements and RSPO requirements. They informed that they do not employed any child labour. They are aware of the complaint procedure. The payment made by the company was in timely manner.</p>
	<p>Audit Team verification and response: Verified the agreements signed by contractors. However, there were incompliance by contractors and details refer to Indicator 2.2.2.</p>
6	<p>Feedbacks: School's Representative – He informed that the school has good relationship with the management. The management will provide assistance whenever they requested. The water and electricity bill were bear by the company.</p>
	<p>Audit Team verification and response: Verified the contribution record and found no other issue.</p>

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



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

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.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Sedenak POM and Supply Base has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Sedenak POM and Supply Base is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: VIJAY KANNA PAKIRISAMY	Name: SALASAH ELIAS
Company Name: BSU SERVICES (MALAYSIA) SDN BHD	Company Name: KULIM (MALAYSIA) BERHAD
Title: CLIENT MANAGER	Title: DEPUTY GENERAL MANAGER
<p>Signature:</p> 	<p>Signature:</p> <p><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></p> 
Date: 14/02/2022	Date: 22/ 02/ 2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (M) Berhad has developed Transparency Procedure with Doc. No.: SQD/SMS/1.0 dated 01/08/2020 where operating units to provide adequate information when requested by stakeholders on sustainability, social and legal issues when appropriate.</p> <p>The documents may be publicly available but not limited to are such as:</p> <ul style="list-style-type: none"> i. Land title ii. OSH plan iii. Plans and impact assessment relating to environmental and social impacts iv. HCV documentation v. Pollution prevention and reduction plans vi. Complaint and grievances details vii. Human Rights policy viii. Procedure for negotiation on compensation ix. Results of FPIC processes x. HCS documentation xi. Continuous Improvement Plan xii. Report on the progress of smallholder support programme 	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Besides, the stakeholders could access to company's website, http://www.kulim.com.my/ to get the information such as annual report.</p> <p>The stakeholders have been briefed on the request of publicly available documents during the stakeholder meeting conducted on 20/10/2021 in Basir Ismail Estate, 27/10/2021 in Sedenak Complex and Ulu Tiram Estate on 18/10/2021 as verified in the meeting presentation slides.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The stakeholders have been briefed on the request of publicly available documents during the stakeholder meeting conducted on 20/10/2021 in Basir Ismail Estate and 27/10/2021 in Sedenak Complex as verified in the meeting presentation slides. All the relevant documents were in Bahasa Malaysia and English.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Enquiry Register book was implemented as written in the procedure above. Seen the Enquiry Register book in Basir Ismail Estate and Kuala Kabong Estate found that most of the requests were related to compliance inspection from government authorities such as TNB and requests from local communities for donation. It was verified that the management of the respective units have responded to all the requests and enquiries in a timely manner.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>KULIM (M) Berhad has established Consultation and Communication Procedure with Doc. No.: SQD/SMS/1.1 dated 01/08/2020 to ensure KULIM has an open and transparent communication methods with local communities and other internal & external stakeholders. Modes of the communication are such as muster, meetings, campaigns, suggestion boxes, letter, email, social media and face to face communication. Any request for information that publicly available and grievance shall record in Enquiry Register.</p> <p>Stakeholder meeting with contractors was conducted on 20/10/2021 in Basir Ismail Estate. Seen the attendance list and</p>	Complied

		<p>meeting minutes. No issue was reported as verified in the meeting minutes.</p> <p>There was a virtual online stakeholder meeting organized for Sedenak Complex on 27/10/2021 and Ulu Tiram Estate on 18/10/2021. Seen the attendance list where contractors, suppliers and neighbouring communities were attended. Records of email invitation to the stakeholders was sighted. Meeting minutes and meeting slides was sighted and no issue was reported.</p> <p>Assistant Manager of Basir Ismail Estate, Chief Clerk of Kuala Kabong Estate, Assistant Manager of Sedenak POM and Assistant Manager in Ulu Tiram Estate has been appointed as Social Officer by the Senior Manager/ Manager and appointment letter dated 16/06/2021, 01/08/2021, 01/01/2020 and 01/11/2021 was sighted respectively.</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>Stakeholder list for Year 2021 was developed in all operating units where stakeholders such as government authorities, contractors, suppliers, local communities, neighboring plantations and NGO was included. Details such as contact number and nominated representatives was included in the list.</p>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Kulim (M) Berhad has established Code of Business Ethics (COBE), last edited August 2021. The policy is applicable to all employees, board of director, business associates such as contractor and sub-contractors. The policy was signed by Managing Director.</p> <p>Briefing of the COBE was conducted on 20/10/2021 in Basir Ismail Estate and 27/10/2021 in Sedenak Complex during stakeholder meeting. Seen the briefing records such as attendance list and photo evident.</p>	Complied

		The workers have to sign on <i>Borang Aku Janji Integrity Pekerja</i> to ensure not involving in any bribe or carry out any illegal activity. Besides, Kuala Kabong Estate has briefed to the workers on the anti-bribery and whistleblowing procedure on 28/11/2021. Record of briefing was sighted.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Sedenak Complex has a system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. The monitoring mechanism includes annual Internal Audits by HQ Sustainability Department team in the mill and estates.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	Sedenak Certification Unit is continues to ensure compliance towards all applicable local, national and ratified international laws and regulations. The compliances is guided by the document Sustainable Management System; Compliance To Legal Requirement; Document Number: SQD/SMS/2.0; Document Date: 01/08/2020; Issue: 01. Among permit and license sampled were: <u>Sedenak POM</u> <ol style="list-style-type: none"> 1. MPOB License; License Number: 500058304000; License Validity Period: 01/01/2021 – 31/12/2021. 2. River Water Diversion and Extraction License; License Number: 08/A/KJ/051; File Number: BAKAJ/334/300/05/02/08/1; License Expiry Date: 31/12/2021. 3. Permit Barang Kawalan Berjadual; Reference Number: KPDKK.J-JB/26/5A/11/1057 (P/D) (P14); Description: Diesel; Storage Quantity: 19, 100 Litres; License Validity Period: 16/01/2021 – 15/01/2024. 	Non-compliance

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>4. Energy Commission – Private Installation License; License Number: LP 12/1/9/1822; License Date of Issuance: 07/06/2016; License valid for 10 years.</p> <p>5. DOE License – Compliance Schedule; License Number: 004532; License validity period: 01/07/2021 – 30/06/2022.</p> <p>6. Sedenak POM has obtained approval from <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i> for overtime limit and <i>Jabatan Tenaga Kerja Negeri Johor</i> for deduction of wages as below:</p> <p>a. Ref. No.: BHG. PU/9/134 Jld 34 (14) dated 09/12/2020 for overtime limit to 130 hours per month.</p> <p>b. Ref. No.: TK (NJ) U-21 dated 31/03/2019 for <i>Skim Khairat Keluarga Perbadana Johor</i> for RM 5 per month and premium not more than RM 37.50.</p> <p>c. Ref. No.: TK (NJ) U-21 dated 02/05/2019 for medical fee more than subsidized amount.</p> <p><u>Sedenak Estate</u></p> <p>1. MPOB License (FFB); License Number: 501224702000; License Validity Period: 01/04/2021 – 31/03/2022</p> <p>2. MPOB License (Nursery); License Number: 620248011000; License Validity Period: 17/05/2021 – 30/04/2022</p> <p>3. Permit Barang Kawalan Berjadual; Derial Number: P (J 001030); Reference Number: KPDNHEP.J-JB/26/5A/11/248 (P/D) (P14); Description: Diesel (22,730 Litres) and Ptrol (5,460 Litres); License Validity Period: 31/03/2021 – 30/03/2024.</p>	
--	--	--	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>4. License for Diversion and Extraction of River Water; File Number: BAKAJ/334/300/05/02/07/09; License Number: 07/A/KJ/118; License Expiry Date: 31/12/2021.</p> <p>5. SPAN License; Class License Number: SPAN/EKS/(PT)/800-4(2)/2/14; License Validity Period: 13/04/2020 – 12/04/2023.</p> <p>6. Sedenak Estate has obtained approval from <i>Jabatan Tenaga Kerja Negeri Johor</i> for deduction of wages for the following:</p> <ul style="list-style-type: none"> a. Ref. No.: TK (NJ) U-21 dated 31/03/2019 for <i>Skim Khairat Keluarga Perbadana Johor</i> for RM 5 per month and premium not more than RM 37.50. b. Ref. No.: TK (NJ) U-21 dated 02/05/2019 for medical fee more than subsidized amount. c. Ref. No.: TK (NJ) U-21 dated 31/03/2019 for sport and recreational fee for not more than RM 10. d. Ref. No.: TK (NJ) U-21 dated 26/11/2019 for school fare for RM 10. <p><u>Kuala Kabong Estate</u></p> <ul style="list-style-type: none"> 1. MPOB License; License Number: 503896302000; License Validity Period: 01/04/2021 – 31/03/2022; Estate Area: 1718.32 Ha. 2. Permit Barang Kawalan Berjadual; Reference Number: KPDNHEP.J-JB/26/5A/11/851 (P/D0 (13); Serial Number: P(J 000100); Description: Diesel (8,000 Litres), Petrol (400 Litres); Permit Validity Period: 10/05/2021 – 09/05/2024. 3. Air Compressor License; Registration Number: JH PMT 22737; License Expiry Date: 29/03/2022. 	
--	--	--	--

**RSPO P&C Public Summary Report
Revision 12 (Jun 2021)**

		<p>4. Kuala Kabong Estate has obtained approval from <i>Jabatan Tenaga Kerja Negeri Johor</i> for deduction of wages for the following:</p> <ul style="list-style-type: none"> a. Ref. No.: TK (NJ) U-21 dated 31/03/2019 for <i>Skim Khairat Keluarga Perbadana Johor</i> for RM 5 per month and premium not more than RM 37.50. b. Ref. No.: TK (NJ) U-21 dated 31/03/2019 for sport club and recreation fee not more than RM 10. c. Ref. No.: TK (NJ) U-21 dated 02/05/2019 for medical fee more than subsidized amount. d. S/N: PP3/29/001/2008 dated 14/02/2008 for water and electricity bill not more than RM 50/ person. e. S/N: PP3/29/002/2008 dated 14/02/2008 for mosque fund not more than RM 1/ person. <p><u>Ulu Tiram Estate</u></p> <ul style="list-style-type: none"> 1. MPOB License; MPOB License Number: 501257302000; License Validity Period: 01/04/2021 – 31/03/2022; Estate Area: 698.05 Ha. 2. Permit Barang Kawalan Berjadual; Serial Number: P J 004247; Reference Number: KPDNKK.J-JB/26/5A/11/811 (P/D) (P13); Description: Diesel; Storage Quantity: 14, 000 Litres; License Validity Period: 10/10/2021 – 09/10/2024. 3. Air Compressor License (Air Receiver); License Number: PMT-JH/20 129277; Registration Number: JH PMT 22863; License Expiry Date: 29/03/2021. 	
--	--	---	--

		<p>4. Ulu Tiram Estate has obtained approval from <i>Jabatan Tenaga Kerja Negeri Johor</i> for deduction of wages for the following:</p> <ol style="list-style-type: none"> a. Ref. No.: TK (NJ) U-21 dated 09/08/2018 for <i>Lembaga Tabung Haji</i> not more than RM 160. b. Ref. No.: JTKNJ.PMT/TK(NJ)U-21 dated 25/02/2021 for electricity bill after deducting the subsidy by company for not more than RM 20 for single and RM 60 for family. c. Ref. No.: JTKNJ.PMT/TK(NJ)U-21 dated 25/02/2021 for water bill after deducting the subsidy by company for not more than RM 10 for single and RM 50 for family. d. Ref. No.: TK (NJ) U-21 dated 09/08/2018 for mosque fund not more than RM 1/ person. <p><u>Basir Ismail Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 501258102000; Estate Area: 3196.63 Ha; License Validity Period: 01/04/2021 – 31/03/2022. 2. Permit Barang Kawalan Berjadual; Reference Number: KPDNKK.J.KTG/PERMIT 0153 (PD); P Serial Number: J 000208; Description: Diesel (10,000 Litres) ; Permit Validity Period: 29/12/2020 – 28/12/2021. 3. Air Compressor License; Registration Number: JH PMT 24676; License Expiry Date: 29/03/2022. 4. Basir Ismail Estate has obtained approval from <i>Jabatan Tenaga Kerja Negeri Johor</i> for deduction of wages for the following: <ol style="list-style-type: none"> a. Ref. No.: TK (NJ) U-21 dated 31/03/2019 for <i>Skim Khairat Keluarga Perbadana Johor</i> for RM 5 per month and premium not more than RM 37.50. 	
--	--	--	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Nevertheless, non-compliance were noted as below,</p> <ol style="list-style-type: none"> 1. Verified the Overtime record book for weighbridge operator (Employee No.: 602030) in Basir Ismail Estate found that he has worked more than 104 hours of overtime in May 2021 (120 hours), June 2021 (135 hours), July 2021 (136 hours), August 2021 (144 hours) and October 2021 (139 hours) without approval from authority. Besides, reviewed the payslips for the respective months found that he was only paid for 104 hours of overtime. 2. Sampled the Overtime Form for May 2021 and Checkroll G23, G26 and G21 for the weighbridge operator (Employee No.: 604899) in Kuala Kabong Estate found that she has worked 53 hours of overtime on May 2021. However, verified the payslips found that she was only paid for 44.50 hours of overtime. 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Sedenak POM certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU's operation.</p> <p>Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, Workers' Minimum Standard of Housing and Amenities Act, Minimum Wages order 2020 to name a few. Other related legal for COVID19 pandemic under Prevention and Control of Infectious Diseases (Measure Within The Infected Local Areas) Regulation 2020 was also has been identified.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>information and the information are communicated from the Head Office. Kulim (Malaysia) Berhad have centralised system for tracking any changes in the law.</p> <p>The tracking law person in-charge is Miss Handayani Bagong (RMC/COM/GM/18/10) dated 27/06/2018 who will maintain the changes in laws and updated the Legal and other requirement in Sedenak Complex.</p>	
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit Kuala Kabong Estate, Basir Ismail Estate and Ulu Tiram Estate. Apart from that, erection of concrete slab with GPS coordinate along the boundaries was also commonly practiced and clearly visible.</p> <p><u>Basir Ismail Estate</u></p> <p>Sighted boundary peg at P03/01 (No.50) and P13/02 (No. 54), Neighbouring to Johor River and Kg Ayer Putih. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Kuala Kabong Estate</u></p> <p>Sighted boundary peg at P00/5 (No.90) and P02/04 (No. 40), Neighbouring to Risda and Smallholders. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Ulu Tiram Estate</u></p> <p>Sighted boundary peg at P12/1 (No.48) Neighbouring to Government road. Verified that there is no planting beyond these legal or authorised boundaries.</p>	<p>Complied</p>
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			

2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contracted parties is maintained accordingly. Seen the List of Stakeholder 2021 for Basir Ismail Estate, Kuala Kabong Estate, Sedenak POM, Ulu Tiram Estate and Sedenak Estate where all the contractors engaged by the operating units were included.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>All the contractors have signed an agreement prior to provide any services. There is an addendum to the contract agreement where specifically mentioned the contractor shall comply with applicable labour and employment laws. Sampled of the contract agreement as below:</p> <ol style="list-style-type: none"> 1. Contract No.: KMB/LBI 1/2017 – harvesting, loading and transporting of FFB from field P14 to ramp at Basir Ismail Estate which valid until 31/03/2023 2. Contract No.: KMB/LBI 1/40/2019 – harvesting, loading and transporting of FFB P11R and harvesting at P04R to ramp at Basir Ismail Estate which valid until 31/07/2023 3. Contract No.: KMB/LBI 1/2016 – harvesting FFB in P11 and P12 at Basir Ismail Estate which valid until 31/07/2024 4. Contract No.: LKK 09/2021 – harvesting FFB Field P00/4 and 5 at Kuala Kabong Estate which valid until 31/12/2021 5. Contract No.: KMB/ LKK 1/2017 – loading & transporting of FFB from fields to ramp and from ramp to mill at Kuala Kabong Estate which valid until 30/09/2022 6. Contract No.: REM/UT 02/2021 – FFB harvesting, loose fruit collection and pruning at Ulu Tiram Estate which valid until 31/12/2021 7. Contract No.: MPSB/SEDENAK 4/2016 – Loading & transporting of FFB from field to Sedenak POM which valid until 31/12/2021 	Non-compliance

		<p>8. Contract No.: MPSB/SEDENAK 3/115/2020 – Harvesting of FFB in field P00 & P01 and loading of FFB into bin at Sedenak Estate which valid until 31/07/2024</p> <p>Verified the agreements between the mill and FFB suppliers also found that specific clause of compliance of legal requirements was outlined in the agreement. Interviewed with the FFB suppliers confirmed that they are aware of the terms and conditions outlined in the agreement and comply accordingly.</p> <p><u>Basir Ismail Estate</u></p> <p>Reviewed the employment contract, payslips and SOCSO contribution Form 8A of contractors found the following issues:</p> <ol style="list-style-type: none"> 1. Employment contract signed by the workers of Gunalash Enterprise was incomplete. Terms and conditions such as annual leave and medical leave entitlement, reason of dismissal and notice period was not available. 2. SOCSO contribution made was not in accordance to Employees’ Social Security Act 1969 (Act 4) for the workers of Gunalash Enterprise and Sri Thilakkumar Enterprise. 3. There is no mention of the wages’ rate in the employment contract signed by the workers of Sri Thilakkumar Enterprise. 4. There was no payment of wage for public holiday on February 2021 to the workers of Soko SK Enterprise as verified in the payslips. 5. During interview in the field found there were 4 foreign workers employed by Soko SK Enterprise as harvesters. However, there was no employment contract, permit and payslips sighted. <p><u>Kuala Kabong Estate</u></p>	
--	--	--	--

**RSPO P&C Public Summary Report
Revision 12 (Jun 2021)**

		<p>Reviewed the records of contractors' workers found the following issues:</p> <ol style="list-style-type: none"> 1. Reviewed the payslips and FFB Ticket Report for May 2021 and August 2021 found that the FFB Lorry Drivers (Eco Lane Enterprise) have worked on rest day. However, no payment of wages as per Employment Act 1955, Section 60 (3) (d). <table border="1" data-bbox="1234 571 1879 785"> <thead> <tr> <th>I/C No.</th> <th>Dates of Work on Rest day</th> </tr> </thead> <tbody> <tr> <td>700913-71-50XX</td> <td>22/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021</td> </tr> <tr> <td>730507-01-61XX</td> <td>14/08/2021</td> </tr> </tbody> </table> <ol style="list-style-type: none"> 2. EPF contribution made by Eco Lane Enterprise for the workers were not in accordance to Employees Provident Fund Act 1991, Third Schedule. <p><u>Ulu Tiram Estate</u></p> <p>Reviewed the records of contractors' workers found the following issues:</p> <ol style="list-style-type: none"> 1. Reviewed the payslips and productivity reports for May 2021, August 2021 and October found that the FFB Loader & Driver and harvesters (TBK Plantation Works and Perusahaan Mewah Hijau) have worked on rest day. However, no payment of wages as per Employment Act 1955, Section 60 (3) (d). <table border="1" data-bbox="1234 1225 1879 1353"> <thead> <tr> <th>Passport No.</th> <th>Dates of Work on Rest day</th> </tr> </thead> <tbody> <tr> <td>C2748457 (Harvester)</td> <td>22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021</td> </tr> </tbody> </table>	I/C No.	Dates of Work on Rest day	700913-71-50XX	22/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021	730507-01-61XX	14/08/2021	Passport No.	Dates of Work on Rest day	C2748457 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021	
I/C No.	Dates of Work on Rest day												
700913-71-50XX	22/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021												
730507-01-61XX	14/08/2021												
Passport No.	Dates of Work on Rest day												
C2748457 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021												

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

			<table border="1"> <tr> <td data-bbox="1234 363 1485 443">C6902851 (Harvester)</td> <td data-bbox="1485 363 1877 443">22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021</td> </tr> <tr> <td data-bbox="1234 443 1485 655">C3811881 (FFB Loader & Driver)</td> <td data-bbox="1485 443 1877 655">08/05/2021, 22/05/2021, 29/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021, 02/10/2021, 09/10/2021, 23/10/2021, 30/10/2021</td> </tr> </table>	C6902851 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021	C3811881 (FFB Loader & Driver)	08/05/2021, 22/05/2021, 29/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021, 02/10/2021, 09/10/2021, 23/10/2021, 30/10/2021	
C6902851 (Harvester)	22/05/2021, 29/05/2021, 21/08/2021, 23/10/2021							
C3811881 (FFB Loader & Driver)	08/05/2021, 22/05/2021, 29/05/2021, 07/08/2021, 14/08/2021, 21/08/2021, 28/08/2021, 02/10/2021, 09/10/2021, 23/10/2021, 30/10/2021							
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>2. Employment contract signed by the worker of TBK Plantation Works (Passport No.: C3811881) was incomplete. Terms and conditions such as annual leave and medical leave entitlement, reason of dismissal and notice period was not available.</p> <p><u>Sedenak Estate</u></p> <p>Reviewed the payslips of contractor’s workers (Yap Aun Kok) (Passport No.: C5719809 and C7521687) found that the contractor only paid 1 day of public holiday wage instead 3 days on May 2021. This has confirmed through interviewed with the contractor. Thus, NC has been raised for is indicator.</p>	Complied				
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>								

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>The mill has 4 estates supplying Certified FFB within the certification scope and 5 supply base supplying Certified FFB from outside the certification scope (Kulim Plantation Sister Estates).</p> <p>The mill also receives non-certified FFB from 23 outside FFB Suppliers (18 FFB Traders and 5 Estates)</p> <p>The mill has compiled the evidences for all its suppliers on the information on geo-location of FFB origins, evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, one or more supporting documents for claims and valid MPOB license. Sampled the documents as below:</p> <ol style="list-style-type: none"> 1. AZ Iman Resources Sdn Bhd (FFB Trader); MPOB License Number: 610583015000; License validity Period: 01/05/2021 – 30/04/2022. 2. Che Yung Trading Sdn Bhd (FFB Trader); MPOB License Number: 505632515000; License validity Period: 01/10/2021 – 30/09/2022. 3. Kebun Sedenak Sdn Bhd (Estate Area: 170 Ha); MPOB License Number: 502868202000; License validity Period: 01/07/2021 – 30/06/2022. 4. Guan Leng Trading Sdn Bhd (FFB Trader); MPOB License Number: 505874315000; License validity Period: 01/02/2021 – 31/01/2022. 	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>There are 18 Collection Centres/FFB Traders registered in the mill's list of FFB suppliers. The mill is in the process of obtaining the information mentioned in Indicator 2.3.1 of the indirectly sourced FFB.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			

<p>3.1.1</p>	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -</p>	<p>Sedenak certification unit has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Annual business plan in the form of annual budget and the projection for 5 years (2022-2026) were prepared as guidance for future planning. In estate the business plan was include harvesting, vehicles, operation including medical expenses, upkeep and cultivation. Verified that the business plan contains FFB throughput, mill utilization rate, CPO, OER and KER, costs of production, and CAPEX.</p> <p>Similarly, the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p> <ul style="list-style-type: none"> a. FFB Processing & CPO/CPK production forecast b. Extraction Ratios – OER / KER, c. Cost of production d. Administration / labour overhead e. Processing cost labour, maintenance, consumables f. Depreciation and head office charges- g. EVIT running accounts h. CAPEX - capital expenditure. 	<p>Complied</p>														
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -</p>	<p>A long-range replanting programme projected for the minimum of 5 years was made available for review. Refer to replanting programme subject to annual review.</p> <table border="1" data-bbox="1137 1209 1935 1391"> <thead> <tr> <th rowspan="2">Year of Replanting</th> <th colspan="4">Estate / Replanting Ha</th> </tr> <tr> <th>Basir Ismail</th> <th>Kuala Kabong</th> <th>Ulu Tiram</th> <th>Sedenak</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>171.28</td> <td>0</td> <td>0</td> <td>214.04</td> </tr> </tbody> </table>	Year of Replanting	Estate / Replanting Ha				Basir Ismail	Kuala Kabong	Ulu Tiram	Sedenak	2022	171.28	0	0	214.04	<p>Complied</p>
Year of Replanting	Estate / Replanting Ha																
	Basir Ismail	Kuala Kabong	Ulu Tiram	Sedenak													
2022	171.28	0	0	214.04													

		2023	0	0	0	233.33	
		2024	114.99	0	0	257.60	
		2025	0	0	0	336.10	
		2026	0	0	0	94.25	
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The management review was conducted after internal assessment, latest as per sample: -</p> <ul style="list-style-type: none"> a. Basir Ismail Estate: 08/11/2021 b. Kuala Kabong Estate: 20/08/2021 c. Ulu Tiram Estate: 25/11/2021 d. Sedenak Estate: 04/10/2021 e. Sedenak POM: 05/10/2021 <p>The issues discussed include:-</p> <ul style="list-style-type: none"> 1. Results of internal audits 2. Customer (internal/external) feedback 3. Process performance and product conformity 4. Status of preventive and corrective actions 5. Follow-up actions from management reviews 6. Changes that could affect the management system 7. Recommendations for improvement 8. Complaints and grievances 9. Resource needed. 					Complied

Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.

<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>Continuous Improvement Plans 2021 were available at all the operating units and verified as below:</p> <p><u>Sedenak POM</u></p> <ol style="list-style-type: none"> 1. Social <ul style="list-style-type: none"> - Repaid Workers Quarters and drainage at workers quarters. - CSR - Provide food basket for COVID-19 2. Environmental <ul style="list-style-type: none"> - Effluent Discharge – to install Sludge Dewatering System - To install 1 unit 2.5MW Steam Turbine c/w Alternator. 3. Occupational Safety & Health <ul style="list-style-type: none"> - To extend building at Engine Room c/w ventilation & roofing - Resurface Hard Standing at Ramp. <p><u>Sedenak Estate</u></p> <ol style="list-style-type: none"> 1. Reduce chemical usage by implementation of Good Agriculture Practice. 2. Scheduled Waste need to be stored and disposed as per DOE Guidelines. 3. Awareness on Biodiversity and Monitoring of HCV Areas. 4. Rewiring Programme to 188 unit housing. 5. Construction outdoor storage water tank. <p><u>Kuala Kabong Estate</u></p> <ol style="list-style-type: none"> 1. Occupational Safety and Health 	<p>Complied</p>
--------------	---	---	-----------------

		<ul style="list-style-type: none"> - Install safety signage at workstations - Install fire resistance door for chemical store <p>2. Social</p> <ul style="list-style-type: none"> - Repair workers quarters - Repainting workers quarters - Upgrading surau (build toilet and wuduk area) - Repair water tank flushing and cleaning <p>3. Environmental</p> <ul style="list-style-type: none"> - Install warning sign at HCV spots. <p><u>Ulu Tiram Estate</u></p> <ol style="list-style-type: none"> 1. OSH - Install Safety Signages at Chemical Store. 2. Workers Housing – Repaint 24 Units houses. <p><u>Basir Ismail Estate</u></p> <ol style="list-style-type: none"> 1. Occupational Safety and Health <ul style="list-style-type: none"> - Install safety signage at linesite and main road - Replacement of wooden door to mild steel door for chemical store - Installation of safety features at steel loading ramp. 2. Social <ul style="list-style-type: none"> - Replacing Bare Cable to ABC insulated cable - Upgrading works of 16 unit workers quarters - Repair workers quarters - Repainting workers quarters - Desludging latrines 	
--	--	--	--

		<p>3. Environment</p> <ul style="list-style-type: none"> - Install warning sign at HCV spots - Mucuna planting at terrace area at P18 - Desilting Drain at P00, P03, P04. 	
<p>3.2.2</p>	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of Kulim Sedenak Certification Unit's metrics (economic, social and environment). Data reporting period is January to December 2020 for (social and environment metrics) and economic metrics from Nov 2020 – Oct 2021 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	<p>Complied</p>
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sedenak Certification Unit continued to implement the established procedure for mill and estate. For Sedenak POM, Standard Operating Procedure (SDPOM/QM), dated 01/02/2018 is referred to.</p> <ol style="list-style-type: none"> 1. Reception Station 2. Fruit Handling 3. Sterilisation 4. Threshing 5. Empty Bunch Press 6. Digestion and pressing 7. Clarification 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>8. Kernel Extraction 9. Effluent Treatment & Waste Management 10. Boiler House</p> <p>Estates have a separate SOP that covered nursery operations, replanting, upkeep mature and immature oil palm, water management, roads, oil palm pest management, oil palm disease management and manuring immature and mature oil palms.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>Mechanism to check consistent implementation of procedures are in place. Internal audit by SQD department conducted on annual basis to check and report compliance against company policy and procedure with regards to operation, safety, health and welfare requirements. For other to ensure consistency of SOP implementation was verification from Agronomist Report, Regional Controller Report and Plantation Inspectorate Report.</p> <p>Nevertheless, the implementation of procedures was not comprehensively checked in the operating units.</p> <ol style="list-style-type: none"> 1. Ladang Basir Ismail; <i>Standard Operating Procedure; Lubricant & Petrol Store; No.4. Semua bahan kimia hendaklah disimpan didalam bekas yang betul.</i> During the site visit it was noticed that unlabelled plastic bottles were used to store lubricants on the tractor. 2. <i>Work Instruction: General Store; Document Number: UTE-EMS-OP-W31; No.4. No chemicals are allowed to be stored here.</i> <p>- Ulu Tiram Estate; Visit to the General Store, it was noticed that Chemical: Calcium Hypochlorite was stored without proper containment tray and hazard signages. There were no SDS</p>	<p>Non-compliance</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>(Safety Data Sheet) available for the mentioned chemical as well.</p> <ul style="list-style-type: none"> - Ulu Tiram Estate; Visit to the General Store, it was noticed that there was a 20 Litres white unopened chemical container with no label or SDS placed on the floor of the store. <p>Due to this being a recurrence of minor non-conformity of the same indicator, thus the minor non-conformity is escalated to critical non-conformity.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring with regards to Best practice SOP and RSPO implementation are maintained and available for verification. Among monitoring records checked:</p> <p><u>Basir Ismail Estate</u></p> <ol style="list-style-type: none"> 1. Inspectorate report visit 01/2021 dated 07/03/2021. 2. Agronomist Report 01/2021 dated 03/05/2021. 3. Internal audit report dated 02/11/2021 by SQD team (Result 1 NC & 1 OFI) <p><u>Kuala Kabong Estate</u></p> <ol style="list-style-type: none"> 1. Inspectorate report visit 02/2021 dated 19/07/2021. 2. Agronomist Report 01/2021 dated 25/04/2021. 3. Internal audit report dated 28/06/2021 by SQD team (Result 1 OFI) <p><u>Ulu Tiram Estate</u></p> <ol style="list-style-type: none"> 1. Inspectorate report visit 02/2020 dated 17/09/2021. 2. Agronomist Report 01/2021 dated 28/02/2021. 3. Internal audit report dated 18/11/2021 by SQD team (Result 1 NC) <p><u>Sedenak Estate</u></p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ol style="list-style-type: none"> 1. Inspectorate report visit 01/2021 dated 19/04/2021. 2. Agronomist Report 01/2021 dated 06/05/2021. 3. Internal audit report dated 08/09/2021 by SQD team (Result 1 NC) <p><u>Sedenak POM</u></p> <ol style="list-style-type: none"> 1. Inspectorate report visit 02/2021 dated 13/06/2021. 2. Internal audit report dated 15/09/2021 by SQD team. 	
<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>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new planting reported in the sampled estates. SIA was conducted on 27/06/2021 in Basir Ismail Estate, 28/06/2021 in Kuala Kabong Estate, 15/09/2021 in Sedenak POM, 07/09/2021 in Ulu Tiam Estate and 08/09/2021 in Sedenak Estate by Sustainability Department. The methodology of the assessment was through field interview with stakeholders. The assessment has involved internal workers as verified the attendance list.</p> <p>Checklist Interview was utilized during interview with the workers for SIA. The social impact register is developed based on the scoring of frequency, consequence and likelihood. Social Management Plan will be developed after the social impact register established.</p> <p>The mill had established Environmental Impact Assessment (EIA) procedure and has been documented as per Environmental Aspect and Impact Assessment Form (EIA-SEDPOM-2021) dated 15/09/2021. All significant impacts have been determined and mitigation plan was developed thereafter as per document. Similarly, for the estates the EAI was available for each activity reviewed for the year of 2021. The EIA has been prepared by</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		assistant Manager, Reviewed by Environmental Officer and ERA approval by Manager.	
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>Sedenak Certification Unit has established Social and Environmental Management Plan and was made available in the estates/mill for review. Internal stakeholders (estate and mill team) were consulted for during review process especially for those interact directly with the activities at estate’s and mill’s workstation. Result of participation will be considered as part of SEIA review process. If there is any environmental incidents or changes of process (new installation/modification, SEIA will be reviewed to evaluate the environmental impact.</p> <p>Social management plan was developed in Basir Ismail Estate on 07/09/2021, 06/09/2021 in Kuala Kabong Estate, 15/09/2021 in Sedenak POM, 07/09/2021 in Ulu Tiram Estate and 15/10/2021 in Sedenak Estate. Sampled of issues as below:</p> <ol style="list-style-type: none"> 1. Issue: Monitoring of food price in the groceries. Action to be taken: Basir Ismail Estate’s management will conduct monitoring of the food pricing on quarterly basis. Status: The Field Supervisor has conducted monitoring on 22/09/2021 using the Building Inspection checklist where list of pricing of the foods and goods were maintained. The monitoring was verified by Assistant Manager and Senior Manager. 2. Issue: Impact of Movement Control Order/ Enhanced Movement Control Order by government towards workers such as job and source of income. Status: The management has conducted briefing to the workers on the instruction from government on the MCO’s 	Complied

		condition such as operation hour of the mill limited to 8 hours per day and with 60% of attendance. Seen the briefing record dated 01/06/2021.	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The social management plan was implemented, reviewed and updated on yearly basis in the participatory way by collected feedbacks during meeting with internal and external stakeholders. Seen the Social Management Plan 2020 in mill and estates and reviewed the area of concerns for Social Management Plan 2020 as below:</p> <p>1. Positive Impact: The mill will be distributed school uniform and shoe to the children.</p> <p>Status: Seen the form collection size school uniform for boy and girl for school term 2021. Record of recipient of the school uniform and shoes was sighted.</p> <p>The environmental management plan established based on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation. Sighted Environmental Plan has been reviewed on August 2021 for mill and estates.</p>	Complied
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>KULIM (M) Berhad has developed procedures for Recruitment of Local Workers for Operating Units last updated on 01/10/2020 and Recruitment of New Foreign Workers last updated on 01/01/2019, Rev. No.: 1. Recruitment, selection, hiring, promotion, retirement and termination has been outlined in the procedure.</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Basir Ismail Estate has published vacancy advertisement in the food stalls in nearby town and circulated the job vacancy in the social media. Seen the advertisement where criteria such as minimum 18 years old and above and fit to work was included. Benefits such as wages and housing provided are also published in the advertisement. Seen the recruitment records such as application form, routine medical check up report, photocopied of identification card and employment contract. The last batch of recruitment in Basir Ismail Estate was on October 2021 and November 2021 in Sedenak POM.</p>	Complied
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim Sedenak Operating Units have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The HIRARC is guided by the document Guidelines for Hazard Identification, Risk Assessment and Risk Control (HIRARC), Department of Occupational Safety and Health, 2008. The assessment covers all main operations and support operations.</p> <p><u>Sedenak POM</u></p> <ol style="list-style-type: none"> 1. HIRARC was available in the mill to identify assess and provide controls for all the risks associated to the operations in the mill. Sighted the HIRARC for process and Maintenance (Reviewed on Oct 2021), Press Station (Reviewed on Oct 2021) and Ramp (Reviewed on Oct 2021). 2. CHRA was conducted on 17/04/2018 – 13/08/2018 by QMSPRO Sdn Bhd (JKKP HQ/03/ASS/00/154). The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2018/059) was available for verification. 	Non-compliance

		<p>3. Medical Surveillance was conducted for mill workers on 08/11/2021 for those deemed to be exposed to hazardous chemicals and fumes.</p> <p>4. Noise Risk Assessment has been conducted at Sedenak POM on 30th August 2020 by Noise Risk Assessor, Noordin Bin Saian (JKKP Registration No.: HQ/18/PEB/00/00018). The NRA Report (HQ/18/PEB/00/00018 – 2020/40) was available for verification.</p> <p>5. Audiometric Test was conducted for workers exposed to excessive noise in the mill based on the NRA recommendations. The test have been conducted on 14th and 30th march 2021 by PAC Testing & Consulting Sdn Bhd. A total of 64 workers were tested and the results showed that 6 workers have hearing Impairment, 10 workers with NIHL and 1 worker with Standard Threshold Shift (STS). The worker with STS has been retested on 08/07/2021.</p> <p><u>Sedenak Estate</u></p> <p>1. HIRARC was available for all operations in the estate. Among the HIRARC available were Nursery, Harvesting, Fogging, Manuring, Census and Road Maintenance among others. The HIRARC was reviewed after accidents occurred in the estate.</p> <p>2. Chemical Health Risk Assessment was conducted in the estate to assess the usage of hazardous chemicals in the estate. The CHRA was conducted by QMSPRO Sdn. Bhd on 17/04/2018 – 13/08/2018. The CHRA Report (Report Ref.: JKKP HQ/03/ASS/00/154-2018/042) was available for verification.</p> <p><u>Kuala Kabong Estate</u></p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ol style="list-style-type: none"> 1. HIRARC was available to address the risks in the estate. Nevertheless, the HIRARC was not comprehensively assessed. 2. Chemical Health Risk Assessment was conducted in the estate to assess the usage of hazardous chemicals in the estate. The CHRA was conducted by QMSPRO Sdn. Bhd on 16/04/2018 – 13/08/2018. The CHRA Report (Report Ref.: JKKP HQ/03/ASS/00/154-2018/041) was available for verification. 3. Identification of excessive noise has been done by the estate management on 23/04/2021. <p><u>Ulu Tiram Estate</u></p> <ol style="list-style-type: none"> 1. Chemical Health Risk Assessment was conducted in the estate to assess the usage of hazardous chemicals in the estate. The CHRA was conducted by QMSPRO Sdn. Bhd on 01/04/2018 – 13/08/2018. The CHRA Report (Report Ref.: JKKP HQ/03/ASS/00/154-2018/040) was available for verification. <p><u>Basir Ismail Estate</u></p> <ol style="list-style-type: none"> a. HIRARC was available to identify the risks associated with the operations in the estate. The risk are then assed and control measures are stated in the HIRARC to reduce the risks of the operations. b. Chemical Health Risk Assessment was conducted in the estate to assess the usage of hazardous chemicals in the estate. The CHRA was conducted by QMSPRO Sdn. Bhd on 26/02/2018 – 13/08/2018. The CHRA Report (Report Ref.: JKKP HQ/03/ASS/00/154-2018/061) was available for verification. Supplementary CHRA Report (Report Ref.: JKKP/03/ASS/00/154 – 2021/002) was also available with the 	
--	--	--	--

		<p>assessment done on 22/12/2020 – 31/01/2021 to include the new chemicals used in the estate.</p> <ul style="list-style-type: none"> c. Medical Surveillance was conducted on 22/11/2021. The results have not been obtained by the management as of yet. d. Identification of excessive noise has been done by the estate management on 20/04/2021. Nevertheless, the management have not appointed a noise risk assessor within 1 month of the identification. <p>Nevertheless, it was found that the hazards were inadequately identified, assessed and controlled. Evidences are detailed out as below:</p> <p><u>Kuala Kabong Estate</u></p> <ul style="list-style-type: none"> a. The Estate Workshop uses Acetylene and Oxygen Tanks for Welding Works. The hazard and risks associated with oxygen and acetylene tanks such as the decomposition which can generate heat and cause fire and explosions through flashbacks from welding & hot work operations and movement & separation of the gas and the porous mass inside the cylinder and its control measures has not been assessed in the HIRARC titled Workshop; Revised on 01/08/2021. Furthermore during the visit to the mill, it was sighted that there was no usage of “flashback arrestors” to stop flames in its tracks. b. Ramp in the estate was used to collect FFB from the platforms and transferred to the External FFB Lorry’s for transport to the Mill. The HIRARC titled Ramp dated 01/08/2021 only captured work activity climbing lorry and fixing canvas. All other work activities such as works on the ramp platform, working at 	
--	--	--	--

		<p>height, FFB tractors unloading FFB, back bucket works, etc were not identified and assessed its hazards and risks.</p> <p>c. Ramp HIRARC stated the Existing Control – PPE such as Safety Shoes, Safety Harness and Safety Helmet. During the visit to the ramp it was noticed that the ramp attendant was wearing wellington boots.</p> <p>d. The estate uses a blower at the ramp and office compound. There were no evidence that the operation has been assessed in the HIRARC.</p> <p><u>Ulu Tiram Estate</u></p> <p>a. Site verification indicated the HIRARC for the operations at the Ramp was not adequate to assess the risks associated to the operations.</p> <ul style="list-style-type: none"> - The existing controls for various risks at the ramp was “work as a team”. The ramp attendant acknowledged that he was the only attendant working at the ramp. - The ramp attendant was seen climbing over the railing to go into the ramp hopper without any harness to remove off spec FFBs. The HIRARC did not capture the risks associated to this activity. - Interview with the ramp worker indicated he was unaware on the methods to use the safety harness provided while climbing down. - The HIRAC for RAMP stated, Work Activity: Grading FFB; Hazard: Injury; Existing Control: Safety Boot has been provided. Visit to the ramp indicated the ramp attendant was not provided with safety boot. <p><u>Basir Ismail Estate</u></p>	
--	--	--	--

		<p>a. Verified the HIRARC for Transport – Transporting FFB – Platform to Ramp; Existing Control Measures – PPE: Safety Shoes. It was sighted during the field visit at Basir Ismail Estate the Contract Tractor Drivers were wearing Rubber Shoes and Rubber boots instead of Safety Shoes.</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Annual H&S plan established by each Operating Unit are mostly implemented through Annual Training Program 2020 to address the identified health and safety risks. The emphasis is on safe work by providing</p> <ul style="list-style-type: none"> ▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. ▪ Awareness and understanding of workplace hazards and how to identify, report, and control them. ▪ Specialized training, when their work involves unique hazards. <p>Besides formal classroom training other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> • Internal Audit conducted by the Kulim Head office Sustainability Palm Oil Department; • Workplace inspection by site OSH Committee; • Direct involvement of supervisor and rounds by Asst Manager; • Safety occurrence reporting; • Health / medical surveillance; • Chemical exposure monitoring, and • Audiometric test 	<p>Complied</p>

		The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.					
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.							
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The Annual Training Program 2021 was established that covers mainly Health and Safety but extends to include all aspects of RSPO P&C and Supply Chain Certification Standard (SCCS).</p> <p>Means implemented by Kulim Plantation to assess understanding of participants include:</p> <ul style="list-style-type: none"> • Participants completing post-training evaluation/feedback form and give suggestions; • Learners engagement such as interactive quizzes; • Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what is RSPO, the several subsidiaries policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, Covid-19 Safe Practices. etc.</p>	Complied				
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records are maintained by each Operating Unit. Sample some records at each Operating as follows:</p> <p>Sedenak POM</p> <table border="1" data-bbox="1144 1326 1926 1391"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Training	Date			Complied
Training	Date						

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		Grievance Procedure Training	18/11/2021
		Biodiversity Training	18/11/2021
		RSPO Awareness Training	17/11/2021
		3R Awareness Training	19/03/2021
		Furrow Training	06/03/2021
		ERP – Effluent Station Training	07/03/2021
		FFB Quality – Outside Supplier Training	01/04/2021
		Confined Space Training	03/05/2021
		Chemical Safety and Handling Training	29/03/2021
		Sedenak Estate	
		Training	Date
		Harvesting Training	26/01/2021
		Waste Cleaning and Landfill Training	29/07/2021
		Schedule Waste Training	10/05/2021
		Fertilizer Sampling Training	12/10/2021

		Tractor, Lorry and MB Safe Driving	09/07/2021	
		Kuala Kabong Estate		
		Training	Date	
		Safety Work at Stores	12/09/2021	
		Fire Drill & Use of Fire Extinguisher	10/11/2021	
		Fogging Training	11/10/2021	
		Manuring SOP Training	25/09/2021	
		Ammonia (Smelling Salt) Training	13/09/2021	
		Eye Wash & Shower Training	22/09/2021	
		FFB Unloading at Ramp Training	19/08/2021	
		Oil Spillage Training	20/07/2021	
		Ulu Tiram Estate		
		Training	Date	
		Harvesting Training	06/04/2021	

		<table border="1"> <tr> <td>Scheduled Waste Training</td> <td>20/08/2021</td> </tr> <tr> <td>Water Sampling Training</td> <td>25/02/2021</td> </tr> <tr> <td>Rat Baiting Training</td> <td>03/02/2021</td> </tr> <tr> <td>PCD Cleaning Training</td> <td>25/08/2021</td> </tr> </table>	Scheduled Waste Training	20/08/2021	Water Sampling Training	25/02/2021	Rat Baiting Training	03/02/2021	PCD Cleaning Training	25/08/2021								
Scheduled Waste Training	20/08/2021																	
Water Sampling Training	25/02/2021																	
Rat Baiting Training	03/02/2021																	
PCD Cleaning Training	25/08/2021																	
		<p>Basir Ismail Estate</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>PPE Usage Training</td> <td>10/10/2021</td> </tr> <tr> <td>Harvesting Training</td> <td>06/10/2021</td> </tr> <tr> <td>Spraying – HCV & Buffer Zone Training</td> <td>02/08/2021</td> </tr> <tr> <td>Spill Containment Training</td> <td>15/11/2021</td> </tr> <tr> <td>Scheduled Waste Training</td> <td>22/09/2021</td> </tr> <tr> <td>Triple Rinsing Training</td> <td>31/10/2021</td> </tr> </tbody> </table>	Training	Date	PPE Usage Training	10/10/2021	Harvesting Training	06/10/2021	Spraying – HCV & Buffer Zone Training	02/08/2021	Spill Containment Training	15/11/2021	Scheduled Waste Training	22/09/2021	Triple Rinsing Training	31/10/2021		
Training	Date																	
PPE Usage Training	10/10/2021																	
Harvesting Training	06/10/2021																	
Spraying – HCV & Buffer Zone Training	02/08/2021																	
Spill Containment Training	15/11/2021																	
Scheduled Waste Training	22/09/2021																	
Triple Rinsing Training	31/10/2021																	
<p>3.7.3</p>	<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. - Minor Compliance -</p>	<p>Supply chain training carried out for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training conducted on 27/01/2021 – attended by Mill and estate representative.</p>		<p>Complied</p>														
<p>Criterion 3.8: Supply chain requirement for mills</p>																		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

(note: All supply chain requirements are considered as Critical (C) . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	Not applicable. Sedenak POM is under Mass Balance Module.	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Sedenak POM is using the MB supply chain model since it receives FFB from own supply bases and outside FFB suppliers.	Complied
3.8.3	<p>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.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Summary of CPO and PK deliver in a year (13 Months from the last audit date: October 2020 to October 2021) reported under Table 10 of the report.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace.</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <ul style="list-style-type: none"> - Members ID: RSPO_PO1000000019 - License validity period 23/03/2021 – 22/01/2022 - Member category : Oil Mill 	
<p>3.8.5</p>	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<ul style="list-style-type: none"> a. Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 01/08/2020) and RSPO Supply Chain Procedure (Doc. No.: MKD/001, Rev. 01 dated 9/10/2018). On the marketing side, Procedure title: RSPO Supply Chain; Procedure # MKD/001; Date: 9/10/2018 is referred to. b. Seen the records that included in the procedure are as below: <ol style="list-style-type: none"> 1. Weighbridge tickets 2. Training records 3. Internal audit report 4. Invoice and contracts 5. Delivery and storage records 6. Daily Production Report c. Training records for RSPO Supply Chain & Stamping was sighted where the training was conducted on 27/01/2021 for the critical control point responsible person such as Weighbridge Operators and Security Guards. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure. d. Head of each operating unit has automatically appointed as person responsible for all certification inclusive of RSPO SCCS. 	<p>Complied</p>

		<p>Responsibility of the person-in-charge has clearly stated in the appointment letter dated 15/09/2021.</p> <p>e. Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 01/08/2020) and RSPO Supply Chain Procedure (Doc. No.: MKD/001, Rev. 01 dated 09/10/2018).</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Kulim (Malaysia) Berhad has developed Internal Audit Procedure (Doc. No.: SQD/SMS/3.2, Issue No.: 1, Rev. No.: 0 dated 01/08/2020) where the objective is to ensure that the implementation of company’s RSPO, ISCC and MSPO management system is in line with the policies, procedures and other requirements. The frequency of the internal audit to be carried out is at least once within 12 months (before expiry of the certificate).</p> <p>The latest internal audit was carried out on 15/09/2021 by SQD team. There were 1 Major Non-Conformity raised under 3.8.12 as below</p> <p><u>Details of Non-Conformity</u></p> <p>Record keeping – The mill can only deliver mass balance sales from a positive stock. Positive stock can include product ordered for delivery within (3) months.</p> <p><u>Objective Evidence</u></p> <p>As per Mass balance Sustainable Product Monthly Movements report at August 2021, we found that respective POM had delivered RSPO Certified PK from negative stock. Stock RSPO Certified palm kernel as at August 2021 is 1290.97mt.</p> <p><u>Immediate Action</u></p>	Complied

		<p>Identify the quantity of oversold certified PK. Revise the projection of PK to cover the negative stock.</p> <p><u>Preventive Action Plan</u></p> <p>Long term projection and monitoring template is established.</p>	
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>When FFB delivered to the mill from the estate, the transporters presented FFB despatch report to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the FFB despatch report is as follows:</p> <p>Diversion Crop</p> <p><u>Estate's Names: Rem Estate</u></p> <ul style="list-style-type: none"> • FFB despatch no.: DB A No. 6366 • Date of delivery: 19/09/2021 • Field No: P10, P13, P88, P04A & P14 • Lorry No: JKH 8185 • Weight: 19.180 Mt • Traceability Identification: RSPO certified FFB (RSPO 642392) <p><u>Estate's Names: Sungai Papan Estate</u></p> <ul style="list-style-type: none"> • FFB Despatch No: DB A No. 100614 • Date of delivery: 18/07/2021 • Field No: Field P10, P03, P09A • Lorry no: JSP 3312 • Weight: 36.24 Mt • Traceability Identification: RSPO certified FFB (RSPO 612392) 	Complied
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</p>	<p>Sedenak POM ensured the required information is available in document form. Sampled of CPO contract: CPOMB-M2018 dated 07/12/2020, quantity 500 mt (delivery month – September 2021)</p>	Complied

	<p>information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> a. The name and address of the buyer: XXX b. The name and address of the seller: Mahamurni Plantations Sdn Bhd c. The loading or shipment / delivery date: 29/09/2021 d. The date on which the documents were issued: 29/09/2021 e. RSPO certificate number: RSPO 537873 f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPO (Mass Balance) g. The quantity of the products delivered: 34.99 Mt h. Any related transport documentation: Collection Order (No. 13078), Loading Note, MPOB L3 Form. i. A unique identification number: Weighbridge Ticket Number – C32096 <p>Sedenak POM ensured the required information is available in document form. Sampled of PK contract: MPOK 2065MB dated 09/09/2020, Quantity 1000 mt (delivery month – June 2021)</p> <ul style="list-style-type: none"> a. The name and address of the buyer: XXX b. The name and address of the seller: Mahamurni Plantations Sdn Bhd c. The loading or shipment / delivery date: 30/06/2021 d. The date on which the documents were issued: 30/06/2021 e. RSPO certificate number: RSPO 537873 	
--	---	---	--

		<ul style="list-style-type: none"> f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPK (Mass Balance) g. The quantity of the products delivered: 31.15 Mt h. Any related transport documentation: Collection Order (No. 8380160018909) and Loading Note. i. A unique identification number: Weighbridge Ticket Number – K08959 	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>iii) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>iv) The mill shall ensure the following:</p> <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective 	<p>No CPO and PK process, bulking facilities outsourced by the mill. Transporter for PK was assigned by buyer. For CPO, contract agreement with contractor, Mirzafiz Sdn Bhd (Contract Number: MPSB/CPO 1/2020 (MIRZAFIZ) was made available for review, effective from 05/10/2020</p> <p>In the addendum under contract, 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 was available.</p> <p>Training on SCCS was given to outsourcing activities (transporters) during meeting stakeholder dated 27/10/2021.</p>	<p>Complied</p>

	operations, systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of all contractors used for the physical handling of CSPO listed under stakeholder list 2021.	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.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. 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. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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. 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. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three 	<p>The retention period for traceability records are 5 years as per the procedure of Control of Record (Doc. No.: SQD/SMS/3.4 dated 20/09/2019, Rev. No.: 0).</p> <p>Verified the records such as internal audit report, mass balance sheets, training records and management review meeting minutes are accurate, complete, up-to-date and accessible.</p> <p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Computerized system, DOMAIN in place to maintain the records.</p> <p>Mass balance sheet named Sustainable Products Monthly Movements Summary Report for 2020 and 2021 are reviewed. All the certified CPO and PK products sold were deducted from the accounting system.</p>	Complied

	(3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Not Applicable
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Not applicable as Sedenak POM is opted for Mass Balance module.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>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>Sampled the shipping announcement as below:</p> <ol style="list-style-type: none"> Transaction ID: TR-c9a9bf21-e304, last delivery on 03/11/2021, created on 23/11/2021 and confirmed on 26/11/2021 Transaction ID: TR-8ba5046d-0397, last delivery on 23/09/2021, created on 12/10/2021 and confirmed on 09/11/2021 Transaction ID: TR-3ebb1a0a-6adc, last delivery on 18/08/2021, created on 26/08/2021 and confirmed on 26/08/2021 <p>All the announcements were made within 3 months.</p>	Complied
3.8.17	Claims	Kulim (M) Berhad has obtained RSPO trademark license with license number: 1-0080-09-100-00 which valid until 12/08/2023.	Complied

	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.	The management is aware of the requirements of the usage of RSPO trademark logo.	
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2019 without the use of trademark logo.	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) 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.	Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2019 without the use of trademark logo.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The company does not make any statement that may misleading to the consumers to believe that RSPO membership by itself implies that selling of RSPO-certified oil palm products by verified through the website.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	The communication that made via website is consistent, clear and does not mislead the consumer and stakeholders as to the certified content of oil palm products in their own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.	Complied

Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Mass Balance) was stamped on the tickets.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (Mass Balance) with RSPO certificate number: RSPO 537837.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Sedenak Palm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made by Sedenak POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made by Sedenak POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Sedenak POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made by Sedenak POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Sedenak POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made by Sedenak POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made by Sedenak POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to	No business to consumer communication on product specific claim made by Sedenak POM and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

	<p>ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Sedenak POM is producing crude palm product and does not involved in any labelling of end-product.</p>	<p>Not Applicable</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Sedenak POM is producing crude palm product and does not involved in any labelling of end-product.</p>	<p>Not Applicable</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. 	<p>Sedenak POM is producing crude palm product and does not involved in any labelling of end-product.</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>Sedenak POM is producing crude palm product and does not involved in any labelling of end-product.</p>	<p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and	Kulim (M) Berhad has developed Sustainability Policy dated 01/10/2021 where Kulim will respect, support and protect	Complied

	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. - Critical (Major) compliance -	international human rights against violence, threats, all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and peoples which includes Environmental Human Rights Defenders, whistle-blowers, complainants and community spokesperson. Briefing of the policy was conducted on 22/11/2021 in Sedenak POM and 07/11/2021 in Ulu Tiram Estate to the workers.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Kulim (M) Berhad ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. 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 whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Kulim (M) Berhad has developed Sustainability Policy dated 01/10/2021 where KULIM will respect, support and protect international human rights against violence, threats, all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and peoples which includes Environmental Human Rights Defenders, whistle-blowers, complainants and community spokesperson.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Kulim (M) Berhad has developed Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 to ensure Kulim has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. Dispute resolution mechanisms are established through open and consensual agreements with affected parties. Procedure has outlined the process of complaint management. The timeline to resolve the grievances is clearly stated in the procedure which is	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>within 26 days for internal employees and 21 days for other stakeholders.</p> <p>Besides, KULIM has developed Grievance Policy dated 01/05/2018 to ensure that there is a transparent process for ensuring stakeholder's grievances and complaints are dealt with fairly, consistently and promptly. Briefing of the policy was conducted on 27/10/2021 to external stakeholders during stakeholder meeting for Sedenak Complex.</p> <p>Whistleblowing channels were available in the company's website, http://www.kulim.com.my/whistleblowing.aspx?p_Id=19&c_Id=2201 and Code of Business Ethics (COBE), edition August 2021. The workers have been briefed on the procedure on 24/01/2021 in Kuala Kabong Estate, 22/11/2021 in Sedenak POM, 10/11/2021 in Ulu Tiram Estate and 18/10/2021 in Sedenak Estate.</p>	
4.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Basir Ismail Estate has implemented Enquiry Register book and Housing Defect Report form to record any complaints from all the stakeholders. Sampled one of the complaints lodged on 14/06/2021 at Staff House for broken water closet and mosquitoes netting. The management has replaced the new water closet and netting on 17/06/2021. Seen the photo evident of replacement done.</p> <p>Kuala Kabong Estate has implemented Housing Defect Logbook to record any housing defect from workers. Sampled the complaint for House No.: LQ 6 on 03/06/2021 for broken doorknob and door frame. The management has purchased the doorknob and seen the Delivery Order# 01070 dated 10/06/2021. The complainant has acknowledged after action taken.</p> <p>Mill has implemented Housing Defect Complaint Form to record any issues related to housing repair and Enquiry Register Book for</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>external complaint. There was no external complaint received since last audit. Sample the housing defect complaint as below:</p> <ol style="list-style-type: none"> House No.: 47 dated 11/09/2021 Issue: Plug point in the kitchen was broken. Status: The management has ordered the items to keep stock and seen the DO# 74137 dated 09/09/2021. The management has arranged technician to repair on 13/09/2021 and complainant has acknowledged after issue resolved. <p>Ulu Tiram Estate has implemented Housing Defect Logbook to record any housing defect from workers and Enquiry Register Book to record any issues from external stakeholders. Sampled the complaint for House No.: 20/91 on 29/01/2021 for leakage of roof. The management has repaired with a zinc roof on 30/01/2021. The complainant has acknowledged after action taken on 31/01/2021.</p> <p>Sedenak Estate has implemented Housing Defect Logbook to record any housing defect from workers and Enquiry Register Book to record any issues from external stakeholders. Sampled the complaint for House No.: 21 dated 23/11/2021 for blockage of toilet and broken flooring in toilet. Seen the invoice# 1617 dated 26/11/2021 where the contractor has repaired the defects.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>KULIM has developed Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 where they have outlined the mechanism where consideration will be given to involve independent legal, technical advice and third parties mediator, such as disinterested community group, NGOs, or government to support the complainants and/ or act as observer to facilitate smallholder</p>	Complied

		schemes and communities and others as appropriate in these communications where practicable.	
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 -	<p>Management of Basir Ismail Estate has made contribution to the local communities upon request such as donation to the events of school and IPD Kota Tinggi. Seen the petty cash vouchers for the donation made on April 2021 and responded to the stakeholders. Food baskets were provided to the workers and the family who under Covid-19 quarantine. Seen the payment voucher# 21000882 dated 29/10/2021 and receipt of purchase of foods.</p> <p>Contribution to the local communities was provided upon request by the communities. Seen the records of contribution such as donation to the neighbouring village for the activity organized by the community in Kuala Kabong Estate. Seen the petty cash voucher# 21000024 dated 22/04/2021. Besides, donation of foods to the Covid-19 patient who underwent self-quarantine in the house. Records of purchase of foods were sighted. All the donations made were recorded in the Enquiry Register Record Book. Besides, the management has engaged transporter to send the children to school.</p> <p>Mill management has made contribution to local communities upon request from the communities. For eg: donation to the school for upgrading mosque, upgrading classroom and support for school events. Records of petty cash voucher were sighted. Food baskets were provided to the workers during the closure of mill due to outbreak of Covid-19.</p>	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free,	Total of 28 land titles available in Basir Ismail Estate and sampled the land titles as below:	Complied

	<p>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>	<ol style="list-style-type: none"> 1. Title No.: 22664; Total Area: 1,061.4888 ha; Lot No.: Lot 1419 2. Title No.: 105258; Total Area: 217.8217 ha; Lot No.: Lot 806 <p>There is only 1 land title available in Kuala Kabong Estate and seen the record of payment of quit rent for Y2021 made on 28/04/2021. Seen the land title# 71140, Lot No.: PTD 35021 with total 1,718.2174 hectares.</p> <p>Sedenak POM is located on the land of Sedenak Estate under Land Title# 237961, Lot 136. A copy of the land title was kept in the mill.</p> <p>Total of 10 land titles available in Ulu Tiram Estate and sampled the land titles as below:</p> <ol style="list-style-type: none"> 1. Title No.: 354254; Total Area: 101.058 ha; Lot No.: PTD 105774 2. Title No.: 354243; Total Area: 115.844 ha; Lot No.: PTD 105763 <p>Total of 10 land titles available in Sedenak Estate and sampled the land titles as below:</p> <ol style="list-style-type: none"> 1. Title No.: 354796; Total Area: 1,225.3881 ha; Lot No.: Lot 817 2. Title No.: 237392; Total Area: 21.4357 ha; Lot No.: Lot 964 <p>Kulim (M) Berhad has legal ownership on the lands as verified in the land titles.</p>	
--	---	--	--

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.2b	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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.2c	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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.3	(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 -	Basir Ismail Estate has maintained boundary stone map (Survey Date: 15/01/2018) with total 88 boundary stones were identified. Monthly monitoring of the boundary stones was conducted by using Boundary Stone Maintenance Checklist. Kuala Kabong Estate has maintained boundary stone map (Survey Date: 22/10/2017) with total 100 boundary stones were identified	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		and Ulu Tiram Estate has identified 190 boundary pegs (Survey Date: 17/12/2020). Weekly monitoring of the boundary stones was conducted by Field Staff using Boundary Stone Monitoring Report in Kuala Kabong Estate. Seen the records of monitoring from October 2020 to October 2021. Boundary stones and pegs were available to demarcate the boundary and this has confirmed by interviewed with the community and verified through site visit.	
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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.5	(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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable

4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable

4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Kulim (M) Berhad has developed Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Kulim (M) Berhad has developed Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.	Complied

		There was no dispute that involved compensation in Sedenak Complex.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	There were no scheme smallholders attached with Sedenak Complex.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There was no dispute that involved compensation in Sedenak Complex.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	KULIM (M) Berhad has developed Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Kulim (M) Berhad has developed Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.	Complied

4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There was no community that have lost access and rights to land for plantation since there was no expansion by the company during the time of audit. However, the company has provided job opportunity to the local communities as this has verified through the master list of employees.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied

4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and past FFB prices available in the mill as per MPOB guideline. The mill has displayed the FFB pricing from January to October 20121 at the weighbridge area. The pricing was according to MPOB set price. Grading guideline according to MPOB was publicly displayed at the weighbridge area.	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 -	FFB pricing to smallholders/dealers explained to individual smallholders during contract signing on annual basis. - FFB price calculation based on monthly average price of CPO and PK for peninsular Malaysia declared by MPOB. - Processing charges – based on tonnage supplied. - Extraction rates – basic of OER	Complied
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 -	Pricing of FFB is based on MPOB latest price and it was publicly available at weighbridge. No bidding contract between mill and supplier and they are free to send their crop to other mill or collection centre.	Complied
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	No binding contract between mill and FFB suppliers that includes finance, loans/credit and repayments through FFB price reductions for replanting and or other mechanisms at Sedenak POM. Thus, this indicator is not available.	Complied

	<p>repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>		
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts sighted were between Sedenak POM and FFB Supplier, both were available for verification. Based on the review of the contract, all the terms contained therein are fair, legal, transparent and with an agreed timeframe. Sampled the Contract for Purchase of FFB as below.</p> <ol style="list-style-type: none"> 1. Hong Hui Trading Sdn Bhd; Date 30/12/2020; Agreement validity Period: 01/01/2021 – 31/12/2021. 2. Che Yu Trading Sdn Bhd; Date 30/12/2020; Agreement validity Period: 01/01/2021 – 31/12/2021. 3. Az Iman Resources Sdn Bhd; Date 30/12/2020; Agreement validity Period: 01/01/2021 – 31/12/2021. 	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>As refer to the agreement, under Clause 3, "Monthly payments shall be made in three (3) instalments. The first instalment payment being made on or before 15th of the month in payment of FFB delivered in the first 10 days of the same month at a price per tonne based on 80% of the previous month's price calculated in accordance with the agreement...." Verified the payment records of FFB suppliers found the payment was not made within the agreed period as per the agreement of Purchase of FFB. Records of payment vouchers, payment memo and transaction record as below:</p> <ol style="list-style-type: none"> 1. Payment Memo dated 15/11/2021; Payment Voucher# PV2102130 dated 18/11/2021 for first payment; Transaction No.: 202111170110230613 dated 18/11/2021. 	Non-compliance

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>2. Payment Memo dated 15/11/2021; Payment Voucher# PV2102142 dated 18/11/2021 for first payment; Transaction No.: 202111170110230613 dated 18/11/2021.</p> <p>FFB suppliers have informed during stakeholder consultation that the payment was late in the past four months and they have brought this matter to the Head Office. However, the issue has yet to be resolved. Thus, NC raised under this indicator.</p>																						
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Records of weighing equipment stamping was maintained on annual basis at visited operating units even though there is no smallholder within Sedenak certification unit. Summary of stamping records as follows:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Weighbridge A</th> <th>Weighbridge B</th> </tr> </thead> <tbody> <tr> <td>Date of Calibration</td> <td>09/08/2021</td> <td>08/02/2021</td> </tr> <tr> <td>Serial Number</td> <td>S42051</td> <td>B217745</td> </tr> <tr> <td>Safety Label Number</td> <td>2.1K Q 024883</td> <td>2.1KQ 024712</td> </tr> <tr> <td>Invoice Number</td> <td>B 1913058</td> <td>B 1834915</td> </tr> <tr> <td>Description</td> <td>70, 000 kg</td> <td>70, 000 kg</td> </tr> <tr> <td>Calibration Department</td> <td>Metrology Corporation Malaysia Sdn Bhd</td> <td>Metrology Corporation Malaysia Sdn Bhd</td> </tr> </tbody> </table>	Description	Weighbridge A	Weighbridge B	Date of Calibration	09/08/2021	08/02/2021	Serial Number	S42051	B217745	Safety Label Number	2.1K Q 024883	2.1KQ 024712	Invoice Number	B 1913058	B 1834915	Description	70, 000 kg	70, 000 kg	Calibration Department	Metrology Corporation Malaysia Sdn Bhd	Metrology Corporation Malaysia Sdn Bhd	Complied
Description	Weighbridge A	Weighbridge B																						
Date of Calibration	09/08/2021	08/02/2021																						
Serial Number	S42051	B217745																						
Safety Label Number	2.1K Q 024883	2.1KQ 024712																						
Invoice Number	B 1913058	B 1834915																						
Description	70, 000 kg	70, 000 kg																						
Calibration Department	Metrology Corporation Malaysia Sdn Bhd	Metrology Corporation Malaysia Sdn Bhd																						
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p>	<p>No independent smallholder at Sedenak Business Unit.</p>	Not Applicable																					

	- Minor compliance -		
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>An agreed and documented system which deals with complaints and grievances are available and documented as follows:</p> <p>a. Grievance Policy dated 1 May 2018. This Policy commits to a transparent process ensuring stakeholder’s grievances and complaints are dealt with fairly, consistently and promptly.</p> <p>b. Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020. This SOP is applicable to all parties who deal with the Company who may have complaints and grievances.</p> <p>The grievance mechanism that has been established is applicable to all parties, including smallholders.</p>	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>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.</p> <p>- Minor compliance -</p>	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable
5.2.2	<p>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).</p> <p>- Minor compliance -</p>	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable

5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The mill received no crop from smallholders. The outside crop suppliers being invited in the stakeholders meetings and briefing cum training are made in these sessions. Details as per minutes of meeting with the stakeholders dated 01/04/2021.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 01/10/2021 where the company will not engage in nor support discrimination in any form. Briefing of the policy was conducted on 11/08/2021 to the workers in Kuala Kabong Estate and 22/11/2021 in Sedenak POM. The policy was displayed at the notice board outside the office. Interviewed with the workers confirmed that the management treated all the workers equally. Overtime was offered to anyone who is willing to work without forcing them and they are given freedom to association.	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 -	The process of recruitment and promotion based on individual qualification and performance regardless of religion, race, age, gender, nationality or physical disability. Interviewed with the workers from different nationalities and gender confirmed that no discrimination happened in the company. The management treated all equally and provide equal opportunity for promotion based on capabilities. There was no recruitment fee being paid by the workers during the time of audit as there was no recruitment of foreign workers since last audit.	Complied

6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The process of recruitment and promotion based on individual qualification and performance regardless of religion, race, age, gender, nationality or physical disability. Interviewed with the workers from different nationalities and gender confirmed that no discrimination happened in the company. The management treated all equally and provide equal opportunity for promotion based on capabilities.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Interviewed with the female workers confirmed that no pregnancy testing is conducted by the company as a measure for recruitment. Seen the record of medical check-up found urine test for drug was conducted.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee was established in all the operating units and known as Women on Ward in KULIM (M) Berhad. Complaint Panel of Women was established in Kulim and contact number of the panellist was published and displayed at the notice board in all the estates.</p> <p>Meeting was conducted on 04/01/2021 where the committee is formed by the female workers and wives of the staffs/ executives in the Basir Ismail Estate. Function of the WOW and the complaint procedure of sexual harassment and violence was briefed. There was no sexual harassment case reported. During the meeting, the committee has discussed to organize short courses for the female to improve their knowledge on entrepreneurship.</p> <p>WOW committee has conducted meeting on 11/11/2021 in Kuala Kabong Estate, 14/02/2021 in Sedenak POM and 20/10/2021 in Ulu Tiram Estate. Meeting minutes was sighted. There was no case of sexual harassment and violence reported.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Reviewed on the total 55 payslips (February 2021, May 2021, June 2021 and August 2021) which consists of male and female workers</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Overtime and work on rest day were paid according to Employment Act 1955.	
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(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. - Critical (Major) compliance -	All the workers have signed on the employment contract prior to work. The contract is in their national languages. All the terms and conditions were clearly outlined in the contract and briefed to all the workers before they signed the contract during induction training. Total sampled 55 employment contracts of the checkroll workers.	Complied
6.2.2	(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. - Critical (Major) compliance -	Sampled total 55 employment contracts and payslips February 2021, May 2021, June 2021 and August 2021). It has clearly stated that the payment and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, reasons for dismissal, period of notice) in the employment contract.	Complied
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. - Critical (Major) compliance -	Verified the checkroll workers' payslips confirmed that the workers were paid according to the Employment Act 1955 and Minimum Wage Order 2020. Deduction of wages was made as per approval from Labour Department.	Complied
6.2.4	(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	Linesite inspection was carried out Estate Hospital Assistant on weekly basis in Basir Ismail Estate, Kuala Kabong Estate, Sedenak POM and Ulu Tiram Estate by using the Linesite/ Building Inspection	Complied

	<p>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>Checklist. Reviewed the records of inspection from October 2020 to October 2021. Any issue sighted during the inspection was recorded in the checklist with action taken. Seen the evidence of action taken to resolve the issue. The inspection will be verified by Assistant Manager and Senior Manager.</p> <p>Water and electricity were supplied by government and subsidized by the management to the workers for 50 units per worker. Clinic was available in the estates and the workers were provided with free medical facilities. For POM, the water and electricity was supplied free of charge to the workers as they are using genset and own water treatment.</p>																						
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where sundry shops are available inside the estates. The management has monitor the foods pricing in the sundry shop on quarterly basis.</p>	<p>Complied</p>																					
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p>	<p>Kulim (M) Berhad has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages as below:</p> <table border="1" data-bbox="1137 995 1890 1378"> <thead> <tr> <th>Operating Unit</th> <th>In-kind benefit</th> <th>Cost</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Basir Ismail Estate</td> <td>Electricity & water</td> <td>RM 43.52</td> </tr> <tr> <td>Healthcare</td> <td>RM 68.60</td> </tr> <tr> <td rowspan="2">Kuala Kabong Estate</td> <td>Electricity & water</td> <td>RM 95.55</td> </tr> <tr> <td>Healthcare</td> <td>RM 35.13</td> </tr> <tr> <td rowspan="2">Sedenak POM</td> <td>Electricity & water</td> <td>RM 98.33</td> </tr> <tr> <td>Healthcare</td> <td>RM 78.58</td> </tr> <tr> <td>Ulu Tiram Estate</td> <td>Electricity & water</td> <td>RM 129.89</td> </tr> </tbody> </table>	Operating Unit	In-kind benefit	Cost	Basir Ismail Estate	Electricity & water	RM 43.52	Healthcare	RM 68.60	Kuala Kabong Estate	Electricity & water	RM 95.55	Healthcare	RM 35.13	Sedenak POM	Electricity & water	RM 98.33	Healthcare	RM 78.58	Ulu Tiram Estate	Electricity & water	RM 129.89	<p>Complied</p>
Operating Unit	In-kind benefit	Cost																						
Basir Ismail Estate	Electricity & water	RM 43.52																						
	Healthcare	RM 68.60																						
Kuala Kabong Estate	Electricity & water	RM 95.55																						
	Healthcare	RM 35.13																						
Sedenak POM	Electricity & water	RM 98.33																						
	Healthcare	RM 78.58																						
Ulu Tiram Estate	Electricity & water	RM 129.89																						

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<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>	<table border="1" data-bbox="1137 363 1890 512"> <tr> <td></td> <td>Healthcare</td> <td>RM 171.01</td> </tr> <tr> <td rowspan="2">Sedenak Estate</td> <td>Electricity & water</td> <td>RM 40.24</td> </tr> <tr> <td>Healthcare</td> <td>RM 75.79</td> </tr> </table> <p>The prevailing wages is more than the Minimum Wage Order 2020.</p>		Healthcare	RM 171.01	Sedenak Estate	Electricity & water	RM 40.24	Healthcare	RM 75.79	
	Healthcare	RM 171.01									
Sedenak Estate	Electricity & water	RM 40.24									
	Healthcare	RM 75.79									
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>All the core works are performed by permanent and full-time employees in Sedenak Complex. There were contractors’ workers employed for harvesting and transporting FFB in the estates</p>	Complied								

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	- Minor compliance -	permanently. There were no casual or temporary workers used in the company.	
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 01/10/2021 where the company recognized and respected the rights of employees to form and/ or join trade unions of their choice which are given due recognition by KULIM. The policy was in bi-lingual which is Bahasa Malaysia and English. Briefing of the policy was conducted on 11/08/2021 to the workers in Kuala Kabong Estate and 22/11/2021 in Sedenak POM. Interviewed with the workers confirmed that they are allowing to join any workers' association freely such as NUPW.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Basir Ismail Estate has established NUPW committee and meeting was conducted which involved the participation of NUPW representatives and management representative. The last meeting was conducted on 22/09/2021 and meeting minutes was sighted. There were issues raised during the meeting and the management has taken action to resolve it. Verified the evidence of action taken for the construction of fencing in mosque area.</p> <p>The last NUPW meeting was conducted on 22/11/2021 in Kuala Kabong Estate, 10/01/2021 in Sedenak POM, 17/01/2021 in Ulu Tiram Estate and 21/10/2021 in Sedenak Estate. Issues raised during the meeting in Kuala Kabong Estate was incorporated into action plan with proposed action taken and status. The management is in progress to take action to resolve the issue. There was no issue reported by the representatives from Sedenak POM. Issues raised in Ulu Tiram Estate was resolved with evidence sighted.</p>	Complied

6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>The representatives of NUPW were elected by all workers and seen the record of election dated 08/01/2019 in Basir Ismail Estate and 14/05/2019 in Sedenak Estate. Interviewed with the workers confirmed that the election of the representatives was elected freely by the workers without any interference of management. They are aware of their own representative.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 01/10/2021 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. Briefing of the policy was conducted on 13/06/2021 to the workers in Kuala Kabong Estate and 22/11/2021 in Sedenak POM.</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>KULIM (M) Berhad has developed procedures for Recruitment of Local Workers for Operating Units last updated on 01/10/2020 and Recruitment of New Foreign Workers last updated on 01/01/2019, Rev. No.: 1 where age verification will be part of the process during the recruitment process. As verified, a copy of identification card of local workers was obtained to ensure they meet the minimum age of employment. Document verified the master list of the workers confirmed that the minimum age of workers employed are above 18 years.</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 young person employed by the company as their minimum age was 18 years old. This has verified with the Master List and through interviewed with the stakeholders.</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</p>	<p>The policy has been briefed to the stakeholders during stakeholder meeting conducted on 27/10/2021 in Sedenak Complex.</p>	Complied

	<p>protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Interviewed with the contractors and workers confirmed that there was no child labour employed in the company.</p>	
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>KULIM (Malaysia) Berhad has developed Sexual Harassment Policy dated 01/05/2018 where the company seeks to eradicate all forms of sexual harassment in the workplace and wherever possible influence the behavior of its employees. KULIM has a zero tolerance on sexual harassment. Besides, the company has established Core Labour Standard Policy dated 01/10/2021 where the company recognized and respects the right of employees of their rights and freedoms relating to reproduction and reproductive health. Briefing of the policy to workers was conducted on 17/06/2021 in Kuala Kabong Estate and 22/11/2021 in Sedenak POM. The policy was displayed at the notice board at the muster ground.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 01/10/2021 where the company recognized and respects the right of employees of their rights and freedoms relating to reproduction and reproductive health. Briefing of the policy to workers was conducted on 17/06/2021 in Kuala Kabong Estate and 22/11/2021 in Sedenak POM. The policy was displayed at the notice board at the muster ground.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>There was no new mother identified in Basir Ismail Estate and Ulu Tiram Estate. However, the female workers were briefed on the new mother needs during the WOW meeting conducted on 04/01/2021 and 20/10/2021 respectively.</p> <p>There were one new mother in Kuala Kabong Estate, two new mothers identified in Sedenak POM and one new mother in Sedenak Estate. The assessment of the new mother needs was conducted</p>	Complied

		on 29/11/2021, 14/10/2021 and 30/08.2021 and records of assessment were sighted. Interviewed with the new mothers confirmed that the assessment was conducted to consult their needs as new mother.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	Kulim (M) Berhad has established Panel Complaint for WOW in all the operating units as a grievance mechanism to make complaint related to sexual harassment and violence. However, during interview with the workers in Kuala Kabong Estate, it was found that they do not understand the process to make complaints when sexual harassment case has happened. Thus, NC raised under this indicator.	Non-compliance
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <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 - Critical (Major) compliance -	Interviewed with the workers confirmed that no forced and trafficked labour in Sedenak Complex. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They kept their passport in the office for safety purpose and have given consent to the management to sign. They can access to their passport anytime. The workers are entered to overtime voluntarily. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed. They also allowed to move freely without any restriction. No recruitment fee was paid at home country. They only paid the statutory fee such as passport, medical fee and transportations in home country. Interviewed with the workers who return to Malaysia since outbreak of Covid-19 found that all the expenses were absorbed by the company.	Complied
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Kulim (Malaysia) Berhad has developed Employee Handbook dated 01/09/2018 and Core Labour Standard Policy dated 01/10/2021. Besides, a Work Contract issued by Consulate Indonesia was signed	Complied

	<p>- Critical (Major) compliance -</p>	<p>by the workers prior to Malaysia. All the documents above have included the following terms:</p> <ul style="list-style-type: none"> a) No forced labour and no contract substitution for all the employees. b) Provide the appropriate trainings to each of the employees. c) The company will provide and ensure the facilities at least be at par with the minimum statutory requirements. d) The company will not engage in nor support discrimination in any form. e) Recruitment agencies are prohibited from charging candidates for recruitment fees and other expenses. <p>The company has implemented all the terms such as provide free and decent living condition to workers, induction training to workers, no discrimination and no contract substitution verified through interviewed with the workers.</p> <p>Interviewed with the workers confirmed no contract substitution occurred during their recruitment. All the terms and conditions are identical as they have been promised in home country. They were provided with housing facilities and it is well maintained by the company. They informed that the management treated equally among of them.</p>	
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>The General Manager/ Senior Manager/ manager/ Deputy Manager/ Assistant In-Charge/ Acting manager of the respective Operating Units are appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter dated</p>	<p>Complied</p>

	<p>- Critical (Major) compliance -</p>	<p>15/09/2021 undersigned by the Chairman, ESG Committee Occupational Safety and Health Main Committee Kulim (M) Berhad.</p> <p><u>Sedenak POM</u></p> <p>OSHA safety meetings were conducted at an interval of 3 months at the mill to address all the OSH related issues. Sighted the meeting minutes dated 27/09/2021 (03/2021), 24/06/2021 (02/2021), 26/03/2021 (01/2021).</p> <p><u>Sedenak Estate</u></p> <p>OSHA safety meetings were conducted at an interval of 3 months at the mill to address all the OSH related issues. Sighted the meeting minutes dated 21/09/2021 (03/2021), 09/09/2021(02/2021) and 24/03/2021 (01/2021).</p> <p><u>Kuala Kabong Estate</u></p> <p>OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 27/05/2021 (02/2021), 25/02/2021 (01/2021), 29/08/2021 (03/2021).</p> <p><u>Ulu Tiram Estate</u></p> <p>OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 14/10/2021, 25/08/2021 (Online) and 28/04/2021.</p> <p><u>Basir Ismail Estate</u></p> <p>OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the</p>	
--	--	---	--

		meeting minutes dated 06/09/2021 (03/2021), 05/05/2021 (02/2021) and 12/01/2021 (01/2021).	
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>Emergency Procedures and Safe Working Procedures were available at the office, workshops and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies.</p> <ul style="list-style-type: none"> - Fire Drill and Fire Prevention Training was conducted for 150 workers at Sedenak POM on 01/07/2021. - Fire Drill Training was conducted at Sedenak Estate on 11/01/2021. - Fire Drill Training was conducted on 26.03.2021. at Basir Ismail Estate. - Emergency Response Plan & CPR Training was done on 03/02/2021 at Kuala Kabong Estate. - Fire Drill Training and Use of Fire Extinguisher was conducted on 10/11/2021 at Kuala Kabong Estate. - Fire Drill Training & Use of Fire Extinguisher Training was conducted at Ulu Tiram Estate on 17/10/2021 <p>First Aid Kits were available at all sampled work units Spraying Gang, Harvesting Gang, Workshop, Boiler Station and Chemical Store. The first aid kits were well equipped with first aid items as stated in the list. All items were seen to be replenished at monitored regularly as per the monitoring checklist. The First Aid Kit holders were aware on how to use the items in case of an emergency.</p>	Complied

**RSPO P&C Public Summary Report
Revision 12 (Jun 2021)**

		<ul style="list-style-type: none"> - First Aid Training was conducted for 13 first aid kit holders on 11/08/2021 at Sedenak POM. - First Aid Training was conducted on 14.11.2021 for the relevant first aid kit holders. at Basir Ismail Estate. - First Aid Training was conducted on 03/02/2021 at Kuala Kabong Estate. - First Aid Training was conducted on 21/10/2021 at Ulu Tiram Estate. - First Aid Training was conducted at Sedenak Estate on 11/01/2021. <p><u>Sedenak POM</u></p> <p>Accident records were maintained and updated on a monthly basis at the mill. There were 1 electric shock case resulting in death at the mill for the year 2020. The accident investigation have been conducted accordingly and the JKPP 6 forms have been submitted to DOSH and available for verification. The JKPP 8 form have been submitted for the year ending 2020 on 19/01/2021. As for 2021 to date there were 2 accident cases in the mill. The JKPP 6 forms have been submitted to DOSH accordingly.</p> <p><u>Sedenak Estate</u></p> <p>There were 20 accident cases reported for the year 2020 which includes 2 major cases exceeding 4 days LTA. The JKPP 6 Forms have been submitted to DOSH accordingly. The JKPP 8 Form for the year ending 2020 have been submitted to DOSH on 11/01/2021 and available for verification. There were 3 major accidents reported for</p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>the year 2021. The JKKP 6 Forms have been submitted to DOSH and available for verification.</p> <p><u>Kuala Kabong Estate</u></p> <p>Accident records were maintained and updated on a monthly basis at the estate. There was a total of 17 cases reported for the year 2020 including 1 death case. The JKKP 6 Forms was submitted to DOSH accordingly. The summary of accident incidences for 2020 were reported in the JKKP 8 Form and submitted to DOSH on 14/01/2021. There were 13 accident case reported for the year 2021 as of to date in the estate. The related JKKP 6 forms have been submitted to DOSH and available for verification.</p> <p><u>Ulu Tiram Estate</u></p> <p>Accident records were maintained and updated on a monthly basis at the estate. For the year 2020 there were no accident case reported in the estate. The JKKP 8 form have been submitted to DOSH for the year ending 2020 on 31/01/2021. For the year 2021 there were no accidents reported in the estate.</p> <p><u>Basir Ismail Estate</u></p> <p>Accident records were maintained and updated on a monthly basis at the estate. There was a total of 2 cases reported for the year 2020. The JKKP 6 Form was submitted to DOSH. The summary of accident incidences for 2020 were reported in the JKKP 8 Form and submitted to DOSH on 12/01/2021. There were 1 accident case reported for the year 2021 as of to date.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>																									
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees by the organization. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for August 2021, September 2021 and October 2021 for the mill and all sampled estate as below.</p> <table border="1" data-bbox="1137 847 1928 1329"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Sedenak POM</td> <td>Aug 2021</td> <td>153</td> <td>RM 7,745.30</td> </tr> <tr> <td>Sept 2021</td> <td>151</td> <td>RM 7,817.70</td> </tr> <tr> <td>Oct 2021</td> <td>154</td> <td>RM 7,791.50</td> </tr> <tr> <td rowspan="3">Sedenak Estate</td> <td>Aug 2021</td> <td>218</td> <td>RM 8,732.10</td> </tr> <tr> <td>Sept 2021</td> <td>217</td> <td>RM 8,411.10</td> </tr> <tr> <td>Oct 2021</td> <td>218</td> <td>RM 8,636.40</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Sedenak POM	Aug 2021	153	RM 7,745.30	Sept 2021	151	RM 7,817.70	Oct 2021	154	RM 7,791.50	Sedenak Estate	Aug 2021	218	RM 8,732.10	Sept 2021	217	RM 8,411.10	Oct 2021	218	RM 8,636.40	Complied
Operating Unit	Month	Total Workers	Amount																								
Sedenak POM	Aug 2021	153	RM 7,745.30																								
	Sept 2021	151	RM 7,817.70																								
	Oct 2021	154	RM 7,791.50																								
Sedenak Estate	Aug 2021	218	RM 8,732.10																								
	Sept 2021	217	RM 8,411.10																								
	Oct 2021	218	RM 8,636.40																								

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		Kuala Kabong Estate	Aug 2021	109	RM 4,093.30		
			Sept 2021	108	RM 4,036.30		
			Oct 2021	107	RM 4,010.40		
		Ulu Tiram Estate	Aug 2021	111	RM 3,455.90		
			Sept 2021	108	RM 3,234.70		
			Oct 2021	105	RM 3,264.00		
		Basir Ismail Estate	Aug 2021	282	RM 11,250.80		
			Sept 2021	285	RM 10,538.00		
			Oct 2021	282	RM 11,134.50		
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Occupational Injuries were recorded using the Lost Time Accident metrics as below:				Complied	
		Operating Unit	2020		2021		
			Cases	Days	Cases		Days
		Sedenak POM	1	6000*	2		11
		Sedenak Estate	20	51	3	34	

		Kuala Kabong Estate	17	6027*	13	108	
		Ulu Tiram Estate	0	0	0	0	
		Basir Ismail Estate	2	51	1	3	
* Death case is categorized as loss of 6000 days.							

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

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

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM Plan has been established in the certification unit estates which includes the planting of beneficial plants and control of damage by rodents and leaf eating pest</p> <p>Beneficial plants such as Turnera subulata and Cassia cobanensis are grown in the estates and their records of planting in new areas and maintenance of existing areas of beneficial plants and location maps are available. Rat damage and leaf-eating pest census was regularly carried out to obtain information about threshold level and action to be taken thereafter. The records of census and rat baiting (averaging fruitlet damage <2%) were available for verification.</p> <p>Barn owl census conducted showed that it is inhabited. Additional owl boxes had been added, ratio ranging from 1:21 ha to 1:37 ha from one estate to another. Occupancy rate ranges from 59% - 70% among the estates visited. Inspection at one random barn owl box showed that it is inhabited with bones and bird droppings sighted on the ground at the foot of the barn owl box pole.</p>	Complied
-------	--	--	----------

7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	None of species referenced in the Global Invasive Species Database and CABI.org are used for the management of IPM in the estates visited. The estates have declared this compliance in the status of IPM species invasiveness.	Complied									
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There was no land preparation in the certification unit estates by burning ever since KMB practiced zero burning as per the policy in: a) ARM-SOP-Section A04 - Felling/Clearing & Land Preparation b) Kulim Sustainability Handbook - Pollution Management. KMB has a policy of no open burning. As advocated, the estates practiced zero burning. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	Complied									
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.												
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification of all agrochemicals is available in the Kulim Malaysia Berhad Agricultural Manual; Justification of chemical use; Table H01-2 till Table H01-6. The table states the Weed Situation, Active Ingredient, Chemical Brand Name, Product Rate/Ha and CKS Dossage/18L	Complied									
7.2.2	(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. - Critical (Major) compliance -	Records of Pesticide/Agrochemicals used in the estate were recorded and monitored on a monthly basis and available for verification. Data were sampled as below: Chemical Usage (to date October 2021) <table border="1" data-bbox="1137 1248 1930 1394"> <thead> <tr> <th>Chemical</th> <th>a.i / Ha</th> <th>LD50</th> </tr> </thead> <tbody> <tr> <td colspan="3"><u>Basir Ismail Estate</u></td> </tr> <tr> <td>Amine</td> <td>0.01651</td> <td>0.0001</td> </tr> </tbody> </table>	Chemical	a.i / Ha	LD50	<u>Basir Ismail Estate</u>			Amine	0.01651	0.0001	Complied
Chemical	a.i / Ha	LD50										
<u>Basir Ismail Estate</u>												
Amine	0.01651	0.0001										

		<table border="1"> <tbody> <tr> <td>Kenly</td> <td>0.01328</td> <td>0.0000</td> </tr> <tr> <td>Glyphosate</td> <td>0.78000</td> <td>0.0002</td> </tr> <tr> <td colspan="3"><u>Kuala Kabong Estate</u></td> </tr> <tr> <td>Amine</td> <td>0.00150</td> <td>0.0000</td> </tr> <tr> <td>Kenly</td> <td>0.01230</td> <td>0.0000</td> </tr> <tr> <td>Glyphosate</td> <td>0.33880</td> <td>0.0000</td> </tr> <tr> <td colspan="3"><u>Sedenak Estate</u></td> </tr> <tr> <td>Amine</td> <td>0.00000</td> <td>0.00000</td> </tr> <tr> <td>Kenly</td> <td>0.02010</td> <td>0.00000</td> </tr> <tr> <td>Glyphosate</td> <td>0.50110</td> <td>0.00001</td> </tr> <tr> <td colspan="3"><u>Ulu Tiram Estate</u></td> </tr> <tr> <td>Amine</td> <td>-</td> <td>-</td> </tr> <tr> <td>Kenly</td> <td>0.00713</td> <td>0.00000</td> </tr> <tr> <td>Glyphosate</td> <td>0.08855</td> <td>0.00000</td> </tr> </tbody> </table>	Kenly	0.01328	0.0000	Glyphosate	0.78000	0.0002	<u>Kuala Kabong Estate</u>			Amine	0.00150	0.0000	Kenly	0.01230	0.0000	Glyphosate	0.33880	0.0000	<u>Sedenak Estate</u>			Amine	0.00000	0.00000	Kenly	0.02010	0.00000	Glyphosate	0.50110	0.00001	<u>Ulu Tiram Estate</u>			Amine	-	-	Kenly	0.00713	0.00000	Glyphosate	0.08855	0.00000	
Kenly	0.01328	0.0000																																											
Glyphosate	0.78000	0.0002																																											
<u>Kuala Kabong Estate</u>																																													
Amine	0.00150	0.0000																																											
Kenly	0.01230	0.0000																																											
Glyphosate	0.33880	0.0000																																											
<u>Sedenak Estate</u>																																													
Amine	0.00000	0.00000																																											
Kenly	0.02010	0.00000																																											
Glyphosate	0.50110	0.00001																																											
<u>Ulu Tiram Estate</u>																																													
Amine	-	-																																											
Kenly	0.00713	0.00000																																											
Glyphosate	0.08855	0.00000																																											
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</p>	Complied																																										

7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>	Complied				
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The 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>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.</p> <p>The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>	Complied				
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <p>Sedenak Estate</p> <table border="1" data-bbox="1137 1268 1928 1391"> <tr> <td data-bbox="1146 1268 1664 1337">Chemical Handling Training</td> <td data-bbox="1673 1268 1919 1337">09/03/2021</td> </tr> <tr> <td data-bbox="1146 1343 1664 1391">Spraying Training</td> <td data-bbox="1673 1343 1919 1391">09/02/2021</td> </tr> </table>	Chemical Handling Training	09/03/2021	Spraying Training	09/02/2021	Complied
Chemical Handling Training	09/03/2021						
Spraying Training	09/02/2021						

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		Safety Work at Chemical Store	24/06/2021		
		Bukit Kabong Estate			
		Chemical Handling Training	01/01/2021		
		Safety Work at Chemical Store	12/09/2021		
		Spraying Calibration Training	12/03/2021		
		Circle and Selective Spraying Training	24/09/2021		
		Ulu Tiram Estate			
		Training	Date		
		Spraying Training	08/11/2021		
		Spraying – HCV/ Buffer Zone Area	23/11/2021		
		Safety Work at Chemical Store	20/08/2021		
		Basir Ismail Estate			
		Chemical Handling Training	31/10/2021		
		Spraying Training	02/08/2021		
		Spraying Calibration Training	31/10/2021		

7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store keeper was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste contractors.</p> <p><u>Sedenak POM</u></p> <ul style="list-style-type: none"> - 0.2742 Mt of Plastic Pesticide Containers were disposed on 29/09/2021 to Kualiti Alam Sdn. Bhd. Verified the Consignment Note Number: 2021092918VI1X5S. <p><u>Kuala Kabong Estate</u></p> <ul style="list-style-type: none"> - Triple Rinsing Training was conducted for the PIC on 04/01/2021 and 02/07/2021. - Disposal of Chemical Containers; 20 Litres: 60 units; 4 Litres: 126 Units; 500g Containers: 56 Units; Disposed Date: 21/11/2021; Disposed to SS Setia Teknologi Enterprise. <p><u>Ulu Tiram Estate</u></p> <ul style="list-style-type: none"> - Triple Rinsing Training was conducted for the PIC on 03/01/2021 at the estate premix area. 	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>- Chemical Containers were triple rinsed, punctured and stored at the store as sighted during the visit.</p> <p><u>Basir Ismail Estate</u></p> <p>Plastic Pesticide Containers - 20 Litres: 239 Units, 500 gram: 35 Units; 10kg: 20 Units; Kenlly: 168 Units; Disposal Date; 23/11/2021; Disposed to G-Planter Sdn Bhd.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>No aerial spraying for pesticide were done in all the estates</p>	<p>Complied</p>
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. There were no use of organophosphate chemicals in all the estates audited. This was verified via the Chemical Register, visit to the Chemical Store of each operating units as well as interview with the respective estate's pesticide applicators. Nevertheless, the estates conduct monthly health screening at the estate clinics by their own Medical Assistant and records were available for verification. Health surveillance are also done for the workers to identify general health conditions regularly. Records were available and verified as below:</p> <p><u>Sedenak POM</u></p> <p>Medical Surveillance conducted on 28/07/2020 for 30 workers at Wellness Centre, KPJ Bandar Dato' Onn Specialist Hospital, indicated all workers were fit for work. The latest Medical Surveillance was conducted on 08/11/2021. The results were not available yet.</p>	<p>Complied</p>

		<p><u>Ulu Tiram Estate</u> Annual Biological Monitoring was last conducted on 04/08/2020 for 5 workers exposed to chemicals. The results indicated all workers were fit for work.</p> <p><u>Basir Ismail Estate</u> Annual Medical Surveillance was conducted on 22/11/2021 for 41 workers exposed to chemicals in the estate. The results have not been obtained yet as of this assessment.</p>							
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Internal Memo verified in the estates.</p> <p>For Kulim (Malaysia) Berhad, the SOP for Agrochemical Management under Sustainable Management System; Doc Number: SQD/SMS/6.1; Doc Date: 01.08.2020 (Issue 01) states <i>"No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work."</i></p>	Complied						
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>									
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Sedenak POM and the 4 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2021 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1"> <thead> <tr> <th>Waste type</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>Empty pesticide container (SW409)</td> <td>Chemical store</td> </tr> <tr> <td>Empty pesticide packaging</td> <td>Chemical store</td> </tr> </tbody> </table>	Waste type	Source	Empty pesticide container (SW409)	Chemical store	Empty pesticide packaging	Chemical store	Complied
Waste type	Source								
Empty pesticide container (SW409)	Chemical store								
Empty pesticide packaging	Chemical store								

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		(SW409)										
		Empty Hydrocarbon containers (SW409)	Workshop									
		Batteries (SW102)	Workshop									
		Spent oil (SW305)	Workshop									
		Contaminated Rags / sacks (SW410)	Fertilizer store, Chemical store									
		Hydrocarbon / pesticide spillages (SW408)	Workshop									
		Contaminated soil (SW409)	Workshop									
		Medical Waste	Clinic									
		Effluent Discharge (Mill)	Furrow									
		POME (Mill)	Extraction of CPO									
	<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2021. The waste generated from the mill/estates operations as shown below. This CU has identified all waste products and its source of pollution and documented in Types of Waste Products and Method of Disposal. The waste identified as follows:</p>											
		<table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>SW409, SW102, SW305, SW410, SW408, SW409, SW307, SW410, SW422, SW430, SW307, SW404, SW110, SW110/109</td> </tr> <tr> <td>2</td> <td>Non-Schedule waste</td> <td>Domestic waste, Plastic, Garden waste, Kitchen waste, Scrap Iron, Empty Bags,</td> </tr> </tbody> </table>			Type of waste	Details	1	Scheduled waste	SW409, SW102, SW305, SW410, SW408, SW409, SW307, SW410, SW422, SW430, SW307, SW404, SW110, SW110/109	2	Non-Schedule waste	Domestic waste, Plastic, Garden waste, Kitchen waste, Scrap Iron, Empty Bags,
	Type of waste	Details										
1	Scheduled waste	SW409, SW102, SW305, SW410, SW408, SW409, SW307, SW410, SW422, SW430, SW307, SW404, SW110, SW110/109										
2	Non-Schedule waste	Domestic waste, Plastic, Garden waste, Kitchen waste, Scrap Iron, Empty Bags,										

		Empty Pesticide containers, palm by product, Liquid waste, Office waste, Rubber materials, POME, Black Smoke etc.	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Procedure of Schedule waste management has been established. Refer Labelling, Handling, Storage and Disposal of Schedule waste dated 18/10/2018 document number SDM/WI/5.</p> <p>Sighted Record of Inventory of Schedule Waste and Disposal Record:</p> <p><u>Basir Ismail Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: AS(B)J11/123/000/053 • Date Reporting: 27/11/2021 • Waste Generated: SW110, SW 305, SW307, SW408, SW409, SW410 <p><u>Disposal</u></p> <ul style="list-style-type: none"> • Disposal consignment note: 2021101411GQR370 • Date Disposal: 12/10/2021 • SW404 Pathogenic wastes, clinical waste or quarantined material: 0.0035 MT by Kualiti Alam Sdn Bhd <p><u>Kuala Kabong Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: AS(B)J11/123/000/178 • Inventory Number: 0109J2314852F112021 • Date Reporting: 16/11/2021 	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ul style="list-style-type: none"> Waste Generated: SW305, SW307, SW404, SW408, SW409, SW410 <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 202108091083QUVX Date Disposal: 09/08/2021 SW410 – Rags, Plastics, Papers or filters contaminated with schedule waste: 0.0240 MT by Kualiti Alam Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 20210809115MYV6H Date Disposal: 09/08/2021 SW307 – Spent Mineral oil-water emulsion: 0.0240 MT by Kualiti Alam Sdn Bhd <p><u>Sedenak POM</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: AS(B)J31/152/000/054 Date Reporting: 29/11/2021 Waste Generated: SW110, SW 305, SW429, SW409, SW410 <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 20210929076H5X1Q Date Disposal: 28/09/2021 SW 408 – Contaminated Fibre, Debris, and Soil From Cleaning Spill Of Mineral Soil: 0.0050 MT by Kualiti Alam Sdn Bhd <p>Sample 2</p>	
--	--	---	--

		<ul style="list-style-type: none"> Disposal consignment note: 2021092907J9PHR5 Date Disposal: 28/09/2021 SW 102 – Waste of lead acid batteries in whole or crushed: 0.0800 MT by Kualiti Alam Sdn Bhd <p>At the Sedenak POM the following procedures are used to identify, record, segregate and dispose wastes:</p> <ol style="list-style-type: none"> Labelling, Handling, Storage and Disposal of Scheduled Waste Doc. No. SDM/WI/5 dated 18.10.2018 Rev.01 Waste Management (Boiler Ash and Decanter Cake) Doc. No. SDM/WI/8 DATED 1.7.2007 Rev.00 Handling, Storage and Disposal of Metal waste (scrap Iron) Doc. No. SDM/WI/7 dated 1.7.2007 Rev.00 Similar to the mill, the estates use their below document: Scheduled Waste Management Guidelines issue no.1, dated 15.5.2007 *Non-Scheduled Waste Guidelines issue no.1, dated 15.5.2007 * domestic wastes and general office <p>Domestic waste for the operating units was disposed internally as follows:</p> <table border="1" data-bbox="1144 1114 1928 1311"> <thead> <tr> <th>Unit</th> <th>Disposal site</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Basir Ismail Estate</td> <td>P13/1</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Kuala Kabong Estate</td> <td>P99/2</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Ulu Tiram Estate</td> <td>P86</td> <td>Collection 2/3 x week</td> </tr> </tbody> </table>	Unit	Disposal site	Remarks	Basir Ismail Estate	P13/1	Collection 2/3 x week	Kuala Kabong Estate	P99/2	Collection 2/3 x week	Ulu Tiram Estate	P86	Collection 2/3 x week	
Unit	Disposal site	Remarks													
Basir Ismail Estate	P13/1	Collection 2/3 x week													
Kuala Kabong Estate	P99/2	Collection 2/3 x week													
Ulu Tiram Estate	P86	Collection 2/3 x week													
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Disposal for domestic and non-hazardous waste is through landfilling at designated area within estate. Segregation of non-	Complied												

		<p>degradable and degradable waste was done at site and dumping of waste only allowed for degradable waste. Verified at sampled estates as below:</p> <table border="1" data-bbox="1137 467 1928 746"> <thead> <tr> <th data-bbox="1137 467 1355 515">Estate/POM</th> <th colspan="3" data-bbox="1355 467 1928 515">Landfill</th> </tr> <tr> <td data-bbox="1137 515 1355 600"></td> <th data-bbox="1355 515 1532 600">Block No</th> <th data-bbox="1532 515 1731 600">Pit No</th> <th data-bbox="1731 515 1928 600">Date Open/Closed</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 600 1355 647">Basir Ismail</td> <td data-bbox="1355 600 1532 647">P13/1</td> <td data-bbox="1532 600 1731 647">34</td> <td data-bbox="1731 600 1928 647">26/10/2021</td> </tr> <tr> <td data-bbox="1137 647 1355 695">Kuala Kabong</td> <td data-bbox="1355 647 1532 695">P99/2</td> <td data-bbox="1532 647 1731 695">37</td> <td data-bbox="1731 647 1928 695">02/09/2021</td> </tr> <tr> <td data-bbox="1137 695 1355 746">Ulu Tiram</td> <td data-bbox="1355 695 1532 746">P86</td> <td data-bbox="1532 695 1731 746">49</td> <td data-bbox="1731 695 1928 746">29/11/2021</td> </tr> </tbody> </table>	Estate/POM	Landfill				Block No	Pit No	Date Open/Closed	Basir Ismail	P13/1	34	26/10/2021	Kuala Kabong	P99/2	37	02/09/2021	Ulu Tiram	P86	49	29/11/2021	
Estate/POM	Landfill																						
	Block No	Pit No	Date Open/Closed																				
Basir Ismail	P13/1	34	26/10/2021																				
Kuala Kabong	P99/2	37	02/09/2021																				
Ulu Tiram	P86	49	29/11/2021																				
<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.</p> <p>- Minor compliance -</p>	<p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice.</p> <p>Good agriculture practices which follows the Kulim (M) Berhad Agriculture Manual dated October 2015 amended 3 October 2019 contains Standard Operating Procedures for</p> <ul style="list-style-type: none"> a) Replanting b) Road, drains, bridges, culverts and fences c) Construction of buildings 	<p>Complied</p>																				

		<p>d) Manuring e) Harvesting f) Pruning and ablation g) Soil conservation h) Justification of chemical used i) Weeds Management j) Plant disease</p> <p>On October 2019, amended on D02 manuring: method of application, harvesting in terrace area and palm: circle and selective weeding on terrace area.</p>	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -</p>	<p>Latest foliar sampling was done by Agronomist, the analysis report from UTCL Laboratories endorsed by Registered Chemist M/292/5304/08/10 was verified. Among samples as below:</p> <p><u>Basir Ismail Estate</u></p> <ul style="list-style-type: none"> • Date of report: 07/03/2021 • Report No: FI/2021/03/36 • Date Tested: 22/02/2021 to 05/03/2021 • Remarks: Sample of Oil Palm Leaf and Rachis <p><u>Kuala Kabong Estate</u></p> <ul style="list-style-type: none"> • Date of report: 30/01/2020 • Report No: L1/2001/KK/0054-0063 • Date Tested: 12/01/2021 to 14/01/2021 • Remarks: Sample of Oil Palm Leaf and Rachis <p><u>Ulu Tiram Estate</u></p> <ul style="list-style-type: none"> • Date of report: 17/12/2020 • Report No: FI/2020/12/58 	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ul style="list-style-type: none"> • Date Tested: 03/12/2020 to 15/12/2020 • Remarks: Sample of Oil Palm Leaf <p>Latest soil sampling was done by Agronomist, the analysis report from UTCL Laboratories endorsed by Registered Chemist M/292/5304/08/10 was verified. Among samples as below:</p> <p><u>Basir Ismail Estate</u></p> <ul style="list-style-type: none"> • Date of report: 11/03/2021 • Report No: SI/2021/03/26 • Date Tested: 21/02/2021 to 10/03/2021 • Remarks: Sample of soil from P11/03 <p><u>Kuala Kabong Estate</u></p> <ul style="list-style-type: none"> • Date of report: 30/08/2021 • Report No: SI/1908/0245-0248 • Date Tested: 01/08/2019 • Remarks: Sample of soil (PA 19-19) <p><u>Ulu Tiram Estate</u></p> <ul style="list-style-type: none"> • Date of report: 23/01/2017 • Report No: SI/1701/0001-0004 • Date Tested: 03/01/2017 • Remarks: Sample of soil (15-60 CM PC) 	
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>A nutrient recycling strategy is in place. EFB application only apply at mature are with the rate of 30 – 40 tonne/ha depending on yield and soil category. EFB applied at selected field which is (P01/1-6) and (P06/1-3).</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

			Volume/Tonne applied	Hectare/ Area applied																																									
		EFB/Shredded EFB	38,125.00 MT	762.50 Ha																																									
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>The records of agronomic and fertilizer recommendation for the year 2021 by Agronomy Advisory & Services Department shown the application date, filed number, dosage applied per palm, type of fertilizer and number of applications. The programme consists of) for compound and straight fertilizer. Sample of application record for as below:</p> <p><u>Basir Ismail Estate</u></p> <table border="1"> <thead> <tr> <th>Field</th> <th>Type of Fertilizer</th> <th>Dosage, Kg</th> <th>Month Recommended</th> <th>Month Applied</th> </tr> </thead> <tbody> <tr> <td>P00</td> <td>AS</td> <td>2.50</td> <td>Feb</td> <td>March</td> </tr> <tr> <td>P03</td> <td>MOP</td> <td>2.75</td> <td>Aug</td> <td>Sept</td> </tr> <tr> <td>P04</td> <td>HGFB</td> <td>0.10</td> <td>May</td> <td>May</td> </tr> </tbody> </table> <p><u>Kuala Kabong Estate</u></p> <table border="1"> <thead> <tr> <th>Field</th> <th>Type of Fertilizer</th> <th>Dosage, Kg</th> <th>Month Recommended</th> <th>Month Applied</th> </tr> </thead> <tbody> <tr> <td>P99/2</td> <td>MOP</td> <td>1.75</td> <td>Feb</td> <td>Feb</td> </tr> <tr> <td>P00/2</td> <td>AS</td> <td>1.50</td> <td>Mar</td> <td>Mar</td> </tr> <tr> <td>P01/3</td> <td>KIE</td> <td>2.00</td> <td>June</td> <td>June</td> </tr> </tbody> </table>			Field	Type of Fertilizer	Dosage, Kg	Month Recommended	Month Applied	P00	AS	2.50	Feb	March	P03	MOP	2.75	Aug	Sept	P04	HGFB	0.10	May	May	Field	Type of Fertilizer	Dosage, Kg	Month Recommended	Month Applied	P99/2	MOP	1.75	Feb	Feb	P00/2	AS	1.50	Mar	Mar	P01/3	KIE	2.00	June	June	Complied
Field	Type of Fertilizer	Dosage, Kg	Month Recommended	Month Applied																																									
P00	AS	2.50	Feb	March																																									
P03	MOP	2.75	Aug	Sept																																									
P04	HGFB	0.10	May	May																																									
Field	Type of Fertilizer	Dosage, Kg	Month Recommended	Month Applied																																									
P99/2	MOP	1.75	Feb	Feb																																									
P00/2	AS	1.50	Mar	Mar																																									
P01/3	KIE	2.00	June	June																																									
Criterion 7.5: Practices minimise and control erosion and degradation of soils.																																													
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Soil map and topographic information, including the identification of steep terrain, marginal and fragile soils were available at all estates			Complied																																								

	<p>- Critical (Major) compliance -</p>	<p>assessed. Sighted the soil series available in the soil maps at these estates as shown below with sample of soil types:</p> <table border="1" data-bbox="1137 432 1926 1062"> <thead> <tr> <th>Estate</th> <th>Type Of Soil</th> <th>Percentage of area %</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Basir Ismail</td> <td>Kesatuan Rengam-Bungor</td> <td>45.71</td> </tr> <tr> <td>Siri Rengam</td> <td>15.23</td> </tr> <tr> <td>Siri Tok Yong</td> <td>1.57</td> </tr> <tr> <td rowspan="5">Kuala Kabong</td> <td>Gambut Dalam</td> <td>78.18</td> </tr> <tr> <td>Siri Batang Merbau</td> <td>4.20</td> </tr> <tr> <td>Siri Gajah Mati</td> <td>10.59</td> </tr> <tr> <td>Siri Rengam</td> <td>6.82</td> </tr> <tr> <td>Tanah Telah Di Ganggu</td> <td>0.21</td> </tr> <tr> <td rowspan="3">Ulu Tiram Estate</td> <td>Kesatuan Rengam-Bungor</td> <td>29.64</td> </tr> <tr> <td>Siri Beserah</td> <td>15.06</td> </tr> <tr> <td>Siri Tai Tak</td> <td>10.36</td> </tr> </tbody> </table> <p>Verified Soil Survey conducted by Agronomy Department with Data source from Semi Detailed Soil Map (DOA) 2012 dated 23/07/2017.</p>	Estate	Type Of Soil	Percentage of area %	Basir Ismail	Kesatuan Rengam-Bungor	45.71	Siri Rengam	15.23	Siri Tok Yong	1.57	Kuala Kabong	Gambut Dalam	78.18	Siri Batang Merbau	4.20	Siri Gajah Mati	10.59	Siri Rengam	6.82	Tanah Telah Di Ganggu	0.21	Ulu Tiram Estate	Kesatuan Rengam-Bungor	29.64	Siri Beserah	15.06	Siri Tai Tak	10.36	
Estate	Type Of Soil	Percentage of area %																													
Basir Ismail	Kesatuan Rengam-Bungor	45.71																													
	Siri Rengam	15.23																													
	Siri Tok Yong	1.57																													
Kuala Kabong	Gambut Dalam	78.18																													
	Siri Batang Merbau	4.20																													
	Siri Gajah Mati	10.59																													
	Siri Rengam	6.82																													
	Tanah Telah Di Ganggu	0.21																													
Ulu Tiram Estate	Kesatuan Rengam-Bungor	29.64																													
	Siri Beserah	15.06																													
	Siri Tai Tak	10.36																													
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>The estates visited in CU continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <p>a) Slope & River Protection Policy in Section A17 KMB Manual b) Buffer Zone & 25-degree slope in Section A07 KMB Manual</p>	Complied																												

		<p>c) Land Preparation for Terracing in Section A08 KMB Manual.</p> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through:</p> <ol style="list-style-type: none"> 1. Proper stacking of fronds 2. EFB application 3. Avoidance of blanket spraying 4. Construction terraces 5. Road maintenance and maintenance of soft vegetation in the interlines. <p>Cover crops were planted in the replants and in certain mature areas. The cover crop <i>Mucuna Bracteata</i> had been planted along crucial slopes by management. Large areas with <i>Neprolepis Biserrata</i> in the inter rows were sighted during the visit.</p>	
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>This compliance being addressed in the Sustainable Policy - "Slope and River Protection" signed by the Executive Director dated May 2018 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program.</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>This compliance being addressed in the Sustainable Policy - "Slope and River Protection" signed by the Executive Director dated May 2018 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program.</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>KMB Group had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.</p>	Complied

	- Minor compliance -										
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are made and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. Details as per 7.5.1 and 7.5.2.	Complied								
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. - Critical (Major) compliance -	There is no new planting sighted on peat soil at Kuala Kabong estate.	Complied								
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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). - Minor compliance -	<p>Within this CU, Kuala Kabong is the only estate that grows oil palm on peat soil. It covers 78.2% (1269 ha.) of the plantation area. The peat areas are inventoried, documented and reported to RSPO Secretariat in document title: RSPO Peat Inventory, Drainability Assessment and Revised BMP for Peat dated August 21, 2019.</p> <p>Sighted Peat Drainability Assessment Kuala Kabong Estate for Replanting 2026 and replanting 2025 has been prepared dated 26/10/2021 and 02/09/2021 respectively. Report was prepared by Agronomy Advisory Services Department, Kulim (M) Berhad. Result of assessment as below:</p> <table border="1"> <thead> <tr> <th>Peatland Zone</th> <th>Drainage limit Time (DLT)</th> <th>No Replanting Indicator (NRI)</th> <th>Status Result</th> </tr> </thead> <tbody> <tr> <td>2026 A (P00/1, P00/2, P00/3)</td> <td>53</td> <td>13</td> <td>No Issue for Replanting</td> </tr> </tbody> </table>	Peatland Zone	Drainage limit Time (DLT)	No Replanting Indicator (NRI)	Status Result	2026 A (P00/1, P00/2, P00/3)	53	13	No Issue for Replanting	Complied
Peatland Zone	Drainage limit Time (DLT)	No Replanting Indicator (NRI)	Status Result								
2026 A (P00/1, P00/2, P00/3)	53	13	No Issue for Replanting								

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<table border="1"> <tr> <td>2026 B (P00/2, P00/3)</td> <td>66</td> <td>26</td> <td>No Issue for Replanting</td> </tr> <tr> <td>2025</td> <td>78</td> <td>38</td> <td>No Issue for Replanting</td> </tr> </table>	2026 B (P00/2, P00/3)	66	26	No Issue for Replanting	2025	78	38	No Issue for Replanting	<p>The assessment result show that No Replanting Indicator, NRI>0. It means that area threshold limit has not yet been reached and can replanting.</p> <p>Training on Calculate of Drainability Assessment has been conducted on 08/10/2020 attended by 12 participant from Agronomy Department and LKK.</p> <p>Sighted evidence of Reporting of RSPO Peat Inventory, Drainability Assessment and Revised BMP for Peat; RSPO Membership Survey – 2019. Refer email corresponded between Kulim Malaysia Berhad with RSPO dated 21/08/2019 and 29/11/2021.</p>	
2026 B (P00/2, P00/3)	66	26	No Issue for Replanting									
2025	78	38	No Issue for Replanting									
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>Kulim Plantation Agricultural Manual is used and adhered to by Kuala Kabong Estate Management. In particular, the procedure A19, Monitoring of subsidence of peat soils guide the area (location), maintenance of subsidence poles installed and the monitoring regime.</p> <p>Subsidence rate data from January 2012 to date 03/11/2021 from 6 Subsidence Pole Points and graphic presentation of each pole measurement timeline vs. its subsidence rate (cm) were sighted maintained.</p> <p>Verified 2 sample of subsidence pole at SPD 2 at P02/3 and SP 4 at P01/2 were maintained and in order.</p> <p>Sighted Piezometer has been constructed at 11 points in the P00. Reading has been recorded as per November 2021. Refer</p>	Complied									

		Piezometer Census Book. Sample field observation of Piezometer at P00/4 and P00/6 found in order.	
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Water Management in peat areas was implemented accordingly as per procedure refer A18. It is used to provide extensive and effective drainage system in peat soil in order to maintain the water levels during dry period and to drain out the excess water during wet period. A typical pattern and cross sectional of Drainage Network is evident. The intensity of field drains in high water table areas starts at every eight row, fourth row and then at every alternate row of oil palm depending on the water table.</p> <p>To conserve moisture, a series of weirs are constructed across the collection drains to hold back water and raise the water-table to within 50-75 cm from the surface. Water level monitoring pole is erected in the middle of the weir. Daily water level at each weir is recorded in addition to recently installed piezometers (11) .</p> <p>The weirs sighted in the field are made of sandbags. To regulate the height of the water table, wooden planks/sandbags, acting as sluice gates, are slotted into the desired level. Except for periodic flushing of acidic water during the rainy seasons, the blocks are always maintained at the predetermined level.</p> <p>Assisted by the water gates (5 nos.) at the discharge ends of the main drains, the weirs are very effective in minimizing the adverse effects of the moisture stress.</p> <p>Records of daily water level recording at 65 weirs were conducted to monitor ground level subsidence of peat soil were evident.</p>	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two</p>	No replanting is envisaged in the next 4-5 years at Kuala Kabong estate.	Complied

	<p>cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>Nonetheless, the RSPO Drainability Manual for replanting of existing oil palm on peatlands, issue November 2019 is used.</p>	
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>Kuala Kabong Estate continued to implement Best Management Practices for oil palm cultivation on peat land much in line with RSPO requirements. Subsidence of peat soils are minimised and monitored. Documented water and ground cover management programme is in place. Also noted within the estate, Kuala Kabong has river reserve and boundary buffer zones that it conserves, maintain and rehabilitate because river reserves that are intact and functional are important habitats for biodiversity and provide ecosystem services. It also helps in:</p> <ul style="list-style-type: none"> • Water Quality Management • Flood Mitigation • Riverbank stabilization; and • Fire Protection <p>In addition, that they benefit to promote and contribute to sustainable peatland management as part of reducing the impacts of oil palm cultivation on peat.</p>	Complied
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the</p>	<p>At Kuala Kabong Estate it has set aside an unplanted area, 2.19 ha HCV near RISDA oil palm plantings. It is Peat Swamp Forest. Also, nearby there is man-made stream that function as boundary markers separating Kuala Kabong Estate with neighbours where on</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>its bank trees have been neatly planted in rows, mature and flourish in abundance of more or less same height with each other. The area is scenic, soothing to the eyes and has attracted macaque to dominate and freely roam the protected "peatland conservation area" as sighted by the auditor. This Rehabilitation of Natural Vegetation, that is, adoption by a plantation of an adjacent peat swamp forest area not only can reduce the net GHG emission profile but also can be a useful part of any GHG emission reduction strategy.</p>	
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The Sedenak CU monitors water quality of outgoing waters to identify any adverse effect from the mill and estate activities. There is no water from mill discharge to waterways. All water from ETP at mill are used for land irrigation. The plan takes into account the efficient use of resources, ensure amongst others that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent. The mill and estate water management plans have been established with the recent review made on 01/8/2020.</p> <p>Water Management Plan for Basir Ismail Estate and Kuala Kabong Estate has been established at 01/08/2021.</p> <p>Field operation covered: Spraying & Manuring, Drain Maintenance, cleaning process, Replanting and nursery, Line site.</p>	<p>Complied</p>
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. White and blue stripe marker poles were erected. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. The guidelines are detailed</p>	<p>OFI</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>in the SOP No A17: Protection of Natural of Water Course. The buffer zones established are as follows</p> <table border="1" data-bbox="1137 434 1904 798"> <thead> <tr> <th>River width (meter)</th> <th>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</th> </tr> </thead> <tbody> <tr> <td>1-5</td> <td>5</td> </tr> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>>40</td> <td>50</td> </tr> </tbody> </table> <p>All estates monitored river water entering and exiting their property. Water sampling for Nitrate Nitrogen and Phosphate was done in months when fertilisers were applied. Analysis was assigned to UTCL Laboratory, Kota Tinggi.</p> <p><u>Basir Ismail Estate</u></p> <ul style="list-style-type: none"> • Date of report: 01/10/2021 • Report No: W1/2021/10/466 • Date Tested; 27/09/2021 to 29/09/2021 • Sample point: W1-1421-Inlet Sg Redan, W1-1422-Outlet Sg Redan, W1-1423-Inlet Sg Serai, W1-1424-Outlet Sg Serai, W1-1425-Outlet Sg Air Putih <p><u>Kuala Kabong Estate</u></p> <ul style="list-style-type: none"> • Date of report: 21/10/2021 • Report No: W1/2021/09/507 • Date Tested; 18/10/2021 to 20/10/2021 	River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	5-10	10	10-20	20	20-40	40	>40	50	
River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak														
1-5	5														
5-10	10														
10-20	20														
20-40	40														
>40	50														

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ul style="list-style-type: none"> • Sample point: W1-1549-SP P99/02 In Let and W1-1550-SP P02/4 Outlet. <p><u>Ulu Tiram Estate</u></p> <ul style="list-style-type: none"> • Date of report: 21/10/2021 • Report No: W1/2021/10/497 • Date Tested; 11/10/2021 to 18/10/2021 • Sample point: W1-1505 A In let, WI-1506 B Outlet <p>For Mill, sighted Water Test Report. Refer Report Number WI/2021/08/396 dated 24/08/2021, WI/2021/09/431 dated 16/09/2021 and WI/2021/10/493 dated 12/10/2021.</p> <p>Monitoring of HCV can be further improved by ensuring no activities such as fishing is conducted in the water course located within the certification unit. Hence an opportunity for improvement was raised.</p>	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>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 regularly monitored. - Minor compliance - Effluent Analysis conducted by accredited laboratory, Mahamurni Plantations Sdn Bhd and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Refer to the latest report for dated October 2021. Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD₃, COD, TS, SS, TN,</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		AN and O&G) were tested. Latest analysis report for October, September and August 2021 were verified.													
		<table border="1"> <thead> <tr> <th>Report Date</th> <th>Report No.</th> <th>BOD (Limit=2500mg/L)</th> </tr> </thead> <tbody> <tr> <td>26/10/2021</td> <td>EI/2021/10/193</td> <td>689</td> </tr> <tr> <td>28/09/2021</td> <td>EI/2021/09/178</td> <td>468</td> </tr> <tr> <td>23/08/2021</td> <td>EI/2021/09/169</td> <td>360</td> </tr> </tbody> </table>	Report Date	Report No.	BOD (Limit=2500mg/L)	26/10/2021	EI/2021/10/193	689	28/09/2021	EI/2021/09/178	468	23/08/2021	EI/2021/09/169	360	
Report Date	Report No.	BOD (Limit=2500mg/L)													
26/10/2021	EI/2021/10/193	689													
28/09/2021	EI/2021/09/178	468													
23/08/2021	EI/2021/09/169	360													
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Sedenak POM. Average data as below:	Complied												
		<table border="1"> <thead> <tr> <th>Year</th> <th>FFB Processed</th> <th>Water/L</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>415,278.24</td> <td>408,204</td> <td>0.98</td> </tr> <tr> <td>2021@Oct</td> <td>348,703.29</td> <td>363,528</td> <td>1.04</td> </tr> </tbody> </table>	Year	FFB Processed	Water/L	Water/FFB	2020	415,278.24	408,204	0.98	2021@Oct	348,703.29	363,528	1.04	
Year	FFB Processed	Water/L	Water/FFB												
2020	415,278.24	408,204	0.98												
2021@Oct	348,703.29	363,528	1.04												
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised															
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2021. The document was reviewed/updated on August 2021. The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e. a) Infrastructure of estates,	Complied												

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

b) Community size / no of gen-sets,
 c) No. of vehicles / age of machine.
 d) Weather interference / crop production volume

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

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

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

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

Sedenak POM				
No	Month	FFB processed	Diesel/L	Diesel/FFB
1	Jan 21	28343.33	40110	1.42
2	Feb 21	18510.63	41702	2.25
3	Mac 21	30552.25	22141	0.72
4	April 21	38854.29	38681	1.11
5	May 21	37372.95	30797	0.82
6	Jun 21	44425.88	21672	0.49
7	July 21	41176.17	25198	0.61
8	Aug 21	40913.70	27841	0.68

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

9	Sept 21	35147.17	32167	0.92
10	Oct 21	37406.92	30229	0.81
TOTAL		348,703.29	310,538	0.89

Basir Ismail Estate				
No	Month	Diesel	FFB	Diesel/FFB
1	Jan 21	11053	4154.73	2.66
2	Feb 21	12726	2959.30	4.30
3	Mac 21	13057	4797.12	2.72
4	April 21	13659	4864.36	2.81
5	May 21	14366	4693.99	3.06
6	Jun 21	12334.32	7476.00	1.65
7	July 21	13005.36	6558.00	1.98
8	Aug 21	13635.12	6320.00	2.16
9	Sept 21	11993.94	6228.00	1.93
10	Oct 21	12095	5013.57	2.41
Total		127,924.74	53,065.07	2.41

Kuala Kabong Estate				
---------------------	--	--	--	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

No	Month	Diesel	FFB	Diesel/FFB
1	Jan 21	3878	1613.04	2.40
2	Feb 21	3045	1443.26	2.11
3	Mac 21	4083	2225.72	1.83
4	April 21	4424	1834.10	2.41
5	May 21	4898	2066.39	2.37
6	Jun 21	4894	2087.64	2.34
7	July 21	6236	2424.97	2.57
8	Aug 21	6017	2650.05	2.27
9	Sept 21	4947	2174.50	2.28
10	Oct 21	5067	2459.30	2.06
Total		47,489	20,978.97	2.26

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

7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> • FFB record book • Stock book • Monthly stock issue • Stock requisition note Mill: • Mill Month End Production Report 	Complied
--------	--	--	----------

		<ul style="list-style-type: none"> • 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>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports:</p> <p><u>2nd half 2020</u></p> <ul style="list-style-type: none"> - Report no.: PAC-AE-201118 - Report date: 30/11/2020 - Result: Dust: 58 mg/m³ (B5) vs limit 150, CO: 938 mg/m³ vs limit 1000 @ 12% CO₂ <p><u>1st half 2021</u></p> <ul style="list-style-type: none"> - Report no.: PAC-AE-210508 - Report date: 10/05/2021 	Complied

**RSPO P&C Public Summary Report
Revision 12 (Jun 2021)**

		<p>- Result: Dust: 140 mg/m³ (B5) vs limit 150, CO: 938 mg/m³ vs limit 1000 @ 12% CO₂</p> <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring</p> <p>Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were in progress for Dark smoke emissions monitored.</p> <p>Sighted Ambient Air Quality Monitoring Report as below:</p> <p><u>1st Quarter 2021</u></p> <p>Report Number: PAC-AA-210201/02</p> <p>Date Of monitoring: 3-4/2/2021</p> <p>Particulate matter: Point A1: 20 µg/m³ & Point A2: 47 µg/m³</p> <p>Limit: 100 µg/m³</p> <p><u>2nd Quarter 2021</u></p> <p>Report Number: PAC-AA-210509/10</p> <p>Date of monitoring: 10-11/5/2021</p> <p>Particulate matter: Point A1: 15 µg/m³ & Point A2: 45 µg/m³</p> <p>Limit: 100 µg/m³</p> <p><u>3rd Quarter 2021</u></p> <p>Report Number: PAC-AA-210809/10</p> <p>Date of monitoring: 19-20/8/2021</p> <p>Particulate matter: Point A1: 11 µg/m³ & Point A2: 65 µg/m³</p> <p>Limit: 100 µg/m³</p>	
--	--	--	--

		Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan AS(B)J31/152/000/054 Jilid 18(12)	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	There was no new planting and replanting which prepared by burning and in lined with Sustainability handbook has described therein on Environmental Policy (signed by the Executive Director) to include the adoption of Zero Open Burning Policy dated January 2008	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	For fire watch, for aerial monitoring Asean Fire Alert has been used for hot spot area/ peat soil area. Kuala Kabong has subscribed to Asean Fire Alert (AFA) since 7/10/2020. The hotspot area has been identified to AFA during the subscription. This monitoring base on colour of Fire Weather Index (FWI), if the colour changes from blue into yellow the estate will standby for any emergency fire break. In case of any fire detected by AFA, an alert will be sent to PIC of Kuala Kabong estate. On site preparedness, 3200 gallon of portable water browser is readily available to fight any potential fire. On top AFA, Kuala Kabong estate will perform Estate Patrol. The record of the patrolling was sighted. The patrolling is conducted daily. The patrolling conducted by auxiliary police according to the patrolling schedule. The monitoring for any fire at the estate will also be conducted by workers and "Mandore". In case of any fire detected, the "Mandore" will report to the management/security head. Management also established "Carta Organisasi Pelan Tindakan Kecemasan (ERP) Kebakaran Tanah Gambut LKK 2021".	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Engagement with adjacent stakeholders was done during Stakeholder Meeting through Online on 27/10/2021 for Sedenak	Complied

	<p>- Minor compliance -</p>	<p>Complex. Refer section "Pencegahan Kebakaran Tanah Gambut". This meeting conduct to educate and inform the stakeholder neighbouring with estate regarding to Fire Management at peat area.</p>																	
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>																			
<p>7.12.1</p>	<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. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -</p>	<p>Verified that there is no land development/ land clearing within Sedenak Complex Unit since November 2005.</p>	<p>Complied</p>																
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>The Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report February 2013 (Compiled from unchanged draft of January 2008). HCV assessment for the Sedenak Complex was conducted by A.J.F.M Dekker (RSPO Assessor, HCV/Biodiversity) was available for verification. Sample of HCV Details as below:</p> <table border="1" data-bbox="1137 1070 1928 1353"> <tr> <td rowspan="5" style="text-align: center; vertical-align: middle;">KUALA KABONG 22/10/2017</td> <td>P00/04</td> <td>UNPLANTED (RBA 3)</td> <td>0.28</td> </tr> <tr> <td>P00/05</td> <td>UNPLANTED (RBA 3)</td> <td>0.76</td> </tr> <tr> <td>P00/08</td> <td>UNPLANTED (RBA 3)</td> <td>1.15</td> </tr> <tr> <td>P02/04</td> <td>VACANT (RBA 2)</td> <td>0.02</td> </tr> <tr> <td></td> <td>RIVER & BUFFER ZONE (RBA 4)</td> <td>9.8</td> </tr> </table>	KUALA KABONG 22/10/2017	P00/04	UNPLANTED (RBA 3)	0.28	P00/05	UNPLANTED (RBA 3)	0.76	P00/08	UNPLANTED (RBA 3)	1.15	P02/04	VACANT (RBA 2)	0.02		RIVER & BUFFER ZONE (RBA 4)	9.8	<p>Complied</p>
KUALA KABONG 22/10/2017	P00/04	UNPLANTED (RBA 3)		0.28															
	P00/05	UNPLANTED (RBA 3)		0.76															
	P00/08	UNPLANTED (RBA 3)		1.15															
	P02/04	VACANT (RBA 2)		0.02															
		RIVER & BUFFER ZONE (RBA 4)	9.8																

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<table border="1" data-bbox="1137 362 1928 592"> <tr> <td colspan="3" style="text-align: right;">Total</td> <td style="text-align: right;">12.01</td> </tr> <tr> <td rowspan="2" style="text-align: center;">SEDENAK 02/03/2020</td> <td></td> <td style="text-align: center;">POND (RBA 2)</td> <td style="text-align: right;">25.58</td> </tr> <tr> <td style="text-align: center;">P06/04</td> <td style="text-align: center;">DRAIN & BUFFER ZONE (RBA 4)</td> <td style="text-align: right;">0.81</td> </tr> <tr> <td colspan="3" style="text-align: right;">Total</td> <td style="text-align: right;">26.39</td> </tr> </table> <p>The structure of the report generally has the description about methodology used, coverage and the findings on presence of HCV and RTE species.</p> <p>For Ulu Tiram Estate, HCV assessment conducted by Malaysian Environmental Consultant Sdn Bhd (Expertise in Natural Resource Management & Sustainability) dated August 2016.</p> <p>Awareness Training on Biodiversity has been conducted at Kuala Kabong Estate on 17/10/2021.</p> <p>Awareness on No Open Burning has been conducted at Kuala Kabong Estate on 05/11/2021.</p> <p>Awareness on Management of Endangered Species has been conducted 07/11/2021.</p>	Total			12.01	SEDENAK 02/03/2020		POND (RBA 2)	25.58	P06/04	DRAIN & BUFFER ZONE (RBA 4)	0.81	Total			26.39	
Total			12.01															
SEDENAK 02/03/2020		POND (RBA 2)	25.58															
	P06/04	DRAIN & BUFFER ZONE (RBA 4)	0.81															
Total			26.39															
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable	Not Applicable															
7.12.4	(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	<p>Based on the report, there was no HCV or RTE presence in the plantation. Nonetheless, Sedenak complex estate has its own self-declared conservation areas.</p> <p>Biodiversity Improvement Plan has been established at each sample estates. The management plan has included short-term and long-term plan. Among details in the plan as below:</p> <p>Short Term Plan</p> <ol style="list-style-type: none"> 1. RTE Species sighting record and training 	Complied															

	<p>managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>2. Erosion control and risk checking</p> <p>3. SQD Department to organize Bird Survey at respective unit Long Term Plan</p> <p>1. Buffer zone establishment and training</p> <p>2. Restore the natural vegetation from monitoring and training</p> <p>3. Wildlife and Habitats protection of flora and fauna.</p> <p>Regular security patrol and sighting within the estate was carried out and finding/issue recorded by the respective estate personal/security to monitor the conservation / buffer zone areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signage that prohibit hunting and water polluting activities were verified on-site found to be satisfactorily maintained.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>No local communities have been identified in self-declared HCV areas within sampling Estate.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in 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>Although there is no RTE species identified at Sample Estates, there is evidence to continuously prevent and discourage illegal or hunting, fishing, or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity.</p> <p>Sighted evidence of prohibiting of illegal hunting signage at sample estates. Verified through interview of workers found they have good awareness on it.</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Sighted Supervision on High Conservation Value (HCV) Area latest conducted on 7/11/2021 and 16/11/2021 at Kuala Kabong Estate.</p> <p>HCV and Biodiversity Training has been conducted on 04/07/2021 and 10/08/2021 at Kuala Kabong Estate and Ulu Tiram estate respectively.</p> <p>Animal sighting has been recorded at Kuala Kabong Estate and Sedenak Estate.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The HCV management plan is developed based on recommendation given by the assessor dated 01/08/2021 based on email date. The plan includes monitoring of buffer zone area and conservation area in the estate and surrounding area.</p> <p>Monitoring of action plan was carried out at appropriate frequency as a mechanism to ensure effectiveness of implementation. Report of the monitoring was adequately recorded by the person in-charge on daily basis. Based on the report, no RTE sighted and no evidence of encroachment/trespasses at the identified HCV and conservation area. Management plan as per 7.12.4.</p> <p>Checked daily patrolling and sighting reports confirm that there was no RTE species and illegal activities reported.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>Verified that there is no land clearing without prior HCV assessment since November 2005 occurred at Sedenak Complex.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Sedenak POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for Sedenak POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	8.25
PKO	8.25

Extraction	%
OER	20.34
KER	5.17

Production	t/yr
FFB Process	415,278.24
CPO Produced	84,459.42
PKO Produced	0

Land Use	Ha
OP Planted Area	27,160.17
OP Planted on peat	1366.44
Conservation (forested)	14.01
Conservation (non-forested)	194.90
Total	28,735.52

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	71556.72	0.47	2969.46	0.44	84504.21	0	159030.39	0.91
CO ₂ Emission from fertilizer	5393.14	0.04	224.60	0.03	2910.02	0	8527.77	0.07
NO ₂ Emission	4642.40	0.03	201.89	0.03	1976.92	0.29	6821.22	0.35
Fuel Consumption	1505.95	0.01	63.69	0.01	2398.50	0	3968.13	0.02
Peat Oxidation	726137.78	4.77	0	0	0	0	726137.78	4.77
Sink								
Crop Sequestration	-67826.28	-0.45	-2814.65	-0.34	-74576.13	0	-145217.06	-0.79
Conservation Sequestration	0	0	-5.89	0	0	0	-5.89	0
Total	741409.71	-3.58	639.1	0.17	17213.52	0.29	759262.34	5.33

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	84,993.52	0.2
Fuel Consumption	1,188.67	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	-7,916.55	-0.02
Sales of EFB	0	0
Total	78,265.64	0.19

Summary of Kernel Crusher Emission and Credit (if applicable)

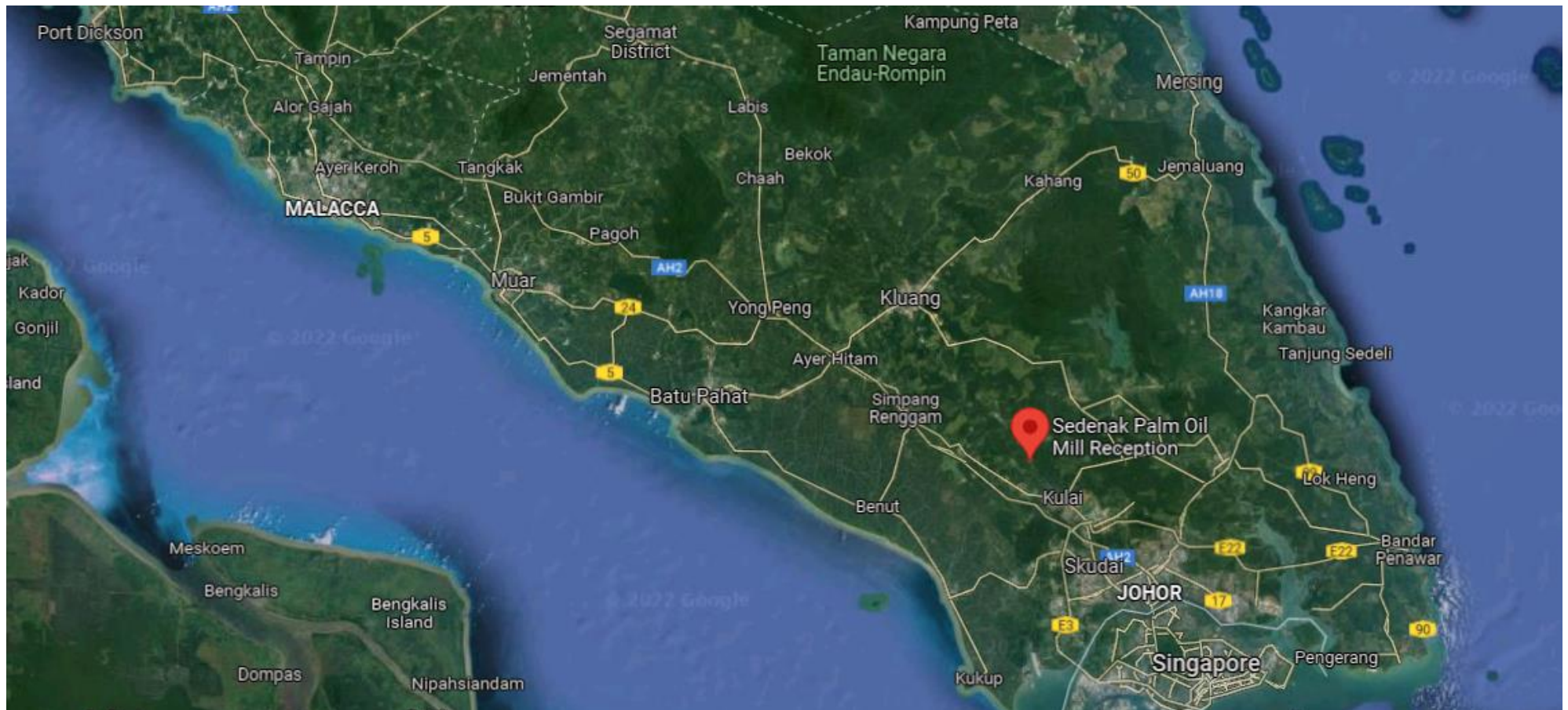
Emissions	tCO ₂ e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

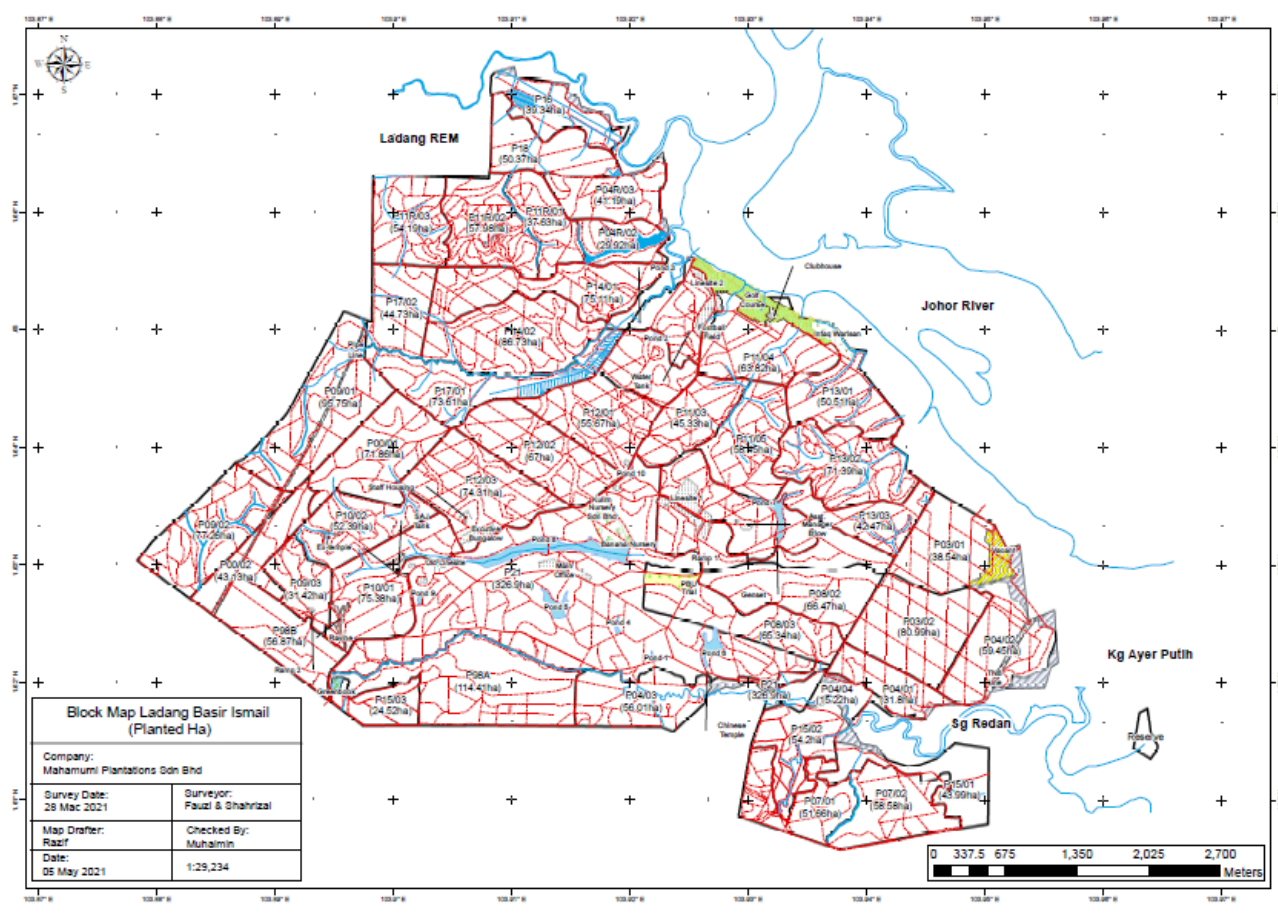
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

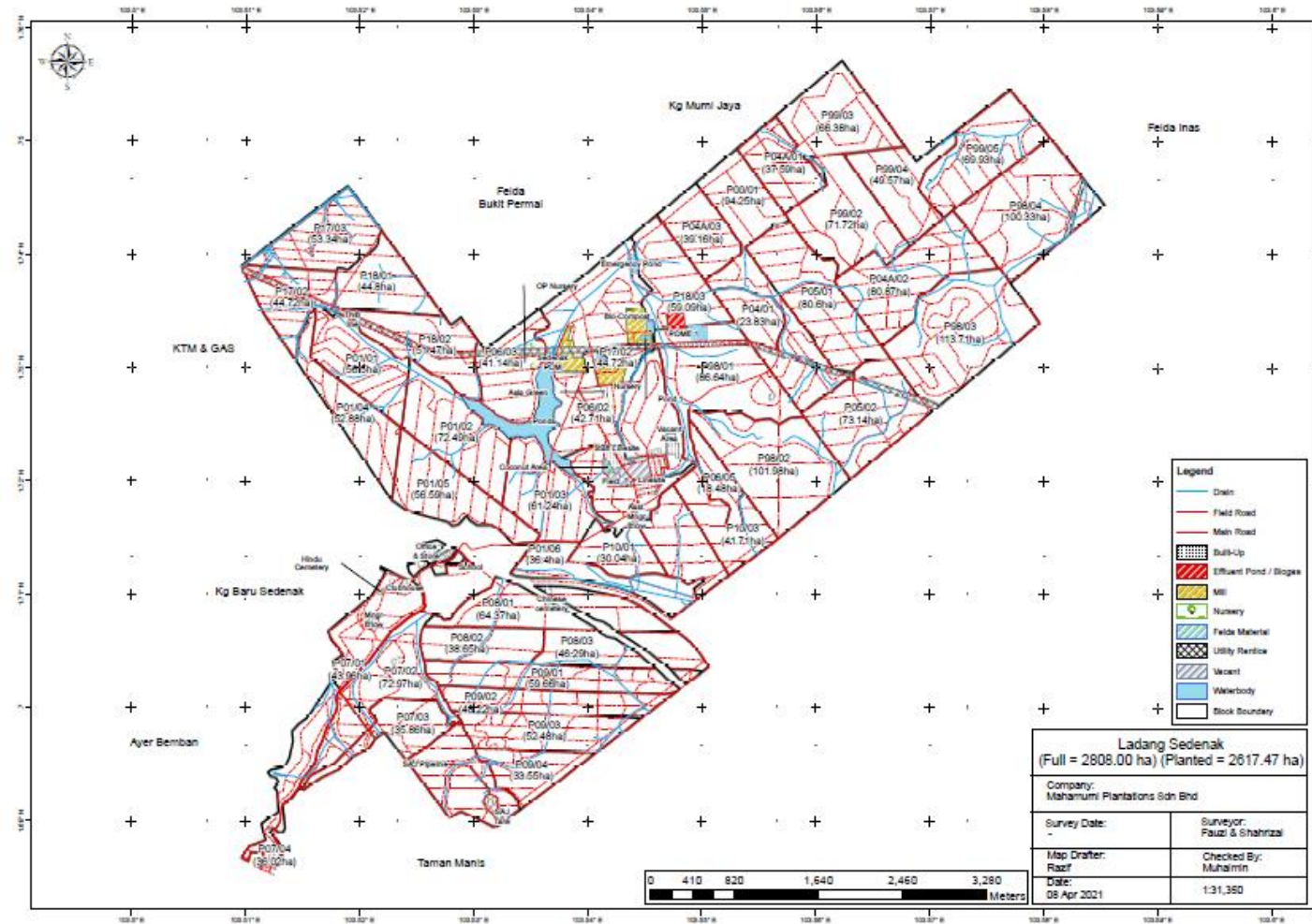
Appendix C: Location Map of Certification Unit and Supply bases

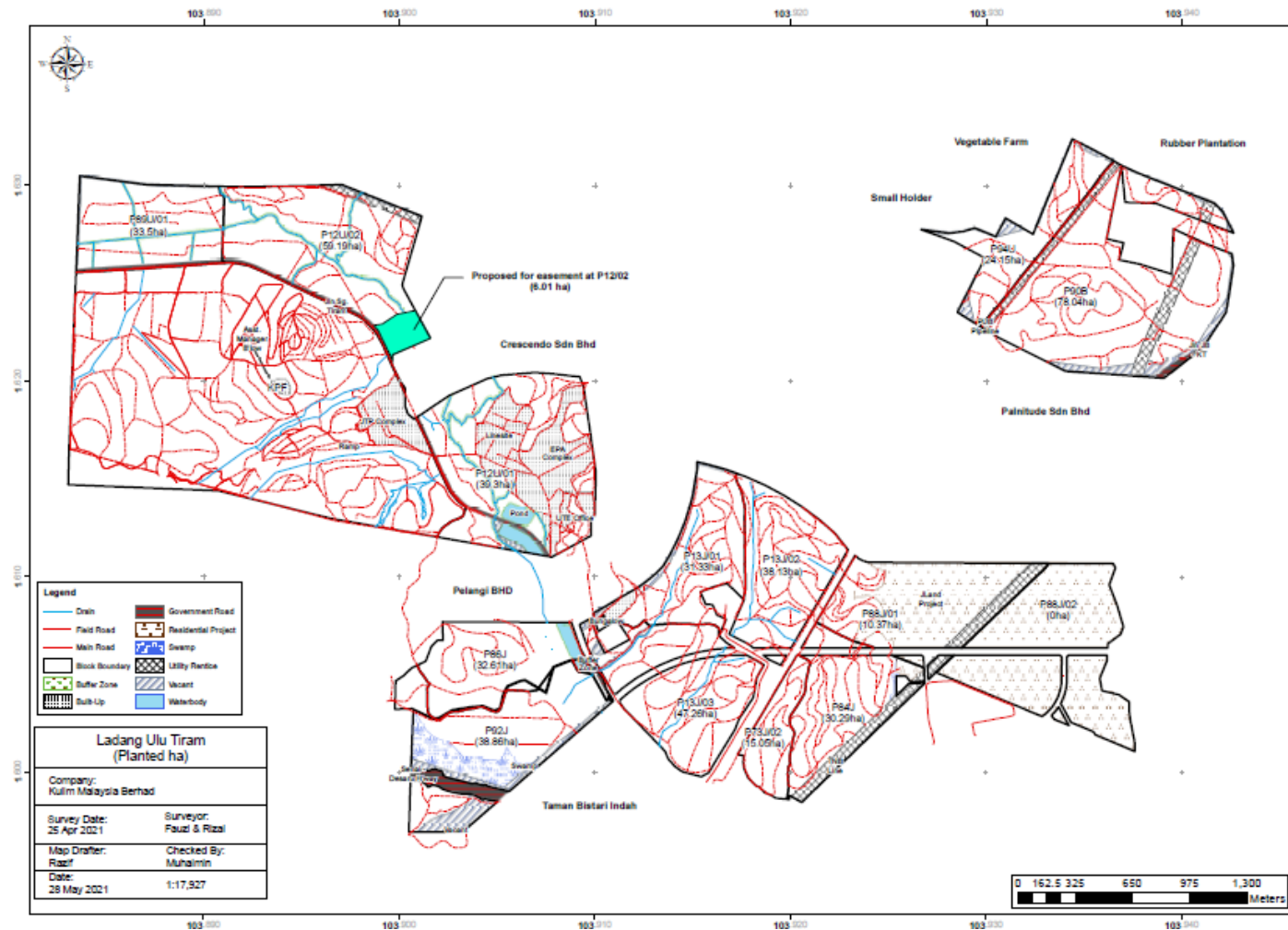


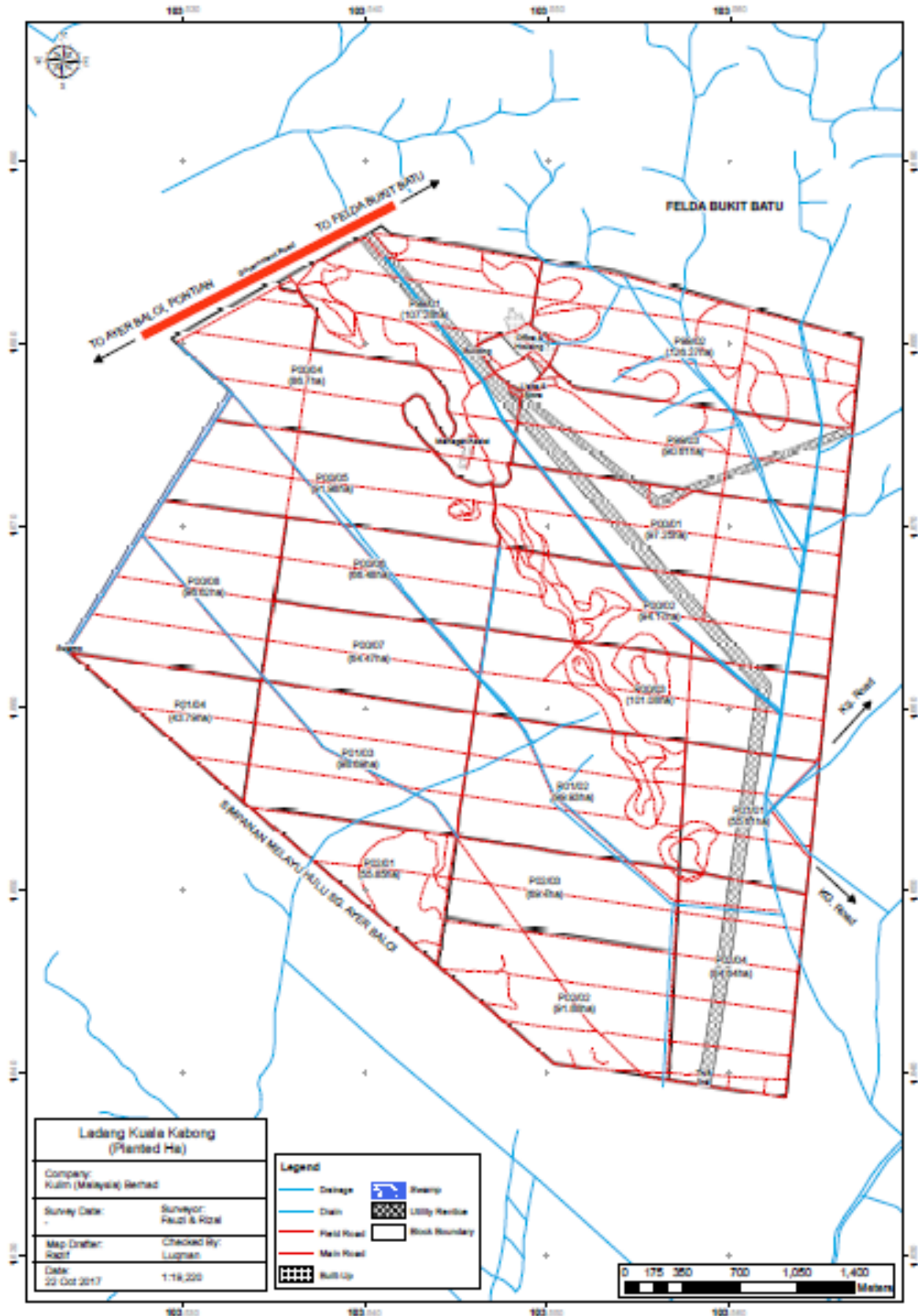
Appendix D: Estate Field Map



RSPO P&C Public Summary Report
Revision 12 (Jun 2021)







Appendix E: List of Smallholder Registered and sampled

Not Applicable

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
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
SDS	Safety Data Sheet
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure