

SIRIM QAS INTERNATIONAL SDN. BHD.

Building 4, SIRIM Complex, No. 1, Persiaran Dato' Menteri, Section 2, 40700 Shah Alam, Selangor, Malaysia.

File Ref.: EH04760001

RSPO PUBLIC SUMMARY REPORT

CLIENT

: JEROCO PLANTATIONS SDN. BHD. - JEROCO PALM OIL MILL 1

PARENT COMPANY: HAP SENG PLANTATIONS HOLDINGS BERHAD

RSPO MEMBERSHIP No.: 1-0098-11-000-00

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE): (In the case of multisite certification, list additional sites in attachments):

Certification Unit	Mill and Supply	GPS I	Location	Location	
	Base	Latitude	Longitude	Location	
-/	Jeroco Palm Oil Mill 1	N 5° 25' 52.0"	E 118° 25' 02.0"	epropse deltared s	
	Batangan Estate	N 5° 24' 43.7"	E 118° 26' 59.8"	Off KM 50, Jalan Jeroco 91109 Lahad Datu, Sabah	
Jeroco 1	Lutong Estate	N 5° 21' 55.6"	E 118° 26' 26.2"	Malaysia	
	Lokan Estate	N 5° 25' 51.8"	E 118° 22' 57.8"	were as executed 1. *	
	Lungmanis Estate	N 5° 28' 46.3"	E 118° 24' 11.3"		

MAP: See Attachment 1 DURATION auditor days : 17 24-27 July 2018 AUDIT DATE : Recertification Audit Annual Surveillance Audit No. TYPE OF AUDIT: STANDARD: RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION 2014 (REVISED 14 JUNE 2017) SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model VALIDITY OF RSPO CERTIFICATE: 27/09/2013 - 26/09/2018 (EXTENDED UNTIL 26/12/2018) The following attachments form part of this report: List of additional site(s) Non-conformity Report(s) Acknowledgement by Client's Representative Report by Audit Team Leader Khairul Najwan Ahmad Jahari Name Name Signature Signature Date 15 November 2018 Date

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit						
On-site audit date	:	24-27 July 2018			No. of auditor days :	17 mandays
Audit team	:	Khairul N	lajwan, Ru	zita, Mohd Raouf,	Rozaimee & Suzalina	
No. of major NCR	:	1	1 Indicator: 4.7.3 C0osir			C0osing date: 20/10/2018
No. of minor NCR	:	1	Indicator	: 2.1.2		
Indicate the stakeholders	:	Employe	es	Settlers	Villagers / Local communities	Suppliers
interviewed during the		•	/	-	✓	✓
on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers
			-	✓	✓	-
		Indigeno	us	Contractor	Others (Please specify)
		people			School Teachers	
			-	✓	✓	
Supply base sampled	:	Lokan, Lungmanis, Batangan and Lutong Estates				
Justification of audit	:	Total allocation of auditor days for Jeroco 1 CU were:				
planning		Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG				
		verification and Social at Mill) + (1 day for supply chain certification systems)				
		Estate = 13 days overall for verification of safety and health, environment, good				
		agricultu	re best pra	ctices, Social, HC	V, TBP, Partial Certification	on and GHG verification
plus the verification of Land History and Land Title.						
Report approved by	:	Radziah	Mohd Dau	d	Approval date: 15	5/11/2018

	Annual	Surveillance A	udit 1	
On-site audit date :			No. of auditor days :	
Audit team :			•	
No. of major NCR :	Indicator			Closing date :
No. of minor NCR :	Indicator	•		
Indicate by ticking the : stakeholders interviewed	Employees	Settlers	Villagers / Local communities	Suppliers
during the on-site audit				
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractor	Others (Please specify	y)
Supply base sampled :				
Changes since the last :				
audit				
Justification of audit :				
planning				
Report approved by :			Approval date :	

		Annua	Surveillance A	udit 2	
On-site audit date	:			No. of auditor days :	
Audit team	:				
No. of major NCR	:	Indicator	:		Closing date :
No. of minor NCR	:	Indicator	:		
Indicate by ticking the stakeholders interviewed	:	Employees	Settlers	Villagers / Local communities	Suppliers
during the on-site audit		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specif	У)
Supply base sampled	:		1		
Changes since the last audit	:				
Justification of audit planning	:				

Report approved by	_ :			Approval date :	
		Annual	Surveillance Au	ıdit 3	
On-site audit date	:			No. of auditor days:	
Audit team	:				
No. of major NCR	:	Indicator	:		Closing date:
No. of minor NCR	:	Indicator	:		
Indicate by ticking the	:	Employees	Settlers	Villagers / Local	Suppliers
stakeholders interviewed				communities	
during the on-site audit					
		Contract workers	NGOs	Govt. agency	Independent growers
			_		
		Indigenous people	Contractor	Others (P	lease specify)
Supply base sampled	:				
Changes since the last	:				
audit					
Justification of audit	:				
planning Report approved by				Approval data	
Report approved by	<u>:</u>			Approval date :	
		Annua	Surveillance Au	alit 4	
On site sudit data		Annua	Surveillance Au		T
On-site audit date Audit team	· ·			No. of auditor days :	
No. of major NCR	:	Indicator			Closing data:
No. of minor NCR	:	Indicator			Closing date :
Indicate by ticking the	<u>:</u>		Settlers	Villagers / Local	Suppliers
stakeholders interviewed	•	Employees	Settlers	communities	Suppliers
during the on-site audit				Communities	
during the on site dual.		Contract workers	NGOs	Govt. agency	Independent growers
		CONTRACT WORKERS	11003	Govt. agency	independent growers
		Indigenous people	Contractors	Others (Please specif	·v)
		maigenede people	Contractore	Curere (r reace opeon	,
Supply base sampled	:				L
Changes since the last	÷				
audit					
Justification of audit	:				
planning					
Report approved by	:			Approval date :	

Approval date:

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	July 2018 to				July 2017 to
-	June 2019				June 2018
Certified FFB Processed (MT)	199,350.00				186,748.00
Production of Certified CPO (MT)	43,385.00				41,241.00
Production of Certified PK (MT)	9,550.00				9,176.00
Certified Areas (Ha)	11,436.67				11,436.67
Planted Areas (Ha)	10,380.00				10,380.00
Production Areas (Ha)	9,267.00				9,041.00
HCV Areas / Conservation Areas (Ha)	386.34				386.34
REMARKS	-		<u>'</u>		- 1

TABLE 2

	PO	PK
Last years certified volume (MT)	*78,163.66	*17,305.76
Last years actual certified sold (MT)	**44,088.62	**12,686.66
Last years actual sold under other schemes (MT)	12,811.79	0.00
Last years sold conventional (MT)		
New year certified volume (MT)	43,385.00	9,550.00

^{*}Jeroco 1 has applied extension of volume together with the extension of PalmTrace. The license has been extended until 26/12/2018. The RSPO EB has approved the application on 4/06/2018 & 4/10/2018.

**The sales has been based on productions from July 2017 to June 2018 only, the current reporting period.

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1.0 AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and accredited by ASI on 27 September 2014.

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Khairul Najwan bin Ahmad Jahari	Lead Auditor, HCV and Social Issues	Possessed B.Sc. of Forestry from Universiti Putra Malaysia with total more than 17 years of working experience in the Forest Management, forest inventories, forest harvesting, remote sensing & GIS. He had 7 years of working experience in the oil palm operation including auditing in HCVF and social issues. He is a qualified Lead Auditor for RSPO P&C, MSPO, and Forest Management (FMC).
Ruzita binti Abd Gani	Auditor Environment and occupational health and safety	Possessed Bachelor of Chemical Engineering from the University Technology Malaysia. She had worked in the palm oil mill for more than 6 years and 16 years of working experience as environmental and OHS lead auditor. She is also a qualified Lead Auditor for RSPO P&C, MSPO and RSPO Supply Chain.
Mohd Ab Raouf bin Asis	Auditor Good Agricultural Practices (GAP)	Holds B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He had 10 years of working experience in the oil palm operation. He is a qualified auditor for RSPO P&C and Lead Auditor for MSPO.
Rozaimee Ab. Rahman	Auditor Environment and occupational health and safety	Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and Lead Auditor for MSPO.
Suzalina Kamaralarifin	Auditor Supply Chain	Holds a B. Sc. of Industrial Chemistry from University Teknologi Malaysia. She had 8 years of working experience in the palm oil related industry of POM, Oleo chemical & refinery. She is a qualified Lead Auditor for RSPO Supply Chain.

1.3 Audit methodology

The audit covered the Jeroco 1 palm oil mill and all four its supply base. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. However, all four supply base covered during the audit are Batangan Estate, Lungmanis Estate, Lutong Estate and Lokan Estate. The audit included an onsite audit to the estates, mill and workers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 21 June 2018. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). Consultations with WWF Lahad Datu, Lahad Datu Distric Forest Officer, Deputy Chief Conservator of Sandakan Forestry Department, Lahad Datu Wildlife Department and Contractors and Suppliers found no complaint from them.

1.5 Audit plan: Refer to Attachment 2

1.6 Date of next audit: The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

Jeroco Palm Oil Mill 1 certification unit (hereafter refer to JPOM1 CU) is one of the business unit under the Hap Seng Plantations Holdings Berhad (HSPHB). Located at Off 50 KM, Jalan Jeroco, Lahad Datu, Sabah, Malaysia, the CU consists of one mill (JPOM 1) and 4 supply base i.e. Batangan, Lutong, Lokan and Lungmanis Estates.

The Jeroco Palm Oil Mill 1 has a processing capacity of 60 metric tonnes of fresh fruit bunches (FFB) per hour. The mill only receives and processes crops from HSPHB's certified supply bases. The CU have other management system certification scheme such as HACCP, ISCC and MSPO.

2.2 Description of the Supply Base (including the planting profile)

The FFB is sourced from company owned estates that were certified. Noted that there were some diversions of FFB from HSPHB's estates certified under different CU.

Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

<u>Table 1: Actual FFB production by the supply base for the last reporting period</u>
(July 2017 to June 2018) JPOM1

Estates	FFB Pro	oduction
	Tonnes	Percentage (%)
¹ Batangan	44,799.12	16.50
¹ Batangan (Kretam)	23,328.57	8.60
¹ Lutong	34,126.93	12.57
¹ Lokan	38,562.05	14.20
² Kapis	40,614.93	14.96
¹ Lungmanis	36,306.55	13.37
³ Litang	6,118.09	2.25
³ Litang (Wecan)	6,695.89	2.46
³ Tagas	16,137.04	5.94
³ Tagas (Tampilit)	1,346.97	0.50
³ Tomanggong	13,504.63	4.97
⁴ Sungai Segama 1	1,140.22	0.42
⁴ Sungai Segama 2	2,244.03	0.83
⁴ Bukit Mas Estate	5,111.11	1.88
⁵ Ladang Kawa	1,344.33	0.49
⁵ Ladang Kawa (Hapseng Properties)	175.40	0.06
Total	271,555.86	100

¹ = Jeroco POM 1 CU; Certified by: SIRIM QAS; Certificate No.: RSPO 0018.

² = Jeroco POM 2 CU; Certified by: SIRIM QAS; Certificate No.: RSPO 0028.

³ = Tomanggong CU; Certified by: SIRIM QAS; Certificate No.: RSPO 0024.

⁴ = Sg. Segama CU; Certified by: TUV Rheinland; Certificate No.: 82450214016.

⁵ = Ladang Kawa CU; Certified by: TUV Rheinland; Certificate No.: 82450215028.

Table 2: Projected FFB production by supply base for the next reporting period (July 2018 to June 2019) JPOM1

CU own estates	FFB Contribution		
CO OWIT estates	Tonnes	Percentage (%)	
Batangan	77,370	38.81	
Lutong	42,190	21.16	
Lokan	44,670	22.41	
Lungmanis	35,120	17.62	
Total	199,350	100	
Other Supply Bases			
Third parties (non-certified)	-	-	
Grand Total	199,350	100	

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period (July 2017 to June 2018) JPOM1

	Total (MT)
FFB Received	271,555.86
FFB Processed	271,555.86
CPO Production	56,900.41
PK Production	12,689.11
CPO delivered as RSPO certified	44,088.62
CPO delivered under other schemes / delivered as non-RSPO certified (MT)	12,811.79
PK delivered as RSPO certified	12,686.66
PK delivered under other schemes / delivered as non-RSPO certified (MT)	0.00

Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period (July 2018 to June 2019) JPOM1

	Total (MT)
FFB Received	199,350
FFB Processed	199,350
CPO Production	43,385
PK Production	9,550
CPO delivered as RSPO certified	43,385
CPO delivered as non-RSPO certified	-
PK delivered as RSPO certified	9,550
PK delivered as non-RSPO certified	-

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Batangan Estate	3,394.00	3,632.88
Lutong Estate	2,194.00	2,448.40
Lokan Estate	2,837.00	3,155.39
Lungmanis Estate	1,688.00	2,200.00
Total	10,380.00	11,436.67

Table 6 Planting profile for Jeroco 1 CU

Estate	Year of planting	Planting Cycle	Mature (Ha)	Immature Years (Ha)	Planted area	% of planted area mature	% of planted area immature
	2004	2nd	450	-	450	13.26	-
	2006	2nd	388	_	388	11.43	-
		2nd	151	-	151	4.45	-
		2nd	148	-	148	4.36	-
Batangan 2009 2010 2011 2 2011 2012 2013 2014 2015 2015 2 SUB TOTAL 1999 2004 2006 2007 2011 22011 22011	2nd	280	-	280	8.25	=	
Batangan	2011	2nd	682	-	682	20.09	-
	2012	2nd	458	-	458	13.49	-
	_	2nd	406	-	406	11.96	-
		2nd	151	-	151	4.45	-
		2nd	280	-	280	8.25	-
S		-	3,394	-	3,394		100
	1999	1 st	157	-	157	7.16	-
	2004	1 st	42	-	42	1.91	-
	2006	2 nd	456	-	456	20.78	-
Lutong	2007	2 nd	159	-	159	7.25	-
	2011	2 nd	157	-	157	7.16	=
	2012	2 nd	146	-	146	6.65	-
	2013	2 nd	306	-	306	13.95	-
	2014	2 nd	318	-	318	14.49	=
	2015	2 nd	303	-	303	13.81	=
	2017	2 nd	-	150	150	-	6.84
S	UB TOTAL		2,044	150	2,194	1	100
	1980	1 st	439	-	439	15.47	-
	1990	1 st	1309	-	1309	46.14	-
	2014	2 nd	244	-	244	8.60	-
Lokan	2015	2 nd	149	-	149	5.25	-
	2016	2 nd	-	296	296	-	10.43
	2017	2 nd	-	161	161	-	5.68
	2018	2 nd	-	239	239	-	8.42
S	UB TOTAL		2,141	696	2,837		00
Lungmanis	1995	1 st .	765	267	1,032	39.13	13.66
, and the second	1996	1 st .	923	-	923	47.21	-
S	UB TOTAL		1,688	267	1,955		100
	TOTAL 9,267 1,113 10,380 89.28 10.				10.72		
						10	0.00

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as shown below:

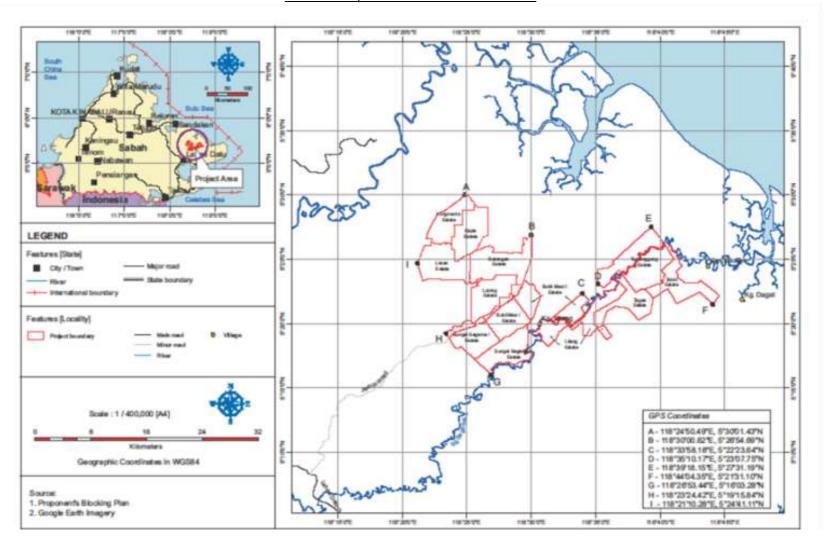
Name	:	Mr. Kee Keow Chong
Position	:	General Manager, Agronomy
Address		Hap Seng Plantations Holdings Berhad C/O: Hap Seng Fertilizers Sdn Bhd, Batu 2, Jalan Kastam Baru, 91119 Lahad Datu, Sabah, Malaysia.
Phone no.	:	+6089 278183, +6089 278138
Fax no.	:	+6089 278168/186
Email	:	keekc@hapseng.com

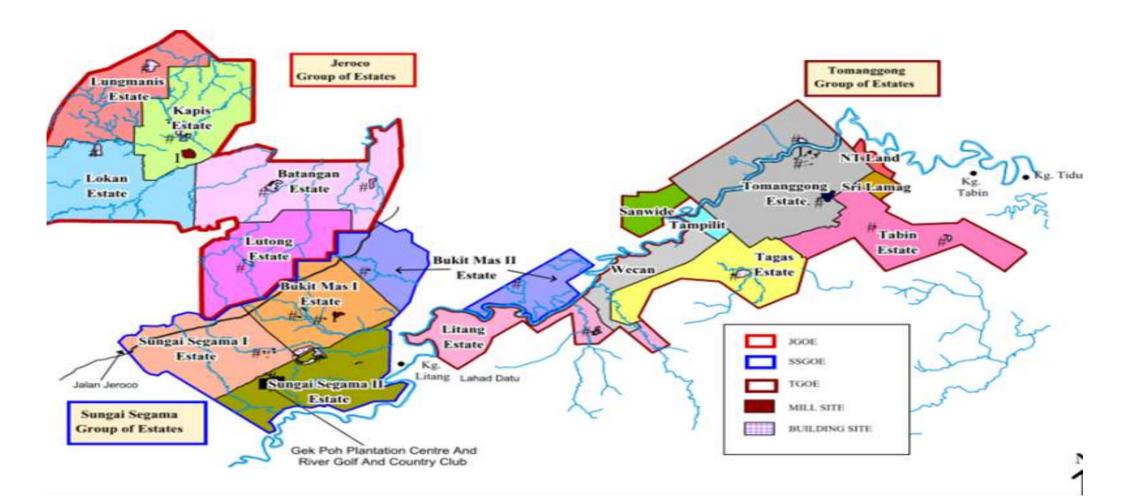
3.0	AUDIT FINDINGS
3.1	Changes to certified products in accordance to the production of the previous year
	There were no changes to the certified products since last assessment.
3.2	Progress and changes in time bound plan (Refer to Attachment xx for the time bound plan)
i.	Have all the estates under the parent company been certified?
	If no, comments on the organization's compliance with the RSPO partial certification rules :
ii.	Are there any changes to the organization's time bound plan? Yes ✓ No
	If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?
iii.	Are there associated smallholders (including scheme smallholders) in the CU Yes ✓ No
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its Yes No certification?
	If no, please state reasons NA
iv.	Any new acquisition which has replaced primary forests or HCV areas Yes ✓ No
3.3	Other changes (e.g. organizational structure, new contact person, addresses, etc.)
	Changes or correcting of address from "Off 40 KM, Jalan Jeroco, 91109 Lahad Datu, Sabah, Malaysia" to "Off KM 50, Jalan Jeroco, 91109 Lahad Datu, Sabah, Malaysia".

3.4	Status of previous non-conformities * * If not closed, minor non-conformity will be upgraded to major non conformity Not closed*					
3.5.	Complaint received from stakeholde	er (if any)				
		Forestry De	eatu Distric Forest Officer & Forest Ranger, Deputy epartment, Lahad Datu Wildlife Department and int received from them.			
4.0	DETAILS OF NON-CONFORMITY REPORT					
4.1	For P&C (Details checklist refer to Attachment 3) :					
	Total no. of minor NCR(s) (details refer to Attachment 4)	List:1	Indicator 2.1.2			
	Total no. of major NCR(s) (details refer to Attachment 4)	List :1	Indicator 4.7.3			
4.2	For SC (Details checklist refer to At	tachment 5)	:			
	Total no. of minor NCR(s) (details refer to Attachment 5)	List : none				
	Total no. of major NCR(s) (details refer to Attachment 5)	List: none				
5.0		e ŘSPO P&C	nas / has net* established and maintained its requirements of the standard and demonstrated the greed criterion & requirements.			

6.0	RECOMM	ENDATIO	ON			
		No NCR	recorded. Recom	mended to continue of	certification.	
	\checkmark		CR(s) recorded. Crried out in the nex		has been accepted. V	erification of the NCR(s)
			inor NCRs raised in the major NCRs.	in the audit which are	not addressed in the s	subsequent audit shall be
	√				entation of the correct NCR(s) have been satis	ctive actions have been sfactorily closed out.
	V	Recomm	nended to continue	e certification.		
		provided	I but not fully acc	epted by the audit te		ctive actions have been ve not been satisfactorily of the certificate.
			lajor NCRs whicl te being withdrawr		l within a further 60	days shall result in the
7.0	HAVE B	EEN SA S PLANS ED AND	TISFACTORILY S PROVIDED OI	REVIEWED, ACCER N MINOR NON CO	TED AND VERIFIED NFORMITIES HAVE	OR NON-CONFORMITIES AND ALL CORRECTIVE BEEN SATISFACTORILY ON OF RSPO P & C
Audi	t Team Lea	ader:	Khairul Najwan A	hmad Jahari	Caro	20/10/2018
		•	(Nar	me)	(Signature)	(Date)

Location map of Jeroco 1 Certification Unit





DETAILS OF AUDIT PLAN

Day 0: 23 July 2018 (Monday)

-			
	8.30am -	All five (5) Auditors (Najwan, Ruzita, Rozaimee, Raouf and Suzalina) travelling from KLIA to Kota Kinabalu on Monday, 23rd July	
	1.00pm	2018. Flight from KUL to BKI, ETD - 09:15, ETA - 11:55	
	•		
	2.00pm -	Continue travelling from Kota Kinabalu to Lahad Datu,	
	3.35pm	Flight from BKI to LDU, ETD – 15:00, ETA – 15:55	
	0.00p	1 light 10 line 2 2 0, 2 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	4.00pm-	Travel to Guest House, Plantation Central Office (PCO)	
		Haver to Guest House, Flantation Central Office (FCO)	
	5.00pm		

Day 1: 24 July 2018 (Tuesday)

Time		Activitie	s & Areas		Auditee		
8.30am -	Opening Meeting at PCO – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria,						
9.00am.	programmes, and confirmation of itinerary and logistic by SIRIM QAS Audit Team Leader.						
9.00am –	Update by organization on:				Managem		
9.15am	 actions taken to address 	previous audit findings.			ent		
	 update on progress of tir 	ne bound plan and uncertified unit	s (if any).		Represent		
	 significant changes that 	could affect conformities to req	uirements, new acquisition / dis	sposition, structure, infrastructure,	ative		
	facilities, capacity, new p	planting / replanting hectares, sale	s, etc.				
	 issues, such as legal nor 	n-compliance / action, disputes, co	omplaint, claims etc.				
0.45000	Neimen	D:4-a	Decut	Danaimaa	Cuide(a)		
9.15am -	Najwan	Ruzita	Raouf	Rozaimee	Guide(s)		
12.00pm	Jeroco POM 1	Jeroco POM 1	Batangan Estate	Jeroco POM 1	for each		
	Audit of relevant Indicators of	Audit of relevant Indicators of	Audit of relevant Indicators of	Audit of relevant Indicators of	auditor		
	P1, P2, P6, P7, and P8 of		P2, P3, P4, P5, P7 and P8 of	P1, P2, P4, P5, P7, and P8 of			
	<u>Social</u> management, which	Environmental, Safety and	GAP , which may include:	Environmental, Safety &			
	may include:	<u>health</u> management, which	 review of relevant 	<u>health</u> and Social			
	review of relevant	may include:	evident of conformities,	management, which may			
	evident of conformities,		pertaining compliance to	include:			
	pertaining commitment to	evident of conformities,	laws and regulations,				
	transparency, compliance to	pertaining commitment to	commitment to long-term	evident of conformities,			
	laws and regulations, land	transparency, compliance to	economic and financial	pertaining commitment to			
	use rights, Social Impact	laws and regulations,	viability, good agricultural	transparency, compliance to			

12.00pm	Assessment plan & implementation, complaints and grievances, training, continuous improvement plan, etc. • review of plantation boundary and any relevant amenities and facilities for employees (such as house, water and electricity supplies, shops, worship / prayer places, clinic, recreational facilities etc.). • consultation with any relevant personnel (e.g. management, local and foreign employees, unions, suppliers, communities, government agencies etc.). • follow up of previous issue, if any.	health and environmental mitigation practices at any relevant operation and facilities (e.g. wastes collection / disposal sites, wastewater control facilities, genset, chemicals, oils storage, workshop, etc.). • consultation with any relevant personnel (e.g. management, employees, communities, government agencies etc.). • follow up of previous issue, if any:	stores of fertiliser and herbicides, etc.). • follow up of previous issue, if any.	laws and regulations, environmental impact assessment, management plans related to wastes, pollution, safety and health & implementation, training, continuous improvement plan, etc. • review of safety, health and environmental mitigation practices at any relevant operation and facilities (e.g. wastes collection / disposal sites, wastewater control facilities, genset, chemicals, oils storage, workshop, etc.). • consultation with any relevant personnel (e.g. management, employees, communities, government agencies etc.). • follow up of previous issue, if any:	
12.00pm – 1.00pm		LUNCH	I BREAK		
1.00pm –	Jeroco POM 1	Jeroco POM 1	Batangan Estate	Jeroco POM 1	Guide(s)
5.00pm	Continue assessment	Continue assessment	Continue assessment	Continue assessment	for each auditor

Day 2: 25 July 2018 (Wednesday)

Time	Activities & Areas					Auditee
Travel at	Najwan	Ruzita	Raouf	Rozaimee	Suzalina	Guide(s)
7.00am	Lungmanis Estate	Lutong Estate	Lokan Estate	Lungmanis Estate	Jeroco POM 1	for each

8.00am-12.00pm

Audit of relevant Indicators of P1, P2, P5, P6, P7, and P8 of **Social** and **HCV** management, which may include:

- review of relevant evident of conformities, pertaining commitment | • transparency, compliance to laws and regulations, land use rights, Social Impact Assessment (SIA), **HCV** social and management plans & implementation, complaints and grievances, training, continuous improvement plan, etc.
- review plantation boundary and any relevant amenities facilities and for employees (such as and | house, water electricity supplies, shops, worship / prayer places. clinic. recreational facilities etc.).
- review of land statement, conservation areas (e.g. riparian buffer zone, steep

of Audit relevant Indicators of P1, P2, P4, P5, P7, and P8 of environmental, safety and health which management, may include:

- review of relevant evident of conformities, pertaining commitment to transparency, compliance to laws regulations, and environmental impact assessment, management plans related to wastes, pollution, safety and health implementation. training, continuous improvement plan, etc.
- review of safety, health and environmental mitigation practices at any relevant operation and facilities (e.g. wastes collection / disposal sites. wastewater control facilities.

Audit of relevant Indicators of P2, P3, P4. P5. P7 and P8 of **GAP**, which may include:

- review of relevant evident of conformities. pertaining compliance to laws and regulations, commitment to long-term economic and financial viability, good agricultural practices (GAP), management plan implementation training, continuous improvement plan, etc.
- review of field operation (e.g. harvesting, upkeep, replanting etc.) related and activities (e.g. nursery, stores of fertiliser and • herbicides, etc.).

Audit of relevant Indicators of P1, P2, P4, P5, P7, and P8 of environmental. safety and health management, which may include:

- review of relevant evident of conformities. pertaining commitment | • Documented transparency, compliance to laws and regulations, environmental impact assessment. management plans related to wastes. pollution, safety and health implementation, training. continuous improvement plan, etc.
- review of safety, health and environmental mitigation practices at any relevant operation and facilities (e.g. wastes collection / disposal sites. wastewater control facilities. genset, chemicals, oils storage, workshop, etc.).
- consultation with any relevant personnel

Audit of relevant Supply Chain model used. which mav include:

auditor

- · General Chain of Custody System Requirements for the supply chain
- procedures
- Purchasing and aoods in
- Outsourcing activity
- Sales and goods out
- Processing
- Records keeping
- Registration
- Training
- Claims

	areas, wildlife habitat, etc.) and boundary. consultation with any relevant personnel (e.g. management, local and foreign employees, unions, suppliers, communities, government agencies etc.). follow up of previous issue, if any.	genset, chemicals, oils storage, workshop, etc.). consultation with any relevant personnel (e.g. management, employees, communities, government agencies etc.). follow up of previous issue, if any:	follow up of previous issue, if any.	(e.g. management employees, communities, government agencies etc.). • follow up of previous issue, if any:		
12.00pm - 1.00pm			LUNCH BREAK			
•	Najwan	Ruzita	Raouf	Rozaimee	Suzalina	Guide(s)
	Lungmanis Estate	Lutong Estate	Lokan Estate	Lungmanis Estate	Jeroco POM 1	for each
1.00pm – 5.00pm 5.00pm	Continue assessment	Continue assessment	Continue assessment	Continue assessment	Continue assessment Travel back to Lahad Datu	auditor Transport to Lahad Datu

Day 3: 26 July 2018 (Thursday)

Time	July 2010 (Illui Suay)	Activities &	Areas		Auditee
8.00am	Najwan	Ruzita	Raouf	Rozaimee	Guide(s)
12.00nn	Batangan Estate	Batangan Estate	Lungmanis Estate	Lokan Estate	for each
	Audit of relevant Indicators of	Audit of relevant Indicators of P1,	Audit of relevant Indicators of	Audit of relevant Indicators of	auditor
	P1, P2, P5, P6, P7, and P8 of	P2, P4, P5, P7, and P8 of	P2, P3, P4, P5, P7 and P8 of	P1, P2, P4, P5, P7, and P8	
	Social and HCV management,	environmental, safety and	GAP , which may include:	of <u>environmental</u> , <u>safety</u>	
	which may include:	<u>health</u> management, which may	 review of relevant 	and <u>health</u> management,	
	 review of relevant 	include:	evident of conformities,	which may include:	
	evident of conformities,		pertaining compliance to		
	pertaining commitment to	of conformities, pertaining	laws and regulations,	evident of conformities,	
	transparency, compliance to	commitment to transparency,	commitment to long-term	pertaining commitment to	
	laws and regulations, land	compliance to laws and	economic and financial	transparency, compliance	
	use rights, Social Impact	regulations, environmental	viability, good agricultural	to laws and regulations,	
	Assessment (SIA), social	impact assessment,	practices (GAP),	environmental impact	
	and HCV management plans	management plans related to	management plan &	assessment, management	
	& implementation,	wastes, pollution, safety and	implementation training,	plans related to wastes,	
	complaints and grievances,	health & implementation,	continuous improvement	pollution, safety and	
	training, continuous	training, continuous	plan, etc.	health & implementation,	
	improvement plan, etc.	improvement plan, etc.	review of field operation	training, continuous	
	review of plantation		(e.g. harvesting, upkeep,	improvement plan, etc.	
	boundary and any relevant	and environmental mitigation	replanting etc.) and related		
	amenities and facilities for	practices at any relevant	activities (e.g. nursery,	health and environmental	
	employees (such as house,	operation and facilities (e.g.	stores of fertiliser and	mitigation practices at any	
	water and electricity	wastes collection / disposal	herbicides, etc.).	relevant operation and	
	supplies, shops, worship /	sites, wastewater control	• follow up of previous issue,	facilities (e.g. wastes	
	prayer places, clinic,	facilities, genset, chemicals,	if any.	collection / disposal sites,	
	recreational facilities etc.).	oils storage, workshop, etc.).		wastewater control	
	review of land statement,	consultation with any relevant		facilities, genset,	
	conservation areas (e.g.	personnel (e.g. management,		chemicals, oils storage,	
	riparian buffer zone, steep	employees, communities,		workshop, etc.).	
	areas, wildlife habitat, etc.)	government agencies etc.).		• consultation with any	
	and boundary.	follow up of previous issue, if		relevant personnel (e.g.	
	 consultation with any 	any:		management, employees,	

	relevant personnel (e.g. management, local and foreign employees, unions, suppliers, communities, government agencies etc.). • follow up of previous issue, if any.			communities, government agencies etc.). • follow up of previous issue, if any:	
12.00nn – 1.00pm		LUNCH BE	REAK		
1.00pm –	Najwan	Ruzita	Raouf	Rozaimee	Guide(s)
5.00pm	Lokan Estate	Batangan Estate	Lungmanis Estate	Lokan Estate	for each auditor
	Audit of relevant Indicators of P1, P2, P5, P6, P7, and P8 of social and HCV management, which may include: • review of relevant evident of conformities, pertaining commitment to transparency, compliance to laws and regulations, land use rights, Social Impact Assessment (SIA), social and HCV management plans & implementation, complaints and grievances, training, continuous improvement plan, etc. • review of any relevant amenities and facilities for employees (such as house, water and electricity supplies, shops, worship / prayer places, clinic, recreational facilities etc.).	Continue assessment	Continue assessment	Audit of relevant Indicators of P1, P2, P5, P6, P7, and P8 of Social and HCV management, which may include: HCV management plans & implementation continuous improvement plan, etc. review of plantation boundary and any relevant amenities and facilities for employees (such as house, water and electricity supplies, shops, worship / prayer places, clinic, recreational facilities etc.). review of land statement, conservation areas (e.g. riparian buffer zone, steep areas, wildlife habitat, etc.) and boundary.	auditoi

 consultation with any relevant personnel (e.g. management, local and foreign employees, unions, suppliers, communities, government agencies etc.). follow up of previous issue, if any. 	consultation with any relevant personnel (e.g. management, local and foreign employees, unions, suppliers, communities, government agencies etc.). follow up of previous issue, if any.	
	issue, ii arry.	

Day 4: 27 July 2018 (Friday)

Time		Activities	s & Areas		Auditee
	Najwan	Ruzita	Raouf	Rozaimee	Guide(s)
Travel at	Lutong Estate	Batangan Estate	Lutong Estate	Lutong Estate	for each
7.00am	Audit of relevant Indicators of	Audit of relevant Indicators of	Audit of relevant Indicators of	Audit of relevant Indicators of	auditor
0.00	P1, P2, P5, P6, P7, and P8 of	P1, P2, P4, P5, P7, and P8 of			
8.00am -	Social and HCV management,	environmental , safety and	GAP , which may include:	GAP, HCV and Social which	
12.00pm	which may include:	<u>health</u> management, which	 review of relevant 	•	
	 review of relevant 	may include:	evident of conformities,		
	evident of conformities,		pertaining compliance to		
	pertaining commitment to	[·	laws and regulations,		
	transparency, compliance to	, ,	commitment to long-term		
	laws and regulations, land	1	economic and financial		
	use rights, Social Impact	laws and regulations,	viability, good agricultural		
	Assessment (SIA), social	environmental impact	practices (GAP),	viability, good agricultural practices (GAP),	
	and HCV management plans & implementation,		management plan & implementation training,	practices (GAP), management plan &	
	complaints and grievances,		continuous improvement		
	training, continuous		plan, etc.	continuous improvement	
	improvement plan, etc.	continuous improvement	 review of field operation (e.g. 		
	• review of plantation		harvesting, upkeep,	<u> </u>	
	boundary and any relevant	l	replanting etc.) and related	·	
	amenities and facilities for		activities (e.g. nursery,	` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `	
	employees (such as house,		stores of fertiliser and		

	water and electricity supplies, shops, worship / prayer places, clinic, recreational facilities etc.). • review of land statement, conservation areas (e.g. riparian buffer zone, steep areas, wildlife habitat, etc.) and boundary. • consultation with any relevant personnel (e.g. management, local and foreign employees, unions, suppliers, communities, government agencies etc.). • follow up of previous issue, if any. herbicides, etc.). • follow up of previous issue, if any. herbicides, etc.). • follow up of previous issue, if any. stores of fertiliser and herbicides, etc.). • follow up of previous issue, if any. stores of fertiliser and herbicides, etc.). • follow up of previous issue, if any.					
12.00pm – 1.00pm	LUNCH BREAK & FRIDAY PRAYER					
1.00pm – 4.00pm	 Continue assessment Verification on outstanding issues Audit Team discussion, preparation on audit findings and issuance of NCR (if any) 					
4.00pm – 5.00pm	Closing meeting at PCO Jeroco 1 CU End of audit	All				

Note: Time and duration shown are approximate. Subject to weather, field visits may change accordingly, if necessary.

Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS

Principle 1: COMMITMENT TO TRANSPARENCY

Clause		Indicators	Comply Yes/No	Findings
C 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental,	1.1.1	There shall be evidence that growers and millers provide adequate information upon request for information on issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	YES	Jeroco 1 CU is committed to provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making by upon request. There was procedure available on communication as evidenced in Jeroco 1 CU. The procedure had involved internal and external consultation. The procedure provided a form to be filled up by any stakeholder who has the interest to request any information pertaining to P1.
social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	YES	The information was submitted to DOE through online system and all necessary supporting document were well maintained.
C 1.2 Management	1.2.1	Land titles/user rights (Criterion 2.2);	YES	The right to use the land at Jeroco 1 CU can be demonstrated and not disputed by any party. The auditor has sighted that there were clear land ownership documents.
documents are publicly available,		Occupational health and safety plans (Criterion 4.7);	YES	Safety and Health plan was available at Jeroco 1 CU
except where this is prevented by commercial confidentiality or		Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	YES	The SIA action plans were updated and each of issues were identified for each of the Estates and POM.
where disclosure of information would		HCV documentation summary (Criteria 5.2 and 7.3);	YES	The Jeroco 1 CU have established the HCV's documentation summary, and posted at each notice boards at all estates, as well as Jeroco POM 1.
result in negative environmental or social outcomes.		Pollution prevention and reduction plans (Criterion 5.6);	YES	JPOM 1 and estates have identified all sources of pollution resulted from their activities. Pollution prevention and action taken also made available. Among of activities covered include waste management, effluent discharge, conversation of natural resources and mill/estate operation.
		Details of complaints and grievances (Criterion 6.3);	YES	No complaint or grievances were observed.
		Negotiation procedures (Criterion 6.4);	YES	Negotiation procedure maintained available.

Clause	Indicators		Comply Yes/No	Findings
		Continual improvement plans (Criterion 8.1);	YES	Continual improvement plans maintained available. Continual improvement is reported in the indicator 8.1. The continuous improvement plans were established and updated accordingly by the Executives from the Sustainability Department.
		Public summary of certification assessment report;	YES	The public summary made publicly available at website by SIRIM QAS.
		Human Rights Policy (Criterion 6.13).	YES	The human rights policy maintained available. The policy is posted at office notice boards.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	Jeroco 1 CU had a documented policy to committing on integrity for all their staffs and workers. The code of conduct policy (Code of Conduct and Business Ethic Policy), issued on 1 March 2018 has been communicated to the new staffs and foreign workers during induction course. New foreign workers (Indonesia) and local at Jeroco POM 1 had been briefed with the policy.

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause		Indicators	Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local,	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	YES	Generally, Jeroco 1 CU maintained to continue the operations with relevant legal requirements. It was evident based on documents reviewed during the onsite visit at Jeroco 1 POM, Lungmanis estate, Lokan estate, Lutong estate and Batangan estate.
national and ratified international laws and regulations.	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	NO	The Legal and Other Requirements Register was prepared by the Sustainability Department. Each operating unit has its own copy of the Legal and Other Requirements Register and were evaluated individually annually for its compliance. However, it has been noted that the Legal register in Jeroco 1 POM, Batangan, Lokan, Lungmanis and Lutong Estate was not updated with latest "The Employment Insurance System Act 2017". Thus, Minor NCR MAR/01 2018 was raised.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	 Jeroco 1 CU maintained its mechanism for ensuring all the applicable legal requirements are implemented. The mechanism is by: Evaluation of compliance exercise against the legal register by Sustainability Executive. Internal audit on RSPO compliance. Agronomist Report in areas of review on rainfall & yield, palms condition and any agronomist related, pest & disease and palm nutrition deficiencies. The reporting by Agronomist Department. It was also doing for fertilizer recommendation. Estate Field Inspection by Plantation Advisor.
	2.1.4	A system for tracking any	YES	The CU maintained documented system for identifying and tracking the updates of the applicable

Clause		Indicators	Comply Yes/No	Findings
		changes in the law shall be implemented. Minor Compliance		legal requirements through various media such as LawNet, internet, newsletter, etc. The legal register management noted had been update accordingly.
C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal,	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised NCR land) and the actual legal use of the land shall be available. Major Compliance	YES	The right to use the land at Jeroco 1 CU can be demonstrated and not disputed by any party. Auditor sighted that there were clear land ownership documents. Land titles were available in documents. It has been verified that Jeroco Group of Estate (JGOE) owned the said lands as Country Lease land title from the Government of The State of Sabah. The original copies of the documents however, were kept in Plantation Central Office, Sg. Segama. Copies of land titles for all estates were sighted. All the estates were under the jurisdiction of Kinabatangan District. Document review shows it was confirmed the terms of the land title for all the estates cultivation of an agricultural crop of economic value have been complied.
customary or user rights.	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	YES	The perimeter boundaries of the estates were visibly maintained by erecting white painted pegs along the boundary, especially the ones that adjacent to other plantations and forest reserves. During the site review, the boundary pegs and boundary stones adjacent with IOI Plantation were available and maintained at Lutong, Lokan and Lungmanis Estate. Meanwhile, the Sg Simpang Forest Reserve boundaries were clearly demarcated with boundary stones 400) and signboards as visited at Batangan Estate.
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	There were no local communities surrounding of Jeroco 1 CU, as stated in the Social Impact Assessment dated 2012. The Social Action Plan reviewed in July 2018 has also confirm no any stakeholder. Therefore, no land is encumbered by customary rights or dispute from any stakeholder at Jeroco 1 CU.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	YES	There were no land conflicts sighted during the audit, as explained in indicator 2.2.3.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with	YES	There were no land conflicts sighted during the audit, as explained in indicator 2.2.3.

Clause		Indicators	Comply Yes/No	Findings
		involvement of affected parties. Minor Compliance		
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance	YES	Auditor had verified through stakeholders meeting and interview with management and other oil palm plantation companies that there was no conflict raised due to violence action taken by Jeroco 1 CU to maintaining peace and order in their current and planned operations. In addition, Jeroco 1 CU had employed watchmen in order to guard of their workers, staffs, children's life, their belongings and company's property.
C 2.3 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.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). Major Compliance	YES	This requirement is not applicable for Jeroco 1 CU since there has been no land is encumbered by customary rights or dispute from any stakeholder. There were no land conflicts sighted during the audit, as explained in indicator 2.2.3
	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include:	YES	This requirement is not applicable for Jeroco 1 CU since there has been no land is encumbered by customary rights or dispute from any stakeholder.
	a)	Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision-making;	YES	This requirement is not applicable for Jeroco 1 CU since there has been no land is encumbered by customary rights or dispute from any stakeholder.
	b)	Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;		This requirement is not applicable for Jeroco 1 CU since there has been no land is encumbered by customary rights or dispute from any stakeholder.

Clause		Indicators	Comply Yes/No	Findings
	c)	Evidence that the legal, economic, environmental and social implications for 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 company's title, concession or lease on the land. Minor Compliance		This requirement is not applicable for Jeroco 1 CU since there has been no land is encumbered by customary rights or dispute from any stakeholder.
	2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance		This requirement is not applicable for Jeroco 1 CU since there has been no land is encumbered by customary rights or dispute from any stakeholder.
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance		This requirement is not applicable for Jeroco 1 CU since there has been no land is encumbered by customary rights or dispute from any stakeholder.

Principle 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY

Clause	Indicators		Comply Yes/No	Findings
C 3.1	3.1.1	A business or management	YES	All 4 estates visited maintained to have minimum 4 years' business plans. The budget allocations
There is an		plan (minimum three years)		at estates, include activities for operating expenditure i.e. upkeep, cultivation, harvesting &
implemented		shall be documented		evacuation, welfare, other than that, capital expenditure, RSPO compliance, etc. Attention was
management plan		That includes, where		given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the
that aims to		appropriate, a business case		performance of each operating unit. The cost of production was reviewed and compared against
achieve long-term		for scheme smallholders.		expenditure each year with projections in place for future years. While, provisions at mill, include
economic and		Major Compliance		the activities for milling process, general charges, RSPO compliance and capital expenditure.
financial viability.	3.1.2	An annual replanting	YES	Replanting program was tabulated annually consistence with business plans reviewed. The
		programme projected for a		decision for replanting was guided by Oil Palm Agriculture Policy, agronomy department and

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Clause	Indicators	Comply Yes/No	Findings
	minimum of five years, with yearly review, shall be		approved by Chief Executive Group Plantation.
	available. Minor Compliance		

Principle 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS

Clause		Indicators		Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored.	I	Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	YES	Oil Palm Agriculture Policy is the manual used for the operations in the estate. The manual is maintained and updated accordingly. The latest update was carried out in 5/7/2017. A review on the manual was carried out by the auditors. It was confirmed that all activities in the estates from seedlings in nursery to planting in the fields have been included in the Manual. The document specifies the following sections such as pest & diseases management (control of Rhinoceros Beetles, rat, bagworms and nettle caterpillars, ganoderma), fertilizer of replanting (terracing and platforming, planting distances and lining), nursery (single and double stage nursery), manuring, weeding, water management, road maintenance management, thinning, epiphyte eradication, belt press solid application (BPS), pruning and harvesting. Safe and Standard Operating Procedures is the Standard Operating Procedures used for the safety precautions for all operations in the estate. The document stated the procedure and control measures, other than that PPE's that made compulsory during work commenced. It was also noted that relevant SOPs maintained displayed at various work stations for easy reference, for example, at the muster ground, workshop, riparian buffer zone, chemical storage and diesel storage.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	YES	The mechanism is by: 1. Evaluation of compliance exercise against the legal register by Sustainability Executive. 2. Internal audit on RSPO compliance. 3. Agronomist Report in areas of review on rainfall & yield, palms condition and any agronomist related, pest & disease and palm nutrition deficiencies. The reporting by Agronomist Department. It was also doing for fertilizer recommendation. 4. Estate Field Inspection by Plantation Advisor.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	Relevant records on implementation and monitoring of Agriculture Manual and other SOP at the CU were clearly verified. Among the records sighted were: Program sheets, Field cost books, Planting Advisor reports, Agronomic reports, Audits by Sustainability Officers, Harvesting Interval records, Rat baiting records, Fertiliser application records, Monthly Progressive Reports, scheduled wastes records, PPE Checklist etc. Most records are being maintained for more than a year and some much longer.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	The CU continued to record the origin of FFB source. However, there was no third-party source since the mill maintained its Identity Preserved production model.

Clause		Indicators	Comply Yes/No	Findings
C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	All estates continued to practice the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields), belt press solid application and EFB application. Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the Agronomy Department. Fertilizer recommendations were made based on annual foliar sampling. Soil sampling was carried out yearly consistence with foliar sampling.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertiliser inputs were based on recommendation by the Agronomist Department. The application programs were monitored using program sheets, bin cards, field cost book and manuring program sheets. Records of programs and applications of fertilisers were available.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	Periodic tissue and soil sampling had carried out in Jeroco 1 CU to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. Foliar sampling was carried out in April 2018 at Batangan Estate, March 2018 at Lokan Estate, November 2017 at Lungmanis Estate and in January 2018 at Lutong Estate.
	4.2.4	A nutrient recycling strategy shall be in place and may include use of EFB, POME, and palm residues. Minor Compliance	YES	All estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose. EFB were also applied. EFB applied in the mature and immature oil palm area (replants).
C 4.3 Practices minimise and control erosion	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	There were no fragile/marginal soils in both estates visited based on the soil maps provided sourced from Soil of Sabah.
and degradation of soils.	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance	YES	Jeroco 1 CU had a management strategy for planting on slopes and to minimise and control erosion and degradation of soils. The plantings on slopes was guided by its Oil Palm Agriculture Policy. The agronomy department guided by Land Survey Department to established slope map for all estates. Cover crop was observed planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> and soft grasses in the inter rows were sighted during the visit. No bare ground was sighted during the visit.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	During the field visit, it was observed that the main and field roads of Jeroco 1 CU were in satisfactory condition and accessibility were made possible by regular maintenance. There was evidence of road maintenance programmes which consist of road resurfacing with grading and compaction and culvert maintenance.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.	YES	No peat soil observed in all estates in Jeroco 1 CU. It was supported with soil map provided by estate.

Clause	Indicators		Comply Yes/No	Findings
		Major Compliance		
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	YES	No peat soil observed in all estates in Jeroco 1 CU. It was supported with soil map provided by estate.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	There were no problematic soils in both estates. Refer to soil types at 4.3.1.
C 4.4 Practices maintain the quality and	4.4.1	An implemented water management plan shall be in place. Minor Compliance	YES	Water management plans was prepared by sustainability executive in July2018 to covered for the Jeroco Group Estates and POM.
availability of surface and ground water.	4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated. Major Compliance	YES	All Estates had continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways within the estates. During the site audit at the estates, it was noted that buffer zones were allocated along the natural waterways. Signage and red paint on oil palm trunk were used as demarcations of the buffer zones. The boundary marker for buffer was sufficiently maintained. It was clear that HSPHB had a policy to maintain the buffer by restricting agrochemicals application. There was no sign of agrochemicals applied. The signboard for riparian buffer zone were erected and it contain several order and instruction such as prohibited for intrusion, spraying of agrochemical, fishing, open burning and planting.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance	YES	An Effluent Treatment Plant is available at JPOM 1 to treat the POME. According to DOE's license, the disposal method of the final discharge is through land irrigation. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory limit.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	Processing water obtained from water catchment area, the use of water in the mill was monitored accordingly.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	YES	Jeroco 1 CU continued to implement Integrated Pest Management in Batangan, Lokan, Lungmanis and Lutong Estate. All estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Oil Palm Agriculture Policy. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis, Antigonan leptopus and Turnera</i>

Clause	Indicators		Comply Yes/No	Findings
appropriate				subulata and for rhinoceros beetles is by using pheromone traps.
Integrated Pest Management techniques.	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Training related to IPM implementation as per the OPAP was evident. The understanding of the workers involved was satisfactory based on random interview conducted.
C 4.6 Pesticides are used in ways that do not endanger health or the environment.	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance	YES	The use of all agrochemicals by the estates (Batangan, Lokan, Lungmanis and Lutong) was guided by its agriculture manual Oil Palm Agricultural Policy (OPAP) where written justifications had been provided. The manual had included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic names.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be provided. Major Compliance	YES	All estates visited maintained records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used. The total quantity used, number of applications and active ingredients (ai) per Ha were also recorded. These includes mature and immature areas. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. Records of pesticides used were available for verification. All estates had documented programs for spraying pesticides. The estates had maintained agrochemical consumption for the year 2017 and 2018. The record includes total litre, litre per ha, active ingredient (a.i) per ha.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance	YES	As part of the IPM plans, management of all estates had established nectariferous beneficial plants (<i>Cassia cobanensis, Antigonan leptopus and Turnera sublata</i>) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. During visits to the site, noted that a number of beneficial plants were planted. All estates had plants ready for planting at the Nurseries. Pheromone traps to trap Rhinoceros Beetles were sighted in all replants and immature in all estates. There was no evidence on prophylactic use of pesticides in both estates.
	4.6.4	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, except in specific situations identified in	YES	Records showed that pesticides were handled, used and applied by trained personnel and as per the MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat baits were trained. Random interviews conducted showed that they understood the hazards involved and the usage and handling of chemicals in a safe manner. The trade and generic names of the chemicals were made known to the workers through the CSDS training. It was also noted that CSDS are available at all sites.

Clause	Indicators	Comply Yes/No	Findings
	industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in ac. with USECHH Regs (2000). Minor Compliance		
	4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance	YES	Based on site observations, the chemicals at the estates were stored in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Only authorized personnel have the access to the chemical store. Records showed that pesticides were handled, used and applied by trained personnel and as per the SDS of the pesticide. The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat baits were trained. Random interviews conducted showed that they understood the hazards involved and the usage and handling of chemicals in a safe manner. The trade and generic names of the chemicals were made known to the workers through the CSDS training.
	4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Major Compliance	YES	The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and use were maintained. All of the stores were equipped with exhaust fans and the door was secured. Only authorized personnel are allowed to handle the chemicals. All the chemicals were segregated accordingly.

	Clause		Indicators	Comply Yes/No	Findings	
		4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	Pesticide applications were guided by HSPHB's OPAP manual, SSOP, CHRA and by MSDS supplied by the manufacturer. The Manual had included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic names. The safe handling, storage and use of chemicals were demonstrated in the SSOP manual.	
		4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat bait were continuously trained. The training was regularly conducted by the estate management to enhance knowledge and skills of employees. The training included the safety aspects and usage of PPE. Records of training were maintained for verification. Random interviews with the workers showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Aerial spraying was not practiced by all estates. There was no evidence to show that aerial spraying was carried out. All estates only practices circle spraying and selective spraying which is only for targeted species such as woodies and VOPs.	
		4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide-handling shall be demonstrated or made available. Minor Compliance	YES	The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat bait were continuously trained. The training was regularly conducted by the estate management to enhance knowledge and skills of employees. The training included the safety aspects and usage of PPE. Records of training were maintained for verification. Random interviews with the workers showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner.	
		4.6.10	Proper disposal of waste material, according to procedures that are fully-understood by workers and managers shall be demonstrated. Minor Compliance	YES	Scheduled wastes were stored at centralized scheduled waste store in Jeroco Central workshop. Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. 5 th schedule inventory was evident.	
		4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	YES	Medical surveillance has been conducted by a registered doctor for all relevant workers i.e. manure, sprayer, and storekeeper. Results from assessment was satisfactory and fit to handle chemical.	
		4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in both estates. Workers interviewed were aware that pregnant and breast-feeding women should not handle chemicals. Monitoring of pregnancy and lactating was conducted on every quarterly by the estate HA.	
C 4.7 An	occupational	4.7.1	An occupational health and safety policy shall be in place.	YES	Occupational Safety and Health Policy signed by the Chief Executive-Group Plantation was sighted. The policy had been communicated to all levels of the organization through briefings	

Clause		Indicators	Comply Yes/No	Findings
health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:		An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance		and also displayed prominently in Bahasa Malaysia and English on notice boards at mill and estate office and Muster Ground. Random interviewed with employees showed that they generally understood the basic requirements of the policy. An Occupational safety and health plan for 2018 for each sites had been established and implemented. The plan covered the health and safety plan activities for year 2018 which included the work place inspection, health and safety training programme, and health monitoring programme. The implementation of OSH plan by each operating unit is monitored by HSPHB Safety and Health Officer.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	YES	Hazard identification, risk assessment and risk control (HIRARC) register covered activities in the estate and the mill. Among the activities included were chemical spraying, P&D rat baiting, manuring, harvesting and FFB collection in the estates while for milling operation boiler operation, FFB sterilization, kernel extraction and oil extraction and clarification as well as bio polishing and bio gas plant operation. Appropriate risk control measures had been determined and implemented for the other station in the mill. Most of the moving parts and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative control was sighted with safety signage and SOPs were displayed in the mill processing area.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.	NO	Training and Briefing on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. However, during field visit the following was observed: i) Site visit observed on 25/7/2018 at Block 9806 Lokan Estate found that 6 cutters did not wear appropriate PPE i.e. goggle. ii) Site visit observed on 27/7/2018 at Block 28 Lutong Estate found that 1 cutter did not wear appropriate PPE i.e. goggle and hard hat. Therefore, Major NCR MAR 02, 2018 was raised.
	4.7.4	The responsible person/s shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety	YES	Regular safety meetings between the responsible persons and workers about safety, health and welfare were conducted. Safety Committee Meeting was conducted once in three months and meeting minutes were made available at the estate office. Among the agenda discussed are confirmation previous meeting minutes, appointment of new AJK, issue reported by HA, Laporan pemeriksaan bangunan & rumah asuhan kanak-kanak, Laporan tindakan kecemasan, Ulasan Borang Pengumpulan Maklumat & other issues. The minute of meeting was established however it can be improved to include result from inspection activity carried out by each estate such as

Clause	Indicators	Comply Yes/No	Findings
	and welfare shall discussed at these meeti and any issues raised be recorded. Major Compliance	shall	Monthly Safety site inspection, Periodic Inspection report & recommendation (mainly on field condition & GAP), Daily Personnel Protective Equipment Checklist. Appointment of Safety committee was seen through appointment letter. Safety committee consists of employer rep. & employee representative.
	4.7.5 Accident and emergy procedures shall exist instructions shall be cle understood by all work Accident procedures sha available in the approp language of the workfor Assigned operatives train First Aid should be prein both field and coperations, and first equipment shall be avail at worksites. Records of accidents shall be kept periodically reviewed. Minor Compliance	and early ers. I be riate rce. ned sent ther aid able all and	Lutong, Lokan, Lungmanis and Batangan Estate has continued to implement Emergency Reponses Plan. The ERT consisting of trained First Aiders, mill/field staffs, Mandores, Admin clerk, workshop operator and Security personnel. Interviews with mill/estate staffs and mandores revealed they understood and were aware of the emergency procedures requirements. It was observed that all operating units were provided with first aid boxes which were checked on a monthly basis by the Hospital Assistants. At the estates, first aid box was given to mandores and available at estate office, workplace and chemical store. Records of replenishment were verified by the auditor. Telephone numbers and names of the members of the Emergency Response Team were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and Hospital were also included. Jeroco CU had emergency response plan and has been prepared by ESHS officer. Among of procedure of ERP such as Fire, Chemical spillage, Emergency preparedness and response, Accident occurrence reporting procedure & Other emergencies such as accident, flooding, etc.
	4.7.6 All workers shall be prov with medical care covered by acci insurance. Minor Complia	and dent	The CU continued to ensure all workers working in the premise (both mill and estate) covered by insurance. All local workers were covered by SOCSO as required under Employee's Social Security Act 1969. Foreign workers were covered by insurance as per the Workmen Compensation Act 1952.
	4.7.7 Occupational injuries sharecorded using Lost Accident (LTA) metrics. Minor Compliance	I be YES	JPOM 1 - No accidents were recorded for 2017. 4 cases an occupational poisoning has been recorded and JKKP 7 report has been submitted to DOSH in Dec 2017. Lungmanis Estate - 1 case has been recorded on in Apr 2017 for harvester during harvesting FFB. 2 day lost accident occur. OSH committee has conducted immediately after accident. Lokan Estate - 2 cases have been recorded on year 2017 with 1-2days lost working days for harvester during pruning and motorcycle riding. OSH committee has conducted investigation immediately after accident occur. Lutong Estate - 5 cases have been recorded on year 2017 with 3 days lost working days for harvester during pruning and motorcycle riding. OSH committee has conducted investigation immediately after accident occur. Batangan Estates - 2017 report 1 fatality and accident 12 cases. All JKKP 8 for 2017 has been submitted in Jan 2018.
C 4.8 All staff, workers, smallholders and	4.8.1 A formal training program shall be in place that co all aspects of the RSPO F	vers	Training programmed for 2018 covering aspects of the RSPO Principles and Criteria was established. Regular assessments of training needs were presented to auditors by POM and estates. The training programmed had also included the contractors and suppliers.

Clause		Indicators	Comply Yes/No	Findings
contract workers are appropriately trained.		and that includes regular assessments of training needs and documentation of the programme. Major Compliance		
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Formal training program for 2018 which cover all aspects of RSPO P&C was established. It was developed based on the training needs identification. Regular assessments of the effectiveness training was mainly done to routine supervision by the management. The program included the type of training and the targeted date. Training records were maintained accordingly.

Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

Clause		Indicators	Comply Yes/No	Findings
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	YES	Environment impact assessment management action plans and continuous improvement plans for Jeroco Group of Estates has been prepared by sustainability executive in July 2018. JPOM 1 - Latest environment aspect impact assessment was established in July 2018 to cover all activities in Jeroco Palm Oil mill 1. Among the identified activities are POME produce, EFB produce, scheduled waste disposal, biogas plant, generator set operation, domestic waste, transportation, diesel spillage, chemical usage and office work. As a result, among key environmental issues identified are water pollution due to scheduled wastes, diesel spillage, boiler ash leaching, air pollution due to transportation, open burning and smoke emission from boiler, noise pollution from operating machines, depletion of natural resources from water & diesel usage and waste generated from the mill operations. The assessment also recognizes the various scale of environmental impacts. All Estates - Latest environment aspect impact assessment was established on 18/07/2018 to cover all activities in estate. Among the identified activities are harvesting, spraying, Diesel tank, Housing area, Landfill. As a result, among key environmental issues identified are water pollution due to scheduled wastes, diesel spillage, chemical leakage into waterways, Air pollution due to transportation, open burning and smoke emission from diesel generator, soil erosion from bare ground condition or replanting operation, depletion of natural resources from water & diesel usage, and waste generated from the estate operations. The assessment also recognizes the various scale of environmental impacts.
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented in a comprehensive	YES	No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed.

Clause		Indicators	Comply Yes/No	Findings
		action plan. The action plan shall identify the responsible person/s. Minor Compliance		
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a min. every 2 years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance	YES	The CU has developed and reviewed the "Environmental Impact Assessment, Management Action Plans and Continuous Improvement Plan for Jeroco Group" to monitor the effectiveness of the mitigation measures taken.
C 5.2 The status of rare, threatened or endangered species other High Conservation Value	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations. Major Compliance	YES	The report of "Potential High Conservation Value Area Assessment Report of Lutong Estate, Batangan Estate, Lokan Estate, Lungmanis Estate and Jeroco Palm Oil Mill 1 (JGOE 1)" was available and prepared by the Sustainability Executive. The report was completed in October 2012 and was updated in July 2018. The HCV assessment had identified on the rare, threatened and endangered species (RTEs) for estate named Lutong, Lungmanis, Batangan, and Lokan, including the management and action plan.
habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	YES	Jeroco 1 CU had identified potential RTE species, listed as Endangered in the IUCN List, which Crocodiles along the stream of Sg Kretam at Batangan Estate. An appropriate action plan had been made to protect these RTE species. There is no any ERT sighted during the monthly monitoring.
to best ensure that they are maintained and/or enhanced.	5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance	YES	Appropriate disciplinary measures on capturing, harming, collecting or killing the RTE species as required by the indicator. The auditor had review the records accordingly during the audit. Interviews with workers (clerk, FFB grader, boiler-man, gardener, security, foremen, laboratory, harvester, slashing, gardener/cleaner, crèche, security and mandore) found they are all aware of RTE in the Jeroco 1 CU.

Clause		Indicators	Comply Yes/No	Findings
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	YES	Jeroco 1 CU had committed to discourage any illegal or inappropriate hunting fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting were erected at guard and forest border. Furthermore, CCTV 24 monitoring was placed at strategic area surrounding the estate to control everything including controlling the illegal activities.
	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance	YES	There were no local communities living nearby Jeroco 1 CU. Thus, this indicator was not applicable with this CU.
C 5.3 Waste is reduced, recycled, re-used, and disposed of in	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	Jeroco Group has documented the identification of all waste product and sources of pollution. The "list of waste generated for estate and mill" were established to mitigate applicable identified waste product and source of pollution the plans were reviewed in May 2017.
an environmentally and socially responsible manner.	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Among the identified wastes including empty chemical containers such as pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with EQ (Scheduled Wastes) Regulations. Inventory and consignment documents were verified for confirmation of proper management and disposal. Sighted latest disposal was via approved licensed contractor.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance	YES	Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing was continually implemented for empty pesticide containers. The rinsed containers were pierced and stored prior disposal. 5 th schedule inventory was evident. Noted that all scheduled wastes were stored at centralized Scheduled Waste Store in Jeroco Central workshop. Sighted latest disposal was via approved licensed contractor.
C 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.	5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. Minor Compliance	YES	Fossil fuel such as diesel and petrol were use in both operation of estates and POM, especially on FFB transportation and generating power by gen set. Both estates had developed plan to ensure that used of fossil oil are efficient and monitored properly. Both estates had developed plan "fossil fuels management" dated in July 2018.
C 5.5 Use of fire for preparing land or	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the	YES	Jeroco 1 CU maintain a policy of no open burning. Mill and estates visited had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting. Observed trunk was chipped and stacked at inter row.

Clause		Indicators	Comply Yes/No		Find	ings		
replanting is avoided, except in specific situations		'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance						
as identified in the ASEAN guidelines or other regional best practice	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	The CU had not practiced had been used for preparir Batangan Estate. All palms	ng land for replanting s were chipped and	g activity Lutong, Lok eft decomposed at fi	an, Lungmanis ar eld.	d
C 5.6 Preamble Growers and millers commit to reporting on operational	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	YES	No changes on environme existing EIA documents h such as lorries and farm to operating unit.	ad identified genera	tion of gaseous emis	ssions from its or	peration
greenhouse gas emissions. However, it is recognised that these significant	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	Jeroco Group had identifie as emission from their farr and mill had planned to re tractor and gen set to prenvironment. Also sighted	m tractor and gen se educe emission by event any leakage	t operation. The man daily inspection and and problem that co	agement from all monitoring for the ould adverse imp	estates eir farm
emissions cannot be monitored completely or measured accurately with	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using	YES	Summary of net GHG emiss PalmGHG calculation option Summary of Net GHG Emiss	n used: apply full vers			
current knowledge		appropriate tools.		Emissions per Product	tCO2e/t Product	Extraction	%	
and methodology. It is also recognised		Minor Compliance		СРО	0.5	OER	20.61	
that it is not always				PK	0.5	KER	4.61	
feasible or practical				Production FFB Processed	t/yr.			
to reduce or				CPO Produced	290103.14 59789.25			
minimise these				Land Use	00700.20	ha		
emissions.				OP planted area		29584.2		
Growers and millers				OP planted on peat		0		
commit to an				Conservation (forested) Conservation (non-forested)		0		
implementation				Total		29584.2		
period until the end				[341		2000 112		
of December 2016								

Clause	Indicators	Comply Yes/No		Findings		
for promoting best			Summary of Field Emissions and Si	nks_		
practices in reporting to the				Ow	n Crop	1
RSPO, and				tCO2e	tCO2e/t FFB	-
thereafter to public			Emissions			
reporting. Growers and millers make			Land Conversion	96328.71	7.72	
this commitment with the support of			*CO2 Emissions from Fertiliser	1806.18	0.14	
all other stakeholder			**N2O Emissions	4985.62	0.4	
groups of the RSPO.			Fuel Consumption	4895.62	0.39	
Plans to reduce			Peat Oxidation	0	0	
pollution and			Sinks			
emissions, including greenhouse gases,			Crop Sequestration	-98507.7	-7.9	
are developed,			Conservation Sequestration	0	0	
implemented and			Total	9508.4099	0.76	
monitored.			Summary of Mill Emissions and Cre	dits		_
				tCO2e	tCo2e/tFFB	
			Emissions		1	
			POME	8269.57	0.03	
			Fuel Consumption	453.97	0	
			Grid Electricity Utilisation	0	0	
			Credits	0	0	
			Export of Grid Electricity	0	0	
			Sales of PKS Sales of EFB	0	0	
			Total	8723.54	0.03	
			Palm Oil Mill Effluent (POME) Treatn		0.03	
			Divert to compost	%		
			Divert to anaerobic digestion	100		
			POME Diverted to Anaerobic Digest			
			Divert to anaerobic pond		9%	
			Divert to methane capture (flaring)		0%	
			Divert to methane capture (electricity of	generation) 71	%	

Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS

Clause		Indicators	Comply	Findings
C 6.1 Aspects of plantation and mill management that have social impacts,	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	Yes/No Yes	SIA Assessment Report for Jeroco 1 CU entitled "Social Impact Assessment, Management Action Plans and Continuous Improvement Plans, Jeroco Group of Estates and Jeroco Palm Oil Mill 1 & 2," was prepared in October 2012. The report was prepared with the participation of the relevant stakeholders, such as the estate workers and the neighbouring estates, MPOA, Immigration Department, Lahad Datu Police Department,
including replanting, are identified in a participatory way, and plans to mitigate the negative impacts				Wildlife Department, and Sabah Forestry Department, and remains as the baseline for socioeconomic data within the all four estates, namely, Batangan Estate, Lokan Estate, Lungmanis Estate, Lutong Estate, and one Palm Oil Mill namely Jeroco POM 1, which includes the profile of each individual estate and mill and its stakeholders, including the identification of positive and negative social impacts. The report presented the estates'
and promote the positive ones are made, implemented and monitored, to demonstrate continual				and mill's background information, labour policies, grievance procedures (internal and external), sexual harassment policies, facilities and amenities offered by the estates, and the social impact assessment procedures and results. The reviewed SIA dated 18 July 2018 has highlighting each of issues raised by workers and stakeholders e.g. illegal racing, roaming chicken, Humana & housing facilities and maintenance and landfill management, and was discussed in their respective report.
improvement.	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	Yes	The latest stakeholder meeting was conducted once in 2 years and the current was conducted on May 2017. Appendix 2 'List of Participation during the Stakeholder Consultation' of the SIA report presents in detail the comments made by the various stakeholders on social impacts as well as the proposed mitigation plans by the estates and mill. Each of the issues raised by the participant was addressed in the action plan. Example of stakeholders such as workers, suppliers, contractors, neighboring plantations (Sime Darby), IPD Lahad Datu, Sabah Labour Department and Sabah Forestry Department. Subsequent meetings were also held to document and monitor the impacts identified. The Issues, Recommendations and Action Plans, Progress, Person-in-Charge were all tabulated. The process of reviewing and updating the Action Plan for Social Impact Assessment 2017/2018 done in consultation with the affected parties.
	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. Major Compliance	Yes	A timetable with responsibilities for mitigation of negative impacts and promotion of the positive impacts and monitoring were reviewed and updated as necessary. Identifying specific person in charge responsible for taking actions on each of the mitigation measures with specific time intervals. The monitoring records were verified at Lungmanis, Lokan, Lutong Estate, Batangan Estate and Jeroco POM 1.
	6.1.4	The plans shall be reviewed as a minimum once every two years	Yes	The social action plan for all Estates and Jeroco POM 1 have been reviewed in July 2018. The stakeholders meeting has been conducted with participation of affected parties such

Clause		Indicators	Comply Yes/No	Findings
		and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance		as smallholders and suppliers as example suppliers, contractors, neighboring plantations, Immigration Department, IPD Lahad Datu, Wildlife Department, and Sabah Forestry Department. List of stakeholders was updated in June 2018 at. All neighboring estates were included in the lists.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	Yes	There was no smallholders scheme at Jeroco 1 CU.
C 6.2 There are open and transparent methods for communication and consultation	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	Yes	A documented Consultation and Communication procedures and Grievance procedures for internal and external parties have been made available during the audit. The estates and mill do maintain files on records of communication and consultation with external and internal parties, for examples, with government agencies, suppliers and their own workers.
between growers and/or millers, local communities and	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	Yes	As stated in the SIA report, the estates manager is the nominated person to handle social issues. Appointment letters were verified during the audit.
other affected or interested parties	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	Yes	The lists of stakeholders were prepared by company headquarters. The lists included government agencies, suppliers, contractors, schools, bus operators, traders. List of stakeholders was updated in June 2018 at Jeroco 1 CU. All neighboring estates, suppliers and contractors were included in the lists.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	Yes	The estates and mill have developed the procedures for reporting complaints and grievances for stakeholders, to handle any grievances and disputes. The procedures cover issues pertaining to safety, health, cleanliness, environment, conflicts, thefts and other work matters. The procedures require the complainant to fill up a complaint form and forward it to the relevant officers of authority. Complaints from workers will first have to go to the <i>mandore</i> and, subsequently, to the assistant manager, manager and the higher authority for decisions, if necessary. Complaints from external parties, on the other hand, will first go to the chief clerk or assistant manager and subsequently to the higher authority for decision.
affected parties	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be	Yes	Complaints on housing and other services are usually entered into record books. The records include the name of the person who complained, his address, date, and type of service required. Visits to the line sites at Lungmanis Estate, Lokan Estate, Lutong Estate,

Clause		Indicators	Comply Yes/No	Findings
		available. Major Compliance		Batangan Estate and Jeroco POM 1 confirm that actions were taken on the complaints made by the workers.
C 6.4 Any negotiations concerning compensation for loss of legal,	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	Yes	Jeroco 1 CU had developed procedures to deal with land disputes, squatter disputes, and loss of legal and customary rights, as stated in "Land Dispute Management" distributed by Agronomy Department in June 2016.
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.	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and longestablished communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance	Yes	In terms of compensation, the procedures prescribe the determination of lawful owners, distribution of the compensation, time frame for compensation and calculation for various compensations. So far, there has been no compensation made to any disputing parties.
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	Yes	According to the estates' or mill's management and record, there was no any dispute on land or squatters.
C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	Yes	The documentation of pay and conditions are contained in the workers' contract of employment. All the contracts sampled were Bahasa Malaysia and drafted in accordance with the requirements under Labour Ordinance (Sabah Cap.67). The contract stipulates among others, the wage rate, working hours, overtime wage rate, latest date for payment of wages, rest day, pay rate on rest day, paid public. holidays, rate for working on public holidays, paid annual leave, etc. The contracts, check roll and pay slips of workers (clerk, FFB grader, boiler-man, gardener, security, foremen, laboratory, harvester, slashing, gardener/cleaner, crèche, security and mandore) were sampled at Lungmanis Estate,

Clause		Indicators	Comply Yes/No	Findings
provide decent living wages				Batangan Estate, Lokan Estate, Lutong Estate and Jeroco 1 Palm Oil Mill. The contracts all contain payment of minimum wages or more and comply with the requirements of the Minimum Wages Order 2016.
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	Yes	Every staff or worker had signing a contract of employment upon joining the estates or mill. As required by the Sabah Labour Ordinance, pay and work conditions are spelled out in this contract which is signed by the workers or staffs. Among others, the contracts spell out the period of employment, wage rate, work benefits, overtime, annual leave and public holidays. Details on monthly salary and deductions for every worker and staff are shown in their pay slips which are issued to the workers during pay day.
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	Yes	Jeroco 1 CU continues provide free housing, water supply, free medical services, subsidized electricity and free education for foreign children. Weekly inspection records were verifed and noted that the conditions of the houses at Jeroco 1 CU of estates are good. The compounds are well kept. Water treatment analysis (drinking water) has been conducted internally by monthly basis by Agronomy Department.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance	Yes	The grocery shops at Lungmanis, Lokan, Lutong and Batangan Estates had been inspected by auditor to ensure Jeroco 1 CU monitor to improved worker's access to affordable and sufficient food as stated in the social action plan. In addition, the prices of essentials goods were discussed in JCC meeting in all Estates. Others no any complaint or feedback from the workers. No groceries or sundry shop in Jeroco POM 1, only canteen selling foods for Mill workers.
C 6.6 The employer respects the rights of all personnel to	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	Yes	Jeroco 1 CU have published statements on freedom of association. As a matter of fact, the SIA report did mention that the company respects the right of workers to be unionized. Such statements are available in local languages as required by the standards.
form and join trade unions of their choice and to bargain collectively. Where the right to freedom of assoc. & collective bargaining are restricted under law, the employer	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	Yes	The workers in the estates and mill were not unionized. Furthermore, there was no formal organization formed among the workers to discuss related work or social matters. Nonetheless, a Joint Consultative Committee (JCC) was formed to serve as a platform for the discussion of such issues. This JCC comprises the estate management, field supervisors, <i>mandores</i> , drivers and clerk.

Clause		Indicators	Comply Yes/No	Findings
facilitates parallel means of ind. & free assoc. & bargaining for all such personnel.				
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	Yes	Jeroco 1 CU Labour Policy does not allow children below 18 years old to work in the estates or mill. Site visit at Lungmanis Estate, Lokan Estate, Lutong Estate, Batangan Estate and Jeroco POM 1 found no workers below age was found. Inspections of the Employee Master list in all estates and mill, it was found no workers below 18 years were recruited to work in the estates or mill.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability,	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	Yes	Jeroco 1 CU had published statements to the effect that the company does not practice discrimination in the recruitment of workers or staffs or in paying or promoting them. Such statements were written in the company's "Equal Opportunity Policy" and posted at notice board.
gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	Yes	There were no evidences of discrimination based on race, gender or national origin or any other factors. As shown in the employment letter, there were no differences in the terms of employment between foreign and local workers or between male and female workers. These workers live in the same housing complex and enjoy similar benefits. Interviews also revealed that there is no discrimination on any bases in the estates or mill. However, due to government policies, education opportunities differ between local and foreign children.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	Yes	Jeroco 1 CU had advertised vacant position with specific requirement which based on skills, capabilities and working experiences as in Job Street and HSHSB website. While for employment of foreign workers, Lutong and Batangan Estates has followed management SOP titled 'Syarat-syarat Penggajian Pekerja Asing'.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	Yes	Jeroco 1 CU had published policy on Sexual Harassment, Violence and Abuse Policy dated 20 November 2017 which should guide the practices in the estates and POM. The guidelines emphasize that sexual harassment is a threat to basic human rights and offenders will be punished accordingly, including termination from work. Each of the estates in Jeroco 1 CU had formed a Gender Committee which will be responsible for organizing relevant activities and programmes. The committees have met at quarterly basis to organize some activities for the members, for examples, briefings on the subject of sexual harassment. The policy had been communicated with women and men workers by placing at notice board and stressed during the committee meeting, and morning musters.

Clause		Indicators	Comply Yes/No	Findings
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	Yes	The Policy to Protect Human Right, including Policy on Reproductive Rights dated in September 2015 was placed on notice board at all Estates and Jeroco POM 1. Auditor has verified through interview with workers found they are all aware of the reproductive right policy.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance	Yes	The guidelines prescribe, among others, the procedures for reporting sexual harassment assigning the responsibilities for action as well as the timelines involved. Appendix 1-3 of the guidelines shows the flow chart reporting sexual harassment cases. Noted that there was no report on sexual harassment in the estates or Jeroco POM 1. It was confirmed during the consultations with the workers during the conduct of audit.
C 6.10 Growers and millers deal fairly and	6.10.1	Current and past prices paid for FFB shall be publicly available. Minor Compliance	Yes	It was evident that the mill displayed current and past FFB prices at their notice boards, even though Jeroco 1 CU only received its own certified FFB.
transparently with smallholders and other local businesses.	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB & inputs/services shall be documented. Major Compliance	Yes	The price of FFB was followed the MPOB listing.
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	Yes	Interviews with suppliers and contractors revealed that the estates/mill treat them very well. The contracts are amenable to changes, particularly on the timing on job completion. They usually received their payments in the form of cheques the following month after the job was done.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	Yes	Payments were made through cheques which are issued the month following the completion of the works. All the interviewees mentioned that, in the past, payment has been made very promptly. The records of payments seen testify that the contractors/suppliers have been paid on time.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	Yes	There was no local community lived nearby or within the Jeroco 1 CU plantation area. However, the Jeroco 1 CU has built a primary school within the CU area. The primary school has officially managed by Ministry of Education and open to other children from other estates. Consultation with the teachers at Sek. Keb. Jeroco confirmed the Jeroco 1 CU has contributed free electricity, monetary and school infrastructure as buildings, roads, classrooms etc.
	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or	Yes	There were no scheme smallholders at Jeroco 1 CU. It was verified with the Estates map and visit to external boundaries

Clause		Indicators	Comply Yes/No	Findings
		resources have been allocated to improve smallholder productivity. Minor Compliance		
C 6.12 No forms of forced or trafficked labour	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	Yes	Based on interview with local and foreign workers, men and women in all estates and Jeroco POM 1 found it was verified that there were no forms of forced or trafficked labour are used at the visited area.
are used.	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	Yes	As verified through employment contract, passport, work permit and interview with foreign and local workers, there was no contract substitution has occurred at the visited area.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	Yes	"Labour Policy for Foreign Workers" dated in September 2015 and "Procedure for Hiring Foreign Workers" were verified at the time of audit. Labour policy for foreign workers was made available at all estates and Jeroco POM 1 as displayed at notice board.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance	Yes	"Human Rights Policy" dated in October 2016 was made available at Jeroco 1 CU. The policy had been communicated to staffs and workers during morning muster.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance	Yes	Jeroco 1 CU had provided Humana School for foreign workers' children to take care their children while during working hours without any fee. Visit to Humana School at Estates found the facilities were in good condition, clean and maintained.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Auditors has verified through satellite image of Sentinel in June 2018 and Estate Maps and also through site visit to external boundary with IOI and Sg. Simpang Kanan Forest Reserved at Lungmanis, Batangan, Lokan and Lutong Estate there were no new planting or new development of areas at the Jeroco 1 CU. Therefore, this indicator was not applicable.

Principle 8: COMMITMENT TO CONTINUOUS IMPROVEMENT IN KEY AREAS OF ACTIVITY

Clause		Indicators	Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to:		
	a)	Reduction in use of pesticides (Criterion 4.6);	Yes	The CU adopted several continuous improvements in reducing of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata, Cassia cobanensis</i> and <i>Antigonon leptopus</i> and continue to monitor pest through Early Warning System (as per HSPHB OPAP 10 Policy). The CU also adopted planting of <i>Legominious</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area to minimizing circle and selective weeding. **Neproliphis biserata* was maintained and encouraged to be planted in Jeroco POM 1 CU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area. All Estates continued to manage pests, disease and weeds using appropriate IPM techniques. Pheromone traps to trap Rhinoceros Beetles were used in estates' replants and treatment with the insecticide Furadan 3G was only carried when more than 10 Rhinoceros Beetles / week / trap were caught.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	Yes	Environmental impact assessment, management action plans and continuous improvement plan for Jeroco Group has been updated and monitored by management. Among the improvement actions: (a) construction of sump at chemical and workshop to prevent ground or water contamination. (b) collect back chemicals bags and allocate store for control of misused. (c) use of tray for tractor parking and workshop stations to prevent ground contamination.
	c)	Waste reduction (Criterion 5.3);	Yes	The management of Jeroco Group had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.
	d)	Pollution and greenhouse gas	Yes	The management of both estates and mill had plan to reduce emission by daily inspection

Clause	Indicators		Comply Yes/No	Findings
		(GHG) emissions (Criteria 5.6 and 7.8);		and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.
	e)	Social impacts (Criterion 6.1);	Yes	A mechanism to highlight the performance in social aspects in CAPEX 2018 had been established. The activities listed in the Plans and the monitoring of the actions taken demonstrated the continuous improvement achieved in matters related to the social aspects.
	f)	Encourage optimising the yield of the supply base Major Compliance	Yes	Jeroco POM 1 CU is part of a well-established organization. Yield performance has always been the top priority in ensuring long-term economic and financial viability. Various efforts have been carried out to optimise the yield of the plantation. This included minimising crop losses, ensuring the soil fertility by timely and well monitored fertilizer application and biomass recycling. Roads and transportation vehicles well maintained to ensure timely and proper crop. Merit Point System (MPS), which is to ensuring better loose fruit collection, no left bunches and no un-harvested bunches at field by Agronomist Department and being monitored by Plantation Management Committee. Furthermore, the company has always keep itself updated with possible technological options especially in better planting material. To optimise yields, all estates implemented best agricultural practices, inclusive of: • timely and proper fertiliser application and EFB & Compost application • Improving on accessibility to maximize crop evacuation • expanding in field mechanized collection of FFB
				 constructing water bodies and water conservation pits to conserve moisture reducing surface run off to prevent leaching of fertilisers.

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Clause	Indic	ators	Comply Yes/No	Findings
4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	HSPHB is committed to undergone fully certify RSPO certification. The target year for certification is 2019 with subject to the remediation and compensation procedures that is still ongoing process for Tabin and Northbank Estate. While Pelipikan, the retrospective HCV assessment have been made by Green Harvest Sdn Bhd.
raised. Where there is evidence of fundamental	(b)	Progress towards this plan shall	Yes	There were no changes to the current time bound plan. It was confirmed during audit with representative of HSPHB. Time bound

failure to proceed with implementation of the plan, a major non-compliance shall be raised;		be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;		plan was verified by CB.
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	There were no changes to the current time bound plan as verified during this audit.
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	The internal assessment has been made in February 2018 for the uncertified management units. Based on recent recertification audit, the following was given feedback from HSPHB representatives: Pelipikan Estate Based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest Sdn Bhd) there were no clearance of primary forest at Pelipikan Estate. However, there were land clearing made on May 2006, September 2010 and February 2011. Whereas clearing was made without HCV assessment. HSP has submitted the Declaration of disclosure of non- compliant land clearance to the RSPO in April 2016 and currently HSP is in progress of preparing the LUCA. As in July 2017, HSP has submitted the item 2a and 2b as per RSPO Land Use Change Analysis (LUCA) checklist to RSPO. Currently still

			in progress preparing the satellite data and calculation of conservation liability. The satellite data consume time to complete. North Bank Estate and Tabin Estate HCV Assessment at Northbank and Tabin Estate has been completed in Nov 2013. Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure. As to date, the required LUCA data has already been submitted and has passed by the compensation panel. HSP has also provided the Concept Note for review by RSPO. Noted the latest communication (email) between HSP and RSPO in June 2017 regarding the concept notes. Final Conservation Liability (FCL) figure was confirmed at 579.48 ha. The amended concept note sent to the CEGP for approval. The revise
(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such	Yes	concept notes submitted to RSPO Compensation Panel for review. As of July 2018, the RSPO Compensation had replied and said that they will give feedback about the concept note. The internal assessment has been made in February 2018 for the uncertified management units. Based on recent recertification audit, the following was given feedback from HSPHB representatives:
	as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;		Pelipikan Estate Land conflict was resolved with the affected and relevant parties. Please refer Hap Seng Plantations 2015 Annual Report. Refer to HSP Annual Report Page 208-209, 36.d. Northbank and Tabin Estate Land conflict are still under court case. Please refer Hap Seng Plantations 2016 Annual Report. Refer to HSP Annual Report Page 97-98, 23 (a – b).
(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	Yes	The internal assessment has been made in February 2018 for the uncertified management units. Based on the internal assessment report, there was no labour disputed recorded at the all uncertified unit.
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	The internal assessment has been made in February 2018 for the uncertified management units. Based on internal assessment report, there was no issue on legal non-compliance for all uncertified unit.

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	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	Yes	
		A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;	Yes	The internal assessment has been made in February 2018 for the uncertified management units. The progress of the certification was concluded as 4.5.4. (a-d) on new planting, HCV, legal compliance and labour disputes for Tabin, Northbank and Pelipikan Estate. With regards to the land disputes, the action to address the issues were on-going.
		Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	Yes	It was evident that in handling uncertified management unit, HSP North Bank Estate and Tabin Estate has conducted Joint Consultation Committee meeting in May 2017 (North Bank Estate and Tabin estate) and April 2017 (Pelipikan Estate) to address unresolved issues. Actions in progress.
		Desktop study e.g. web check on relevant complaints	Yes	Further information can be obtained from https://www.rspo.org/acop/2017/hap-seng-plantations-holdings-bhd/HSPHB%20SUSTANABILITY%20REPORT%202014.pdf
		If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.	Yes	There was no non-compliance found for all requirements during this audit.
4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to		No additional indicators	NA	It has been verified that Jeroco Group of Estate owned the said lands as Country Lease land title from the Government of The State of Sabah. The land was not previously owned by any users and subject to customary rights of local communities and indigenous people.

customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.

RSPO PUBLIC SUMMARY REPORT

Note:

- 1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C.
- For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;
- 2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.

Attachment 4

RSPO SUPPLY CHAIN: AUDIT CHECKLIST

SECTION A: GENERAL INFORMATION

1.	File Reference No.	: EH04760001
2.	Name of facility/ site(s) /entity(ies)	: Jeroco Plantations Sdn. Bhd.
		Jeroco Palm Oil Mill 1
3.	Site Location (single site/multisite/Group)	: Off KM 40, Jalan Jeroco, 91109 Lahad Datu, Sabah
4.	SC model	: Identity Preserved
5.	Type of entity	: Palm Oil Mill
6.	RSPO Member Number	: 1-0098-11-000-00 (Hap Seng Plantations Holdings Bhd.)
7.	Annual summary records of certified oil palm products purchased and	: Refer details in Table 1 of this report
	claimed	

SECTION B (i): RSPO SUPPLY CHAIN CERTIFICATION SYSTEM (REVISED JUNE 2017)

	Requirements	Remarks
_	Audit Process Requirements – FOR STAGE 2 / RECERTIFIC	ATION AUDIT
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.	The organizational systems, the management systems and the operational systems, including any documented policies and procedures of JPOM1 are sufficient and adequate in complying with latest revision of RSPO Supply Chain Certification Standard. The Sustainability Agriculture Policy was last updated in February 2017.
	Audit Process Requirements – SURVEILLANCE AUDIT	
5.3.26	The surveillance audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.	Not Applicable

SECTION B (ii): GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
1	Applicability of the general chain of custody requirements	
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.	Jeroco Palm Oil Mill 1 (JPOM1) takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location as mentioned above.
1.2	Traders and distributors require a licence obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.	Not Applicable
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	RSPO Palm Trace Registration is available under Jeroco Plantations Sdn Bhd – Jeroco Palm Oil Mill 1.
1.4	Processing aids do not need to be included within an organization's scope of certification.	Not Applicable
2	Supply chain model	
2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	JPOM1 obtained certified FFB from own certified supply base as listed below. JPOM1 also found to be aware of the downgrading procedure.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	JPOM1 only apply IP model
3	Documented procedures	
3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	-
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Standard Operating Procedures for Traceability (SOPfT) - Chapter 1: CSFFB, CSPO & CSPK traceability system – chain of custody - Chapter 2: Harvesting and Loading of Fresh Fruit Bunch - Chapter 3: Delivery and Reception of CSFFB, In- house and Non In- house FFB - Chapter 4: Dispatch of CSPO and CSPK from the mill to refinery/ bulk transit installation/ buyer's vessel - Chapter 5: Monitoring of CSPO and CSPK sales Appendix 1: Weighbridge Tickets and Delivery Notes RSPO (& ISCC) Stamping Procedure. In addition to Mill Safe Standard Operating Procedures.

b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Among record sighted are; FFB delivery note, WB advice ticket, FFB grading, FFB assessment report, Daily FFB, CPO & PK production, Daily FFB received, Daily production report, Certified sustainable FFB form, Non- sustainable certified FFB form, Delivery notes, Sounding report & Mass Balance System for ISCC/ RSPO JPOM
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 organization's procedures for the implementation of this standard.	Under Chapter 3 of SOPfT, the Mill Manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. Assisted by Mill Assistant Manager, Sustainability Executive and relevant mill staff such as admin executive, mill clerk, weighbridge clerk.
3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii. Effectively implements and maintains the standard requirements within its organization. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal	Under SOPfT, there is Flowchart for Internal Audit system indicating the process for overall audit process in general. Coverage of audit sufficient & comprehensive to cater for the new standard (including modular requirement – Module D CPO Mills: IP). Internal audit was conducted in May 2018. No NC issued on supply chain scope.
	audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organization shall be able to maintain the internal audit records and reports.	
4	Purchasing and goods in	
4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and following minimum information for RSPO certified products is made available by the supplier in document form:	Records of incoming has been audited accordingly. It can be confirmed that the implementation was addressing the standard requirement.
	 The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; Supply Chain certificate number of the seller; 	

	A unique identification number.	
	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).	
a)	The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).	To demonstrate that purchases are made to the material category agreed with their supplier, JPOM1 ensure delivery chit are of their own supply base.
b)	The site ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcement and Shipping Confirmation on the RSPO IT platform on the level of each shipment.	For certified CPO & PK produced, JPOM1 update their stock in Palm Trace.
c)	A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements.	Internal supplier under same certification – valid certificate.
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Mechanism for handling NCP mentioned under Chapter 1 para 3.3.9 of SOPfT whereby no certified crop allowed into JPOM1 to avoid cross contamination. Mechanism for handling NCD mentioned under Chapter 1 of SOPfT; NCD including those without proper stamping, wrong stamping/ with discrepancies (issued by supplier or issued by JPOM2 to buyer). Mill Manager will verify the NCD/ corrected documents prior to release to customer. No NCP/ NCD recorded since last audit.
5	Outsourcing activities	
5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard.	Apply outsourced transportation when necessary.
	This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the organization (not the tank farm manager).	
5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	As mentioned in the JP000558 signed agreed between JPOM1 and the transporter.

	 a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance. 	
5.3		Not Applicable
	certified materials.	
5.4	The site shall at its next audit inform its CB of the names and	Not Applicable
	contact details of any new contractor used for the processing or production of RSPO certified materials.	
6	Sales and goods out	

7	The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must 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): • The name and address of the buyer; • The name and address of the seller; • The loading or delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number; • A unique identification number. Registration of transactions	Incoming document was checked accordingly. It has been addressing the standard requirement. All the transactions were being announced accordingly in Palm Trace by Sustainability Executive upon receive complete information via email from Shipping department. Completion of announcing in Palm Trace be done between 1 – 2 days after receiving the shipping information to avoid unnecessary complication.
7.1	 Supply chain actors who: are supply chain actors between the mill and final refinery; take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and are part of the supply chain of RSPO Certified Sustainable oil palm products must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO. 	The Sustainability Executive updated the RSPO IT Platform based on input provided by JPOM1 and shipping department.
8	Training	
8.1	The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff.	Annual Training Program established & being reviewed accordingly by the Mill Manager. The training record was well maintained.
8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system. Training shall be specific and relevant to the task(s) performed.	Last training was conducted in July 2018 by the Assistant Mill Manager. The training focus on relevant IP procedures and record. Attended by mill clerk, weighbridge clerk and lab assistant.
9	Record keeping	

9.1	The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	The relevant record pertaining to RSPO SCCS within JPOM1 found to be updated accordingly and easily accessible during the audit.
9.2	Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Relevant record pertaining to implementation of RSPO SCCS within JPOM1 retained for minimum 2 years.
9.3	The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	This was made available through mass balance accounting sheet.
10	Conversion factors	
10.2	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org). This is in particular relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. The guidance document for oleochemicals is available on the RSPO website (www.rspo.org). Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if	The actual OER and KER has been used as the conversion rates. Daily OER & KER were provided in the production report. Both conversion rates were monitored on monthly basis to check their performance against industry average.
11	appropriate. Claims	
11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO rules on communications and claims.	JPOM1 apply RSPO trademark with license and the trademark being displayed on mill and estate entrance signboard. JPOM1 has complied with the minimum requirement in term of the corporate communications rules as well as Annex 1 (RSPO trademark usage and guidance) of the RSPO Rules on Market Communications and Claims 2016).
12	Complaints	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Refer Grievance Procedure (published in website). No complaint from stakeholder with regards to RSPO SCCS since last audit.
13	Management review	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Management review planned once annually. Last conducted in June 2018.
13.2	The input to management review shall include information on: • Results of internal audits covering RSPO SCCS	Management review report, doc. no. HSP-SE-2018 rev. 2 Coverage sufficient, among item discussed during audit;

	Customer feedback	- follow up actions from earlier management review
	Status of preventive and corrective actions	- sustainability & adequacy of all SOP's
	Follow-up actions from management reviews	- sustainable agriculture policy
	Changes that could affect the management system	- result of internal audit
	Recommendations for improvement	- change in legal requirement of any compliance
13.3	The output from the management review shall include any	- compliant (internal & external)
	decisions and actions related to:	- accident & injury (LTA)
		- environmental quality
	Improvement of the effectiveness of the management	- waste management
	system and its processes	- energy usage performance
	Resource needs	- status of corrective actions
		- recommendation for improvement

SECTION C : SUPPY CHAIN MODELS (to only use whichever is applicable)

	Module D - CPO Mills: Identity Preserved		
D.3	Documented procedures		
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.	The RSPO Supply Chain committee of JPOM1 was found to be aware and understand the new standard requirement as well as their own internal procedures in implementing the requirements.	
	This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.		
D.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	JPOM1 only receive and process certified sustainable FFB from their own supply base as well as those of other estate under different certification unit. For receiving and processing of certified FFBs, JPOM1 refer to Chapter 3 of SOPfT and their Mill Safe Standard Operating Procedures respectively.	
D.4	Purchasing and goods in		
D.4.1	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	Refer detail in para 9.3 of this checklist	
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	JPOM1 has had volume extension approved by RSPO through notification to CB dated 6/04/2018 & 4/10/2018.	
D.5	Record keeping		

D.5.4	TT : (DODO : : (DODO : : :)		T		
D.5.1	The site shall record and balance all receipts of RSPO certified F deliveries of RSPO certified CPO and PK on a real-time basis.		CPO and PK were done on real time basis using the various report/ record as		
			mentioned in para 3.1b of this checklist.		
D.6	Processing				
D.6.1	The site shall assure and verify through documented procedures		To ensure 100% segregation, JPOM1 did not receive non-certified outside crop.		
	keeping that the RSPO certified oil palm product is kept segregate	ed from non-	For external transport that they use for delivery of certified CPO and PK will be		
	certified oil palm product including during transport and storage. The objective is for 100 % segregated material to be reached.		checked and clean if necessary prior to loading of the product. Record of cleanliness check being well maintained for reference.		
	The objective is for 100 % segregated material to be reached.		clearinitess check being wen maintained for reference.		
	E - CPO Mills: Mass Balance - Not Applicable				
	- Supply Chain Yield Schemes - Not Applicable				
	– Book & Claim (BC) – Not Applicable				
Annex 3	- RSPO Rules on Communications and Claims				
	Module A – IP and SG specific rules				
	Certified oil palm content	Not Applicat	ble		
	• For IP, 95% or above of the oil palm content must be RSPO IP-				
	certified.				
	• For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.				
	Where there is any percentage of non-certified oil palm within the				
	product, the reason for this must be fully justified and an action plan				
	for moving to fully certified oil palm must be in place, in accordance				
	with the requirements of the RSPO SCCS. In addition, the volume of				
	non-certified oil palm products must be covered by the purchase of				
	RSPO Credits of equivalent volume.				
	Labelling and trademark	Not Applicat	ple		
	Members are allowed to use the RSPO label in one of the following				
	ways: • RSPO trademark which includes the tag 'CERTIFIED' or				
	RSPO trademark which includes the tag 'This product contains'				
	certified sustainable palm oil'.				
	Wherever a RSPO trademark is displayed, the applicable trademark				
	license number must be shown immediately under or next to the				
	trademark or the 'statement'. Font must be Calibri, font size must be				
	at least 4pt (1.4 mm or 0.06 inch).				
	In on-pack communications, the RSPO trademark can be printed				
	anywhere on the pack.	<u> </u>			
1	Messaging	Not Applicat	ple		
	Messaging ALLOWED in storytelling in product-related				
	communications may include some or all of the following elements: • The oil palm products contained in this product have been certified				
	to come from RSPO sources. www.rspo.org				
	to come nom noro sources. www.ispo.org				

- By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org
- RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org
- Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org
- The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org
- RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org
- References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.

Attachment 5

Details of Non-conformities and Corrective Actions Taken During Recertification Audit (2018)

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 2.1.2 MAR01/2018	Minor	Indicator 2.1.2: A documented system, which includes written information on legal requirements shall be maintained. Finding: A documented system was not including "The Employment Insurance System Act 2017" in legal register. Objective evidence: Legal register in Jeroco 1 POM, Batangan, Lokan, Lungmanis and Lutong Estate was not updated and include "The Employment Insurance System Act 2017".	Result of investigation and determination of root cause The Employment Insurance Act 2017 was not included in the LRR list due to the Personnel & Administration Department did not notify to the Sustainability Team on the new requirement. Hence, no latest updated of the applicable regulation is included in the legal register requirement (LRR). Correction (if applicable) and Corrective action plan including completion date The applicable regulation has been immediately updated and included into LRR (Attachment 1) Review of the list of applicable regulation will be carried out every January of the year with the Personnel and Administration Department (Who is more familiar with the Regulations)	Result of investigation and determination of root cause was accepted List of Legal Register includes The Employment Insurance System Act 2017, reviewed on 30th July 2018 was verified. Status: Closed
Indicator 4.7.3 MAR02/2018	Major	Indicator 4.7.3: All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Finding:	Result of investigation and determination of root cause Lack of awareness on wearing Personal protective equipment (PPE) among harvester (Cutter) workers, even though the estate management already provide the	Result of investigation and determination of root cause were accepted Evidences on special training awareness or briefing to affected workers was conducted on 26 and 28 July

Adequate and appropriate protective equipment not available to a few workers at the place of work i.e. harvesting.

Objective evidence:

- 1. Site visit observed on 25/7/2018 at Block 9806 Lokan Estate found that 6 cutters did not wear appropriate PPE i.e. goggle.
- Site visit observed on 27/7/2018 at Block 28 Lutong Estate found that 1 cutter did not wear appropriate PPE i.e. goggle and hard hat.

PPE to all workers and emphasize wearing of PPE during work activity. Lacking awareness is due to the level of understanding of this worker is not the same with another harvester.

Correction (if applicable) and Corrective action plan including completion date

Immediately conduct awareness training on wearing personal protective equipment (PPE) among harvester (cutter) worker.

In addition to the yearly PPE awareness training among harvester worker and daily supervision by estate personnel (mandore and field conductor), monthly inspection by independent RSPO Officer (based in operating unit) was added starting August '18 ensure all harvester worker wearing all the required PPE during harvesting activity.

2018 for Lokan and Lutong Estates was verified respectively.

Status: Closed

Attachment 6

Details of Non-conformities and Corrective Actions Taken During Surveillance Audit 4 (2017)

P & C Specification Major/Minor		Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.1 NCR RAR 01 2017	2.1.1 Major Requirements:		JPOM1 has sent all the Authorized Competent Entrance Standby person for working in confine space to undergo health surveillance in order to get health declaration from Occupational Health Doctor (OHD) on 25th August 2017.	Sighted the following supporting documents as evidence of the corrective action had been taken. Nine workers were sent for medical surveillance for confined space to Chong Clinic. At JPOM 1 authorized entrance intending to work in confined space are certified physically and mentally fit determined by an occupational health doctor (OHD) Dr. Sim Yong Sing (JKKP registration no: HQ/11/DOC/00/223) on 01/08/2017 for 9 workers. Thus, previous NCR was satisfactory closed.
6.1.1: NCR HO-01			Lokan Estate has conducted JCC meeting on 10/8/17 with all the workers who involved in replanting activity and the minute meeting has been incorporated in the SIA report. Lokan Estate will include workers who involve in replanting activity into their JCC meeting at yearly basis.	Social aspects related to replanting has been assessed through JCC meeting with workers on 10/8/17. Minute of meeting and updated SIA report verified. During this RA audit (2018) it was found replanting activities were ongoing in Lungmanis (267ha), and Lokan Estate (239ha). The social impacts of replanting were discussed in Appendix 9 in the reviewed SIA dated 18 th July 2018. Therefore, Major NCR HO-01 was closed. Status Closed.

Attachment 7

Hap Seng Plantations Holdings Berhad Time Bound Plan on RSPO Certification.

No.	CU	Location	Date of Certification	Valid until	CAB & Certificate No.
1	Hap Seng Plantations (River Estates) Sdn Bhd - Sg Segama Group of Estate & Bukit Mas Palm Oil Mill	Lahad Datu	24/05/2017	23/5/2022	PT TUV Rheinland 824 502 14016
2	Jeroco Plantations Sdn Bhd Jeroco Palm Oil Mill 1	Lahad Datu	27/09/2013	26/09/2018	SIRIM QAS RSPO 0018
3	Jeroco Plantations Sdn Bhd Jeroco Palm Oil Mill 2	Lahad Datu	27/09/2013	26/09/2018	SIRIM QAS RSPO 0028
4	Hap Seng Plantations (River Estates) Sdn Bhd - Tomanggong Group of Estates	Lahad Datu	9/01/2015	8/01/2020	SIRIM QAS RSPO 0024
5	Kawa Estate and Hap Seng Estate, Hap Seng Plantations (Ladang Kawa) Sdn Bhd	Tawau	16/10/ 2015	15/10/2020	PT TUV Rheinland 824 502 15028
6	Pelipikan Estate	Kota Marudu	2019 (target)	-	-
7.	Hap Seng Plantations (River Estates) Sdn Bhd - Tomanggong Group Of Estates – North Bank Estate and Tabin Estate	Lahad Datu	2019 (target)	-	-