

RSPO PUBLIC SUMMARY REPORT



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

File Ref. : ES1200001

RSPO STAGE 2 PUBLIC SUMMARY REPORT

CLIENT : Spark Glory Sdn. Bhd.

PARENT COMPANY : Spark Glory Sdn. Bhd.

RSPO MEMBERSHIP No.: 1-0261-18-000-00

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 Base	GPS Location		Location
		Latitude	Longitude	
Spark Glory Sdn Bhd	Spark Glory Sdn Bhd	5° 18' 52" N	118° 34' 34" E	CL 095333467/476/458, 421/430/412/449, Sg Segama, 91117 Kinabatangan District, Lahad Datu. Sabah.

MAP : See Attachment 1

AUDIT DATE : 19th – 20th September 2019

DURATION : 6 auditor days

TYPE OF AUDIT : Stage 2 Audit

STANDARD : RSPO PRINCIPLE & CRITERIA MYNI 2014

SCOPE OF CERTIFICATION: Production of Sustainable Fresh Fruit Bunches

VALIDITY OF RSPO CERTIFICATE : 24/02/2020 – 23/02/2025

The following attachments form part of this report:

Non-conformity Report(s)

List of additional site(s)

Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : MAHZAN BIN MUNAP

Name : YVONNE CHEW SIDE FANG

Signature :

Signature :

Date : 24/02/2020

Date : 09 MAR 2020

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Stage 2 audit				
On-site audit date :	19 – 20 September 2019	No. of auditor days:	6 auditor days	
Audit team :	Mahzan B Munap (LA), Mohd Zulfakar Kamaruzaman, Mohd Ab Raouf Asis and Selvasingam a/l Kandiah, Dzulfiqar Azmi			
No. of major NCR :	1	Indicator: RSPO P&C (4.6.11)	Closing date: 20/01/2020	
No. of minor NCR :	1	Indicator: RSPO P&C (6.5.3)		
Indicate the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√	-	√	√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	-	-	-	-
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled :	Own plantation – Spark Glory			
Justification of audit planning :	During stage 2 audit, the audit team visited the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.			
Report approved by :	Kamini A/P M.Sooriamorthy	Approval date: 24/02/2020		

SUMMARY OF INFORMATION

	STAGE 2
Projection Period	September 2019 to August 2020
FFB Processed (MT)	2,500.00
Certified volume CSPO (MT)	500.00
Certified volume CSPK (MT)	125.00
Certified Areas (Ha)	126.83
Planted Areas (Ha) (<i>Mature + Immature area</i>)	121.46
Production Areas (Ha) (<i>Mature area only</i>)	121.46
HCV Areas (Ha)	1.19
REMARKS	-

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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 re-accredited by ASI on 3 October 2019 (accredited since 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mahzan B Munap	Lead Auditor Occupational Safety & Health and Environment	Possessed B.S (Petroleum Engineering) and M.B.A. Had more than 38 years of working experience spanning the Engineering Technical ladder as well as Operation and Management ladder. Experience in plant design, construction and commissioning; factory manufacturing operations and management and through these assignments had indirect responsibility for Safety, Health, Environmental and Quality. He is Lead Auditor for ISO 14001, ISO 45001, RSPO P&C and MSPO P&C.
Mohd Zulfakar Kamaruzaman	Auditor HCV	Holds B.Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operations. He has been trained as a RSPO P&C and SC Lead Auditor.
Mohd Ab Raouf Asis	Auditor Social	Holds B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He had more than 7 years of working experience in the oil palm operation. He is a qualified auditor for MSPO.
Selvasingam a/l Kandiah	Auditor Good Agricultural Practice	Holds a B.Sc. of Agriculture University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 28 years of working experience in plantation management covering cocoa, rubber and oil palm.
Dzulfiqar Azmi	Auditor Safety & Environment	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.

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1.3 Audit methodology

The audit only cover the Spark Glory Sdn Bhd (SGSB) Estate. Since this is an assessment of an outgrower who owns a single estate, a one parcel of land the size of 126.83 ha. the standard sampling formula of $0.8\sqrt{y}$ does not apply. So, the sampling size is one and only one estate. The audit included an on-site audit of SGSB Estate and its line site to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees 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 13/08/2019. This was then followed by sending letters to relevant stakeholders requesting for input (if any) regarding the company – Spark Glory Sdn. Bhd. There were no comments received during this process. Among the stakeholders consulted included Department of Environment (Lahad Datu), Department of Occupational and Safety Health, (Lahad Datu), Kota Lahad Datu Police Station, Lahad Datu Fire Department, Department of Labour Lahad Datu, SOCSO Lahad Datu, Sabah Environmental Protection Association, Kota Kinabalu, Environmental Protection Department, Kota Kinabalu. During the on-site audit, the audit team had also consulted the, workers' representative and field workers.

Stakeholder consultation was carried out during the on-site audit and the evidence from the stakeholder consultation carried out were as tabulated below: In general, there was no negative comments made against this Certification Unit.

Stakeholders interviewed	Evidence from stakeholder consultation
<p>1) Employees / Workers Organizations (including migrant workers)</p>	<ul style="list-style-type: none"> ▪ Interviewed workers constituted local and foreign, male and female, daily paid, monthly paid and piece rated at estate. They include Spark Glory Plantation workers – 2 local and 2 foreign. ▪ All workers interviewed acknowledged they have signed employment agreements with the estates. The contents of agreement were understood, as these were prepared in English/Bahasa. The contents were explained to them in Bahasa by the management team. ▪ Pre-induction briefing on conditions and terms of employment was explained to them during first reporting of duty ▪ They are aware of their working hours (8 hours). They also acknowledged being paid overtime for any work in excess of 8 hours. There is no forced overtime. Harvesters were paid piece-rated and do not get overtime. They prefer to have their salaries calculated on piece-rate basis even after 8 hours of work as it allows them to be paid higher. Sprayers understood that they are paid daily rate. ▪ They have been getting salaries above RM1,100 since January 2019. Salaries are paid before the 7th of every month. ▪ Through worker's interview, they confirmed there are no abuse at work, and no sexual harassment. They understand what constitutes sexual harassment and the function of Gender Committee. ▪ There is no discrimination between migrant workers and local workers, between male and female workers. ▪ Workers are provided with comfortable housing with free water and electricity. Local workers choose to stay in their houses in the nearby villages. ▪ They have access to affordable food from close by Tomanggong Estate canteen/sundry shops. Spark Glory has made arrangement with Hap Seng Plantation Management to allow it workers have access at this canteen/sundry shops.

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Stakeholders interviewed	Evidence from stakeholder consultation
	<ul style="list-style-type: none"> ▪ They are entitled to free medical facilities at the Hap Seng Estate clinic. Spark Glory has made arrangement with Hap Seng Plantation Management to debit it for treatment received by its workers. ▪ Workers had representatives who attend regular meetings with the management (in the JCC) ▪ Workers confirmed knowledge of Grievance complaints procedure, where they can put forward any complaints and or raise any issues. They are aware of the complaints form in the procedure. Books and complaints forms were used to complain about house defects at the Estates. ▪ They knew the types of work offered at Spark Glory estate when they were still in their own countries (no contract substitution). ▪ All migrant workers confirmed that they keep their own passports although some allowed their passport to be kept in the office for safekeeping with their own consent.
2) Settlers	Not applicable.
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> ▪ Confirmed there is no land dispute between Spark Glory CU and neighbouring estates. ▪ No social issues arising from estate workers.
4) Suppliers	<ul style="list-style-type: none"> ▪ Fair dealings with Hap Seng and traders in Lahad Datu. ▪ Payments are made within 1 months of invoice.
5) Contract workers	Not applicable as none being used.
6) Local & national NGOs	Not applicable.
7) Government agencies / Statutory bodies	None at site as invitation letter sent out did not received any comments . See item 1.4 above.
8) Independent growers / Smallholders	Not applicable.
9) Indigenous people	Not applicable.
10) Contractor	Not applicable as none used.
11) Previous land owner (if any)	Not applicable.
12) Others (please specify)	None
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.	

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2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

Spark Glory Sdn Bhd is a private company established in 1994. It is located in Kinabatangan District, Sabah, and is about 87 km from Lahad Datu town, 66 km from Kampung Paris and can be accessed through the government road, estate road and ferry. Spark Glory neighbors are Hap Seng Plantations Berhad (Kapis Estate) and Tabin Wildlife Forest Reserve.

The estate is fully developed with 100% oil palm planting. It began planting oil palm in year 2002. Hence, Principle 7 of the RSPO P&C is therefore not applicable.

All produced crops are sent to Hap Seng Plantation's mills.

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

Year of planting	Planting cycle (1 st , 2 nd , 3 rd , etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2002	1 st Generation	Mature	121.46	100.00
TOTAL			121.46	100.00

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Yvonne Chew Siok Fong
Position	:	Managing Director
Address	:	MDLD 3432, Room 1401, 14 th Floor, Wisma Khoo Slak Chiew, Jln Buli Sim-Sim, 90000 Sandakan, Sabah, Malaysia (Main Office)
Phone no.	:	+60 19 813 8186
Fax no.	:	-
Email	:	spark.g@hotmail.com

3.0 AUDIT FINDINGS

3.1 Changes to the products in accordance to the production of the previous year

This Stage 2 Audit in 2019 is the initial audit performed at this Certification Unit.

3.2 Progress and changes in time bound plan – Not applicable as Spark Glory does not have any other estates

i. Have all the estates under the parent company been certified? NA Yes No

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? NA Yes No

If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?

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- iii. Are there associated smallholders (including scheme smallholders) in the CU - NA Yes No
- If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification? NA Yes No
- 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.)

None at the time of audit.

3.4 Complaint received from stakeholder (if any)

None.

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 - MAR 01/2019 (6.5.3)

Total no. of major NCR(s) (details refer to Attachment 4) List : 1 - MM01/2019 (4.6.11)

4.2 For SC (Details checklist refer to Attachment 5) :

Total no. of minor NCR(s) (details refer to Attachment 4) List : Not Applicable

Total no. of major NCR(s) (details refer to Attachment 4) List : Not Applicable

5.0 AUDIT CONCLUSION

The audit team concludes that the organization has established and maintained its management system in line with the RSPO MYNI:2014 P& C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

Although lapses were noted during the audit Spark Glory Sdn. Bhd. is committed to take corrective action. Evidence(s) of response were sent via email to the Lead Auditor within the stipulated timeline given.

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6.0 RECOMMENDATION



No NCR recorded. Recommended to continue certification.




Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.

Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .



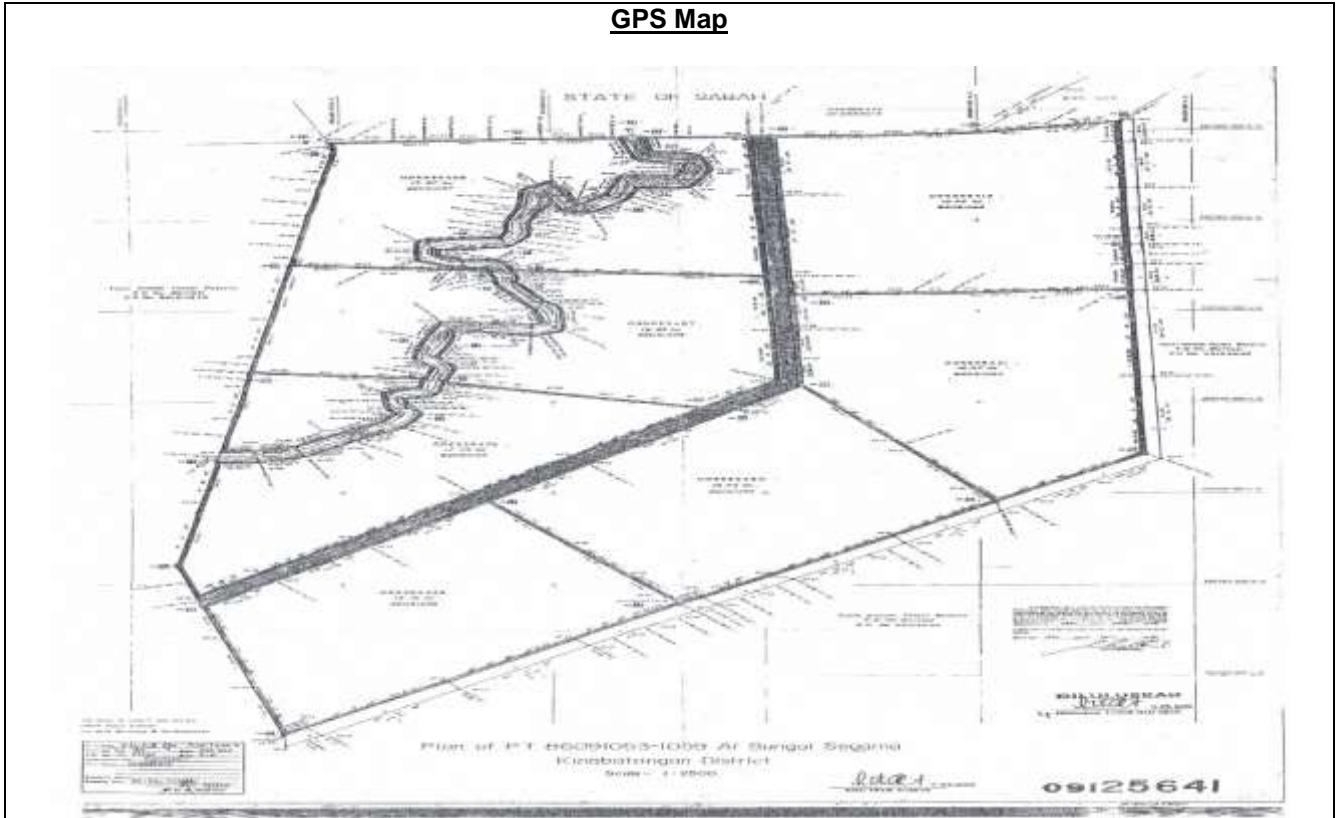
Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.

**7.0 It is confirmed that all corrective actions taken have been satisfactorily verified.
Recommended for certification.**

Audit Team Leader :	MAHZAN BIN MUNAP		20/01/2020
	_____	_____	_____
	(Name)	(Signature)	(Date)

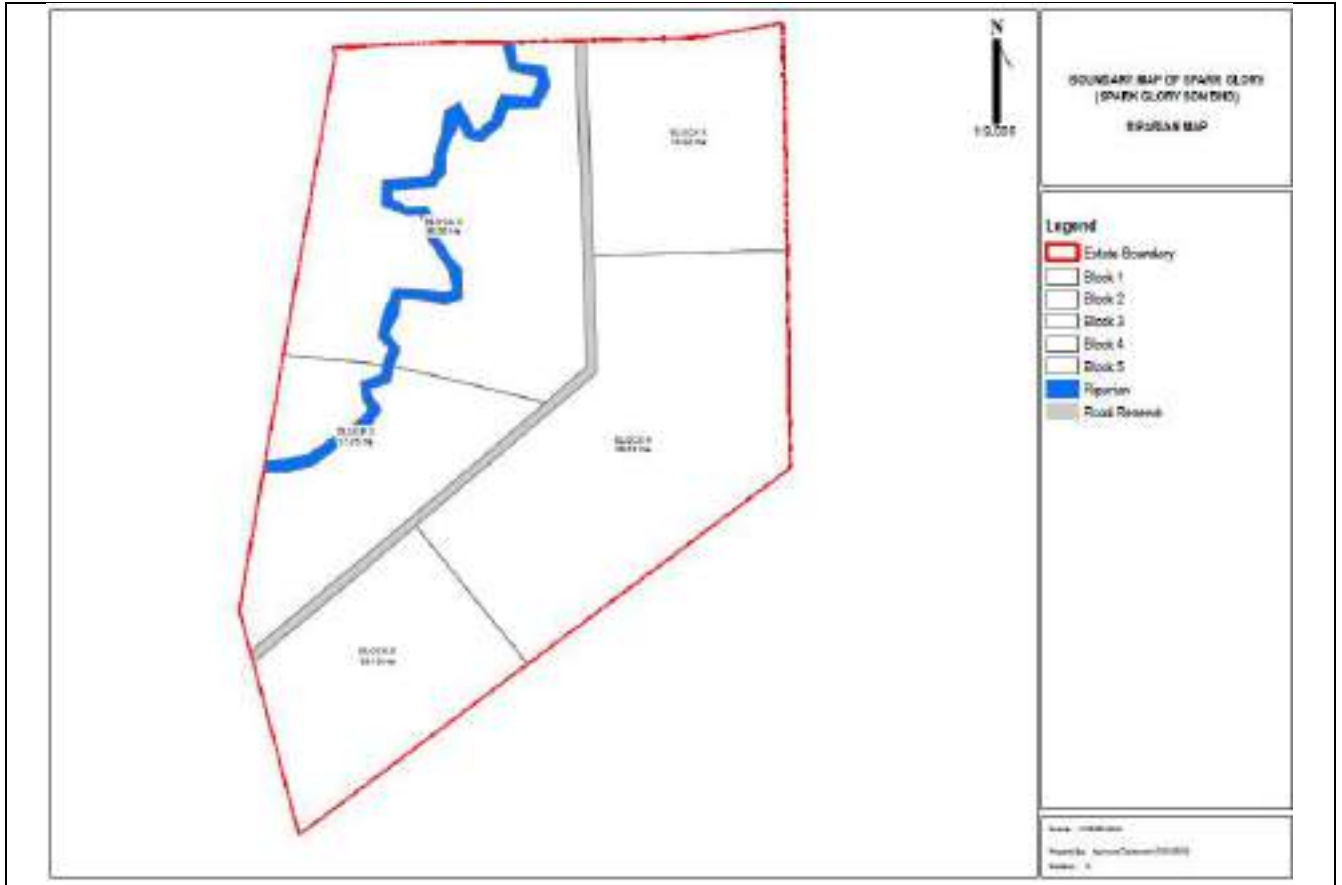
Maps of Spark Glory Sdn. Bhd.

GPS Map



Block Map

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**SIRIM QAS INTERNATIONAL SDN BHD
RSPO P&C MYNI:2014 STAGE 2 AUDIT PLAN**

1. Objectives

The objectives of the assessment are as follows:

- (i) To evaluate **Spark Glory Sdn Bhd** continued conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI)
- (ii) To verify the effective implementation of issue of concerns arising from the stage 1 assessment.
- (iii) To make appropriate recommendations based on the assessment findings.

2. Date of assessment : 19-20 September 2019

3. Site of assessment : Spark Glory Sdn Bhd

4. Scope of Certification: Production of sustainable Fresh Fruit Bunch

5. Reference Standard:

- a. RSPO P&C MYNI: 2014
- b. Company's audit criteria including Company's Manual/Procedures

6. Assessment Team

Assessor: Mahzan Munap (RSPO Lead Auditor Spark Glory)
 Mohd Zulfakar Kamaruzaman
 Mohd Ab Raouf Asis
 Dzulfiqar Azmi
 Selvasingam T Kandiah

If there is any objection to the proposed audit team, the organization is required to inform the Lead Auditor/RSPO Section Manager.

7. Audit Method

Site audits including observation of practices, interviews with interested parties (all categories of contractors, employees, nearby population, etc.), documentation evaluation and evaluation of records.

8. Audit Findings

Audit findings shall be classified as major and/or minor.

9. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain. In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. Conflict of interest

Auditors have not been employed by the organization concerned nor provided consultancy services relating to the development of its system in the past five years and next five years.

11. Working Language : English and Bahasa Malaysia

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12. Reporting

- a) Language : English
- b) Format : Verbal and written
- c) Distribution list : Client file

13. Facilities Required

- a. Room for discussion
- b. Relevant document and record
- c. Personnel protective equipment if required
- d. Photocopy facilities
- e. A guide for each group

13. Assessment Programme Details : As shown below

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17/9/19 (Tuesday)		
Time	Activities / areas to be visited	
9.00 – 9.30 am	<p><u>Joint Opening meeting LKM and Spark Glory Sdn Bhd at LKM</u> Lead Auditor to introduce audit team member, brief on audit objectives, scope, methodology, criteria and programmes</p> <p>Organization Representative to brief on the following:</p> <ol style="list-style-type: none"> 1) Briefing on Spark Glory organization's background, operations, RSPO implementation & legal non compliances such as land / labour dispute - if any (Please provide maps that have details of surrounding stakeholders, terrain, soil profile and conservation/HCV area). 2) Time bound plan for Spark Glory_Sdn. Bhd. (if any) Significant changes on organization activities, machinery, supply bases capacity etc. 	Top mgmt & Committee members

Audit Day 1: 19/9/19 (Thursday)

	Mahzan	Raouf	Zulfakar	Dzulfiqar	Selvasingam	
9:30 – 1:00 pm	Coverage of assessment: P1, P2, P4, P7, P8 <ul style="list-style-type: none"> Laws and regulations Safety Plan, HIRARC Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Facilities at workplace Continuous improvement 	Coverage of assessment: P1, P2, P6, P7, P8 <ul style="list-style-type: none"> Laws and regulations Social Impact Assessment (SIA), management plan & implementation Consultation with relevant government agencies Interview workers, gender committee, local communities and stakeholders Complaints and grievances Training and skill development programmes Continuous improvement 	Coverage of assessment: P1, P2, P5, P7, P8 <ul style="list-style-type: none"> Laws and regulations Land titles user rights Consultation with relevant government agencies Interview workers, gender committee, local communities and stakeholders HCV Assessment, Biodiversity Area, RTE Species 	Coverage of assessment: P1, P2, P5, P7, P8 <ul style="list-style-type: none"> Laws and regulations Environmental management (witness activities at site) EIA, Environmental Plan. Waste & chemical management Interview with workers, committee and contractors Training and skill development programmes Continuous improvement Time Bound Plan and Uncertified Management units 	Coverage of assessment: P1, P2, P3, P4, P5, P7, P8 <ul style="list-style-type: none"> Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice-witness activities at site (weeding/ spraying, etc.) EFB mulching, POME application Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. New planting Facilities at workplace Continuous improvement 	Guide(s) for each assessor
1.00 – 2.00 pm	Break					
2.00 – 5.00 pm	Continue assessment					Guide(s) for each assessor

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Day 2: 20/9/19 (Friday)						
Activities /areas to be visited	Mahzan	Raouf	Zulfakar	Dzulfiqar	Selvasingam	
8.30 – 12.30 pm	Coverage of assessment: P1, P2, P4, P7, P8 <ul style="list-style-type: none"> Laws and regulations Safety Plan, HIRARC Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Facilities at workplace Continuous improvement 	Coverage of assessment: P1, P2, P6, P7, P8 <ul style="list-style-type: none"> Laws and regulations Social Impact Assessment (SIA), management plan & implementation Consultation with relevant government agencies Interview workers, gender committee, local communities and stakeholders Complaints and grievances Consultation with relevant government agencies Training and skill development programmes Continuous improvement 	Coverage of assessment: P1, P2, P5, P7, P8 <ul style="list-style-type: none"> Laws and regulations Land titles user rights Consultation with relevant government agencies Interview workers, gender committee, local communities and stakeholders HCV Assessment, Biodiversity Area, RTE Species 	Coverage of assessment: P1, P2, P5, P7, P8 <ul style="list-style-type: none"> Laws and regulations Environmental management (witness activities at site) EIA, Environmental Plan. Waste & chemical management Interview with workers, committee and contractors Training and skill development programmes Continuous improvement 	Coverage of assessment: P1, P2, P3, P4, P5, P7, P8 <ul style="list-style-type: none"> Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice-witness activities at site (weeding/ spraying, etc.) EFB mulching, POME application Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. New planting Facilities at workplace Continuous improvement 	Guide(s) for each assessor
12.30–1.30 p.m.	Break & Friday Prayers					
1.30 – 4.00 p.m.	<ul style="list-style-type: none"> Continue assessment on unfinished area Verification on outstanding issues Audit Team discussion, preparation on audit findings and issuance of NCR (if any) 					
4.00 – 5.00 p.m.	<input type="checkbox"/> Closing meeting					Top management & Committee members

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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, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1	There shall be evidence that growers and millers 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. Minor compliance	Yes	Spark Glory Sdn Bhd has established and implemented document for responding to any communication in an undated Procedure Request for Information. Information made available include matters on environmental, social and/or legal that are relevant to RSPO Criteria. Sighted their Log book Summary of Request for Information and found no information has been requested by any stakeholders since its establishment in January 2019.
	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	Yes	The above Log book titled Summary Information Requested 2019 was seen maintained as means and evidence of recording information requested by any stakeholders, either internal or external. Viewed the Summary Log Book for External and Internal Stakeholder found no information had been requested to date of this audit.
C 1.2 Publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	1.2.1	Land titles/user rights	Yes	Information made available for public viewing at Spark Glory plantation's office were land titles, licenses issued by authorities, company policies, Safety and Health Plans, HCV report, Pollution Prevention and Reduction plans, Negotiations procedure, Complaint and Grievances procedures and Continual Improvement plans. There was no change in the land ownership / user right. Copies of land titles, which indicate the use right were reviewed. Original copies of land title maintained kept in Head Office.
		Occupational health and safety plans	Yes	The 2019 Occupational Safety and Health Plan (by month) had been established.
		Plans and impact assessments relating to environmental and social impacts	Yes	Management documents related to environmental and social plans and impacts assessments were made available to auditors. They include Management Action Plans And Continuous Improvement Plans.
		HCV documentation summary	Yes	HCV documentation maintained available.
		Pollution prevention and reduction plans	Yes	The pollution prevention and reduction plans had also been documented in Spark Glory Management Action Plans and Continuous Improvement Plans.
		Details of complaints and grievances	Yes	Spark Glory Sdn Bhd have maintained their record of requests and responses. Management document pertaining to complaint / grievance, as well as internal and external grievances flowchart are maintained and available.

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Clause	Indicators		Comply Yes/No	Findings
		Negotiation procedures (Criterion 6.4);	Yes	The negotiation procedure titled 'SOP – Land Dispute Management' has been established. It included negotiation process and should there be any issue related to compensation, the procedure for calculating and distributing fair compensation would be carried out at the company level.
		Continual improvement plans (Criterion 8.1);	Yes	Available.
		Public summary of certification assessment report;		Available.
		Human Rights Policy (Criterion 6.13).	Yes	A policy to respect human rights has been established by Spark Glory Sdn Bhd. The policy was made available at the estate's office.
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	Code of ethical conduct and integrity titled 'Code of Conduct and Business Ethics Policy' has been established and distributed to all staff and workers.

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Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicators	Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 Evidence of compliance with relevant legal requirements shall be available. Major Compliance	Yes	Spark Glory continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation was captured in a Legal Register and monitored by the Assistant Plantation Manager. The Register has included column for Compliance Status. It was last reviewed in Mar 2019.
	2.1.2 A documented system, which includes written information on legal requirements shall be maintained.Minor Compliance	Yes	Spark Glory Sdn Bhd has maintained documented system for identifying, evaluating, reviewing and updating applicable regulations and other requirements. The Legal Requirement Register (LRR) listing applicable laws to oil palm estate has been established and was last reviewed in March 2019.
	2.1.3 A mechanism for ensuring compliance shall be implemented. Minor Compliance	Yes	Spark Glory Sdn Bhd had a mechanism for ensuring that all applicable legal requirements were implemented. The mechanism was through evaluation of compliance exercise against the legal register by the Assistant Plantation Manager.
	2.1.4 A system for tracking any changes in the law shall be implemented. Minor Compliance	Yes	A Flow chart on Mechanism for Tracking any Changes in the Law has been in place
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, customary or user rights.	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 the CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified.
	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	During the site review, the physical markers were visibly maintained at Spark Glory.
	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	Yes	As reported in 2.2.1 of this checklist, it has been verified that the land is legitimately owned by Spark Glory since 1987. The audit team had confirmed that there were no land issues related to previous owners.

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Clause	Indicators		Comply Yes/No	Findings
		to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance		
	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	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 1987. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.
	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 involvement of affected parties (incl. neighbouring communities and relevant authorities where applicable). Minor Compliance	Yes	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 1987. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.
	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	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 1987. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.
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 shall be developed through participatory mapping involving affected parties (incl. neighbouring communities where applicable, and relevant authorities). Major Compliance	Yes	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 1987. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.
	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include:	Yes	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 1987. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.

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Clause	Indicators		Comply Yes/No	Findings
	a)	Evidence that a plan has been developed through consultation and discussion with all affected Estates in the communities, and that information has been provided to all affected Estates, including information on the steps that shall be taken to involve them in decision-making;	Yes	The audit team has also interviewed relevant stakeholder such as the Hap Seng Plantation, IOI Plantation, Head of village and villager representatives from Kg. Litang. From the interviews, it can be concluded that there was no issue raised nor evidence of any land dispute at Spark Glory. Based on the audit findings, copies of negotiated agreements on FPIC and other evidences required by these indicators a) to c) were not applicable.
	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;	Yes	
	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	Yes	
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	Yes	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Spark Glory
2.3.4		Evidence shall be available to show that communities are represented through institutions or representatives of their own	Yes	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Spark Glory

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Clause	Indicators	Comply Yes/No	Findings
	choosing, including legal counsel. Major Compliance		

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

Clause	Indicators	Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1 A business or management plan (min. 3 yrs) shall be documented. That includes, where appropriate, a business case for scheme smallholders. Major Compliance	Yes	Spark Glory Sdn Bhd had documented its business plan with projections until the financial year 2022. The budget provisions covered Revenue and Expenditure on Production Cost, Field upkeep and General Charges. Attention was given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years.
	3.1.2 An annual replanting programme projected for a min of 5yrs with yearly review, shall be available. Minor Compliance	Yes	There was no replanting planned for the next 5 years. Replanting could take place in 2027.

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

Clause	Indicators	Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored.	4.1.1 Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	Yes	Spark Glory Sdn Bhd had adopted the documented manuals (as below) and document as their standard operating procedures. All document has been made available during audit. <ol style="list-style-type: none"> 1. MPOB Code of Good Agricultural Practice for Oil Palm Estates and Small Holdings 2. Standard Operating Procedure (SOP) 3. Safe and Standard Operating Procedure (SSOP)
	4.1.2 A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	Yes	The Plantation Manager was accountable to check on consistent implementation of procedures. Among the means were: Periodic reporting to the Managing Director, On site visits, inspections and discussions with Mandore, Assessments and audits like Internal Audits, and Information on FFB Quality check as informed by Hap Seng mill.
	4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	Yes	Monitoring records available. Sighted there were monitoring records for weekly, monthly, and quarterly intervals being documented.
	4.1.4 The mill shall record the origins of all third-party sourced FFB. Major Compliance		Not applicable since this is Smallholder Growers.

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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	Spark Glory Sdn Bhd implemented its established SOP, to manage soil fertility. The maintenance of long-term soil fertility is via annual application of fertilizer based on periodic foliar analysis, soil analysis and biomass retention (pruned fronds left to decompose in the fields).
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	Yes	Records of fertilizer inputs were maintained.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	Yes	Spark Glory Sdn Bhd carried out annual foliar and soil sampling to monitor changes in nutrient status. The results of the foliar and soil analysis formed the basis for the fertiliser recommendations to maintain and to improve soil fertility.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME and palm residues. Minor Compliance	Yes	A nutrient recycling strategy was in place which included stacking pruned fronds and manually weeded weeds / grass that were left to decompose in the respective fields.
C 4.3 Practices minimise and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	Yes	Based on the Soil Map, extracted from "The Soils of Sabah" document, by the Agronomic Department of Hap Seng Plantations Holdings Berhad listed there were no fragile soils present in Spark Glory Sdn Bhd. Available soils noted were of Kinabatangan and Kretam series.
	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25° unless specified otherwise by the company's SOP. Minor Compliance	Yes	Field visits confirmed that Spark Glory Sdn Bhd had complied with the management strategy in place "Soil Conservation and Terracing" for planting on slopes and to minimize and control erosion and degradation of soils.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	Yes	During the field visit, it was noted that the road conditions were well maintained. Accessibility were made possible by regular maintenance guided by its road maintenance program. Road repairs and maintenance was advocated using hired excavators and the fillings of pot holes done manually.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management prog. shall be in place. Major Compliance	Yes	Not Applicable based on the Soil Map extracted, from "The Soils of Sabah" document. There were no peat soils in Spark Glory Sdn Bhd. This was also confirmed by field visit.
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the	Yes	Not Applicable based on the Soil Map extracted, from "The Soils of Sabah" document.

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Clause	Indicators		Comply Yes/No	Findings
		necessary drainage for oil palm growing. Minor Compliance		
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	Yes	Not Applicable based on the Soil Map extracted, from "The Soils of Sabah" document. There were no peat soils in Spark Glory Sdn Bhd.
C 4.4 Practices maintain the quality and availability of surface and ground water.	4.4.1	An implemented water management plan shall be in place. Minor Compliance	Yes	Spark Glory Water Management Plan has been reviewed and updated in Jan 2019. This plan is confined to only Spark Glory, covering only the water used for daily operation. Among the water management plans are: <ol style="list-style-type: none"> 1) Soil Moisture Conservation Programme 2) Buffer zone / riparian reserve of the streams 3) Water for domestic use 4) Contingency plan during drought season 5) Sewage and septic tank 6) Lubricant and fertilizer store 7) Rainfall records.
	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	Spark Glory continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways.
	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	N/A	Not applicable since this is Smallholder Growers.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	N/A	Not applicable since this is Smallholder Growers.
	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	Yes	Spark Glory Sdn Bhd had a documented integrated pest management (IPM) system in place. The IPM program among others included pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and wild boar.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate IPM techniques.	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	Yes	Records showed that training of those involved in IPM implementation was carried at Spark Glory Sdn Bhd. The training was on rats, RB and Bagworm.

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Clause	Indicators		Comply Yes/No	Findings
<p>C 4.6 Pesticides are used in ways that do not endanger health or the environment.</p>	4.6.1	<p>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</p>	Yes	<p>Justification of all pesticides used had been documented. The use of selective products that are specific to the targeted weed.</p>
	4.6.2	<p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be provided. Major Compliance</p>	Yes	<p>Records showed that Spark Glory Sdn Bhd had maintained records on the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity and Ai/Ha. Pesticides were used only when justified and areas used were recorded in a stock book.</p>
	4.6.3	<p>Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance</p>	Yes	<p>Spark Glory Sdn Bhd had a Pesticide Reduction and Chemical Reduction Plan.</p>
	4.6.4	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in 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 accordance</p>	Yes	<p>All pesticides used were those officially registered under the Pesticide Act 1974. There were no class I and II chemicals nor illegal agrochemicals (stated by local and international laws) in particular, paraquat, were used or found used.</p>

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Clause	Indicators		Comply Yes/No	Findings
		with USECHH Regulations (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	Pesticide operators had been given training on the safe handling/application of pesticides including demonstration on the correct PPE usage conducted in Apr 2019. Chemical Safety Data Sheet were used and especially precautions attached to the products were explained to the participants. They understood the dangers of the chemicals and the reasoning why to don the required PPE.
	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	All pesticides used were found stored in the Pesticides Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations.
	4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	Yes	The quantity of agrochemicals required for various field conditions were documented and justified as mentioned in Indicator 4.6.1. Requirements for Safety are as per CHRA Assessor recommendation. Reference to Safety Data Sheet are used during training to ensure those who handle pesticides are informed and warned of the hazards and risks present.
	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	Aerial spraying was not practiced at Spark Glory Sdn Bhd and there was no evidence to show that any had been carried out.

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Clause	Indicators		Comply Yes/No	Findings
	4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide-handling shall be demo or made available. Minor Compliance	Yes	2019 being the initial year for certification, proper records of training to enhance knowledge and skills of employees on pesticide-handling had been maintained only from 2019. Records of training and attendance list were maintained available.
	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	On the other hand, empty fertilizer bags were triple rinsed and use for Loose Fruit Collection (LFC). The used and worn out LFC bags were collected and disposed of responsibly, that is, the Estate Manager gather them, then self-transport the garbage to Lahad Datu Municipal waste collection bin.
	4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	No	At the time of audit, Spark Glory was found had not conducted medical surveillance for its Pesticides Sprayers. Hence, a major NCR MM01/2019 had been raised.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	Yes	One of the two sprayers is female and her urine test results showed she was not pregnant. She does not have any children to breast-feed. Hence, no work has been undertaken by pregnant or breast-feeding women.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	Yes	OSH Policy signed by Managing Director had been developed and was seen displayed at notice boards at office and main entrance gate.
	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	Spark Glory Sdn Bhd had identified and reviewed all operations that has significant hazards and risks and had determined appropriate risk control measures in accordance with DOSH Hazard Identification, Risk Assessment and Risk Control (HIRARC) Guidelines 2008. The HIRARC Register was last reviewed in Jan 2019.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate	Yes	All field workers, FFB lorry driver and store in-charge were given training on safe work practices. Training courses and dates are shown in Indicator 4.8.1. PPE appropriate to their job function to cover hazardous operations were given Free of Charge.

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Clause	Indicators		Comply Yes/No	Findings
		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. Major Compliance		
	4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance	Yes	OSH Committee is not applicable for Spark Glory Sdn Bhd since its number of employees is below the threshold value required. However, OSH Committee meeting had been conducted quarterly, and the Committee consist of Chairman (Estate Manager), Secretary (Mandore), 1 member representing Employer and 2 representing employees.
	4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance	Yes	There exists a fit-for-purpose Accident and Emergency Procedure. In case of worker's accident, the victim is to yell for help and if there is witness, he is to summon Mandore for assistance. Zero accident has been recorded since 2018. There was no accident reported occurring in year-to-date 2019.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	Yes	All employees were provided with medical care. Local employees (only 3) and 2 foreign workers with passport were covered by SOCSO while the remaining 7 foreign workers were protected by Foreign Workers Compensation Assurance. They will switch to SOCSO when their insurance coverage expires.
	4.7.7	Occupational injuries shall be recorded using LTA metrics. Minor Compliance	Yes	There was zero accident recorded to date noted in the file. Spark Glory is preparing to register as employer with DOSH and shall report to DOSH any occurrence of accident accordingly.

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Clause	Indicators		Comply Yes/No	Findings
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO P&C and that includes regular assessments of training needs and documentation of the prog. Major Compliance		2019 being the initial year for certification, training program that covers all aspects of the RSPO P&C, assessments of training needs and training materials have been established and are in place.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance		Records of training of employees had been maintained only from 2019. It recorded List of Participants, Course name; Facilitator, Date, Venue, Time, Name of attendees, Signature, and Position Title.

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	Spark Glory has established its Environmental Impacts Assessment (EIA) associated with their activities. Last reviewed and updated was in Jan 2019. The EIA covers all activities from harvesting, pest and disease, upkeep programme until delivery to mill has been identified.
	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 within a comprehensive action plan. The action plan shall identify the responsible person/s. Minor Compliance	Yes	Spark Glory has established an "Environmental Impact Assessment, Management Action Plans and Continuous Improvement Plan" to mitigate the negative impacts and promote the positive impacts. Based on the plan, the Plantation Manager has full responsibility to execute the management plan to be followed up for implementation by his Mandore.
	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 minimum every two years to reflect the results of monitoring and where there are operational changes that	Yes	Environmental Impact Assessment Management Action Plan and Continuous Improvement Plan had been implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed annually to reflect the results of monitoring operational changes that may have positive and negative environmental impacts.

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Clause	Indicators		Comply Yes/No	Findings
		may have positive and negative env. impacts. Minor Compliance		
C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.	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 Spark Glory Sdn Bhd" was made available to the auditor.
	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	Spark Glory estate has established HCV action plan for Sg Tagas Tagas titled 'Potential HCV areas Management Action Plans'.
	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	Spark Glory Sdn Bhd has conducted training on HCV and wildlife for field workers in Apr 2019. The Company also has established a disciplinary measure titled " <i>Dilarang Memburu di Kawasan ini</i> ".
	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;	Yes	Spark Glory continued to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that prohibition signage was erected, that is, <ul style="list-style-type: none"> • No hunting, no fishing and no pesticide spraying within buffer area at Sg. Tagas Tagas, and • No hunting and no illegal activities at forest border with Tabin Wildlife forest reserve. Latest monitoring for HCV area, Sg. Tagas Tagas and Boundary with Tabin Forest reserve has been conducted on 20/8/19, 22/7/19, 24/6/19, 2/5/19, 2/4/19, 2/3/19, 21/2/19, 2/1/19 and etc. The monitoring activities was recorded in the HCV & RTE Monthly Checklist 2019.

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Clause	Indicators		Comply Yes/No	Findings
		Outcomes of monitoring shall be fed back into the action plan. Minor Compliance		
	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 was no local community living nearby with Spark Glory CU. So, this indicator was not applicable to this CU.
C 5.3 Waste is reduced, recycled, re-used, and disposed of in an environmentally and socially responsible manner.	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	Yes	Spark Glory has documented the identification of all waste product and sources of pollution. The "List of Waste Generated and Management Plan" were established to mitigate applicable identified waste product and source of pollution. The plans were reviewed on 25/01/2019. In the sampled of Spark Glory practices, seen the waste management programs and plans being incorporated with environmental impact assessments which were reviewed by the Estate Manager. Among the waste products identified in the assessment register were domestic waste, used hydraulic oil, used filters [FFB Transport], empty pesticide containers and recyclable waste such as scrap metal, plastic etc. Sighted the 2nd Schedule of hydraulic oil (SW305), spent lubricant oil (SW306), used chemical containers/drums (SW409) and used filters (SW410). Scheduled wastes identified included Segregations of waste i.e. general and scheduled wastes was verified to be satisfactorily carried out at Spark Glory. Proper storage areas were identified for the storage of scheduled wastes. Currently, no disposal of scheduled wastes has been carried out due to e-SWISS and RSPO requirements just implemented. Spark Glory plans to dispose the SW via Hap Seng Plantation collection programme.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	Yes	Among the identified wastes include empty chemical containers and empty pesticides containers. Some empty 20-liter agrochemical containers were recycled as pre-mix chemicals containers to be carried to field for Sprayers use. Other pesticide containers were cleaned triple rinse, punctured its bottom to render it useless and subsequently disposed in an environmentally and socially responsible manner, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at Spark Glory mentioned in above indicator 5.2.1 were verified kept not more than 180 days or more than 20mt.

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Clause	Indicators		Comply Yes/No	Findings
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented Minor Compliance	Yes	Waste management and disposal plan to avoid or reduce pollution had been documented and implemented. Procedures and guideline from MPOB were used to guide the waste disposal activities and to reduce pollution during routine operation. Spark Glory domestic waste from the housing area was well managed and all domestic wastes were disposed via own transport to Majlis Daerah Lahad Datu (MDLD) waste collection bin. Sighted there was no practice of open fires within Spark Glory. The secondary containments, signages, sump pits, spillage kits and SDS were seen effectively displayed and made available at chemical / pesticide store, diesel drum and fertilizer store.
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	Sighted "Fossil Fuel Management Plan" had been developed and reviewed on 25/01/2019. The plan only focus on diesel usage by FFB Transport and use of fertilizers. Sighted environmental impact and mitigation measure has been identified and documented accordingly. Consumption of diesel was monitored on monthly basis. Sighted data for financial year 2018, diesel consumption @ 10160 Litre/year and FFB production @ 1480.77 Mt/year. Meanwhile for 2019 as at to-date diesel consumption was @ 5187 Litre/year and FFB production @ 1068.27 Mt/year.
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance	Yes	There had been no land preparation by burning as there had been no replanting at Spark Glory Sdn Bhd. All palms were planted in the year 2002 and replanting may be due only around year 2027. Nonetheless, Spark Glory Sdn Bhd had established and documented a Zero Burning Policy in its Sustainable Agriculture Policy. The policy dated July 2018 was signed by the Managing Director. The policy advocated: "A strict Zero Burning Policy is practiced in relation to all new plantings, replanting or other developments".
	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	No fire had been used for preparing land for replanting as there had been no replanting at Spark Glory Sdn Bhd. All palms were planted in the year 2002 and replanting may be due only around year 2027.
C 5.6 Preamble Growers and millers commit to reporting on	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	Polluting activities were assessed through evaluation of Environmental Impact Assessment (EIA) and Greenhouse Gas Calculation. For the estates, greenhouse gas emission was normally identified from emission of fossil fuels transport/machineries and use of fertilizers. Action plans were implemented accordingly. Observed Spark Glory generated their electricity via solar system.

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Clause	Indicators		Comply Yes/No	Findings																			
operational greenhouse gas emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognised that it is not always feasible or practical to reduce or minimise these emissions. Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder Estates of the RSPO. Plans to reduce pollution and emissions,	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	Yes	Spark Glory had identified emission of greenhouse gas (GHG) from their operations such as emission mainly from their FFB transport and use of fertilizers. The Manager had planned to reduce emission by daily inspection and monitoring their FFB transport to prevent any leakage and problem that could adverse impact the environment.																			
	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 appropriate tools. Minor Compliance	Yes	Spark Glory with the assistance of Hap Seng Plantation Berhad (mentor) had used RSPO Palm GHG version 4.0.1 Calculator as a tool to calculate the GHG emissions. Sighted report sent to RSPO on 23/04/2019. The input data was verified and the following were determined: Data Input <table border="1" data-bbox="1010 563 2029 746"> <thead> <tr> <th>Description</th> <th>Unit</th> <th>Input Value</th> </tr> </thead> <tbody> <tr> <td>FFB Supplied to the mill</td> <td>1</td> <td>1480.77 MT</td> </tr> <tr> <td>FFB Produced by this plantation</td> <td>1</td> <td>1480.77 MT</td> </tr> <tr> <td>FFB Production per hectare</td> <td>1</td> <td>12.20 MT/Ha</td> </tr> </tbody> </table> Plantation / field emission <table border="1" data-bbox="1010 802 1850 970"> <thead> <tr> <th>Description</th> <th>Total Emission (tCO2e)</th> <th>tCO2e/ha</th> <th>tCO2e/FFB</th> </tr> </thead> <tbody> <tr> <td>Emission source</td> <td>730.23</td> <td>0</td> <td>0.5</td> </tr> </tbody> </table>	Description	Unit	Input Value	FFB Supplied to the mill	1	1480.77 MT	FFB Produced by this plantation	1	1480.77 MT	FFB Production per hectare	1	12.20 MT/Ha	Description	Total Emission (tCO2e)	tCO2e/ha	tCO2e/FFB	Emission source	730.23	0
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Clause	Indicators	Comply Yes/No	Findings
including greenhouse gases, are developed, implemented and monitored.			

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

Clause	Indicators	Comply Yes/No	Findings	
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	Yes	A Social Impact Assessment report, January 2019 was made available during the audit titled 'Social Impact Assessment (SIA), Management Action Plans and Continuous Improvement Plans, Spark Glory Sdn Bhd. The assessment covered Spark Glory estate only. The report covered stakeholder mapping, wages and decent living wage, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	Yes	As the estate has no immediate neighbouring local communities, the assessment focused on the welfare of workers and estate's employees and legality status of workers. The stakeholder consultation was conducted in July 2019. All records of meetings, consultation held during the SIA was incorporated in the report. List of the stakeholders consulted was also included in the report. This meeting was conducted once covering all stakeholders for the estate.
	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, incl. responsibilities for implementation. Major Compliance	Yes	Plans for mitigation of negative impacts have been established. A timetable with responsibilities for mitigation and monitoring was reviewed and updated accordingly. Specific person in charge (PIC) had been identified and be responsible for taking actions on each of the mitigation measures with specific timetable.
	6.1.4	The plans shall be reviewed as a minimum once every two years 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	Yes	Spark Glory Sdn Bhd will review the action plan "Management on SIA 2019" annually after its Stakeholders Meeting in 2020.

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Clause	Indicators		Comply Yes/No	Findings
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	N/A	Not applicable since this is Smallholder Growers.
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	Yes	Spark Glory Sdn Bhd has established a procedure in order to comply with the requirement and it describe the procedures and mechanism to be taken should any stakeholders (either external or internal) wish to communicate with the company on any issues concerning their interest.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	Yes	Management officials responsible for handling of social issues have been identified accordingly. Appointment letters have been sighted during the audit.
	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	List of stakeholders that may be relevant to the company's operation including local communities, local authorities and NGOs has been established and updated for year 2019 as verified at Spark Glory. As mentioned earlier, consultation with the stakeholders during the establishment of Social Action Plan was conducted.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties	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	Spark Glory maintained affirms that its dispute system is open to any affected parties. Relevant procedure titled ' <i>Prosedur Melapor Aduan dan Permasalahan - Pihak Berkepentingan Luaran dan Dalaman</i> ' were available.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	Yes	Complaints on housing and other services were usually entered into record form. The records include the name of the person who complained, his address, date, and type of service required. Visits to the quarters confirm that actions were taken on the complaints made by the workers.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables	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	All records of (internal and external) complaints and grievances were kept within the grievance/request record book/ Grievance and Complain Logbook Internal Stakeholders as well as in complaint form.
	6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a	Yes	Spark Glory has established a procedure for calculating the compensation. The process and outcome of any compensation claims is documented and made publicly available. If there is any case related to compensation, the procedure for calculating and distributing fair compensation would be carried out at the company level as stated in their SOP – Land Dispute Management.

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Clause	Indicators		Comply Yes/No	Findings
indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		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 long-established communities; and differences in ethnic Estates' proof of legal versus communal ownership of land. Minor Compliance		
	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	Based on interviews with head of village and villager representatives from Kg. Litang, there was no issue raised on land dispute with Spark Glory. As of the date of the audit, no case of negotiation and payment of compensation has been carried out for verification of implementation.
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 provide decent living wages	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	Yes	Pay and conditions are documented and made available during the stage 2 audit. These are contained in the workers' pay slips and employment contracts. The employment contracts specify the latest minimum wages of RM1100 per month payable to all workers with effect from 1 Jan 2019. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during worker interviews. Pay slips for Estate field workers show breakdown for all work done such as allowances received, deductions, no. of days worked. It was also verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages (Amendment) Order 2018 (from January 2019 onwards) and the Sabah Labour Ordinance.
	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	The employment contract is in Bahasa Malaysia for foreign workers. Employment contract of foreign worker clearly stated the working hours, annual leave, medical benefits and sick leave, insurance scheme, retirement, and etc. During interview with the foreign workers as mentioned in 6.5.1, they understood the content of their contract of employment and pay slip statement.

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Clause	Indicators		Comply Yes/No	Findings
	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	No	Spark Glory Sdn Bhd has provided adequate housing, water supplies, medical and welfare amenities. The houses were all in good conditions, and each house has between 2 – 3 bedrooms. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner. Housing inspections are being conducted on a weekly basis as evidenced from the housing inspection reports sampled. However, during line site visit, it was found that drainage at Spark Glory Sdn Bhd linesite does not continuously flow into the monsoon drain at the back of the linesite, but terminates before, and flows into grasses at the back of the linesite. This contravene with Workers' Minimum Standards of Housing and Amenities Act 1990 (Section 23(1)(b)). Therefore, minor NCR MAR 01 2019 was raised.
	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	Workers' access to adequate, sufficient and affordable food is via place order with Estate Manager and going nearby Tamu in Jeroco or a sundry shop at Hap Seng Estate.
C 6.6 The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	Yes	Spark Glory subscribes to the documented policy on Freedom of Association and Right to Collective Bargaining. This Policy is available in dual language, i.e. Bahasa Malaysia and English and it recognizes and respects of employees to join trade union of their choice and to bargain collectively subject to the provisions of relevant national legislations. Employment contracts sighted do not contain any prohibitive clause from joining any trade unions.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	Yes	In practice, there was no trade union/workers' union. However, the Company and workers' representatives have formed a Joint Consultative Committee (JCC) comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers.
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	"Polisi Buruh Kanak-Kanak" is publicly available at Spark Glory estate. The policy statements emphasized on child under 18 years must not be employed to work in hazardous areas. This policy is posted on notice boards in the estate office.

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Clause	Indicators		Comply Yes/No	Findings
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected Estates in the local environment shall be documented. Major Compliance	Yes	Spark Glory is committed to ensure and promote a harmonious, safe and healthy work environment for all employees. All policies were approved in Malay and English language. The following policy was verified by the auditor during audit: i) Policy for foreign workers ii) Reproductive rights policy iii) Freedom of association and right to collective bargaining iv) Equal opportunity policy v) Human Rights Policy vi) Child Labour Policy vii) Sexual Harassment, Violence and Abuse Policy viii) Rare, Threaten and Endangered Policy ix) Code of Conduct Policy The policy statements emphasized on worker information, recruitment and selection, training, employee development, terms of service and records of service. This policy is posted on estate office notice board.
	6.8.2	Evidence shall be provided that employees and Estates including local communities, women, and migrant workers have not been discriminated against. Major Compliance	Yes	There is a publicly available equal opportunities policy (<i>Polisi Kesamarataan Hak</i>) which states that the Company provide equal opportunity to all and does not practice discrimination based on race, caste, national, origin, disability, gender, sexual orientation, union membership, political affiliation, or age. There is no evidence of discrimination when a cross section of employees was interviewed. A functioning grievance mechanism is in place.
	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	Records of hiring were reviewed during the audit. It was noted that the hiring were based on the skills, capabilities, qualities and medical fitness. This was confirmed by the employees who were interviewed during the audit
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	A policy on sexual harassment titled ' <i>Polisi Gangguan Seksual, Keganasan dan Penderaan</i> ' was available. The policy was signed by the Managing Director. The policy is also written in Bahasa Malaysia and displayed at the notice boards within the estate office. No evidence or acts that contradict this policy were observed.
	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	Spark Glory maintained its documented policy to protect reproductive rights of women. Policy implementation is through periodic meeting reviewing violation of reproductive right policy. Interview with employees found no case of violation.
	6.9.3	A specific grievance mechanism which respects anonymity and	Yes	The specific grievance mechanism is available at Spark Glory in flow chart format that documented how to handle complaints and grievances originating from internal and

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Clause	Indicators		Comply Yes/No	Findings
		protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance		external stakeholders. The mechanism has been communicated to all levels of the workforce as verified by auditor during interview with the workers.
C 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.	6.10.1	Current and past prices paid for FFB shall be publicly available. Minor Compliance	Yes	Spark Glory Sdn Bhd managed to record the current and past prices of FFB sold to the Hap Seng mills based on payment voucher.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented. Major Compliance	Yes	Not applicable since this is Smallholder Growers.
	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	No contractor was involved in the operation of Spark Glory Sdn Bhd.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	Yes	No contractor was involved in the operation of Spark Glory Sdn Bhd.
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	Spark Glory committed to contribute cash donation to the Funding for Animals and Independent Rescuers (FAIR). FAIR is an NGO made up of a small group of dedicated animal volunteers with the intention of helping animals.
	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	Yes	Not applicable since this is Smallholder Growers.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	Yes	There was no force or trafficked labour used. This was verified through foreign workers' passport, contract agreements and work permit including interview with workers at visited premise.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	Yes	No contract of substitution is sighted.

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Clause	Indicators		Comply Yes/No	Findings
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	Yes	A special labour policy for employment of foreign workers has been addressed in the social policy. The policy mentioned that foreign employees will be treated fairly in terms of recruitment, terms and conditions of work, provide decent living and no contract substitution. The procedure has been implemented for any employment related with foreign workers.
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	Spark Glory is committed to ensure and promote a harmonious, safe and healthy work environment for all employees. All policies were approved in July 2018, both in Malay and English language. The policy statements emphasized on worker information, recruitment and selection, training, employee development, terms of service and records of service. This policy is posted on notice board in the estates office.
	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	Sighting of database at office and visits at field found no existence of crèche or Community Learning Centre. This was further confirmed when auditor visited the linesite and interview workers and also did not see any children there.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

No new planting was seen during field visit. All planting of oil palm were in 2002. This was also confirmed through cross-checked the Estate Area and Topography Map; checking the www.globalforestwatch.com, GOOGLE Maps; and site visit affirmed the age of oil palm trees plus the existence of field markings. Hence, this indicator is not applicable to Spark Glory Sdn Bhd.

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	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.		This Independent Smallholder has implemented several activities as part of its action plan based on consideration of the main social and environmental impacts.

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Clause	Indicators		Comply Yes/No	Findings
improvement in key operations.		As a minimum, these shall include, but are not necessarily be limited to:		
	a)	Reduction in use of pesticides (Criterion 4.6);	Yes	a) Among practices adopted by Spark Glory to minimise usage of pesticides were: <ul style="list-style-type: none"> • Integrated Pest Management by planting <i>Turnera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> at main roads. • Pacing cut fronds in the inter-rows • Maintain soft weeds and <i>Nephrolepis biserata</i> growth and encourage in the inter-row • continue to only spray Circles and noxious weeds.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	Yes	b) Maintain effort to improve continuously environmental impacts. Among the relevant plans and measures were: <ul style="list-style-type: none"> • reduction of diesel usage / GHG emission. • maintain water quality • reduce soil erosion • reduce land contamination • improve soil fertility • reduce waste
	c)	Waste reduction (Criterion 5.3);	Yes	c) Improvement for waste reduction include: <ul style="list-style-type: none"> • use rinsed empty fertilizer bags for loose fruit collection. • reduce fertilizer use by conducting foliar sampling • segregate at source plastic, aluminium, glass containers and paper and disposed them at recycle collection centre at Lahad Datu. • Likewise, manage and dispose domestic waste from the housing area via Majlis Daerah Lahad Datu (MDLD). • Continue current practise to dispose the SW 102/SW305/SW306 (generated by FFB transport) by servicing all vehicles at the Lahad Datu workshop.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	Yes	Action to reduce GHG include emission by daily inspection and monitoring their FFB Transport to prevent leakage and problem that could adverse impact the environment.
	e)	Social impacts (Criterion 6.1);	Yes	Continue to implement the social action plan determined from results of stakeholders' consultation and meetings. Among the improvement made were supplying the treated water to the workers.

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Clause	Indicators		Comply Yes/No	Findings
	f)	Encourage optimising the yield of the supply base Major Compliance	Yes	Optimize yield by commitment to implement best agricultural practices, inclusive of <ul style="list-style-type: none"> • timely and proper fertilizer application; • maintain/conserves water by water management, • improve on accessibility to maximise crop evacuation • reduce surface run off water to prevent leaching of fertilisers • Maintaining at least 2 rounds of harvesting per month

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Clause	Indicators		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 raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(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	Not applicable. Spark Glory didn't have other mills or estates within it company.
	(b)	Progress towards this plan shall 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;	YES	Not applicable.
	(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	Not applicable.

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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	Not applicable.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such 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;	YES	Not applicable.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	Not applicable.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Not applicable.
	(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	Not applicable.
		<ul style="list-style-type: none"> 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	
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	

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		<ul style="list-style-type: none"> • Desktop study e.g. web check on relevant complaints 	YES	
		<ul style="list-style-type: none"> • 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	
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 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.		No additional indicators	YES	The land was previously owned by a group of smallholders. They bought the land from Sabah Land Development Board.

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Attachment 4

Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
HMM 01/2019 4.6.11	Major	<p>Finding : No medical surveillance has been conducted for pesticide operators</p> <p>Objective evidence: No record of medical surveillance was available to sight.</p>	Yearly checking by SGSB Manager to ensure all pesticide operators are sent for medical surveillance against current's misinformation of CHRA Report recommendation for pesticide operator not required for medical surveillance.	<p>Status: Closed The Occupational Medical Surveillance Report produced by Chong Clinic, Tawau dated 27.10.2019 refers. DOSH Registered OHD No. 0280-k, JKKP/HQ/11/DOC//00/223 had examined the 2 Pesticides Operator from Spark Glory and found them Physically Fit to Work.</p>
MAR 01 2019 6.5.3	Minor	<p>Finding: Workers' Minimum Standards of Housing and Amenities Act 1990 (Section 23 (1) (b) are not complied with.</p> <p>Objective evidence: Drainage at Spark Glory Sdn. Bhd. does not continuously flow into the monsoon drain at the block of the linesite, but flows back into grasses at the back of the linesite.</p>	The Spark Glory Sdn. Bhd. management has immediately completed the concrete perimeter drain. It has connected and water continuously flows into the monsoon drain at the back of the linesite. The management also cross check the housing drainage condition on monthly basis in addition to current weekly housing inspection at mandore level.	<p>Status: Open The effectiveness of the corrective action is accepted and will be verified during next audit.</p>