



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

File Ref: EH04760002

RSPO PUBLIC SUMMARY REPORT

CLIENT : JEROCO PLANTATIONS SDN. BHD. – JEROCO PALM OIL MILL 2

PARENT COMPANY : HAP SENG PLANTATIONS HOLDINGS BERHAD

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

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE):

(In the case of multisite certification, list additional sites in attachments)

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Jeroco Certification Unit	Jeroco Palm Oil Mill 2	N 5° 25' 52.0"	E 118° 25' 02.0"	Off KM 50, Jalan Jeroco, 91109 Lahad Datu, Sabah, Malaysia
	Kapis Estate	N 5° 26' 34.3"	E 118° 24' 51.0"	Off KM 50, Jalan Jeroco, 91109 Lahad Datu, Sabah, Malaysia

MAP : See Attachment 1

AUDIT DATE : 1-3 July 2019

DURATION : 9 auditor days

TYPE OF AUDIT :



Annual Surveillance Audit 1



Recertification Audit

STANDARD : RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014 (REVISED 14 JUNE 2017)

SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using the Mass Balance Supply Chain Model

VALIDITY OF RSPO CERTIFICATE : 27/9/2018- 26/9/2023

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 : Mohd Zulfakar Kamaruzaman

Name : KEE KEAN CHONG

Signature :

Signature :

Date : 7 October 2019

Date : 7.10.19

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SUMMARY OF AUDIT

Annual Surveillance Audit 1				
On-site audit date :	1-3 July 2019		No. of auditor days :	9 Auditor Days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Amir Bahari, Mohd Norddin Abd Jalil			
No. of major NCR :	1	5.13 (RSPO Supply Chain)		Closing date : 30/09/2019
No. of minor NCR :	-	-		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers/ Local community	Suppliers
	√		NA	√
	Contract workers	NGOs	Govt. agency	Independent growers
			√	√
	Indigenous people	Contractor	Others (Please specify)	
	NA	√		
Supply base sampled :	Kapis Estate			
Changes since the last audit :	No changes.			
Justification of audit planning :	Total allocation of auditor days for Jeroco 2 CU were: Mill = 5 days (4 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Estate = 4 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.			
Report approved by :	Kamini Soriamoorthy		Approval date : 7/10/2019	

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

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Annual Surveillance Audit 3				
On-site audit date :		No. of auditor days :		
Audit team :				
No. of major NCR :		Closing date :		
No. of minor NCR :				
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers	Suppliers
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				

Annual Surveillance Audit 4				
On-site audit date :		No. of auditor days :		
Audit team :				
No. of major NCR :		Indicator:	Closing date :	
No. of minor NCR :		Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities	Suppliers
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractors	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				

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

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2/ RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	July 2018 to June 2019	July 2019 to June 2020			
Certified FFB Processed (MT)	37,130.00	37,100.00			
Production of Certified CPO (MT)	7,649.00	7,645.00			
Production of Certified PK (MT)	1,782.00	1,781.00			
Certified Areas (Ha)	2,681.00	2,681.00			
Planted Areas (Ha)	2,342.00	2,342.00			
Production Areas (Ha)	1,690.00	2,082.00			
HCV Areas	29.20	29.20			
REMARKS	-				

TABLE 2

	PO	PK
Last years certified volume (MT)	7,649.00	1,782.00
Last years actual certified sold (MT)	0.00	1,476.29
Last years actual sold under other schemes (MT)	5,774.19	0.00
Last years sold conventional (MT)	0.00	0.00
New year certified volume (MT)	7,645.00	1,781.00

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3.4 All associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, are audited within 3 years from when their fruit was first included in the mill certification.	11
3.5 Any new acquisition which has replaced primary forests or HCV areas	11
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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 recognized standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd. Zulfakar Kamaruzaman	Auditor Team Leader / Supply Chain , Social & HCV	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor.
Mohd Norddin Abd Jalil	Auditor / Good Agricultural Practices (GAP)	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation.
Amir B Bahari	Auditor Health & Safety, Environment.	Possessed B Sc (Hons) USM and Diploma Palm Oil Milling Technology/Management 1996 MPOB. Working experience for 30 years in the oil palm industry including in the mill and estates.

1.3 Audit methodology

The audit covered the one palm oil mill and one of its supply base, i.e. the Kapis Estate. The audit included an on-site audit to the estate and mill and to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit.

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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 8 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

Jeroco Palm Oil Mill 2 certification unit (hereafter refer to JPOM2 CU) is one of the business unit under the Hap Seng Plantation Holdings Berhad (HSPHB). Located at Off 50 KM, Jalan Jeroco, Lahad Datu, Sabah, Malaysia, the CU consists of one mill (JPOM 2) and one supply base i.e. Kapis Estate.

The Jeroco Palm Oil Mill 2 has a processing capacity of 30 metric tonnes of fresh fruit bunches (FFB) per hour. The mill is also receiving and processing crops from smallholders and villagers nearby the estate.

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

The FFB was sourced from company owned estates that were certified and small holders and small growers surrounding the Jeroco 2 CU. Details of the FFB actual and projected contribution from each source to the mill were shown in the following tables.

Table 1: Actual FFB production by the supply base for the period from July 2018 to June 2019

Estates	FFB Production	
	Tonnes	Percentage (%)
Kapis Estate	11919.29	14.64
Batangan/KTM Estate	8241.33	10.12
Lutong Estate	7022.79	8.63
Lokan Estate	764.45	0.94
Lungmanis Estate	4450.73	5.47
Other Supply Bases (Non Certified)		
Bukit Kretam	24826.83	30.50
First Raintree	4015.90	4.93
HarusAbadi	9865.91	12.12
Sangi Enterprise	803.49	0.99
Lebijaya	4383.90	5.39
Casem	840.80	1.03
Chua Soon Lee	1133.85	1.39
Northbank	1146.52	1.41
Tabin	1465.76	1.80
LPC	410.50	0.50
Lim Engit Fun	4.74	0.01
Ku Chin Hung	91.92	0.11
Spark Glory	20.31	0.02
Total	81,409.02	100

Table 2: Projected FFB production by the supply base for the next reporting period July 2019 to June 2020

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Kapis Estate	37,100	100
Total	37,100	100
Other Supply Bases (Non Certified)		
Bukit Kretam	38,400	58.71
First Raintree	5360	8.19
HarusAbadi	14,500	22.17
Sangi Enterprise	370	0.57
Lebijaya	5,600	8.56
Casem	450	0.69
Chua Soon Lee	730	1.11
Grand Total	102,510	100

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Table 3: Actual FFB received and CPO & PK dispatch by Jeroco 2 POM for period from July 2018 to June 2019

RSPO Supply Chain Model : MB	Total (MT)
FFB Received	81409.02
FFB Processed	81409.02
Certified FFB Processed	32398.59
Non-certified FFB Processed	49010.43
Crude Palm Oil (CPO)	
Overall CPO Production	16432.12
Certified CPO Production	6646.16
Certified CPO delivered as RSPO	-
Certified CPO delivered as non-RSPO	-
Certified CPO delivered under other sustainable schemes	5774.19
Credits traded thru Book & Claim	-
Palm Kernel (PK)	
Overall PK Production	4036.72
Certified PK Production	1590.50
Certified PK delivered as RSPO	1476.29
Certified PK delivered as non-RSPO	-
Certified PK delivered under other sustainable schemes	-
Credits traded thru Book & Claim	-

Table 4: Projected FFB received and CPO & PK dispatch by Jeroco 2 POM of next reporting period July 2019 to June 2020

RSPO Supply Chain Model : MB	Total (MT)
FFB Received	102510
FFB Processed	102510
Certified FFB Processed	37100
Non-certified FFB Processed	65410
Crude Palm Oil (CPO)	
Overall CPO Production	21122.00
Certified CPO Production	7645.00
Certified CPO delivered as RSPO	3822.50
Certified CPO delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	3822.50
Palm Kernel (PK)	
Overall PK Production	4922.00
Certified PK Production	1781.00
Certified PK delivered as RSPO	1781.00
Certified PK delivered as non-RSPO	0.00
Certified PK delivered under other sustainable schemes	0.00

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Table 5: Planted and certified area of the Jeroco 2 CU

Estate	Planted (ha)	Certified (ha)
Kapis Estate	2,342	2,681
Total	2,342	2,681

Table 6: Planting profile for Kapis Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1996	1 ST .	MATURE	796	34.0
1997	1 ST .	MATURE	373	15.9
1998	1 ST .	MATURE	521	22.2
2016	2 ND .	MATURE	392	16.7
2017	2 ND .	IMMATURE	260	11.1
Total			2,342	100.0

2.3 Organizational Information/Contact Person

The details of the contact person is as shown below:

Name	:	Mr. Kee Keow Chong
Position	:	General Manager - Agronomy
Address	:	Hap Seng Plantations Holdings Berhad, C/O : Hap Seng Fertilizers Sdn Bhd, Batu 2, Jalan Kastam Baru, 91119 Lahad Datu, Sabah, Malaysia
Phone no.	:	+6089 278183,+6089 278138
Fax no.	:	+6089278168/186
Email	:	keekc@hapseng.com

3.0 AUDIT FINDINGS

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

There was no change to the certified products since last assessment.

3.2 Progress and changes in time bound plan (Refer to Attachment 7 for the time bound plan)

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

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

The time bound plan for Hap Seng Plantations is provided in Attachment 7 of this report.

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iii.	Are there associated smallholders (including scheme smallholders) in the CU	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	If no, please state reasons	Not applicable. There is no associated smallholders supplying FFB to the CU.			
iv.	Any new acquisition which has replaced primary forests or HCV areas	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	<u>N/A</u>				
3.3	Other changes (e.g. organizational structure, new contact person, addresses, etc.)				
	<u>No</u>				
3.4	Status of previous non-conformities *	<input checked="" type="checkbox"/>	Closed	<input type="checkbox"/>	Not closed*
	<i>* If not closed, minor non conformity will be upgraded to major non conformity</i>				
3.5.	Complaint received from stakeholder (if any)				
	<u>No complaints from stakeholders were observed.</u>				

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 :-	N/A		
	Total no. of major NCR(s) (details refer to Attachment 4)	List :-	N/A		
4.2	For SC (Details checklist refer to Attachment 5) :				
	Total no. of minor NCR(s) (details refer to Attachment 5)	List :-	N/A		
	Total no. of major NCR(s) (details refer to Attachment 5)	List : 1	MZK 01 2019		

5.0 AUDIT CONCLUSION

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

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.


Recommended to continue certification.

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) which have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.

7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.

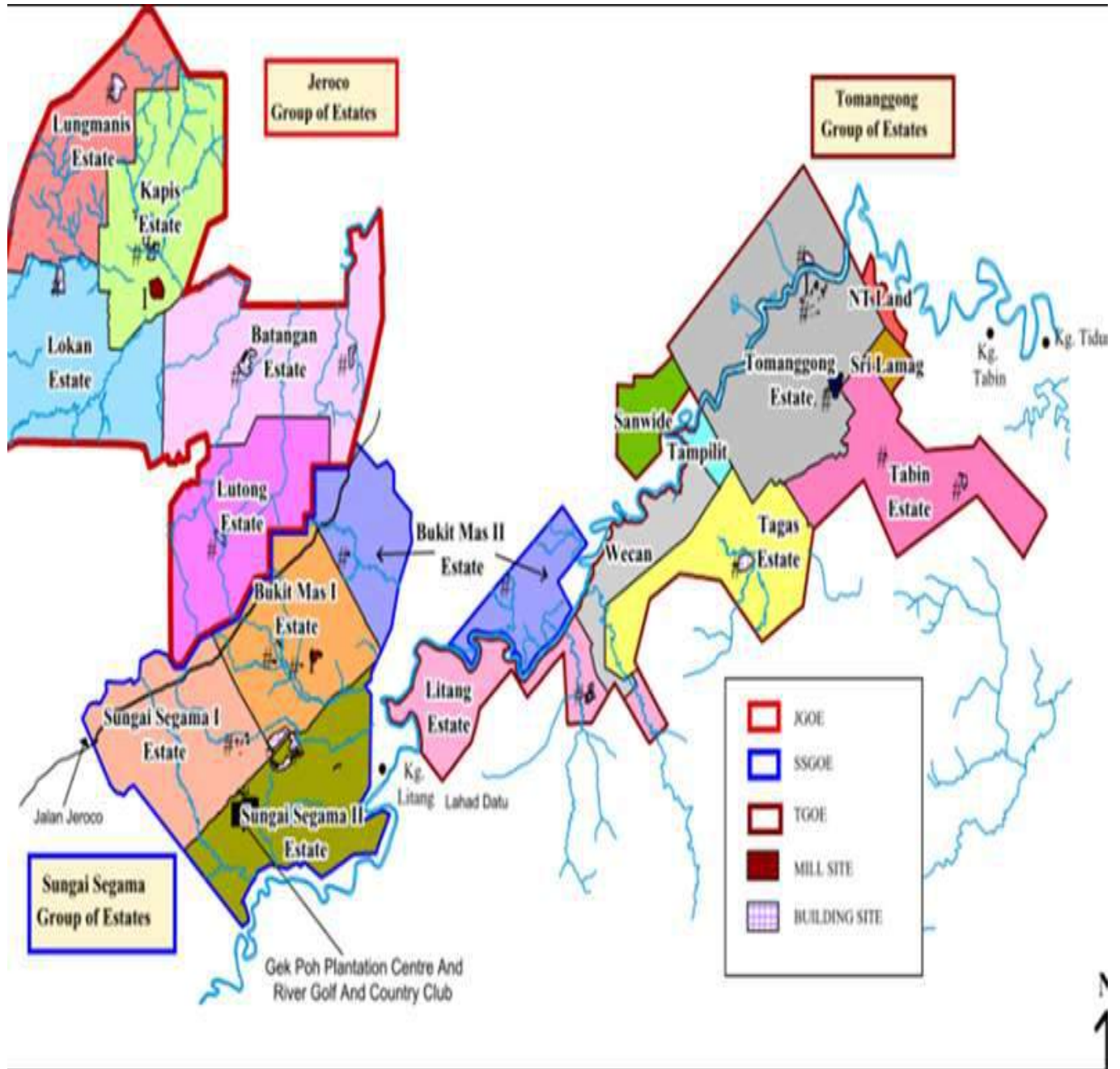
Audit Team Leader : MOHD ZULFAKAR
KAMARUZAMAN
(Name)



(Signature)

30/9/2019
(Date)

Map of Kapis Estate, Jeroco 2



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Attachment 2

RSPO SURVEILLANCE AUDIT PLAN

SIRIM QAS INTERNATIONAL SDN. BHD.

1. Objectives

The objectives of the assessment are as follows:

- (i) To evaluate **Jeroco 2 CU** continued conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI) and RSPO Supply Chain Requirements
- (ii) To verify the effective implementation of corrective actions arising from the findings of last assessment.
- (iii) To make appropriate recommendations based on the assessment findings.

2. Date of assessment : 1-3 July 2019

3. Site of assessment : Jeroco 2 Certification Unit

- Jeroco 2 POM
- Kapis Estate

4. Scope of Certification : Production of crude palm oil and palm kernel using **Mass Balance** model

5. Reference Standard :

- a. RSPO P&C MYNI: 2014
- b. RSPO Certification Systems 2017
- c. RSPO Supply Chain Standard, 2014 rev 14 June 2017
- d. Company's audit criteria including Company's Manual/Procedures

6. Assessment Team

Assessor: Mohd Zulfakar Kamaruzaman (Social, HCV, SC)
Amir Bahari (Environment, Safety, GHG, TBP)
Mohd Norddin Abdul Jalil (Good Agriculture Practices, TBP)

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. Major non-conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non-conformities are still not addressed within another 90 days, the certificate shall be terminated.

If there are five or more major non-compliances within one Principle found during the audit and Recurrence Major non-compliances for successive audit immediate suspension of RSPO certification shall be recommended.

For minor non-conformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major non-conformities if the corrective actions are not satisfactory implemented in the next audit.

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 programmed, 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

12. Reporting

Language : English
Format : Verbal and written

Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit

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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

14. Assessment Programme Details : As shown below

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Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Amir	Norddin
Day 1: 1 July 2019 (Monday)				
8.30am – 9.15am	Opening Meeting – Venue: Jeroco 2 POM <ul style="list-style-type: none"> • Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes • Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings. 			
9.15am – 12.30pm	Site observation to Jeroco 2 POM RSPO Supply Chain 2017 <ul style="list-style-type: none"> • RSPO Supply chain standard implementation including model requirements P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 			
12.30pm – 1.30pm	Lunch Break			
1.30pm – 5.00pm	Continue assessment at respective sites			
Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Amir	Norddin
Day 2: 2 July 2019 (Tuesday)				
8.30am – 12.30pm	Site observation to Jeroco 2 POM P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 			
12.30pm – 1.30pm	Lunch Break			

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1.30pm – 5.00pm	<p>Site observation to Kapis Estate</p> <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7, P8 • Verification of basic information estate • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. <p>Environmental management, waste & chemical management</p>			
Date / Time	Coverage of assessment / Activity / Site	Zulfakar	Amir	Norddin
Day 3: 3 July 2019 (Wednesday)				
	<p>Site observation to Kapis Estate</p> <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7, P8 • Verification of basic information estate • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 			
2.30pm – 4.00pm	<ul style="list-style-type: none"> • Verification on outstanding issues • Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any) 			
4.00pm -5.00pm	<ul style="list-style-type: none"> • Closing meeting • Presentation of audit findings, positive comment, • Question & answer 			

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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.	YES	Hap Seng Plantations Holdings Berhad (HSPHB) is committed to transparency by allowing all information pertaining to environmental, social and legal issues to be publicly available upon request. The CU has established a procedure on communication entitled " <i>Prosedur Memohon Maklumat</i> " (Request for Information Procedure)". The procedure included the internal and external consultation. For any request of information, the person is required to fill in a form. However, the method of requesting information was not limited to filling up the form. The procedure had included other means such as verbal or writing which would also be entertained.
	1.1.2 Records of requests for information and responses shall be maintained. Major Compliance	YES	The estate and mill maintain records of communication and consultation with external and internal parties. These includes communication with DOSH, Labour Department, Immigration Department, Department of Environment, suppliers and their own workers. Comments by DOSH and DOE on mill and estate operation were recorded in the respective DOSH and DOE inspection book.
C 1.2 Management documents are 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	The right to use the land at Jeroco 2 CU can be demonstrated and not disputed by any party. Documents related to land ownership were sighted at the Jeroco 2 POM and Kapis Estate office.
	Occupational health and safety plans	YES	Occupational Health & Safety Plan was established at each site. Indicators set in the plan were being monitored. The progress of the monitoring was verified by the auditor.
	Plans and impact assessments relating to environmental and social impacts	YES	Plans and impact assessments relating to environmental impacts maintained available. The Kapis Estate and Jeroco 2 POM have conducted social assessment titled 'Social Impact Assessment, Management Action Plans and Continuous Improvement Plans'. The SIA action plan was updated and each of the issues was identified for each of the operating unit.
	HCV documentation summary	YES	HCV documentation was available at Jeroco 2 POM and Kapis Estate offices and made publicly available the 'List of publicly available documents' at estate and mill notice board.
	Pollution prevention and reduction plans	YES	Pollution prevention and reduction plans maintained available.
	Details of complaints and grievances	YES	The complaints and their outcomes were recorded using Complaint Form, Grievance Book for Internal Stakeholder and External Stakeholder. The system was open to all aggrieved parties. The review of grievances book must be with permission of the respective Manager.
	Negotiation procedures	YES	HSPHB has developed procedures to deal with land disputes, squatter disputes, and loss of legal and customary rights. In the case of boundary disputes, the procedure requires the estate management and the disputing party to negotiate, first, failing which the case will have to be referred to the Headquarters for further negotiation. If negotiation fails, the case will be brought to court of arbitration. Negotiation procedure was made available to the public at Kapis Estate and Jeroco 2 POM.

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		Continual improvement plans (Criterion 8.1);	YES	HSPHB is committed to utilize the established system to regularly monitor and review their key activities at the mill and estate. The CU initiated relevant action plans for continuous improvement in its key areas of operations on environmental, safety, health and welfare as well as social contribution to workers and community. Details of the CU continual improvement plans has been reported in the indicator 8.1. The continuous improvement plans related to environment was established and update accordingly.
		Public summary of certification assessment report;	YES	Public summary for RSPO certification assessment report can be assessed at SIRIM QAS Website.
		Human Rights Policy	YES	Human Rights policy is available at Kapis Estate and Jeroco 2 POM.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	Jeroco POM 2 has documented policy to committing on integrity for all their staffs and workers by publishing a book for Gek Poh Holdings Corporate Culture. The CU has communicated the policy for new staffs and foreign workers during induction course. Sighted the refresher briefing training regarding code of conduct at Jeroco POM 2.

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	Generally, Jeroco 1 CU had demonstrated compliance with local, state, national and ratified international laws and regulations. Relevant licenses and permits such as DOE, DOSH, JTK, MPOB license, Energy Commission and Ministry of Domestic Trade for diesel storage were valid and displayed at the estate office. Site audit at operational areas and supporting facilities confirmed evidence of compliance. Foreign Workers had valid work permits and passports. For other Legal requirement, these legal were reviewed: Permit (JTK) to salary deduction, MPOB license, License "Menggaji pekerja bukan pemastautin", Permit to storage diesel, Trading license, Suruhanjaya Tenaga License, Fire Certificate etc. Other legal requirements were as follows: Steam Boiler and Unfired Pressure Vessel 1970, The Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulations 1970 Regulation 10(2), Noise Exposure Regulations 1989, OSH (Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000), Code of Practice in Confined Space 2010, EQ (Scheduled Wastes) Regulations 2005, EQ (Prescribe Premises)(CPO) Regulations 1978 etc.
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	The List of Legal Register were available at both Kapis Estate and JPOM 2. The list was updated accordingly by the Sustainability Executive. The document was updated to include: Factories & Machineries (Steam Boiler and Unfired Pressure Vessel) Amendment 2017 and The Employment Insurance System Act 2017'.

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	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	The Jeroco 2 CU had the mechanism for ensuring all the applicable legal requirements were implemented. The mechanism is by the implementation of internal checking by its Assistant In-Charge through evaluation of compliance exercise against the legal register. The evaluation was carried out on at Kapis Estate and JPOM2.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	HSPHB has established a mechanism for identifying and tracking the updates of the legal requirements through various media such as LawNet, internet, newsletter, etc.
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 during this audit. For Kapis Estate the land was previous owned by Sabah Land Development and Jeroco Plantations Sdn Bhd has bought and developed the land in 1980. There were clear land ownership documents available for review. The original copies of the documents were kept in Plantation Central Office, Sg. Segama. Copies of land titles for all estate was also sighted at Kapis Estate office. The Kapis estate was under the jurisdiction of Kinabatangan District.
	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 Kapis Estate. The perimeter boundary of the estate was visibly maintained by erecting pegs along the boundary, especially the ones that adjacent to other private estate.
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land was now legitimately owned by Jeroco 2 CU since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	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 was now legitimately owned by Jeroco 2 CU since 1980. Hence, there was 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	YES	As reported in 2.2.1, it has been verified that there was no conflict or dispute over the land.

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		and relevant authorities where applicable). Minor Compliance		
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land was owned by Jeroco 2 since 1980. Hence, there was no land conflict anticipated nor the need to avoid escalation of conflict was required.
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, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in Hap Seng Plantation Central Office, Sg. Segama and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Hence, there was no need for the establishment of map showing the legal, customary, or user right of other users as required by this indicator
	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; 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; 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	YES	As reported in 2.2.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in Hap Seng Plantation Central Office, Sg. Segama and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team has also interviewed relevant stakeholders relevant stakeholders. Based on the audit findings, copies of negotiated agreements on FPIC and other evidences required by these indicators a) to c) were not applicable.

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		legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance		
	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 Jeroco 2 CU.
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	YES	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Jeroco 2 CU.

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 (minimum 3 yrs.) shall be documented that includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	Kapis Estate continued to make commitment to long-term economic and financial viability. The annual budget for FY 2019 to FY 2023 were sighted. The budget provisions covered activities for upkeep, replanting, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget included projections on yield per hectare, and total cost of production per MT and per hectare.
	3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance	YES	The replanting programme until FY 2023 were sighted for Kapis estate. The programme was reviewed once a year and incorporated in their annual financial budget.

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	4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	YES	a) Oil Palm Agriculture Policy (OPAP) is the manual used for the operations in the estate. The manual is maintained and updated accordingly. It was confirmed that all activities in the estates from seedlings in nursery to planting in the fields have been included in the Manual. The document specifies the following sections such as pest & diseases management (control of Rhinoceros Beetles, rat, bagworms and nettle caterpillars, ganoderma), fertilizer of

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implemented and monitored				replanting (terracing and platforming, planting distances and lining), nursery (single and double stage nursery), manuring, weeding, water management, road maintenance management, thinning, epiphyte eradication, belt press solid application (BPS), pruning and harvesting.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	YES	Several mechanism available i.e. internal audit, agronomy dept. visit, plantation advisor visit.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	Relevant records on implementation and monitoring of Agriculture Manual and other SOP at the CU were clearly verified. Among the records sighted were: Program sheets, Field cost books, Planting Advisor reports, Agronomic reports, Audits by Sustainability Officers, Harvesting Interval records, Rat baiting records, Fertiliser application records, Monthly Progressive Reports, scheduled wastes records, PPE Checklist etc. Most records were being maintained for more than a year and some much longer.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Volumes of certified and non-certified FFBs received by the mill had been properly recorded and monitored.
C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	All estates continued to practice the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields), belt press solid application and EFB application.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertiliser inputs were based on recommendation by the Agronomist Department. The application programs were monitored using program sheets, bin cards, field cost book and manuring program sheets. Records of programs and applications of fertilisers were available. Records showed that actual applied in 2018 and 2019 was in line with recommendations in all estates.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	Periodic tissue and soil sampling had carried out in Jeroco 1 CU to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	Jeroco 2 CU had a nutrient recycling strategy where palm fronds were properly stacked in the inter row to decompose and plus with supplement of EFB applied accordingly.
C 4.3 Practices minimize and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	There were no fragile/marginal soils in Kapis Estate.
	4.3.2	A management strategy shall be in place for plantings on slopes between 9 & 25° unless specified	YES	Jeroco 1 CU had a management strategy for planting on slopes and to minimise and control erosion and degradation of soils. The plantings on slopes was guided by its Oil Palm Agriculture Policy. The agronomy department guided by Land Survey Department to established slope map for all estates.

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		otherwise by the company's SOP. Minor Compliance		
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	During the field visit, it was observed that the main and field roads of Jeroco 1 CU were in satisfactory condition and accessibility were made possible by regular maintenance. There was evidence of road maintenance programmes which consist of road resurfacing with grading and compaction and culvert maintenance.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	YES	Not applicable as there were no peat soils in Kapis Estate.
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	YES	Not applicable as there were no peat soils in Kapis Estate.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	Not applicable as there were no peat soils in Kapis Estate.
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	The Water Management Plan 2019 has been established reviewable annually. This was prepared on a Group basis and implemented for all the Mills and Estates in the Organization. The Water Management Plan 2019 was developed to maintain availability of natural water resources. The plan included practicing efficient water consumption through various methods. Records of rainfall data is maintained to assist in the water management plans were sighted from 2008.
	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	The protection of water courses and wetlands has been documented the Company's standards operating procedures shown below. During the site audit at the estates, it was noted that buffer zones were allocated along the natural waterways. Signage and red paint on oil palm trunk were used as demarcations of the buffer zones.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance	YES	The mill effluent is treated to meet the standard set by DOE.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	The mill processing water is obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on monthly basis. Variation in the consumption is attributed to factors, one of it being the unscheduled mill cleaning activity.

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C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	YES	Jeroco 2 CU continued to implement their Integrated Pest Management (IPM). These include proper management of pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the OPAP No.10 – Pests and Diseases revised on 25 th June 2016. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera subulata</i> and for rhinoceros beetles is by using pheromone traps.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Training of those involved in IPM implementation “IPM Beneficial Plan” was evident. Records of training were available for verification.
C 4.6 Pesticides are used in ways that do not endanger health or the environment	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance	YES	The use of all agrochemicals by the estate was guided by its agriculture manual Oil Palm Agricultural Policy (OPAP) where written justifications had been provided. The manual had included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic names.
	4.6.2	Records of pesticides use (incl. a.i. used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. Major Compliance	YES	Kapis Estate had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and a.i. per Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register and in progress reports. Records of pesticides used were available for verification.
	4.6.3	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	YES	As part of the IPM plans, management of Kapis Estate had established beneficial plants (<i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera subulata</i>) nurseries for continuous planting in order to attract natural predators and to reduce use of insecticides. Grass cutting will also be introduced to minimised the usage of pesticides. There was no evidence on prophylactic use of pesticides in the audited estate.
	4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in 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	YES	Jeroco 2 CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Records and interviews with workers, staff and estate assistants, concluded that that they were trained and cautioned, and all precautions taken, and all legal requirements are met.

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	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 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	Records showed that pesticides were handled, used and applied by trained personnel and as per the MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat baits were trained. Random interviews conducted showed that they understood the hazards involved and the usage and handling of chemicals in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS training. It was also noted that MSDS are available at all sites such as chemical store, lubricant store and laboratory. The trainings were evident.
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 Regs and Orders, Pesticides Act 1974 (Act 149) and Regs. Major Compliance	YES	The chemical stores in Kipas Estate complied with the following legislative requirement; a) Occupational Safety and Health Act 1994 (Act 514) b) Pesticides Act 1974 (Act 149). Records of purchase, storage and use were maintained. All stores were equipped with adequate no of exhaust fans with the door was secured and kept under locked at all times. Only authorized personnel were allowed to enter the chemical stores and handle the chemicals. All the chemicals were segregated accordingly and sufficiently label, with the MSDS displayed. The upkeep of the store is clean and systematically organized. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store prior proper disposal. These empty containers were disposed to a license SW collector registered with DOE.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	a) Pesticide applications were guided by HSPHB's OPAP manual, SSOP, CHRA and by MSDS supplied by the manufacturer. In its OPAP manual the guidance was in Chapter. The Manual had included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic names. The safe handling, storage and use of chemicals were demonstrated in the SSOP manual.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide	YES	The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat bait were continuously trained. The training was regularly conducted by the estate management to enhance knowledge and skills of employees. The training included the safety aspects and usage of PPE. Records of training were maintained for verification.

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		applications with all relevant information within reasonable time prior to application. Major Compliance		Random interviews with the workers showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Aerial spraying was not practiced by all estates. There was no evidence to show that aerial spraying was carried out. All estates only practices circle spraying and selective spraying which is only for targeted species such as woodies and VOPs.
	4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demo or made available. Minor Compliance	YES	The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat bait were continuously trained. The training was regularly conducted by the estate management to enhance knowledge and skills of employees. The training included the safety aspects and usage of PPE. Records of training were maintained for verification. Random interviews with the workers showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner.
	4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demo. Minor Compliance	YES	The disposal of empty pesticide containers were carried out as per the established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. 5 th schedule inventory was evident. Scheduled Waste and empty containers were disposed to DOE approved contractors. The 6 th schedule consignment notes were verified.
	4.6.11	Specific annual medical surveillance for pesticide operators & doc. action to treat related health conditions, shall be demo. Major Compliance	YES	The annual medical surveillance has been carried out accordingly.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women Major Compliance	YES	The CU emphasized the prohibition of no work with pesticides be undertaken by pregnant or breast-feeding women though the LORR <i>Pesticide Act (Highly Toxic Pesticide) Regulations 1996. Prohibition Part III Regulation No 3</i> . All estates/mills in the organization abided to this Regulation. There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in the audited estate. Workers interviewed were aware that pregnant and breast-feeding women are not allowed to handle chemicals. The monitoring of pregnancy and lactating was conducted on every quarterly by the estate HA.
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	The Occupational Safety and Health Policy was established and signed by the <i>Chief Executive- Group Plantation</i> . The policy emphasized on the following; a) Strict compliance with all laws /regulations of OSHA 1994. b) Strict adherence to any codes of practice on OSHA c) To document standards and enforce safe working procedures d) Ensure employees are adequately trained in their jobs with emphasis on safety and safe handlings of machine with motto “ <i>Safety First</i> ” e) To review at regular intervals all current occupational safety and health policies and practices with the aim of improving such practices to be in line with the latest techniques in the industry.
	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	Yes	The chemical register was checked and verified. Both the mill/estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The HIRARC records, as well as CHRA reports were verified during the assessment. All documents were sighted and verified.

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	identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance		
4.7.3	All workers involved in the operation shall be adequately trained in safe working practice. Adequate, appropriate protective eq. 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	YES	Training with briefing on the estate and mill operations were provided for workers. This is aimed to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. Based on the HIRARC carried out at both estate and POM, the PPE types for the various activities were identified.
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	Both the mill and estate management conduct regular two-way communication with their employees through the quarterly ESH meeting. Minutes of meetings held by the mill and estates were verified. At the meetings workers participated in the discussion mainly on housing and safety. All units adopted the agenda as released the Sustainability Unit. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health. The letters of appointment for all identified Executives were evident.
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	Accident and emergency procedures are available in adherence to the HSPHB policy on 'Emergency Response' plan—updated Jan 2019 Each estate and mill had procedures emergencies situation as listed below in the table. There was formation of ERP Team & ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings were conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training.

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	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	Jeroco CU provides medical care to the respective estates and mill. Jeroco Mill & Estates clinics use the facilities in Batangan Estate. The more serious cases were referred to Hospital Lahad Datu which was about 80 km from the complex. The local workers were covered by SOCSO. Similarly, upon expiry of FW insurance coverage all FW will be registered for the coverage of SOCSO under the new Regulations.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Records of all accidents were kept and filed. The methodology of occupational injuries was recorded using LTA. (Lost Man day MC). This was summarized officially in the JKPP 8. Records were kept for a minimum 10 years in the office. Summary for the year was described in the JKPP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any were reviewed during safety meetings. Where required submissions of JKPP 6, & 8 to DOSH were complied with under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly. All units submitted the JKPP 8 in Jan 2018 complying with the DOSH statutory requirement.
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 Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	Formal training programmes for 2018/2019 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Jeroco 2 CU. Year 2019 Training Plan was established in January 2019. A training needs identification matrix has been established with target dates for the training to be conducted.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	The CU had trained their staff, workers and records of training were kept in the RSPO training file. The records included information on title of the training, name and signature of the attendees, name of the trainer and the time and venue.

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	The recent EIA Environmental Aspect Impact assessment was reviewed in May 2019 to cover all activities in the Jeroco II CU/Groups. The chief main purpose for this assessment was to evaluate and analyze impact on soil, water, and air associated with the organization activities. The environmental aspect and impact (EAI) also cover the upstream activities such as FFB reception until the downstream processes. Kapis Estate similarly established EIA and the revision was made in June 2019.
	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	YES	The key environmental issues identified as results of mill and estates operations <ul style="list-style-type: none"> a) Waste generated from mill operations b) Water pollution from SW, diesel spillages and boiler ash leaching c) Air pollution from transportation, open burning and boiler d) Noise pollution from operating machines e) Depletion of natural resources (diesel and water due to indiscriminate utilization/extraction. f) Cumulative impacts of all pollution generated by the mill to natural ecosystems.

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		identify the responsible person/persons. Minor Compliance		There is no changes made to the environmental aspects and impacts or current practices which require changes in the environmental action plans. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed.
	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 may have positive and negative environmental impacts. Minor Compliance	YES	The CU has developed “ <i>Environmental Impact Assessment, Management Action Plans and Continuous Improvement Plan for Jeroco Group</i> ” to monitor the effectiveness of the mitigation measures taken.
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 (such as wildlife corridors). Major Compliance	YES	The report of “Potential High Conservation Value Area Assessment Report of Kapis Estate and Jeroco POM 2” was made available to the auditor. It was noted that the report was prepared by the Sustainable Unit of Hap Seng. The review was updated in May 2019. Based on the assessment, there was no identified RTE at Kapis estate. Kapis Estate had identified a significant HVC4 which the estate has controlled and maintained the river buffer zone for Sg. Kretam Besar (Sg Simpang Kanan). The natural waterways were estimated covered a total of 29.20 ha.
	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill ops, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	YES	Kapis estate has established HCV action plan for Sg Kretam Besar (Sg Simpang Kanan) river 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	Kapis estate has conducted training on HCV and wildlife for the staffs and field workers in Jan 2019. The CU also has established a disciplinary measure titled ‘Disciplinary Measures Against Any Activities Involved with Rare Threatened & Endangered Species (RTE).
	5.2.4	Where an action plan has been created there shall be ongoing monitoring:	YES	Jeroco 2 CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the Sg. Kretam Besar (sg Simpang Kanan). It

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		<ul style="list-style-type: none"> The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. <p>Minor Compliance</p>		was noted that CCTV was placed at strategic area surrounding the estate to control everything including any illegal activities. The CCTV is in operation 24hours.
	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance	YES	There were no local communities living nearby with Jeroco 2 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	Jeroco CU has identified all wastes and sources of pollution. The list waste generated for Estate and Mill were established to mitigate and control the identified wastes and source of pollution.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal currently made to <i>DOE approved contractor</i> .
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance	YES	The CU has established the <i>Waste Management And Disposal Plan 2019</i> . The purpose of the Plan is to avoid / reduce pollution emerged as results of the estate and mill activities. The procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation.
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	<p>The mill and estates record consumption of diesel and tabulate data against the FFB production. The plan for improving efficiency of the use of fossil fuels and to optimise renewable energy as described below;</p> <ol style="list-style-type: none"> Regular servicing of gen-sets Usage schedule and monitoring of consumption 3x/week Regular servicing of vehicles /Daily inspection of vehicles <p>Both the mill and estate established a base line for the ratio consumption. Significance in variation is supported with commentaries</p>
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the <i>'Guidelines for the Implementation of the</i>	YES	HSPHB maintained a policy of no open burning. Both estates visited had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting. Observed trunk were chipped and stacked at inter row.

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situations as identified in the ASEAN guidelines or other regional best practice		<i>ASEAN Policy on Zero Burning' 2003. Major Compliance</i>																																																					
	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	The CU had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting in both estates. All palms were chipped and left decomposed at the field.																																																			
C 5.6 Preamble Growers and millers commit to reporting on operational GHG emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognized 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 Dec 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	5.6.1	An assessment of all polluting activities shall be conducted, incl. gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	YES	There were no changes on environmental aspects and impact or new polluting activities observed. The existing EIA documents had identified generation of gaseous emissions from its operation such as lorries and farm tractor. Noted the documents had been reviewed annually at each operating units.																																																			
	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	Jeroco II CU had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment. Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.																																																			
	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	<p>Jeroco CU had used RSPO Palm GHG V3.0.1 Calculator as a tool. Sighted report send to RSPO in Feb 2019 for 2018 data using Option 2. The final emissions value per product are as below:</p> <p>Milling extraction rate:</p> <table border="1" style="margin-left: 20px;"> <tr> <td>OER</td> <td>20.13</td> </tr> <tr> <td>KER</td> <td>4.90</td> </tr> </table> <p>Mill Emission</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">Own Crop</th> </tr> <tr> <th>tCO2e</th> <th>tCO2e/FFB</th> </tr> </thead> <tbody> <tr> <td>POME</td> <td>623.03</td> <td>0.01</td> </tr> <tr> <td>Fuel consumption</td> <td>132.63</td> <td>0</td> </tr> <tr> <td>Grid electricity utilization</td> <td>0</td> <td>0</td> </tr> <tr> <td>Credits</td> <td></td> <td></td> </tr> <tr> <td>Export of excess electricity to housing & grid</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sale of PKS</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sale of EFB</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total</td> <td>755.66</td> <td>0.01</td> </tr> </tbody> </table> <p>Plantation / field emission</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">Group Estate Crop</th> </tr> <tr> <th>tCO2e</th> <th>tCO2e/ha</th> <th>tCO2e/FFB</th> </tr> </thead> <tbody> <tr> <td>Emissions</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Land Conversion</td> <td>1341.8</td> <td>8.67</td> <td>0.4</td> </tr> <tr> <td>*CO2 Emissions from Fertiliser</td> <td>44.43</td> <td>0.28</td> <td>0.01</td> </tr> </tbody> </table>	OER	20.13	KER	4.90		Own Crop		tCO2e	tCO2e/FFB	POME	623.03	0.01	Fuel consumption	132.63	0	Grid electricity utilization	0	0	Credits			Export of excess electricity to housing & grid	0	0	Sale of PKS	0	0	Sale of EFB	0	0	Total	755.66	0.01		Group Estate Crop			tCO2e	tCO2e/ha	tCO2e/FFB	Emissions				Land Conversion	1341.8	8.67	0.4	*CO2 Emissions from Fertiliser	44.43	0.28
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stakeholder groups of the RSPO. Plans to reduce pollution and emissions, including GHG, are developed, implemented and monitored.

**N2O Emissions	450.36	0.54	0.03
Fuel Consumption	71.22	0.44	0.02
Peat Oxidation	0	0	0
Sinks			
Crop Sequestration	-1419.14	-8.82	-0.41
Conservation Sequestration	0	0	0
Total	488.67	1.11	0.05

Plantation / field emission

Emissions	3 rd party Crop		
	tCO2e	tCO2e/ha	tCO2e/FFB
Land Conversion	1813.2	12.99	0.69
*CO2 Emissions from Fertiliser	24.69	0.19	0.01
**N2O Emissions	42.6	0.32	0.02
Fuel Consumption	47.53	0.35	0.02
Peat Oxidation	0	0	0
Sinks			
Crop Sequestration	-1281.4	-9.36	-0.5
Conservation Sequestration	0	0	0
Total	646.62	4.49	0.24

Plantation / field emission

Emissions	3 rd Party		
	tCO2e	tCO2e/ha	tCO2e/FFB
Land Conversion	0	0	0
*CO2 Emissions from Fertiliser	0	0	0
**N2O Emissions	0	0	0
Fuel Consumption	0	0	0
Peat Oxidation	0	0	0
Sinks			
Crop Sequestration	0	0	0
Conservation Sequestration	0	0	0
Total	27076.88	0	0

The final emissions value per product are:

CPO	1.92 tCO2e/tCPO
PK	1.92 tCO2e/tPK

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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	The social impact assessment report for Jeroco CU's estates and mill was prepared by the Sustainability Team and Report in June 2019. The SIA report presented the estates' and mill's background information, labour policies, grievance procedures (internal, external land owner issues), sexual harassment policies, facilities and amenities offered by the estates, and the social impact assessment procedures and results. List of stakeholders was updated in Jan 2019. All neighbouring estates were included in the lists. All the SIA information was updated and each of issues was identified and discussed them in their respective report.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	The SIA was done with the participation of the affected parties as evidenced from the report reviewed. The stakeholders consulted were Jeroco 2's relevant stakeholders which included its own workers, government agencies such as MPOA, DOE, EPD-Sandakan, IPD Lahad Datu, Kedai Ah Lok, MK Nexus, Suruhanjaya Tenaga. FFB suppliers, contractors, mill's part suppliers, neighbouring estate, Humana, SK Jeroco, Sabah Forestry Department, PDRM, Wildlife Department and Immigration Department and workers representative.
	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	A timetable with responsibilities for mitigation and monitoring was reviewed and updated as necessary. The CU had appointed specific person in charge (PIC) responsible for taking actions on each of the mitigation measures with specific time intervals.
	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	The social action plan for Kapis Estate and Jeroco 2 POM have been reviewed by the CU in June 2019. The stakeholders meeting has been conducted with participation of affected parties.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). Minor Compliance	YES	There was no smallholder scheme at the CU. Only third party FFB supplier send their FFB to Jeroco 2 POM.

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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	There is a documented consultation and communication procedures identified as Stake-holder. This procedure identifies impacts of the Company's operations on its stakeholders based on interview, consultation, discussion and meetings with its stakeholders. The Company also has a Communication Procedure that provides the procedures for external and internal stakeholders to lodge a complaint or grievance on matters related to safety, health, cleanliness, environmental, disputes, thefts, and others. These Procedures have been communicated to workers during muster briefings and workers who were interviewed confirmed their understanding of the communication procedures in place.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	Jeroco 2 CU has nominated Kapis Estate Manager and Jeroco 2 POM Manager as the responsible person to handle social issues at their operating unit.
	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	YES	The lists of stakeholders were prepared by both the CU and the company headquarters. The lists included government agencies, suppliers, contractors, schools, bus operators, traders.
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 whistle blowers, where requested. Major Compliance	YES	There is a documented system for dealing with complaints and grievances. This system is open to all affected parties to resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers. The grievance mechanism identifies who can submit complaints (public, staff, workers, villagers), who can receive the complaints (clerk, chief clerk, assistant manager, manager). There is also a flowchart on how the dispute is to be handled. There is also an option for complaints to remain anonymous, by keeping the complaints in a confidential file kept in Manager's office with an undertaking that information would be kept confidential.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	Documentation of both the process by which a dispute was resolved and the outcome was available. Complaint feedback logbook where complaints are recorded and filed was reviewed. For Jeroco 2 Palm Oil Mill and all the Estates within Jeroco 2 Group, the logbooks mainly comprise complaints from workers on repairs that need to be done to their houses. The Complaints Form have details such as name of complainant, date of complaint, types of complaint, and signature of person receiving the complaint, and an action column which states the actions carried out.
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	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation as well as for calculating and distributing fair compensation (monetary or otherwise) has been established, and is known as Land Dispute Management.
	6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented,	YES	In terms of compensation, the procedures prescribed the determination of lawful owners, distribution of the compensation, time frame for compensation and calculation for various compensations. So far, there has been no compensation made to any disputing parties.

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indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance		In addition to the above procedures, the Sabah Land Ordinance (SLO) 1930 provides for ways which natives can have titles and rights to lands and who should be compensated if losses are incurred. Land titles can be awarded to natives under sections 9, 15, 76 and 78 of the SLO. Compensation can be paid under section 16 of the Ordinance. Therefore, there exists a legal framework against which the estates have to operate when it involves customary lands rights and determination of compensations.
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	YES	According to the CU's management and record, there was no any dispute on land or squatters. This was verified during the audit.
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	Documentation of pay and conditions are contained in employment contracts (for foreign workers) and letters of appointment (for local workers) which meet legal and industry standard. Monthly pay slips also document salary payable every month and these documents were available and sighted during the audit. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO and non-statutory such as donation to mosque funds), net salary, annual leave and medical leave taken, etc. Interview with workers reveal that they understand the contents of the pay slips and seeks explanation from the office whenever they needed any clarifications.
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	YES	Details of payment and conditions of employment are contained in employment agreements. These cover working hours, deductions, overtime, medical, leaves, dismissal, period of notice, etc. There is also evidence that the contracts are prepared in a language understood by workers. For example, contracts with Indonesian workers were prepared in Bahasa Malaysia for both Indonesia and Philippines workers. In addition, their terms of contracts were also explained to them upon arrival at the estates/mill.

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	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	YES	The CU continues to provide free housing, water supply, free medical services, subsidized electricity
	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	There is one grocery shop named Chain Chun Pau at Kapis estate. The estate has monitored the grocery shop in term of adequacy, sufficient and affordable of food.
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	Such statements are available in local languages as required by the standards. The CU has allowed their employee to establish and join union.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	The workers in the estate and mills Jeroco 2 CU are not unionized. Nonetheless, a Joint Consultative Committee (JCC) has just been formed to serve as a platform for the discussion of such issues. This JCC comprises of the estate management, field supervisors, <i>mandores</i> , drivers and clerk.
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	HSPHB Labour Policy does not allow children below 18 years old to work in the estate/mill. Site visit at Kapis estate and Jeroco 2 POM found no workers below age was hired. Inspections of the Employee Master list at Kapis estate and Jeroco 2 POM also found no workers below 18 years were recruited to work in the estate/mill.
C 6.8 Any form of discrimination based on race, caste,	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected	YES	The Equal Opportunity Policy was publicly available in the estates and POM. The policy statements emphasize on worker information, recruitment and selection, training, employee development, based on business needs, terms of service and records of service. It also states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless

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national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		groups in the local environment shall be documented. Major Compliance		of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. This policy is posted on notice boards in Bahasa Malaysia and English for the understanding of the public and workers.
	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	YES	Interviews with Woman and foreign workers at the Jeroco 2 POM and Kapis Estate revealed that there is no evidence of discrimination based on race, gender or national origin or any other factors. As shown in the employment letter, there are no differences in the terms of employment between foreign and local workers or between male and female workers. Foreign workers and local workers received similar pay rate, stay in the same house, and enjoy similar medical benefits as their local counterparts.
	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	Recruitment and promotion observed were according to legal and industry standard as well as the CU criteria, including skills and medical fitness, Auditor has verified medical fitness record of new employee for position as Weighbridge Operator at JPOM 2. The recruitment and hiring process was based on education qualification and interview with manager. No issues concerning recruitment or promotion observed, which acknowledged by employees interviewed. Also auditor has verified Job Advertisement from JPOM2 that they require Weighbridge Operator. All the requirement are follow the job skills, job scope and education qualification.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	Jeroco 2 POM and Kapis estate have displayed policy on sexual harassment titled " <i>Policy on The Prevention and Eradication of Sexual Harassment in the Workplace</i> " and 'Flow Chart – Reporting Sexual Harassment (Worker)' at the office notice board. The guidelines emphasize that sexual harassment is a threat to basic human rights and offenders will be punished accordingly, including termination from work.
	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	A policy to protect women reproductive rights titled 'Policy on Reproductive Rights' dated 2 September 2015 was made available at Kapis estate and Jeroco 2 POM. The policy and procedure were briefed to all levels of the workforce on 8/4/2019 for JPOM2 and 7/1/19 ,21/1/19, 20/3/19 and 29/4/19 for Kapis Estate.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented & communicated to all levels of the workforce. Minor Compliance	YES	The company also has a Guideline and Procedure Sexual Harassment prepared in Bahasa Malaysia and English, and a copy each was distributed to all Gender Committee members. This document contains guarantees of protection against acts of sexual harassment and violence, definitions and complaints procedures. The Company also has a documented SOP for making complaints regarding sexual harassment and violence and abuse. The document is entitled Guidelines/Procedure in Lodging Complaints – Sexual Harassment, Violence and Abuse.
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 Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	It was observed that the JPOM2 has displayed the current and past FFB prices from January 2018 until to date (June 2019) at their weighbridge station.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and	YES	During the audit, interviews were made with contractors, suppliers and FFB to understand the business relationships between them and the CU. No issue.

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		inputs/services shall be documented. Major Compliance		
	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	All of the contractors interviewed have been involved in short-term works, all contractors interviewed were understand content in the agreement with JPOM 2. The short-term works such as maintenance of mill parts are covered by Minor Job Contracts (MJC).
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	Payments observed were paid in timely manner, which were within 60 days of submission of invoice. Payments were in the form online banking into account. Auditor has verified quotation, and invoice that have been issued by contractor. All the interviewed suppliers and contractors mentioned that, in the past, payment has been made very promptly. The records of payments seen testify that the contractors/suppliers have been paid on time.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	YES	There was no local community lived nearby or within the CU plantation area. However, the CU has built a Humana at Kapis Estate for foreign worker's children.
	6.11.2	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 There was no scheme smallholders at the CU.
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	Based on verification of their passport, contract agreements and work permit, interview with local and foreign workers, men and women (sprayers, harvesters, Lab Operator, Watchmen, Foreman and general workers) at Kapis estate and Jeroco 2 POM, it was verified that there was no forms of forced or trafficked labour used at the CU. The Passport also has been released to workers, which is workers retained their passport by itself.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	Based on employment contract, passport, work permit and interview with foreign workers and interview with 20 foreign workers, union representative, and gender committee representative at Jeroco 2 CU (consecutive of Jeroco POM 2 and Kapis Estate) there was no occurrence of contract substitution in the CU.
	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 "Labour Policy for Foreign Workers" was established in both the estate and the mill. The policy included statement of the non-discriminatory practices; No contract substitution; Post-arrival orientation programme to focus especially on language, safety, labour laws, cultural practices etc.; and Decent living conditions to be provided. Procedure for employment of foreign workers was also established and available at Kapis Estate and Jeroco 2 POM.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and	YES	Human Rights policy was made available at Kapis estate and Jeroco 2 POM. The policy has been communicated to staffs and workers during morning muster and training.

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		communicated to all levels of the workforce and operations. Major Compliance		
	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	Kapis estate and Jeroco 2 POM have provided Humana School for foreign workers' children for Education and also Creche Ayah to take care of their toddlers during working hours without any fee.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Jeroco 2 CU has no plan for any new planting and new development of area. This has been observed during the visit. Auditors has verified through checking the www.globalforestwatch.com, GOOGLE Maps, Estate Maps and also through site visit to the estates area; Kapis Estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Jeroco 2 CU.

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

Clause	Indicators	Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1		
	a)	YES	The Jeroco CU adopted several continuous improvements in reducing the use of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> and continue to monitor pest through Early Warning System (as per Hap Seng Plantations Holdings Berhad (HSPHB) OPAP 10 Policy). The CU also adopted planting of <i>Leguminous</i> Cover Crop mainly <i>Pueraria Javanica</i> and <i>Calopogonium Mucunoides</i> at replanting area in order to minimizing circle and selective weeding.

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				<p>Soft weeds and <i>Nephrolepis bisserata</i> were maintained and encouraged in the inter rows. This was to suppress growth of noxious weeds and thus reduce use of pesticides for selective weeding. Mills waste such as EFB and BPS were used as fertilizer in the field thus using less inorganic fertilizer.</p> <p>Other improvement plans to minimize chemical usage were by practising only circle and selective spraying and soft vegetations were maintained in the field upkeep.</p> <p>In the replants in Kapis Estate, application of EFB in circles around the palm base in addition to the other benefits was also to reduce weeds in the palm circles.</p>
b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	<p>The Environmental Impact Assessment, Management Action Plans and Continuous Improvement Plan for Jeroco II CU has been updated, implemented and monitored by both the estate and mill management. The improvement measures among others are:</p> <ul style="list-style-type: none"> a) Construction of sump at chemical and workshop to prevent ground or water contamination through accidental seepage. b) Reuse of chemicals bags and allocate store for control of misused. c) Usage of tray for tractor parking and workshop stations to prevent ground contamination through accidental leakage. 	
c)	Waste reduction (Criterion 5.3);	YES	<p>The management of Jeroco 2 CU had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.</p>	
d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	<p>The management of both estates and mill had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.</p>	
e)	Social impacts (Criterion 6.1);	YES	<p>A mechanism to capture the performance of social aspects in CAPEX has been established. The activities listed in the plans and the monitoring of the actions taken demonstrated the continuous improvement achieved in matters related to the social aspects. Among the planned developments were labour quarters roofing, maintenance of road condition, supply of treated water to Humana School and government primary school (SK Jeroco), etc. Hap Seng Plantation team also provide consultation to surrounding smallholder for RSPO and MSPO certification.</p>	
f)	Encourage optimising the yield of the supply base	YES	<p>The Jeroco CU is part of a well-established organization, Hap Seng Plantations Holdings Berhad (HSPHB), thus the yield performance has always been the top priority in ensuring long-term economic and financial viability. Various efforts have been carried out to optimise the yield of the plantation such as minimising crop losses, ensuring the soil fertility by timely and well monitored fertilizer application and biomass recycling. Roads and transportation vehicles were well maintained to ensure timely and proper crop recovery.</p> <p>Merit Point System (MPS), which is to ensure better loose fruit collection, no left bunches and no unharvested bunches at field was being carried out by Agronomist Department and being monitored by Plantation Management Committee. Furthermore, the company had always keep itself updated with possible technological options especially in better planting material.</p>	

RSPO CERTIFICATIONS SYSTEMS FOR PRINCIPLES & CRITERIA JUNE 2017

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Clause	Indicators		Comply Yes/No	Findings
<p>4.5.3</p> <p>Time-bound plan</p> <p>Note:</p> <p>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;</p>	(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	HSP was committed towards getting the 100% RSPO certification. The target year for certification was initially set at 2019 was revised to 2020 (as in ACOP) as it was subjected to the remediation and compensation procedures which was still ongoing for Tabin and Northbank Estate. While for Pelipikan, the retrospective HCV assessment have been prepared by Green Harvest Sdn Bhd.
	(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	There were no changes to the current time bound plan. It was confirmed during audit with representative of HSPHB. Time bound plan was verified by CB.
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or	Yes	There were no changes to the current time bound plan as verified during this audit.

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		chamber of commerce (or equivalent);																						
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	<p>The first internal assessment was conducted in 20 – 24 Feb 2018 for Northbank and Tabin Estate while 20th Feb 2018 for Pelipikan Estate. From the assessment, the status of the uncertified management unit was summarized as follows:</p> <p><u>Pelipikan Estate</u> Based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest Sdn Bhd) there were no clearance of primary forest at Pelipikan Estate. However, there were land clearing made on May 2006, Sept 2010 and Feb 2011 where the clearing was made without the HCV assessment.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Update</th> </tr> </thead> <tbody> <tr> <td>Apr 2016</td> <td>Submitted the Declaration of disclosure of non-compliant land clearance to the RSPO and proceed in preparing the LUCA.</td> </tr> <tr> <td>25 July 2017</td> <td>HSP has submitted the item 2a and 2b as per RSPO Land Use Change Analysis (LUCA) checklist to RSPO. The preparation of satellite data and calculation of conservation liability were ongoing. The satellite data consumed time to complete.</td> </tr> <tr> <td>30 July 2018</td> <td>HSP has submitted LUCA checklist item 2c, 2d, 2e, 2f, & 2g to RSPO Compensation and has been reviewed by reviewer panel.</td> </tr> <tr> <td>27 Feb 2019</td> <td>RSPO reviewer provided the reply on LUCA status with comments and recommendations for outstanding issues.</td> </tr> <tr> <td>7 May 2019</td> <td>HSP had replied to the recommendation made by RSPO on the LUCA to the RSPO Compensation Department (PIC, Ms. Khing).</td> </tr> <tr> <td>10 June 2019</td> <td>RSPO had reviewed the LUCA report and replied with comment. There were still concerns highlighted by the LUCA reviewer.</td> </tr> </tbody> </table> <p><u>Northbank Estate and Tabin Estate</u> HCV Assessment at Northbank and Tabin Estate was conducted in 2013. Northbank and Tabin Estate were currently undergoing the Remediation and Compensation Procedure (RaCP) process. The required LUCA data was submitted and has passed the compensation panel process.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Update</th> </tr> </thead> <tbody> <tr> <td>21 June 2017</td> <td>HSP submitted the Concept Note to RSPO via email (PIC. Mr. Dhillion). The Final Conservation Liability (FCL) was confirmed as 579.48 Ha. The amended concept note sent to the CEGP for approval. The revised concept notes with attachment (extended riparian reserve maps) submitted to RSPO Compensation for review.</td> </tr> <tr> <td>30 Oct 2018</td> <td>RSPO Compensation replied and said that they will give feedback about the 3rd revision concept note and Management has submit CN to RSPO. CN has been revised by panel reviewer.</td> </tr> </tbody> </table>	Date	Update	Apr 2016	Submitted the Declaration of disclosure of non-compliant land clearance to the RSPO and proceed in preparing the LUCA.	25 July 2017	HSP has submitted the item 2a and 2b as per RSPO Land Use Change Analysis (LUCA) checklist to RSPO. The preparation of satellite data and calculation of conservation liability were ongoing. The satellite data consumed time to complete.	30 July 2018	HSP has submitted LUCA checklist item 2c, 2d, 2e, 2f, & 2g to RSPO Compensation and has been reviewed by reviewer panel.	27 Feb 2019	RSPO reviewer provided the reply on LUCA status with comments and recommendations for outstanding issues.	7 May 2019	HSP had replied to the recommendation made by RSPO on the LUCA to the RSPO Compensation Department (PIC, Ms. Khing).	10 June 2019	RSPO had reviewed the LUCA report and replied with comment. There were still concerns highlighted by the LUCA reviewer.	Date	Update	21 June 2017	HSP submitted the Concept Note to RSPO via email (PIC. Mr. Dhillion). The Final Conservation Liability (FCL) was confirmed as 579.48 Ha. The amended concept note sent to the CEGP for approval. The revised concept notes with attachment (extended riparian reserve maps) submitted to RSPO Compensation for review.	30 Oct 2018	RSPO Compensation replied and said that they will give feedback about the 3 rd revision concept note and Management has submit CN to RSPO. CN has been revised by panel reviewer.
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				29 Apr 2019	Ms. Khing from RSPO has provided the feedback from Compensation panel reviewer. The CN was required further clarification in its content against the additional, long lasting and knowledge-based section.
				15 May 2019	4 th revision of the CN submitted to RSPO.
	(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	<p>The latest internal assessment has been made on 20 – 24 Feb 2019 for Northbank and Tabin Estate while 20 Feb 2019 for Pelipikan Estate.</p> <p><u>Pelipikan Estate</u> Land conflict was resolved with the affected and relevant parties. Please refer Hap Seng Plantations 2015 Annual Report. Refer to HSP Annual Report Page 208-209, 36.d.</p> <p><u>Northbank and Tabin Estate</u> Land conflict are still under court case. Please refer Hap Seng Plantations 2016 Annual Report. Refer to HSP Annual Report Page 97 -98, 23 (a – b).</p>	
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	Yes	Based on the latest internal assessment carried out in Feb 2019, there was no labour disputed recorded at the all uncertified unit.	
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	Based on the latest internal assessment carried out in Feb 2019, there was no issue on legal non-compliance for all uncertified unit.	

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	<p>(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:</p>	<p>Yes</p>	
	<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; 	<p>Yes</p>	<p>Based on the latest internal assessment carried out in Feb 2019, the progress of the certification was concluded as non-compliance against 4.5.4. (a-d) on new planting requirement, HCV, legal compliance and labour disputes for Tabin, Northbank and Pelipikan Estate. With regards to the land disputes, the action to address the issues were on-going.</p>
	<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	<p>Yes</p>	<p>It was evident that in handling uncertified management unit, HSP Northbank Estate and Tabin Estate has conducted the Joint Consultation Committee (JCC) meeting on 23/05/2017 (for Northbank Estate and Tabin estate) and 11/04/2017 (for Pelipikan Estate) to address unresolved issues. Actions in progress.</p>
	<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	<p>Yes</p>	<p>Further information can be obtained from https://www.rspo.org/acop/2017/hap-seng-plantations-holdings-bhd/HSPHB%20SUSTANABILITY%20REPORT%202014.pdf</p>
	<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. 	<p>Yes</p>	<p>There was no non-compliance found for all requirements during this audit.</p>
<p>4.6.4 The CB shall review whether oil palm operations have been established in areas which</p>	<p>No additional indicators</p>	<p>NA</p>	<p>It has been verified that Jeroco Group of Estate (JGOE) owned the said lands as Country Lease land title (CL) from The Government of The State of Sabah. The land was not previously owned by any users and subject to customary rights of local communities and indigenous people.</p>

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<p>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.</p>				
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Note:

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

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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
RSPO Supply Chain NCR MZK 01 2019	Major	<p>Finding :</p> <p>Management Review has been conducted but not enough to cover the input and output as stated in the indicator.</p> <p>Objective evidence :</p> <p>Management review meeting dated 5/6/19 (combine RSPO, RSPO SCCS and MSPO), However the management review was not sufficient due to not include:</p> <p>Input:</p> <ul style="list-style-type: none"> - Changes that could affect the management system <p>Output:</p> <ul style="list-style-type: none"> - Improvement of the effectiveness of the management system and its processes - Resource needs 	<p>Correction:</p> <p>The management has immediately revised the SOP of Management Review to include the details as per RSPO SCCS Clause 5.13.2 and 5.13.3</p> <p>Corrective Action Plan:</p> <p>The Sustainability Team will carry-out yearly cross-checking to ensure the revised SOP of Management Review (to include the details as RSPO SCCS Clause 5.13.2 and 5.13.3) is implemented by Palm Oil Mill and Estate with effective from August 2019.</p> <p>Completion Date: August 2019</p>	<p>Auditor has verified the evidence attached (SOP of Management Review) review dated 10 July 2019 and found to be acceptable as per RSPO SCCS 2017 requirement.</p> <p>Status: Closed</p> <p>The implementation of corrective action will be verified by next audit.</p>

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Attachment 5

RSPO SUPPLY CHAIN : AUDIT CHECKLIST

SECTION A : GENERAL INFORMATION

1. File Reference No.	EH04760002
2. Name of facility/ site(s) /entity(ies)	Jeroco Plantations Sdn. Bhd. - Jeroco Palm Oil Mill 2
3. Site Location (single site/multisite/Group)	Off KM50, Jalan Jeroco, 91109 Lahad Datu, Sabah
4. SC model	Mass Balance
5. Type of entity	Palm Oil Mill
6. RSPO Member Number	1-0098-11-000-00
7. Annual summary records of certified oil palm products purchased and claimed	Projected for last year for period of July 18 until June 19 CPO Projected: 7,649.00 mt PK Projected: 1,782.00 mt (All as at July 18-May 19) CPO Claim as Mass Balance: 0 mt CPO Claim as Under other Sustainable scheme: 5,701.82mt PK Claim as Mass Balance: 1,247.52 mt PK Claim as Under other Sustainable scheme: 0mt

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

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION AUDIT	
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.	The organizational systems, the management systems and the operational systems, including any documented policies and procedures of JPOM2 are sufficient and adequate in complying with latest revision of RSPO Supply Chain Certification Standard.
	Audit Process Requirements – SURVEILLANCE AUDIT	
5.3.26	The surveillance audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.	Not Applicable

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

	Requirements	Remarks
1	Applicability of the general chain of custody requirements for the supply chain	
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.	Jeroco Palm Oil Mill 2 (JPOM2) takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location as mentioned above.
1.2	Traders and distributors require a licence obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.	Not Applicable
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform	Registered.
1.4	Processing aids do not need to be included within an organization's scope of certification.	Not Applicable
2	Supply chain model	
2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	JPOM2 obtained certified FFB from own certified supply base, Kapis Estate as well as external suppliers. JPOM2 also found to be aware of the downgrading procedure.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	JPOM2 only applies MB model.
3	Documented procedures	
3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Jeroco 2 POM had used their documented procedure title title ' <i>Standard operating procedures for Supply Chain SOP/COC/001, issue 03.</i>
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	JPOM 2 only apply RSPO Supply Chain system within their organization. Therefore, records as such FFB delivery note, WB advice ticket, FFB grading, FFB assessment report, Daily FFB, CPO & PK production, Daily FFB received, Daily production report, Certified sustainable FFB form, Non-sustainable certified FFB form, Delivery notes, Sounding report, Supply Chain Mass Balance record

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		were noted to be updated accordingly
c)	Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.	Under Chapter 3 of <i>Standard operating procedures for Supply Chain SOP/COC/001, issue 03</i> . The Mill Manager had overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Jeroco 2 POM. Assisted by Sustainability Executive and other relevant mill staff such as mill clerk, chief clerk, weighbridge clerk.
3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>ii. Effectively implements and maintains the standard requirements within its organization.</p> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organization shall be able to maintain the internal audit records and reports.</p>	Internal audit procedure is available. Audit checklist also been established. The coverage of audit sufficient & comprehensive to cater for the new standard (including modular requirement – Module E CPO Mills: MB). Internal audit conducted in May 2019. No NC has been issued on supply chain scope.
4	Purchasing and goods in	
4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number. <p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p>	JPOM 2 had continued to receive certified FFBS from the CU's own supply bases as well as non-certified FFBS from outsiders.

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a)	The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).	To demonstrate that purchases are made to the material category agreed with their supplier, JPOM2 ensure delivery chit from Kapis Estate being marked/ stamped accordingly with 'CSFFB'.
b)	The site ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcement and Shipping Confirmation on the RSPO IT platform on the level of each shipment.	For certified CPO & PK produced, JPOM2 update their stock in Palm Trace accordingly.
c)	A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements.	Internal supplier under same certification – valid certificate.
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Addressed by the Mechanism for handling NCP procedure.
5	Outsourcing activities	
5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard.</p> <p><i>This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the organization (not the tank farm manager).</i></p>	Not Applicable since transportation and storage of certified finished products are handled internally using budge system. Should there be any additional transporter used in future to carry certified CPO/ PK, JPOM2 prepared Minor Job Contract for acknowledgement by hired service provider informing on the RSPO SCCS requirements as per para 5.2 below.
5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that</p>	Not Applicable

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	independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	
5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	Not Applicable
5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or production of RSPO certified materials.	Not Applicable
6	Sales and goods out	
6.1	<p>The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number; • A unique identification number. 	The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Hap Seng Plantation Shipping Department (HQ) on behalf of Jeroco 2 POM.
7	Registration of transactions	
7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • are supply chain actors between the mill and final refinery; • take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and • are part of the supply chain of RSPO Certified Sustainable oil palm products <p>must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO.</p>	Sustainability Executive updated the RSPO IT Platform based on input provided by JPOM2. JPOM 2 has legal ownership and physical handle RSPO certified sustainable CPO and PK.
8	Training	
8.1	The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the	Annual Training Program established & being reviewed accordingly by the Mill Manager. The training record was well maintained.

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	training provided to staff.	
8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system. Training shall be specific and relevant to the task(s) performed.	Training had been conducted in June 2019 for office clerk, grader, AP and weighbridge operator who handle the weighbridge & relevant paperwork. Training had been conducted by the RSPO SCCS PIC. Based on interview with weighbridge clerk, it was noted that the training had been well conveyed & that the clerk was aware on her function/responsibility with regards to RSPO Supply Chain implementation in the organization.
9	Record keeping	
9.1	The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	The relevant record pertaining to RSPO SCCS within JPOM2 found to be updated accordingly and easily accessible during the audit.
9.2	Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Relevant record pertaining to implementation of RSPO SCCS within JPOM2 retained for minimum 2 years.
9.3	The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Provided accordingly.
10	Conversion factors	
5.10.1	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org). This is in particular relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. The guidance document for oleochemicals is available on the RSPO website (www.rspo.org).	The actual OER and KER has been used as the conversion rates.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Daily OER & KER were provided in the production report. Both conversion rates were monitored on monthly basis to check their performance against industry average.
11	Claims	
11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO rules on communications and claims.	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork. JPOM2 has also complied with the minimum requirement in term of the corporate communications rules as well as Annex 1 (RSPO trademark usage and guidance) of the RSPO Rules on Market Communications and Claims 2019).
12	Complaints	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder	Refer to the Grievance Procedure. No complaint from stakeholder with regards to RSPO SCCS since last audit.

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	complaints.	
13	Management review	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Management review planned once annually, last conducted in June 2019.
13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO SCCS • Customer feedback • Status of preventive and corrective actions • Follow-up actions from management reviews • Changes that could affect the management system • Recommendations for improvement 	The management review minutes did not include: Input: - Changes that could affect the management system Output: - Improvement of the effectiveness of the management system and its processes - Resource needs Thus, Major NCR MZK 01 2019 was raised
13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes • Resource needs 	

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

	Module D – CPO Mills: Identity Preserved – Not Applicable
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	Module E – CPO Mills: Mass Balance
E.3	Documented procedures
E.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.
E.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.
E.4	Purchasing and goods in
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.
	JPOM 2 had continued to receive certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were One supply bases (estates) sending certified FFBs to JPOM 2. They were Kapis Estate. For non-certified FFBs, JPOM 2 had sourced them from twelve FFB collectors namely LPC Plantations Sdn Bhd, Spark Glory Sdn Bhd, Syarikat

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		Pertanian Emmal Sdn Bhd, Khoo Chin Hung, Sri Lamang, First Raintree, Bukit Kretam, Sangi Enterprise, Chua Son Lee, Lebijaya, Koperasi Pembangunan Desa, Chin Hock Vui.
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There was no overproduction of certified FFBs during the period under review.
E.5	Record keeping	
E.5.1	<p>a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/or three-monthly basis.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short (i.e. product can be sold before it is in stock.) For further details refer to Module C.</p>	Available. JPOM 2 had continued to keep record and balances of all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table 'Mass Balance system for ISCC/RSPO Jeroco Palm Oil Mill 2019'.

Annex 1 – Supply Chain Yield Schemes – Not Applicable

Annex 2 – Book & Claim (BC) – Not Applicable

Annex 3 – RSPO Rules on Communications and Claims – Not Applicable

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Attachment 6

VERIFICATION OF NON-CONFORMITIES DURING RECERTIFICATION ASSESMENT AT Jeroco 2 CU

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor																																																																
2.1.2 NCR MRS 01/2018	Minor	<p>Finding: A documented system was not include "The Employment Insurance System Act 2017" in legal register. Objective evidence: Legal register in Jeroco 2 POM and Kapis Estate were not updated and include "The Employment Insurance System Act 2017".</p>	<p><u>Corrective action</u> Review of the list of applicable regulation will be carried out every January of the year with the Personnel and Administration Department (Who is more familiar with the Regulations)</p>	<p>The List of Legal Register were available at both Kapis Estate and JPOM 2. The list was updated on 01/06/2019 at Kapis estate by the Sustainability Executive while at JPOM 2 on 01/03/2019 by the Sustainability Executive. The document was updated to include: Factories & Machineries (Steam Boiler and Unfired Pressure Vessel) Amendment 2017 and The Employment Insurance System Act 2017'. Status: Closed</p>																																																																
4.7.2 NCR MRS 02/2018	Major	<p>Finding: Certain chemicals yet to be risk assessed. Objective evidence: <u>Kapis Estate:</u> The following chemicals were not registered in the CHRA report (8-11/12/2015): i. Pesticides: Starane & Roundup Rainguard ii. Fertilizers: CPD Blue, Natural Kieserite & Urea 46% <u>JPOM 2:</u> The following chemicals were not registered in the CHRA report (22/5/2014): i. Grease: Oberon G36/G38/G30 & Beveron 18 ii. Chemicals: Calcium Carbonate, Iodine Indicator & Methyl Orange</p>	<p><u>Corrective action Plan:</u> Monthly checking on the CHRA by independent RSPO Officer (based in operating unit) will be conducted to ensure all chemical used in the Mills and estate has been undergoes the CHRA by the CHRA competent person. Auditor has verified the evidence attached (picture) which is CHRA has been conduct on 14 August 2018 for all chemicals use in the mill and estate.</p>	<p>The chemical register was checked and verified. The list of CHRA chemical assessed in 16 May 2019 for Kapis Estate and 14/8/18 for Jeroco II Mill comprises of the following and checked against the CHRA. <i>Thus the NCR MRS 02/2018 raised is closed and concluded.</i></p> <table border="1"> <thead> <tr> <th></th> <th>Chemical Used</th> <th>Chemical Register</th> <th>CHRA ass</th> </tr> </thead> <tbody> <tr> <td></td> <td>Kapis Estate</td> <td>/</td> <td></td> </tr> <tr> <td></td> <td>Chemical</td> <td></td> <td></td> </tr> <tr> <td>1</td> <td>Starane</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Roundup Rainguard</td> <td>/</td> <td>/</td> </tr> <tr> <td>3</td> <td>CPD Blue</td> <td>/</td> <td>/</td> </tr> <tr> <td>4</td> <td>Natural Kieserite</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Urea 46%</td> <td>/</td> <td>/</td> </tr> <tr> <td></td> <td>Jeroco Mill</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Grease</td> <td></td> <td></td> </tr> <tr> <td>1</td> <td>Oberon G36/G38/ G30</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Beveron 18</td> <td>/</td> <td>/</td> </tr> <tr> <td></td> <td>Chemicals</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td>Calcium Carbonate</td> <td>/</td> <td>/</td> </tr> <tr> <td>4</td> <td>Iodine Indicator</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Methyl Orange</td> <td>/</td> <td>/</td> </tr> </tbody> </table> <p>Status: Closed</p>		Chemical Used	Chemical Register	CHRA ass		Kapis Estate	/			Chemical			1	Starane	/	/	2	Roundup Rainguard	/	/	3	CPD Blue	/	/	4	Natural Kieserite	/	/	5	Urea 46%	/	/		Jeroco Mill				Grease			1	Oberon G36/G38/ G30	/	/	2	Beveron 18	/	/		Chemicals			3	Calcium Carbonate	/	/	4	Iodine Indicator	/	/	5	Methyl Orange	/	/
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Attachment 7

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

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