



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

File Ref. : ES10170013

RSPO PUBLIC SUMMARY REPORT

CLIENT : BOUSTEAD ESTATES AGENCY SDN BHD – TRONG BUSINESS UNIT

PARENT COMPANY : BOUSTEAD PLANTATIONS BERHAD

RSPO MEMBERSHIP No.: 1-0012-04-000-00

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	
BOUSTEAD TRONG BUSINESS UNIT	Trong Palm Oil Mill	100.708154 °N	4.673560 °E	Km 24, Trong/Bruas 34800 Trong, Taiping.
	Taiping Rubber Plantations Estate	100.692292 °N	4.709455 °E	Km 24, Trong/Bruas 34800 Trong, Taiping.
	Malaya Estate	100.725561 °N	5.124982 °E	Jalan Selama/Kubu Gajah 34100, Selama, Perak
	Malakoff Estate	100.708153 °N	4.673561 °E	Jalan Pokok Machang/ Tasek Gelugor, 13300, Seberang Perai Utara, Pulau Pinang
	Bukit Mertajam Rubber Estate	100.626622 °N	5.422728 °E	Kulim-Mahang main road, Mukim Padang China 09000 Kulim, Kedah
	Kuala Muda Estate	100.582824 °N	5.618517 °E	Sungai Petani/Kuala Ketil main road, 08009, Sungai Petani, Kedah
	Stothard Estate	100.707683 °N	5.551471 °E	Kuala Ketil/Baling main road, Mukim Tawar 09300, Kuala Ketil, Kedah.
	Batu Pekaka Estate	100.628213 °N	5.588646 °E	Sungai Petani/Kuala Ketil main road, 09300 Kuala Ketil, Kedah

MAP : See Attachment 1

AUDIT DATE : 15th to 19th April 2019

DURATION : 20 auditor days

TYPE OF AUDIT :

☒ Annual Surveillance Audit No. 02

☐ 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 Identity Preserved Supply Chain Model

VALIDITY OF RSPO CERTIFICATE : 21/07/2017 – 20/07/2022

The following attachments form part of this report:

Non-conformity Report(s)



List of additional site(s)



Report by Audit Team Leader

Name : MOHD AB RAOUF BIN ASIS

Signature :

Date : 26/07/2019

Acknowledgement by Client's Representative

Name : AHMAD AMIRUL ARIFF

Signature :

Date : 29/07/2019

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SUMMARY OF AUDITS

Stage 2 audit / Recertification audit				
On-site audit date :	13-17 March 2017		No. of auditor days :	15 days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Rozaimiee Ab Rahman, Mohd Razman Salim, Rahayu Zulkifli (Trainee)			
No. of major NCR :	8	2.1.1, 4.4.2, 4.6.6, 4.6.11, 4.7.2, 6.5.2, 6.1.3, 6.9.1		Closing date : 15/06/2017
No. of minor NCR :	6	2.1.2, 2.1.3, 2.2.2, 4.1.2, 6.2.3, 6.5.3		
Indicate the stakeholders interviewed during the on-site audit :	Employees		Settlers	Villagers / Local communities
	x			x
	Contract workers		NGOs	Govt. agency
			x	Independent growers
	Indigenous people		Contractor	Others (Please specify)
		x		
Supply base sampled :	Kuala Muda Estate, Stothard Estate, Batu Pekaka Estate			

Annual Surveillance Audit 1				
On-site audit date :	9-13 April 2018		No. of auditor days :	18 days
Audit team :	Rozaimiee , Mohd Zulfakar, Mohd Ab Raof, Khairul Najwan			
No. of major NCR :	1	Indicator: 4.6.2		Closing date : 9/07/2018
No. of minor NCR :	3	Indicator : 4.4.1, 4.7.5, 5.2.4		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees		Settlers	Villagers / Local communities
	X			x
	Contract workers		NGOs	Govt. agency
	X			Independent growers
	Indigenous people		Contractor	Others (Please specify)
		X	x	
Supply base sampled :	There was changes regarding audit sampling. Malakoff Estate has been added in sampling units to verified issues related to social issues.			
Changes since the last audit :	There was no significance changes			
Justification of audit planning :	Total allocation of audit man day for Trong BU were: <ul style="list-style-type: none"> • Mill = 5 days (4 days for safety and health, environment, mill best practices, ghg verification, etc) + (1 day for supply chain certification systems) • Trong Rubber Plantation Estate = 4 days, certified area = 1382.80ha, for verified safety and health, environment, good agriculture best practices, GHG verification, etc. • Malaya Estate = 4 days, 806.9 ha, for verified safety and health, environment, good agriculture best practices, GHG verification, etc • Bukiot Mertajam Rubber Estate = 4 days, 2482.60 ha, for verified safety and health, environment, good agriculture best practices, GHG verification, etc • Additional site – 1 day, Malakoff Estate – verified social issues. 			
Report approved by :	Radziah Mohd Daud		Approval date : 18/07/2018	

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Annual Surveillance Audit 2				
On-site audit date :	15-19 April 2019		No. of auditor days :	20
Audit team :	Mohd Ab Raouf bin Asis (LA), Dzulfihar bin Azmi (A), Mohd Norddin bin Abdul Jalil (A), Ismail Adnan bin Abdul Malek (A)			
No. of major NCR :	5	Indicator: 4.6.11, 6.1.1, 6.5.1, 1.1.2, MZK 01 2019 (Supply Chain)		Closing date : 18/07/2019
No. of minor NCR :	4	Indicator : 5.6.3, 4.1.2, 4.8.2, 6.2.3		
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	Contractor	Others (Please specify)	
Supply base sampled :	Batu Pekaka Estate, Malakoff Estate, Kuala Muda Estate, Stothard Estate			
Changes since the last audit :	Refer to Table 1 – Summary below			
Justification of audit planning :	Total allocation of audit man day for Trong BU were: <ul style="list-style-type: none"> • Mill = 4 days (3 days for safety and health, environment, mill best practices, ghg verification, etc) + (1 day for supply chain certification systems) • Batu Pekaka Estate = 4 days, certified area = 897.80ha, for verified safety and health, environment, good agriculture best practices, GHG verification, etc. • Malakoff Estate = 4 days, 1379.80 ha, for verified safety and health, environment, good agriculture best practices, GHG verification, etc • Kuala Muda Estate = 4 days, 1419.00 ha, for verified safety and health, environment, good agriculture best practices, GHG verification, etc • Stothard Estate = 4 days, 983.10 ha , for verified safety and health, environment, good agriculture best practices, GHG verification, etc 			
Report approved by :	Radziah Mohd Daud		Approval date : 26/07/2019	

Annual Surveillance Audit 3				
On-site audit date :			No. of auditor days :	
Audit team :				
No. of major NCR :		Indicator:		Closing date :
No. of minor NCR :		Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities	Suppliers
	/	/	/	/
	Contract workers	NGOs	Govt. agency	Independent growers
	/	/	/	/
	Indigenous people	Contractor	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	April 2017 – March 2018	April 2018 – March 2019	April 2019-March 2020		
Certified FFB Processed (MT)	147,406.07	122,000.00	129,200.00		
Production of Certified CPO (MT)	29,292.94	27,000.00	28,000.00		
Production of Certified PK (MT)	7,000.00	6,500.00	6,500.00		
Certified Areas (Ha)	9,351.20	9,351.20	**8,805.20		
Planted Area (Ha) (Mature + Immature)	8,927.10	8,927.10	8,148.90		
Production Area (Ha) (Planted – Immature)	7,674.40	7,674.40	6,733.30		
HCV Areas	*116.30	*116.30	*116.30		
REMARKS	*HCV including buffer zone, pond and stream. **Acquisition land of Malakoff Estate (Land Disposal).				

TABLE 2

	CPO	PK
Last years certified volume (MT)	27,000.00	6,500.00
Last years actual certified sold (MT)	17,337.94	0.00
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	3,291.40	5,857.10
New year certified volume (MT)	28,000.00	6,500.00

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1.0 AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia. SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and accredited by ASI on 27 September 2014.

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Ab Raouf bin Asis	Lead Auditor / Environment, Safety & Health Practices	Holds a B. Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. He is qualified Lead Auditor for RSPO P&C and MSPO.
Mohd Zulfakar Kamaruzaman	Auditor / Supply Chain	Holds a B. Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation. He is qualified Lead Auditor for RSPO P&C, RSPO Supply Chain and MSPO.
Dzulfiqar bin Azmi	Auditor / Safety & Environment	Holds a B. Sc. in Agriculture from University Teknologi Mara (UiTM). He had several years of working experience in the oil palm operation. He is a qualified auditor for RSPO and MSPO.
Mohd Norddin bin Abdul Jalil	Auditor / Good Agricultural Practices	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation. He is qualified auditor for RSPO P&C.
Ismail Adnan bin Abdul Malek	Auditor / Social	Holds a Master of Forestry, University of British Columbia, Canada. One year experience as Sub Assistant Conservator of Forest at the Pahang Forest Department, involved with Forest Administration/Management and Enforcement. Next, seven years spent as Forest Officer/Logging Superintendent at Syarikat Jengka Sdn. Bhd (SJSB), an integrated timber complex in Pahang. Responsible for Forest Licensing/ Administration, Forest Mapping, Road Construction and Logging Operations. Senior Lecturer at the Forestry Faculty, Universiti Putra Malaysia and currently as Auditor at the Food, Agriculture and Forestry, SIRIM QAS International Sdn Bhd, since 2016.

1.3 Audit methodology

The audit covered the Trong palm oil mill and three of its supply base. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. Four supply base covered during the audit were Batu Pekaka Estate, Malakoff Estate, Kuala Muda Estate and Stothard Estate. The audit included on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the management of Trong BU, employees, contractors, local NGO's 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.

1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Boustead Trong Business Unit (hereafter referred to as Trong BU) is one of the business unit registered under the Boustead Estates Agency Sdn. Bhd., a subsidiary company of Boustead Plantation Bhd (BPB). The BU is located at the north of Peninsular Malaysia and consisted of the Trong Palm Oil Mill (TPOM) and 7 other estates namely the Taiping Rubber Plantations (TRP) Estate, Bukit Mertajam Rubber (BMR) Estate, Malakoff Estate, Malaya Estate, Kuala Muda Estate, Stothard Estate and Batu Pekaka Estate.

The Trong Palm Oil Mill commenced its operations in year 2000 with a processing capacity of 60 metric tonnes of Fresh Fruit Bunches (FFB) per hour. All the estates within the CU have been fully developed before the year of 2005. Hence, Principle 7 of the RSPO P&C is therefore not applicable.

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

The FFB sourced from company owned estates that are certified. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Table 1: Actual FFB production by the supply base for the last reporting period
(April 2018 to March 2019)

Estates	FFB Production	
	Tonnes	Percentage (%)
Taiping Rubber Plantations Estate	16,299.27	12.84
Malaya Estate	14,263.43	11.24
Malakoff Estate	6,260.94	4.93
Bukit Mertajam Rubber Estate	31,267.43	24.63
Kuala Muda Estate	29,852.98	23.52
Stothard Estate	12,109.71	9.54
Batu Pekaka Estate	16,883.17	13.30
Total	126,936.93	100.00

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Table 2: Projected FFB production by supply base for the next reporting period
(April 2019 to March 2020)

Estates	FFB Production	
	Tonnes	Percentage (%)
Taiping Rubber Plantations Estate	16,600.00	12.85
Malaya Estate	13,000.00	10.06
Malakoff Estate	6,500.00	5.03
Bukit Mertajam Rubber Estate	29,800.00	23.07
Kuala Muda Estate	28,300.00	21.90
Stothard Estate	15,000.00	11.61
Batu Pekaka Estate	20,000.00	15.48
Total	129,200.00	100.00

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(April 2018 to March 2019)

	Total (MT)
FFB Received	126,936.93
FFB Processed	126,936.93
CPO Production	25,237.58
PK Production	6,103.33
CPO delivered as RSPO certified	17,337.94
CPO delivered under other schemes	0.00
CPO delivered as non-RSPO certified	3,291.40
PK delivered as RSPO certified	0.00
PK delivered under other schemes	0.00
PK delivered as non-RSPO certified	5,857.10
Credits traded through Books and Claim	0.00

Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(April 2019 to March 2020)

	Total (MT)
FFB Received	129,200.00
FFB Processed	129,200.00
CPO Production	28,000.00
PK Production	6,500.00
CPO delivered as RSPO certified	28,000.00
CPO delivered under other schemes	0.00
CPO delivered as non-RSPO certified	0.00
PK delivered as RSPO certified	6,500.00
PK delivered under other schemes	0.00
PK delivered as non-RSPO certified	0.00

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Table 5: Planted and certified area of the Trong BU

Estate	Planted (ha)	Certified (ha)
Taiping Rubber Plantations Estate	1,230.80	1,382.80
Malaya Estate	806.90	906.20
Malakoff Estate	541.10	562.30
Bukit Mertajam Rubber Estate	2,310.40	2,482.60
Kuala Muda Estate	1,419.00	1,519.50
Stothard Estate	942.90	983.10
Batu Pekaka Estate	897.80	968.70
Total	8,148.90	8,805.20

Table 6 : Planting profile for Taiping Rubber Plantations Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2019	3rd	Immature	76.00	6.17
2018	3rd	Immature	97.90	7.95
2017	3rd	Immature	97.90	7.95
2016	3rd	Mature	127.00	10.32
2015	3rd	Mature	47.60	3.87
2014	3rd	Mature	54.20	4.40
2011	2nd	Mature	50.70	4.12
2010	2nd	Mature	41.80	3.40
2004	2nd	Mature	81.40	6.61
2003	2nd	Mature	45.00	3.66
2001	2nd	Mature	150.80	12.25
2000	2nd	Mature	30.00	2.44
1999	2nd	Mature	60.00	4.87
1998	2nd	Mature	23.90	1.94
1997	2nd	Mature	36.60	2.97
1996	2nd	Mature	99.50	8.08
1995	2nd	Mature	110.50	8.98
Total			1230.80	100.00

Table 7 : Planting profile for Malaya Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2019	2nd	Immature	98.90	12.26
2018	2nd	Immature	61.10	7.57
2017	2nd	Immature	45.60	5.65
2016	2nd	Mature	59.60	7.39
2013	2nd	Mature	68.70	8.51
2012	2nd	Mature	52.20	6.47

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2011	2nd	Mature	63.80	7.91
2010	2nd	Mature	81.80	10.14
2008	2nd	Mature	117.50	14.56
2007	2nd	Mature	100.10	12.41
2006	2nd	Mature	57.60	7.14
Total			806.90	100.00

Table 8 : Planting profile for Malakoff Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2017	2nd	Immature	68.80	12.71
2016	2nd	Mature	48.90	9.04
2003	1st	Mature	22.30	4.12
2002	1st	Mature	27.90	5.16
2001	1st	Mature	26.80	4.95
1999	1st	Mature	55.50	10.26
1995	1st	Mature	159.70	29.51
1993	1st	Mature	30.10	5.56
1992	1st	Mature	50.00	9.24
1991	1st	Mature	51.10	9.44
Total			541.10	100.00

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Table 9: Planting profile for Bukit Mertajam Rubber Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2018	2nd	Immature	206.90	8.96
2017	2nd	Immature	218.80	9.47
2016	2nd	Immature	206.90	8.96
2015	2nd	Mature	106.70	4.62
2014	2nd	Mature	121.40	5.25
2012	2nd	Mature	40.90	1.77
2007	2nd	Mature	29.70	1.29
2001	2nd	Mature	252.10	10.91
2000	2nd	Mature	134.60	5.83
1999	1st	Mature	96.00	4.16
1996	1st	Mature	191.70	8.30
1995	1st	Mature	241.00	10.43
1994	1st	Mature	213.80	9.25
1993	1st	Mature	175.80	7.61
1992	1st	Mature	74.10	3.21
Total			2310.40	100.00

Table 10: Planting profile for Stothard Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2019	2nd	Immature	56.90	6.03
2018	2nd	Immature	46.80	4.96
2017	2nd	Immature	31.50	3.34
2014	2nd	Mature	55.70	5.91
2013	2nd	Mature	41.40	4.39
2012	2nd	Mature	71.90	7.63
2011	2nd	Mature	49.80	5.28
2010	2nd	Mature	32.90	3.49
2009	2nd	Mature	48.50	5.14
2008	2nd	Mature	54.90	5.82
2003	2nd	Mature	2.80	0.30
2001	2nd	Mature	43.50	4.61
2000	2nd	Mature	49.40	5.24
1999	1st	Mature	143.90	15.26
1998	1st	Mature	134.90	14.31
1997	1st	Mature	78.10	8.28
Total			942.90	100.00

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Table 11: Planting profile for Batu Pekaka Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2017	2nd	Immature	60.50	6.70
2016	2nd	Mature	37.20	4.15
2015	2nd	Mature	61.80	6.90
2014	2nd	Mature	58.50	6.50
2013	2nd	Mature	64.90	7.22
2012	2nd	Mature	33.10	3.70
2011	2nd	Mature	34.20	3.80
2010	2nd	Mature	30.70	3.41
2009	2nd	Mature	39.80	4.43
2008	2nd	Mature	63.30	7.05
2002	2nd	Mature	151.20	16.84
2001	2nd	Mature	44.10	4.91
2000	2nd	Mature	77.80	8.70
1999	2nd	Mature	41.10	4.58
1997	2nd	Mature	21.40	2.40
1995	2nd	Mature	78.20	8.71
Total			897.80	100.00

Table 12: Planting profile for Kuala Muda Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2018	2nd	Immature	41.10	2.90
2003	1st	Mature	239.00	16.84
2001	1st	Mature	340.40	23.99
2000	1st	Mature	195.50	13.78
1999	1st	Mature	176.60	12.45
1998	1st	Mature	149.10	10.51
1997	1st	Mature	100.10	7.05
1996	1st	Mature	177.20	12.59
Total			1419.00	100.00

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Mr. Anuar Semail
Position	:	Chairman RSPO, Boustead
Address	:	11th Floor, Menara Boustead, 69 Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia
Phone no.	:	+603-2145-2121
Fax no.	:	+603-2141-0693
Email	:	anuar.bea@boustead.com.my

3.0 AUDIT FINDINGS

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

Boustead Plantations Berhad (BPB) is a member of RSPO since 10 October 2004 with the membership number 1-0012-04-000-00. The organization has 41 estates and 10 mills divided under 10 Business Units and with a total land of 65,680.00 ha. All of the Business units are in Malaysia. BPB has established a time bound plan (Attachment 7) for the phased implementation of the RSPO standard for their oil mills and estates.

The audit team considers that the BPB Group is on the right track with its time-bound plan which was considered reasonable and challenging, given the widespread geographic locations of its estates and the resources required.

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 :

Several CU under Boustead Estates Agency Sdn Bhd has not been certified. However, the time bound plan for uncertified management units still on the track. For uncertified units internal audit was conducted by the Sustainability Unit from HQ. They monitored the compliance status on uncertified units for issues on legal compliance, HCV, safety, environment, workers welfare and social.

- 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?

NA

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iii. Are there associated smallholders (including scheme smallholders) in the CU ☐ Yes ☒ No

If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?

☐ Yes ☒ No

If no, please state reasons NA

iv. Any new acquisition which has replaced primary forests or HCV areas ☐ Yes ☒ No

3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.)

No changes

3.4 Status of previous non-conformities * ☒ Closed ☐ Not closed*
* If not closed, minor non conformity will be upgraded to major non conformity

3.5. Complaint received from stakeholder (if any)

There were some stakeholders interviewed during the conduct of this audit. These included the workers, contractors and suppliers. In general, all the interviewed stakeholders had given positive feedback on the CU.

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 : 4 DA 02 2019, MN 01 2019, IAM 01 2019, MAR 02 2019

Total no. of major NCR(s) (details refer to Attachment 4) List : 4 DA 01 2019, IAM 02 2019, IAM 03 2019, MAR 01 2019

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

Total no. of major NCR(s) (details refer to Attachment 5) List : 1 MZK 01 2019

5.0 AUDIT CONCLUSION

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.

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6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

☒

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

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

☒

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

☒

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)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

Note: Major NCRs which are not addressed within a further 60 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 AB RAOUF BIN ASIS

(Name)



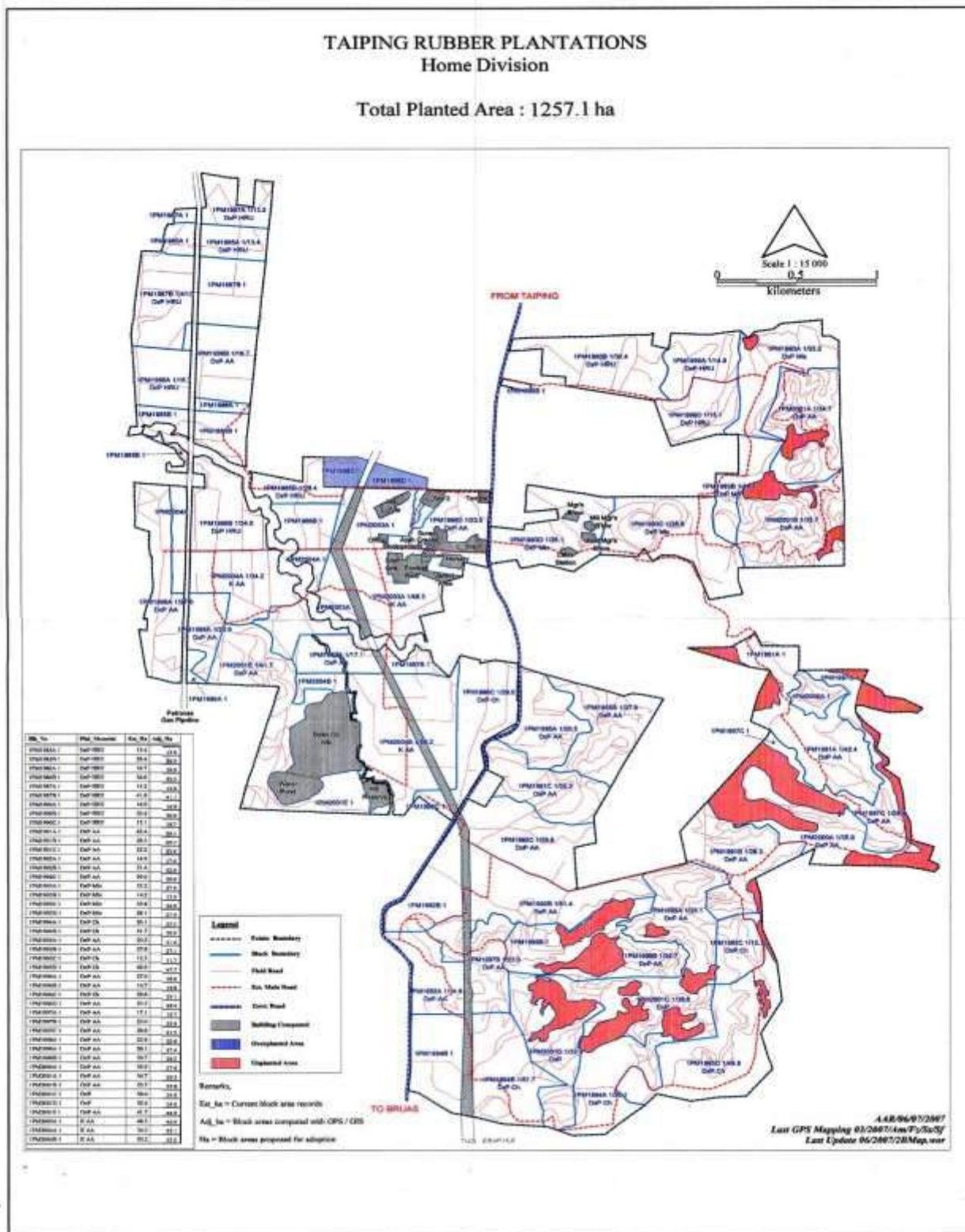
(Signature)

18/07/2019

(Date)

Attachment 1

Map of TRP Estate - Trong BU

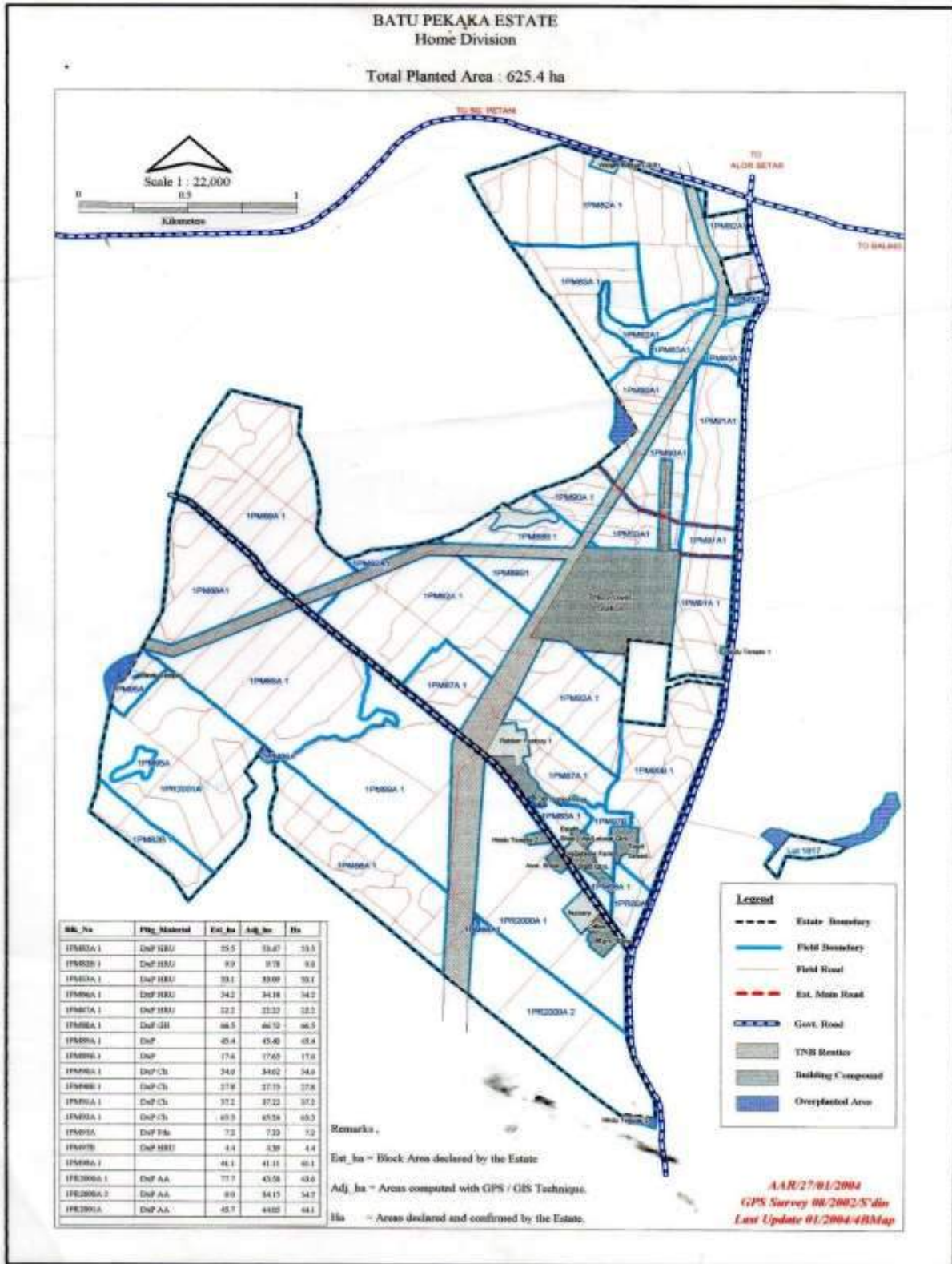


Map of Stothard Estate - Trong BU

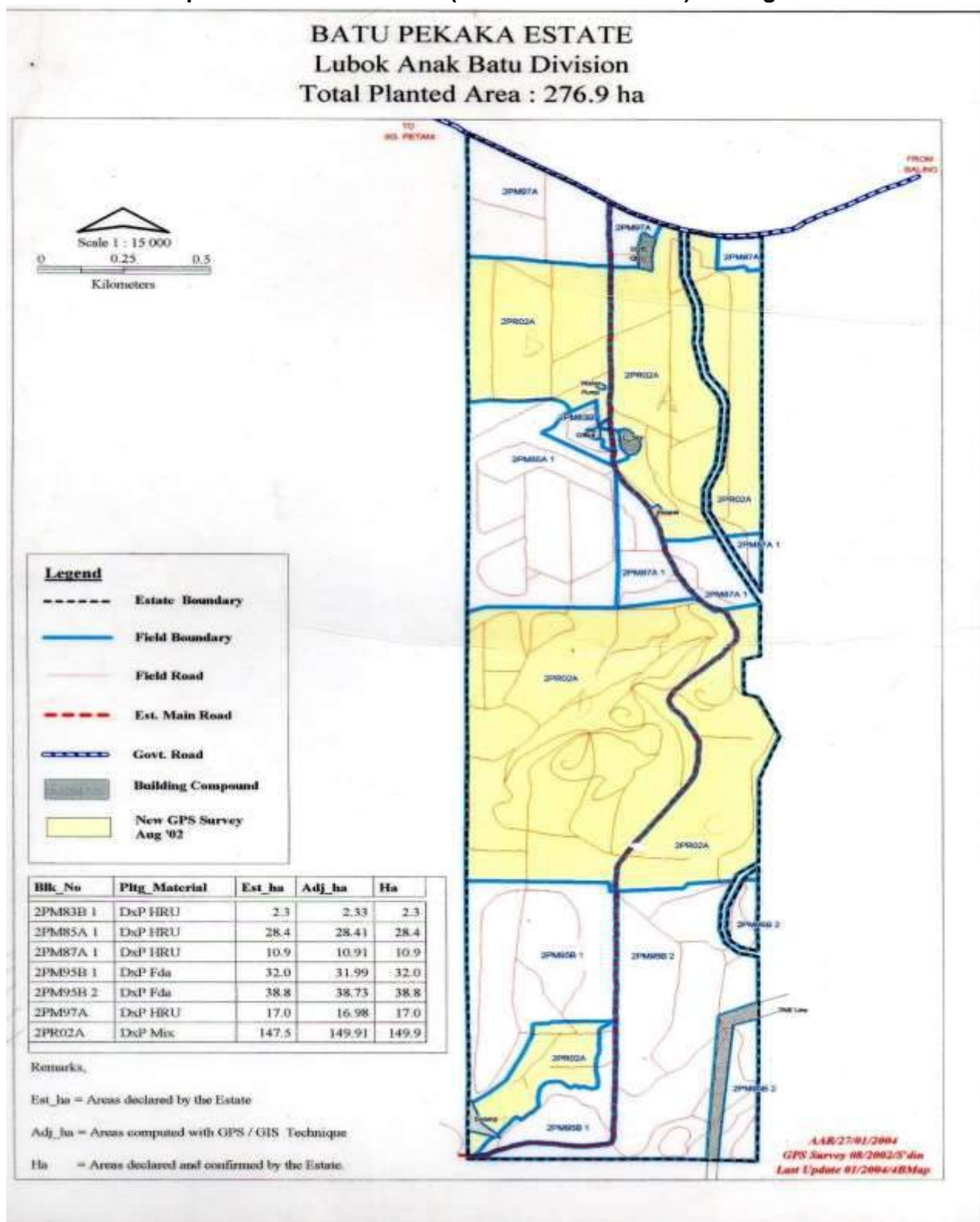


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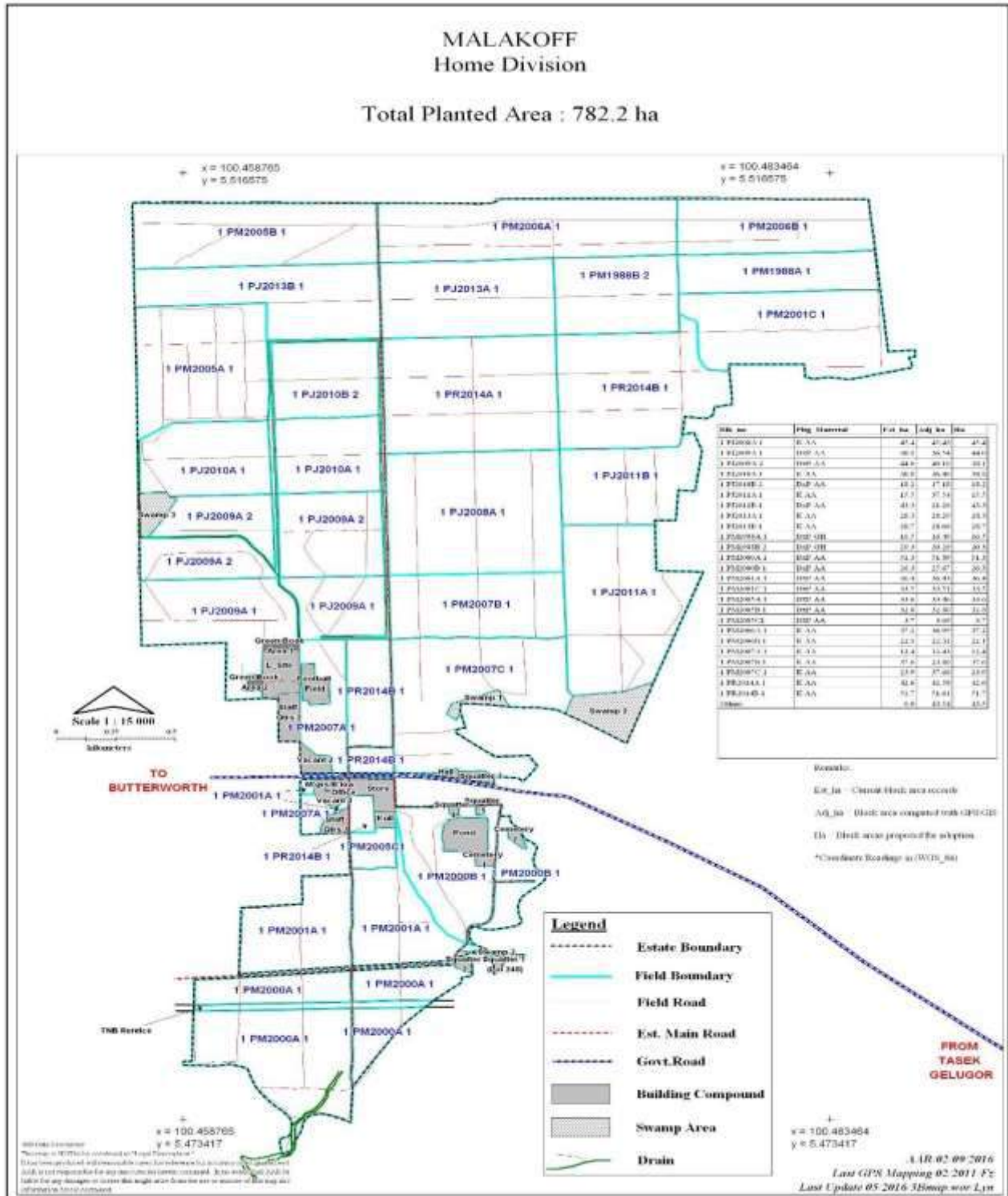
Map of Batu Pekaka Estate (Home Div) - Trong BU



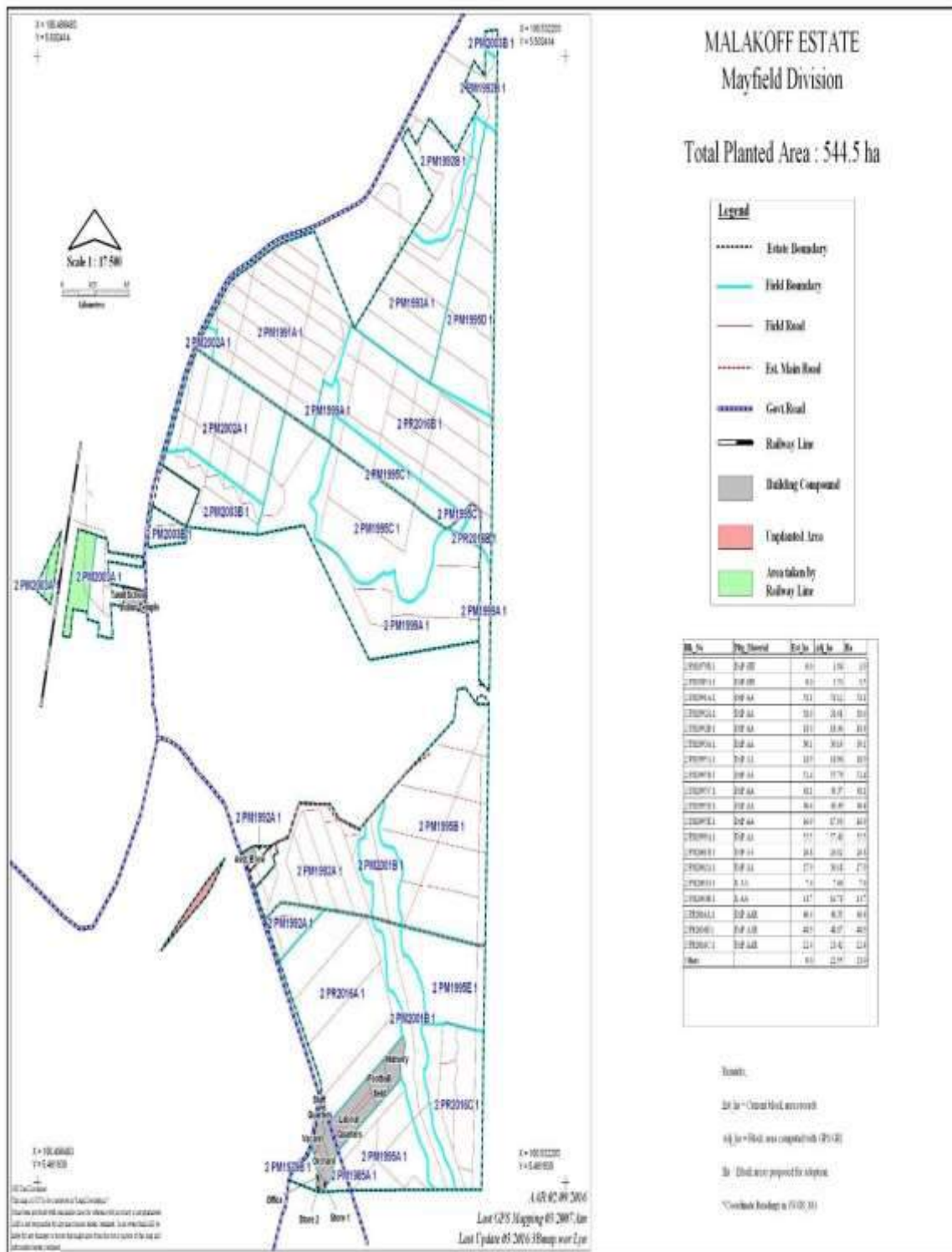
Map of Batu Pekaka Estate (Lubok Anak Batu Div) - Trong BU



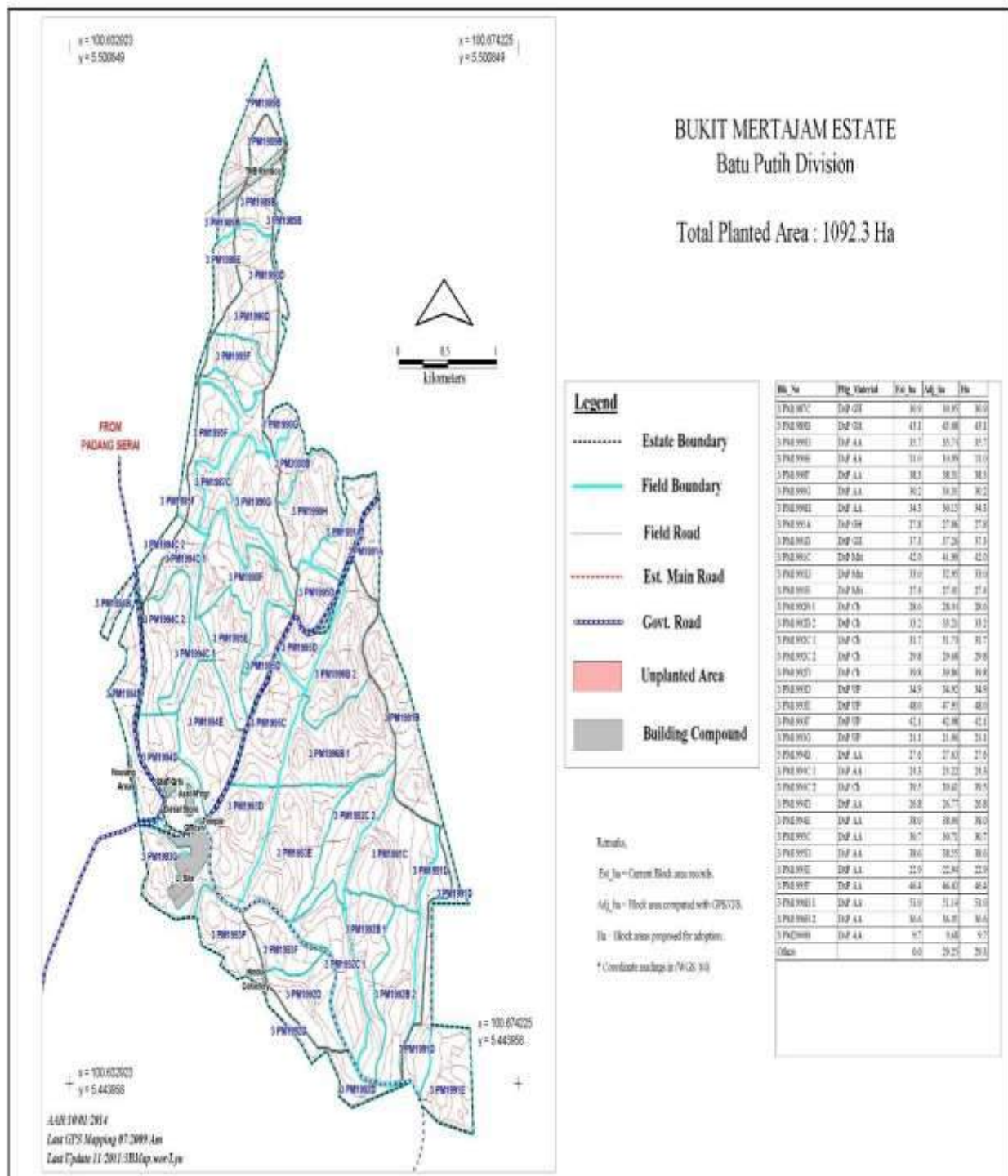
Map of Malakoff Estate (Home Div) - Trong BU



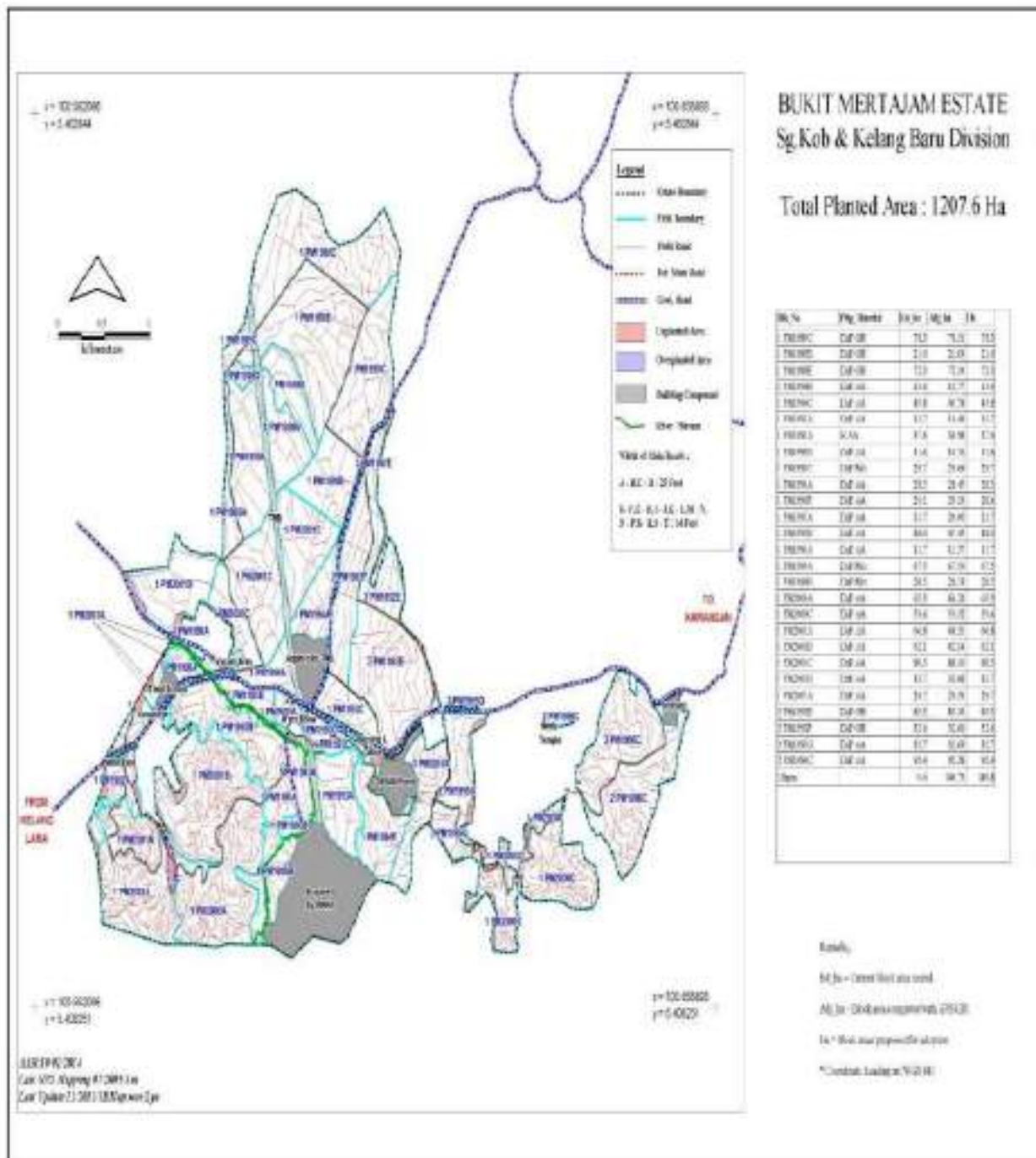
Map of Malakoff Estate (Mayfield Div) - Trong BU



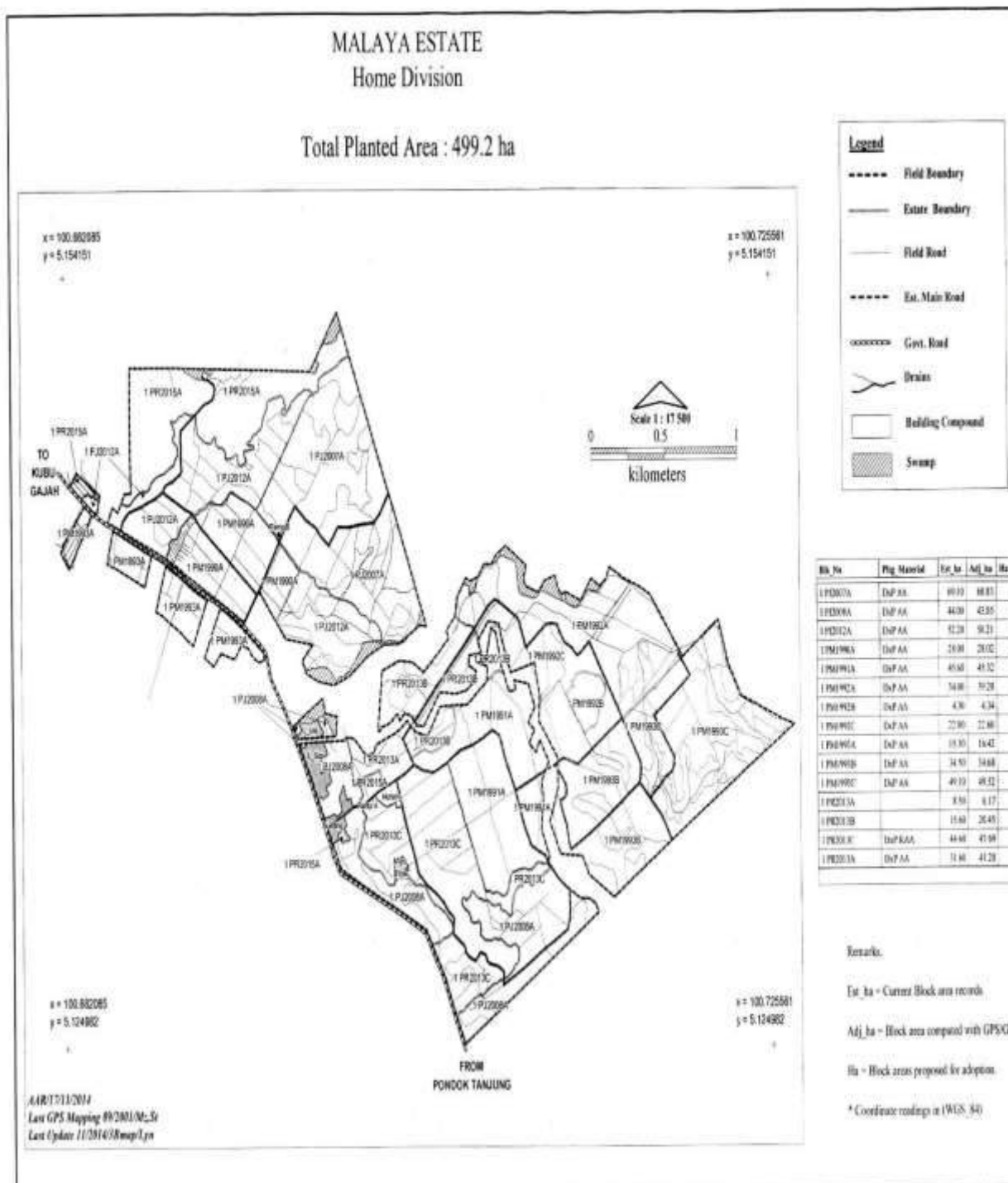
Map of Bukit Mertajam Rubber Estate (Batu Putih Div) - Trong BU



Map of Bukit Mertajam Rubber Estate (Sg. Kob & Kelang Baru Div) - Trong BU



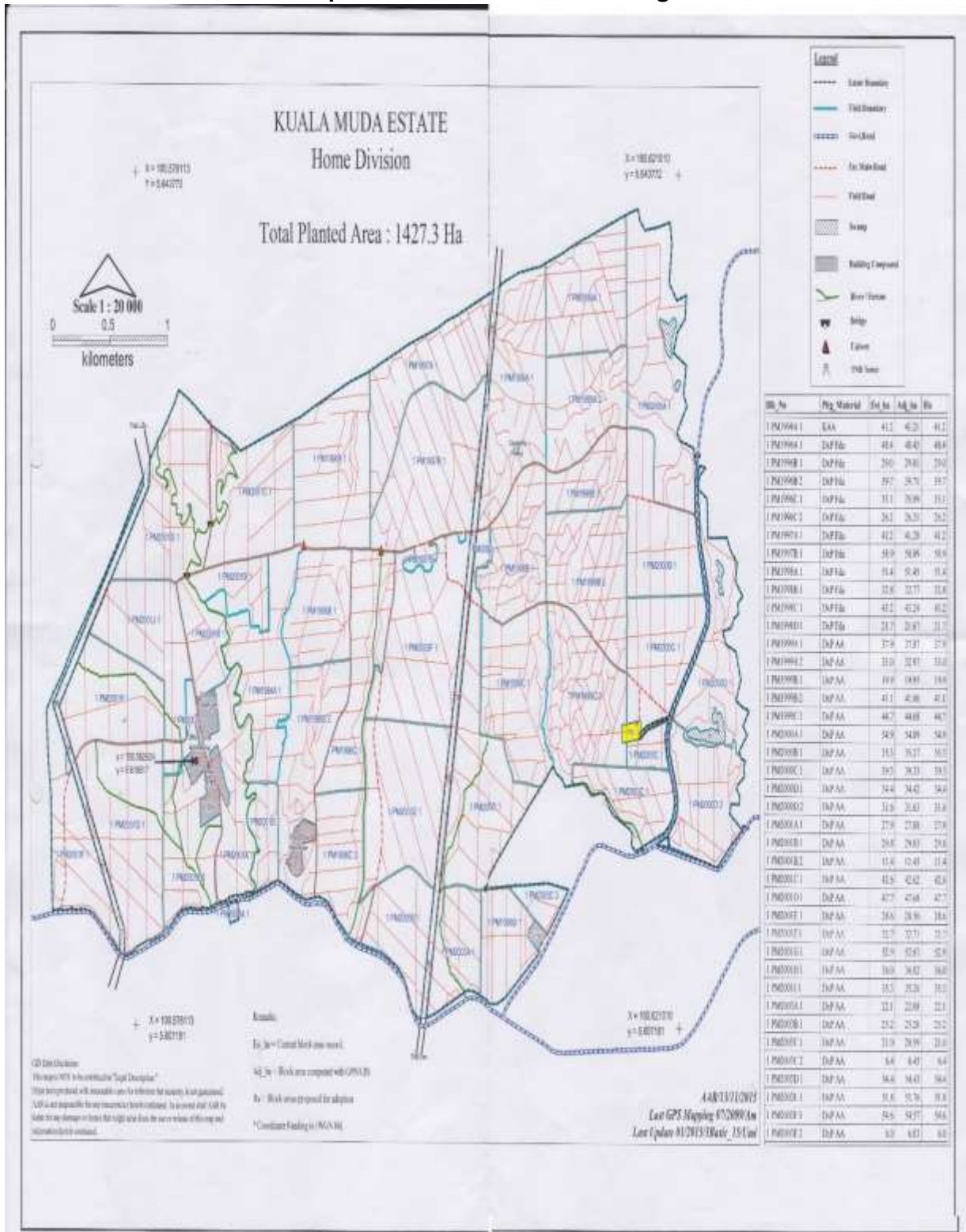
Map of Malaya Estate (Home Div) – Trong BU



Map of Malaya Estate (Lumboh Kluang Div) - Trong BU



Map of Kuala Muda Estate - Trong BU



SURVEILLANCE AUDIT PLAN (ASA 2) TRONG

1. Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI)
- (ii) To verify the effective implementation of corrective actions arising from the findings of last audit
- (iii) To make appropriate recommendations based on the audit findings

2. **Date of assessment** : 15 – 19 April 2019

3. **Site of assessment** : i) Trong POM
ii) Batu Pekaka Estate
iii) Stothard Estate
iv) Kuala Muda Estate
v) Malakoff Estate

4. Reference Standard :

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

5. Assessment Team

- (i) Audit Team Leader : Mohd Ab Raouf bin Asis (Safety, Environment)
- (ii) Auditor : i) Dzulfikar bin Azmi (Safety, Environment, Partial Certification)
ii) Ismail Adnan (HCV, Social)
iii) Mohd Norddin Abd Jalil (GAP)
iv) Mohd Zulfakar bin Kamaruzaman (Supply Chain)

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, 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. For major non conformities raise in the surveillance audit, correction shall be verified in the next audit. Recurring major non- conformities on the same indicator in successive surveillance audits shall result in the immediate suspension of the RSPO P & C certification shall be recommended.

9. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain.

In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. Working Language : English and Bahasa Malaysia

11. Reporting

- | | | | |
|----|------------------------|---|---|
| a) | Language | : | English |
| b) | Format | : | Verbal and written |
| c) | 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. |

12. Facilities Required

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

13. Assessment Programme Details : As below

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Day 1-15/4/2019 (Monday):

Time	Activities / areas to be visited				Auditee
8.30 - 9.00am	Opening Meeting at Batu Pekaka Estate office: <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative – Briefing on RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, time bound plan, actions taken to address previous audit findings. Logistic arrangement 				All
9.00 - 1.00pm	To assign each audit team members – site and the P&C requirements				
	Raouf	Ismail	Dzulfiqar	Zulfakar	Guide(s) for each auditor
	<u>Batu Pekaka Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programs Continuous improvement 	<u>Batu Pekaka Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone HCV Assessment management plan & implementation Training and skill development programs Social aspects - SIA, management plan & implementation, workers' quarters. Land titles user rights Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances Consultation with relevant government agencies 	<u>Batu Pekaka Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programs Time bound plan and uncertified management units Continuous improvement 	<u>Trong POM</u> Site visit and assessment on Supply Chain Implementation including the: <ul style="list-style-type: none"> Model used General Chain of Custody System Requirements for the supply chain Documented procedures Purchasing and goods in Outsourcing activity Sales and goods out Processing Records keeping 	

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1.00 – 2.00pm	LUNCH BREAK	All
2.00 – 5.00pm	Continue assessment	Guide(s) for each auditor
5.00 pm	Audit team discussion / End of Day 1 audit	All

Day 2-16/4/2019 (Tuesday):

Time	Activities / areas to be visited				Auditee
8.30 .– 1.00 pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Raouf	Ismail	Dzulfiqar	Norddin	Guide(s) for each auditor
	<u>Malakoff Estate</u> Site visit and assessment on <ul style="list-style-type: none"> • Laws and regulations • Environmental management – witness activities at site • Waste & chemical management • Interview with workers, safety committee and contractors • Facilities at workplace • Occupational safety & health practice – witness activities at site • Interview with workers, safety committee and contractors • Training and skill development programs • Continuous improvement 	<u>Malakoff Estate</u> Site visit and assessment on <ul style="list-style-type: none"> • Laws and regulations • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • HCV Assessment management plan & implementation • Social aspects - SIA, management plan & implementation, workers' quarters. • Land titles user rights • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, worker representative, contractors, supplier, etc • Linesite inspection • Complaints and grievances 	<u>Malakoff Estate</u> Site visit and assessment on <ul style="list-style-type: none"> • Laws and regulations • Environmental management – witness activities at site • Waste & chemical management • Interview with workers, safety committee and contractors • Facilities at workplace • Occupational safety & health practice – witness activities at site • Interview with workers, safety committee and contractors • Training and skill development programs • Continuous improvement 	<u>Malakoff Estate</u> Site visit and assessment on <ul style="list-style-type: none"> • Laws and regulations • Commitment to long-term economic and financial viability • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) • EFB mulching, POME application • Chemical store/fertilizer Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement 	

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		<ul style="list-style-type: none"> Consultation with relevant government agencies 			
1.00 – 2.00pm	LUNCH BREAK				All
2.00 – 5.00pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Continue assessment				
5.00 pm	Audit team discussion / End of Day 2 audit				All

Day 3-17/4/2019 (Wednesday):

Time	Activities / areas to be visited				Auditee
8.30 – 1.00 pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Raouf	Ismail	Dzulfiqar	Norddin	Guide(s) for each auditor
	<u>Kuala Muda Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill 	<u>Kuala Muda Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone HCV Assessment management plan & implementation Social aspects - SIA, management plan & implementation, workers' quarters. Land titles user rights Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, 	<u>Kuala Muda Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill development programs Continuous improvement 	<u>Kuala Muda Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Chemical store/fertilizer Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. New planting Continuous improvement 	

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	<ul style="list-style-type: none"> development programs Continuous improvement 	<ul style="list-style-type: none"> supplier, etc Linesite inspection Complaints and grievances Consultation with relevant government agencies 			
1.00 – 2.00pm	LUNCH BREAK				All
2.00 – 5.00pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Continue assessment				
5.00 pm	Audit team discussion / End of Day 3 audit				All

Day 4-18/4/2019 (Thursday):

Time	Activities / areas to be visited				Auditee
8.30 .– 1.00 pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Raouf	Ismail	Dzulfiqar	Norddin	Guide(s) for each auditor
	<u>Stothard Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, 	<u>Stothard Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone HCV Assessment management plan & implementation Social aspects - SIA, management plan & implementation, workers' quarters. Land titles user rights Stakeholder consultation with affected communities surrounding the CU 	<u>Stothard Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Occupational safety & health practice – witness activities at site Interview with workers, safety committee and contractors Training and skill 	<u>Stothard Estate</u> Site visit and assessment on <ul style="list-style-type: none"> Laws and regulations Commitment to long-term economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Chemical store/fertilizer Plantation on hilly/swampy area <ul style="list-style-type: none"> IPM implementation, training and safe use of 	

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	safety committee and contractors • Training and skill development programs • Continuous improvement	• Interview with gender committee, worker representative, contractors, supplier, etc • Linesite inspection • Complaints and grievances • Consultation with relevant government agencies	development programs • Continuous improvement	agro-chemicals. • New planting • Continuous improvement	
1.00 – 2.00pm	LUNCH BREAK				All
2.00 – 5.00pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
5.00 pm	Audit team discussion / End of Day 3 audit				All

Day 5-19/4/2019 (Friday):

Time	Activities / areas to be visited				Auditee
8.30 .– 12.30 pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Raouf	Ismail	Dzulfiqar	Norddin	Guide(s) for each auditor
	<u>Trong POM</u> Site visit and assessment on • Laws and regulations • Environmental management – witness activities at site • Waste & chemical management • Interview with workers, safety committee and contractors • Facilities at workplace • Occupational safety & health practice – witness activities at	<u>Trong POM</u> Site visit and assessment on • Laws and regulations • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • HCV Assessment management plan & implementation • Social aspects - SIA, management plan & implementation, workers' quarters. • Land titles user rights • Stakeholder consultation with	<u>Trong POM</u> Site visit and assessment on • Laws and regulations • Environmental management – witness activities at site • Waste & chemical management • Interview with workers, safety committee and contractors • Facilities at workplace • Occupational safety & health practice – witness activities at site • Interview with workers, safety committee and contractors • Training and skill	<u>Batu Pekaka Estate</u> Site visit and assessment on • Laws and regulations • Commitment to long-term economic and financial viability • Good Agricultural Practice- witness activities at site (weeding/spraying, etc) • EFB mulching, POME application • Chemical store/fertilizer Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals.	

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	<ul style="list-style-type: none"> site Interview with workers, safety committee and contractors Training and skill development programs Continuous improvement 	<ul style="list-style-type: none"> affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances Consultation with relevant government agencies 	<ul style="list-style-type: none"> development programs Continuous improvement 	<ul style="list-style-type: none"> New planting Continuous improvement 	
12.30 – 2.00pm	JUMAAT PRAYER / LUNCH BREAK				All
2.00 – 4.00pm	Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.				Guide(s) for each auditor
4.00 -4.30 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager				
4.30 -5.00 pm	Closing meeting at CU / End of audit				All

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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	Trong CU had continued to maintain a comprehensive system with respect to this criterion. Request Form for their stakeholders or other interested party who had viewed / obtained document related to RSPO and Record of Visitation by government agencies such as DOE and DOSH were maintained.
	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	NO	At Trong BU have identified personnel responsible for complaints. Records of communication (classified as internal and external) were identified and maintained in different files, depending on the stakeholders. Among the records reviewed were correspondences with the authorities, local communities and employees. The procedure for responding to any communication has been outlined in "The flow chart" and displayed at the notice boards in the Estate office and Muster grounds. All estates continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Boustead has revised their website, http://www.bousteadplantations.com.my/home.html to include all management documents relating to the unit's environmental, social and legal issues demonstrating commitment towards compliance to RSPO criteria. However, records of request and Information regarding Certified Area was found incorrect. Therefore, NCR was raised as MAR 01 2019.
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	1.2.1	Land titles/user rights	YES	Land titles of Trong CU were kept at their respective offices.
		Occupational health and safety plans	YES	Occupational Health & Safety Plan titled 'Program Tahunan 2019' has been established at Trong BU. Indicators set in the plan are being monitored. The progress of the monitoring were verified by the auditor.
		Plans and impact assessments relating to environmental and social impacts	YES	Plans and impact assessments relating to environmental and social impacts maintained available.
		HCV documentation summary	YES	HCV documentation maintained available.
		Pollution prevention and reduction plans	YES	Pollution prevention and reduction plans maintained available.
		Details of complaints and grievances	YES	The estates and mill have established an External Communications Procedures, a flowchart for complaints to management (internal), and a written consultation and

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Clause	Indicators		Comply Yes/No	Findings
social outcomes.				communications procedure. These documents were all documented and sighted.
		Negotiation procedures	YES	Negotiation procedures titled 'Prosedur Penentuan Hak Pemilikan Tanah' (Procedure in resolving land conflict) and 'Fair Compensation' which were related with land dispute or grievances was made available at the visited sites.
		Continual improvement plans (Criterion 8.1);	YES	Continuous improvement plans for 2018 are available for Trong POM, Taiping Rubber Plantation Estate, Malaya Estate and Bukit Mertajam Estate and were kept at their respective offices.
		Public summary of certification assessment report;	YES	The public summary of certification assessment report for Trong CU can be assessed through SIRIM QAS website.
		Human Rights Policy (Criterion 6.13).	YES	A policy to respect human rights has been established by Trong BU in Jan 2016. Auditor has verified through interview with workers that the policy has been communicated to all levels of the workforce and operations.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	Code of ethical conduct and integrity titled 'Code of Ethics & Conduct' has been established and distributed to all staffs and workers. As verified through interview with local and foreign workers, levels of the workforce have been briefed with code of ethic during morning muster. This company's code of ethic as evident that any unethical business on conduct such as corruption, bribery and fraudulent are prohibited.

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, the CU continued to comply with most of the applicable local, national and ratified international laws and regulations. Relevant licenses and permits were verified accordingly. <ul style="list-style-type: none"> ▪ MPOB License ▪ Energy Commission and Domestic Trade Ministry for diesel storage ▪ Suruhanjaya Tenaga – Lesen Bagi Pepasangan Persendirian, ▪ Factory and Machinery Act 1967 i) Person In Charge Regulation 1970 ii) Steam Boiler and Unfired Pressure Vessel 1970 iii) The Factories and Machinery (Notification, Certificate of Fitness and Inspection), Regulations, 1970 Regulation 10(2) ▪ EQ (Prescribed Premise) Crude Palm Oil Regulations 1977 ▪ EQ (Scheduled Wastes) Regulations 2005

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Clause	Indicators		Comply Yes/No	Findings
				i) Regulation 3 (Notification of scheduled waste generated) ii) Regulation 9 (Storage of scheduled waste < 180 days) iii) Regulation 11 (Inventory of scheduled waste) <ul style="list-style-type: none"> OSHA 1994, Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000 - Regulation 27 (health surveillance programme)
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	At Trong CU have a documented system for identifying, updating and tracking changes in legal requirements and monitoring the status of the legal compliance. Document titled "Legal and Other Requirements Register" maintained available at Trong CU.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	Trong CU has established a mechanism to track changes in the regulation by subscribing to the Malaysian Legal and Tax Information Centre. Compliance status against the identified regulations was indicated in the register list.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	Sustainability Department Executive who was based in Kuala Lumpur responsible to track any changes to the Acts and Regulations. This was done through communicating with the publisher of the documents. This mechanism was outlined in its procedure. The updating of the legal register was carried out on a periodical basis. Any change in the legal register was communicated to the respective BUs.
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 Native Customary Right (NCR) land) and the actual legal use of the land shall be available. Major Compliance	YES	Trong Business Unit maintains and complies with the terms of the land title. The land titles specified the purpose of the planting for either oil palm or agricultural crops for economic value. All the Estate are originated from Boustead Plantation and established from year of 1950, for TRP estate the estate was established in 1959 and planted with Rubber tree and convert to oil palm on 1986, for Malaya Estate the estate was established on 1969 first crop planting was a Rubber planting and convert to oil palm on 1980, The land origin was from Boustead subsidiary named Boustead Silasuka Sdn Bhd. It has been transferred to Boustead Teluk Sengat Sdn Bhd in 1 April 2011 on July 2016 transfer again to Boustead Plantation. Noted that the land title for Batu Pekaka Estate was still in progress to change the ownership from CIMB Trustee Berhad to Boustead.
	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	On-site verification at estate boundary between Malaya Estate with Kg. Titi Ijok confirmed that the boundary marking was sighted and available. At Taiping Rubber Plantation, observed that the boundary stones were visibly maintained between the estate with neighbouring village. Site inspection to Bukit Mertajam Estate found the boundary stone was maintained between the Estate and Kg Batu Puteh.
	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	YES	There was no issue raised on land dispute at Malaya Estate based on interview with head of village of Kg. Titi Ijok where the village was located in adjacent to the estate. As for Taiping Rubber Plantation, auditor had interviewed the village head of onany land dispute issues. The village heads confirmed that there was no case land dispute between the estate and the local communities. At Bukit Mertajam Estate, confirmation was gained through the interview with the head of Kg. Batu Puteh. There was no land dispute issue

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Clause	Indicators		Comply Yes/No	Findings
		available, and that these have been accepted with free, prior and informed consent (FPIC). Minor Compliance		with the Estate.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. Major Compliance	YES	There was no issue raised on land dispute as explained in Indicator 2.2.3.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (incl. neighbouring communities and relevant authorities where applicable). Minor Compliance	YES	There was no issue raised on land dispute as explained in Indicator 2.2.3.
	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	Site visits to Malaya Estate, Taiping Rubber Plantation, Bukit Mertajam Estate and Trong POM confirmed that there was no evidence that the oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. It was also explained in Indicator 2.2.3, based on interview with the head of local communities confirmed that there was no violence action taken by Trong POM, Malaya Estate, Taiping Rubber Plantation, and Bukit Mertajam Estate to maintaining peace. The visited area only employed watchmen in order to guard their workers, staffs and children, their belongings and company properties.
C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior, and informed consent.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (incl. neighbouring communities where applicable, and relevant authorities). Major Compliance	YES	There was no evidence of land dispute as verified through interview with neighboring local communities.
	2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC)	NA	Since there was no conflict or dispute over land ownership in the Trong BU, this indicator was not applicable to them.

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Clause	Indicators		Comply Yes/No	Findings
		(Criteria 2.2, 7.5 and 7.6) 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;	NA	Since there was no conflict or dispute over land ownership in the Trong BU, this indicator was not applicable to them.
	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;	NA	Since there was no conflict or dispute over land ownership in the Trong BU, this indicator was not applicable to them.
	c)	Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance	NA	Since there was no conflict or dispute over land ownership in the Trong BU, this indicator was not applicable to them.
	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	NA	Since there was no conflict or dispute over land ownership in the Trong BU, this indicator was not applicable to them.
	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	NA	Since there was no conflict or dispute over land ownership in the Trong BU, this indicator was not applicable to them.

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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 three years) shall be documented That includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	Trong BU maintained to have minimum 4 years business plans called business horizon plan. The budget allocations at estates, include activities for operating expenditure i.e. upkeep, cultivation, harvesting & evacuation, welfare, other than that, capital expenditure, RSPO compliance. Attention was given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years. While, provisions at mill, include the activities for milling process, general charges, RSPO compliance and capital expenditure.
	3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. Minor Compliance	YES	The replanting programmes until 2022 were sighted for all estates. This 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		Compl y Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored.	4.1.1	SOPs for estates and mills shall be documented. Major Compliance	YES	Trong BU continued to use the established manuals i.e. Oil Palm Circulars & Safety Work Procedure, Standard Sektor Perladangan. The Agriculture Manual, established on 2007 and revised in 2011 maintained in place for estate operation such as land clearing, field upkeep, pest and disease, FFB harvesting and evacuation, soil conservation and terracing, road construction and maintenance, planting density and planting technique, palm replacement during immaturity and supplying, manuring, palm thinning and replanting. Trong POM continued to use the established manuals i.e. Boustead Plantations Berhad: Mill Operations Manual. It is maintain in place for mill operation such as quality system, document control, purchasing, process control, inspection and testing, inspection measuring and test equipment, inspection and test status, control of non-conforming product, complaint and failure investigation, handling, storage, packaging and delivery, quality records, internal quality audits, training and statistical technique.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place.	NO	There were mechanism in place to check consistent implementation of procedures. Among the mechanism verified were the Planting Advisor Report, Agronomist Report, Group Internal Audit Report etc.

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Clause	Indicators		Compl y Yes/No	Findings
		Minor Compliance		However, it was found that some harvesters in Field PM99C of Kuala Muda Estate do not have safety helmets and goggles while harvesting the tall palms and the workers in the nurseries of both Malakoff Estate and Batu Pekaka Estate do not have stray hats to prevent them from heat stress. A nonconformity report was raised against indicator 4.1.2 (NCR No: MN 01 2019).
	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 OPC and other SOPs at the BU 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 and PPE Checklist. Most records were being maintained for more than a year.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Auditor has verified that there was no third party FFB supplier send their FFB to Trong POM. The CU was certified under the Identity Preserved supply chain model. Hence, this indicator was not applicable.
C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal & 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	Trong BU 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) and some EFB and compost application. Maintaining soil fertility was guided by its OPC in a few chapters: i) OPC 01.a – Establishment of Leguminous Cover Crops. ii) OPC 03.b – Application of Fertilisers. iii) OPC 08.b – Mulching. Fertiliser application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the Applied Agricultural Resources Sdn Bhd. Annual fertiliser recommendations were made based on annual foliar sampling. Soil sampling was carried out yearly in fields on a 5-year cycle basis.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertiliser inputs were based on recommendation by the Applied Agricultural Resources Sdn Bhd. The application programs were monitored using manuring program sheets, bin cards and field cost book records of programs and applications of fertilisers were available. Records showed that actual applied in 2018 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 Trong BU to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. Records sighted during the audit.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues.	YES	In addition to the fertiliser application, Trong BU had also carried out frond stacking following the L-shaped in the palm interrow as per the SOPs (OPC.14.a). No EFB application in these estates.

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Clause	Indicators		Compl y Yes/No	Findings
		Minor Compliance		
C 4.3 Practices minimise and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	There were no fragile/marginal soils in both estates visited based on the soil maps provided sourced from Applied Agricultural Resources Sdn Bhd.
	4.3.2	A management strategy shall be in place for plantings on slopes between 9-25 degrees unless specified otherwise by the company's SOP. Minor Compliance	YES	Trong BU had a management strategy for planting on slopes and to minimise and control erosion and degradation of soils. The plantings on slopes were guided by its SOPs to minimise soil erosion based on local soil and climate conditions, ground cover management (OPC 01.a), biomass recycling (OPC 08.b.), terracing (OPC 54.a) and natural regeneration of <i>Nephrolepis biserrata</i> . It was observed in both mature and immature areas that slopes were terraced. The terrain in both estates was mainly flat and undulating with no slopes above 25°. Slopes maps were available. It was observed that practices to minimise and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines.
	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 Trong BU were in satisfactory condition and accessibility were made possible by regular maintenance. There was evidence of road maintenance programs which consist of road resurfacing with grading and compaction and culvert maintenance. It has been noticed that stock piles of dry crusher run put in several designated main road and collection road for the reason of continuous maintenance.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management prog. shall be in place. Major Compliance	YES	There were no peat soils in Trong BU. It was supported with soil map provided by the estates.
	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	There were no peat soils in Trong BU. It was supported with soil map provided by the estates.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	No fragile and problem soils in Trong BU. It was supported with soil map provided by the estates.
C 4.4 Practices maintain	4.4.1	An implemented water management plan shall be in	YES	The water management plans were established and implemented. The water management plans were more towards soil water conservation, pollution prevention and

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Clause	Indicators		Compl y Yes/No	Findings
the quality and availability of surface and ground water.		place. Minor Compliance		domestic use. The management plan covered dry spell/shortage and in case of water pollution. Workers were advised to conserve water. Water from process was reused for cleaning. Water from triple rinsing of pesticide containers was reused for spraying. Water bodies were established in ravines and slit pits in flat areas and on slopes.
	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	Trong BU continues to protect the water courses and wetlands including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estates. Best management practices has been adopted by Trong BU to prevent soil degradation, environmental pollution and conserve water.
	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	Requirement in “Jadual Pematuhan” with license no. 004228 validity period until 30/06/2018 for 60mt/hr. Discharge method is by sprinkler (Land Disposal) and Lab Report for final discharge were carried out accordingly by analytical laboratory – Kuala Lumpur Kepong Berhad (Technology & Quality Control Centre) on Monthly basis. The result was within the limit. The last test was carried out on 16/03/2018. The quarterly report was sent to DOE accordingly and the last was sent on 12/01/2018 for period October until December 2017. The competent person for the Effluent Pond (CePPOME) is Mr. Syarmizar bin Mohd Safki.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	Processing water obtained from water catchment near to the mill. The mill water usage per tonne of FFB continued to be monitored on monthly basis.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.	4.5.1	Implementation of IPM plans shall be monitored. Major Compliance	YES	Trong BU continued to implement Integrated Pest Management (IPM) in all Estates. All estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by its SOP. 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 was by using pheromone traps.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Training conducted and records sighted during audit.
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	YES	The use of all pesticides by the estates was guided by its SOPs and Safety Work Procedure 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.

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Clause	Indicators	Compl y Yes/No	Findings
	have minimal effect on non-target species used where available. Major Compliance		
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be provided. Major Compliance	YES	All estates visited maintained records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used. The total quantity used, number of applications and active ingredients (ai) per Ha were also recorded. These includes mature and immature areas. Pesticides were used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. Records of pesticides used were available for verification. Both estates had documented programs for spraying pesticides and were pasted at the assistants and staff room's board for monitoring purposes.
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	Trong BU was committed to minimise the usage of pesticides by implementing IPM in all estates. All estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by its SOPs and the IPM revised 4 th Edition 2017. 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> . The beneficial plants with ratio of 60:20:20 percent. Main objective to plant the beneficial plant is to minimize use of pesticide. The IPM provided maps of beneficial plant in order to monitor the decametre ratio per ha. Treatment for rhinoceros beetles was using pheromone traps and treatment with the insecticide spraying with cypermethirin fortnightly. Rat damage and leaf-eating pest census had regularly carried out to obtain information about threshold level and action to be taken thereafter. The records of census were available for verification.
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 exceptional circumstances. Pesticides selected for use are those officially registered under	YES	All estates 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). There was no evidence of pesticides that are categorised by World Health Organisation as Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had not been used.

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Clause	Indicators	Compl y Yes/No	Findings
	the Pesticides Act 1974 and the relevant provision (Section 53A); and in acc. with USECHH Regs. (2000). Minor Compliance		
	4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance	YES	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 were available at Trong BU. The training on spraying included the safety aspects and usage of PPE when handling with pesticides. Record of training was available for verification.
	4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Major Compliance	YES	The storage of pesticides at Trong CU was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) were locked & handled only by authorised personnel i.e. storekeeper. The stores in all estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. The fertilizers were well stacked. During Site visit at all stores Batu Pekaka Estate, Malakoff Estate, Kuala Muda Estate, Stothard Estate and Trong POM i.e. chemical and fertilizer store, sighted relevant SDS were seen displayed. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area was available at the estates. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This was to avoid any contamination of chemicals to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers.
	4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. Minor 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 were available at all Estates in the BU. The training on spraying included the safety aspects and

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Clause	Indicators		Compl y Yes/No	Findings
				usage of PPE when handling with pesticides. Record of training was available for verification.
	4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial spraying of pesticide was not practised by Trong BU and there was no evidence to show that any had been carried out.
	4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide-handling shall be demonstrated or made available. Minor Compliance	YES	The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat bait were continuously trained. The training were regularly conducted by the estate management to enhance knowledge and skills of employees. The training included the safety aspects and usage of PPE. Records of training were maintained for verification. Random interviews with the workers showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner.
	4.6.10	Proper disposal of waste material, according to procedures that are fully-understood by workers and managers shall be demonstrated. Minor Compliance	YES	Standard Operating Procedure "Scheduled Wastes Management" dated on June 2017 has been established. Disposal of waste material related to pesticide containers were being carried out as per established procedures. Triple rinsing activities continually implemented for empty pesticide container.
	4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	NO	Apart from Kuala Muda Estate, the relevant records were available for review. However, Kuala Muda Estate yet to be conducted specific annual medical surveillance for pesticide operators and maintenance mechanic as per CHRA recommendation. Therefore, Major NCR DA 01 2019 was raised.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	The estates had policy "Polisi Pengendalian Racun Perosak Bertoksik Tinggi" which stated that no work with pesticides shall be undertaken by pregnant or breast-feeding women. At all estates, identification of pregnancy was done by the HA based on interview with their women workers on the last menstrual period dates. This interview was done during the monthly medical check-up. Pregnancy test was carried on doubtful cases. There was no

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Clause	Indicators		Compl y Yes/No	Findings
				evidence that the work with pesticides was undertaken by pregnant or breast-feeding women. This has also been confirmed through interviewed with workers.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	YES	OSH policy dated 1 June 2012 was available in English and Bahasa Malaysia. The policy has been communicated to all levels of the organization through briefings and also displayed prominently at the notice board of the mill, estate office and Muster Ground. Random interviewed with employees showed that they generally understood the basic requirements of the policy. Occupational health and safety (OHS) management plan titled "OSHA Action Plan 2019" for each operating unit had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans were acceptable.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	YES	Carried out accordingly. Document reviewed.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance	YES	Training programme plan and carried out for the year 2019 include appropriate training on safe working practice for all categories of workers, Workers exposed to machineries and high noise level, Workers working in confined space, Harvesters, Sprayers, Manurers and General workers. The training programme included the various type of training such as firefighting, fire drill, exposed to high noise levels and control measure for protection of hearing and audiometric test, understanding SDS and first aid training. All staff and workers such as the storekeepers, harvesters, sprayers, workers applying fertilizer and rat baits were continuously trained and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Appropriate PPE were given to employees of estate visited. They were seen to wearing PPE such as face masks respirators, goggles, nitrile gloves, apron and hard hat, to cover all potentially hazardous operations such as mixing of pesticides and pesticide application.
	4.7.4	The responsible person/s shall be identified. There shall be	YES	PIC identified and record of meetings viewed during audit.

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Clause	Indicators		Compl y Yes/No	Findings
		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		
	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	Emergency Response Plan (ERP) was established. Random interview with the estate workers showed that they were aware of accident and emergency procedures. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds. Among of procedure of ERP Document, such as:
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	Local & Foreign workers were covered by SOCSO (Pertubuhan Keselamatan Sosial). Relevant records verified during audit.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Sighted the Trong CU has maintained and updated the LTI Summary on monthly basis.
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	A formal training programme covering all aspects of the RSPO Principles and Criteria were established in each Estate and the Trong POM for 2019. Implemented training program for 2018 at Malakoff Estate, Kuala Muda Estate, Stothard Estate and Trong POM were sighted during the audit. At Kuala Muda Estate, the program was titled "RSPO Training program for 2018". A regular assessment of training needs was also conducted for all its workers and staffs at each Estate/Mill.

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Clause	Indicators		Compl y Yes/No	Findings
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	NO	Records of training for each employee shall be maintained by all estates/mill in Trong Bu, however, individual employee training record at Kuala Muda Estate was not available, hence, a Minor NCR (IAM/1/2019) for Indicator 4.8.2 was raised.

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	Boustead Trong CU has established its environmental aspects/impacts register associated with their activities. The environmental aspect and impact (EAI) covers the upstream activities such as FFB reception until the downstream processes. At the mill, the identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental receptors are the air emission from the boiler stack, the generation of the palm oil mill effluent (POME) and land contamination which related to the management of scheduled wastes and domestic waste. For all estates, latest environment aspect impact assessment was reviewed in Jan 2019 covering all activities in estates certification units. The main purposed of this assessment was to evaluate and analyse the operations impact on soil, water, and lair associated with the organization activities. Among environment aspects assessed were agrochemical applications, land and water contamination from hazardous material and farm vehicles, human settlement disturbance and abandonment areas.
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/persons. Minor Compliance	YES	Significant environmental impact was derived from the environmental impact evaluation. Those activities evaluated as significant were then monitored using the mitigation measure established for each activity where the significant impacts occurred. The management has periodically reviewed the implementation and effectiveness of the established program.
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall	YES	Environmental Management plan has been recorded in the "Environmental Management Programme (EMP) – Plan & Progress to Control Pollution 2019". The objective to ensure water quality meets the Environmental Quality Act 1974. Among of action plan has been

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Clause	Indicators		Comply Yes/No	Findings
		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		taken were to conduct water sampling, reduce chemical usage - only circle and selective spray, prohibited manuring and herbicide spraying at buffer zone area, conduct awareness training among of workers.
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 & relevant wider land scape-level considerations. Major Compliance	YES	An assessment of the High Conservation Value of the estates under Trong Business Unit conducted by the third party completed on Dec 2016. The report titled "High Conservation Value Assessment of the estates under Trong Business Unit of Boustead Plantations BHD" was sighted.
	5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	YES	Recommendations for biodiversity and landscape management by the estates in their HCV action plan included the following: <ul style="list-style-type: none"> to erect visual or pictorial signage depicting prohibition of illegal activities such as hunting, fishing and collecting within the estates. to plant or allow natural vegetation or native trees as opposed to non-common species to improve survival and for ecosystem compatibility to manage and conserve all water spring and marked all the water spring in the map and demarcated on the ground. to protect the cemetery by fencing to prevent encroachment and accidental damage. to allow next of kin to access the cemetery to pay their respect. To record sightings of RTE species To record monitoring/visit of HCV sites
	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.	YES	A training programme for year 2019 was verified for all estates. Sighted training records at Stothard estate, Kuala Muda estate and Malakoff Estate include briefings titled 'Penerangan HCV' conducted to Workers and Contract workers'. HCV training for workers was conducted on 15 March 2017. Further to that, an awareness training through morning briefing has been conducted by Assistant Manager from Stothard, Kuala Muda and Malakoff Estate to all workers (Sprayer, Manuring, Harvester, Maintenance). According to the company rules, a disciplinary action was to be taken against those who were found to capture, harm, collect or kill RTE species. This was evident in the 'Prosedur Pemburuan Hidupan Liar (Akta 1997)'.

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Clause	Indicators	Comply Yes/No	Findings
	Minor Compliance		
	5.2.4 Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	YES	Trong BU action plan based on recommendations made by the HCV assessor was available, updated in Jan 2017. Trong BU was committed to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting were erected at riparian zone and border. Patrolling for Illegal hunting was also being implemented to control the illegal activities. Records showed that monitoring was integrated into the patrolling duties of the Auxillary Police at Trong BU.
	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	Available in Stothard Estate.
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	All waste products and sources of pollution identified and documented through "Waste Management Action Plan for the Year 2019" that applicable for both mill and estate. The waste management plan has also identified source of pollution, possible waste/pollution, effected environment, prevention, mitigation and enhancement. Other sources of pollutions are also listed in the Waste Management Plan such as workshop, line-site, office, store, canteen, effluent pond, boiler. Sources of pollution and waste have been adequately identified by the mill and estate. Generally, the wastes identified were of general, recyclable and scheduled wastes. It had listed the waste product, sources of pollution, mitigation measures, target, and person responsible. Among the wastes that were identified include domestic wastes from household, scrap iron, empty chemical containers, scheduled wastes and mill wastes such as POME, EFB, fiber & shell and etc.
	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 pesticide containers was punctured and disposed in an environmentally and socially responsible way, such that there was no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at Trong CU not more than 180 days @ 20mt.
	5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and	YES	Trong CU has compiled Environmental Aspects and Impacts Identification and Risk Assessment for each activity and updated every year. The last up date was made on Jan 2019. The company has also compiled an Environmental Management Plan in an effort to

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Clause	Indicators		Comply Yes/No	Findings
		implemented. Minor Compliance		minimize the environmental impacts identified in Environmental Aspects and impacts identification and risk assessment. Waste management and disposal plan to avoid or reduce pollution had been documented and implemented. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution during 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	Sighted "Improvement on Usage of Fossil Fuel 2019". Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It was monitored to optimise use of renewable energy. Data was being compiled for comparison and control for future improvement. Fossil fuel usage reduction has been included under pollution prevention plan 2019.
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance	YES	Boustead Plantations Berhad practice the zero burning. A policy on the zero burning was established in Jan 2011. There was no evidence that the land preparation by burning. It was also observed that signage " <i>Dilarang Membakar</i> " was available at various locations within the estates.
	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	There was no evidence that fire had been used to prepare land for replanting in all the estates within the CU. There was also no evidence of open burning at all the visited replanting areas. No fire was used for waste disposal.
C 5.6 Preamble Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	YES	Monitoring of mill gas emission was being done online using the Continuous Emission Monitoring System (CEMS) and supported by Ringelmann Smoke Charts. Report show evidence that the emission was within the permissible limits of DOE as verified by document made available during on site visit to the Trong POM. POME treatment, monitoring and land application was monitored, maintained and adhere to DOE requirement. Stack emission and boiler ashes were maintained and monitored at mill. Regular reporting of twice yearly was carried out and report made available during the audit. BOD analysis was conducted on a monthly basis and result confirmed it was below the allowable limit i.e. <5000mg/l as per DOE specification.
	5.6.2	Significant pollutants and GHG emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	Trong CU had identified emission of 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, carbon sink, POME and reported in the PalmGHG Summary Report.

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Clause	Indicators		Comply Yes/No	Findings																																																						
current knowledge and methodology. It is also recognised that it is not always feasible or practical to reduce or minimise these emissions. Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO. Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.	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	NO	<p>The CU had used RSPO Palm GHG version 3.0.1 Calculator as a tool to calculate the GHG emissions. The Trong CU has used option 2 full version to calculate the data. Sighted report sends to RSPO on 05/04/2019. The input data was verified and the following were determined:</p>																																																						
				<table><tr><th>Description</th><th>tCO₂e/tProduct</th><th>Production</th><th>t/yr</th></tr><tr><td>CPO</td><td>1.61</td><td>FFB Processed</td><td>150880.76</td></tr><tr><td>PK</td><td>1.61</td><td>CPO Processed</td><td>25033.61</td></tr></table> <table><tr><th>Land Use</th><th>Ha</th></tr><tr><td>OP Planted Area</td><td>8158.90</td></tr><tr><td>OP Planted on Peat</td><td>31.60</td></tr><tr><td>Conservation (forested)</td><td>0.00</td></tr><tr><td>Conservation (non-forested)</td><td>0.00</td></tr><tr><td>Total</td><td>8190.50</td></tr></table> <p>Milling extraction rate:</p> <table><tr><td>OER</td><td>16.59 %</td></tr><tr><td>KER</td><td>4.11 %</td></tr></table> <p>Mill Emission</p> <table><tr><th colspan="3">Own Crop</th></tr><tr><th>Emission source</th><th>tCO₂e</th><th>tCO₂e/tFFB</th></tr><tr><td>POME</td><td>8898.04</td><td>0.06</td></tr><tr><td>Fuel consumption</td><td>962.04</td><td>0.01</td></tr><tr><td>Grid electricity utilisation</td><td>0</td><td>0</td></tr><tr><td>Credits</td><td>0</td><td>0</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>-303.78</td><td>0</td></tr><tr><td>Sale of EFB</td><td>0</td><td>0</td></tr><tr><td>Total</td><td>9556.31</td><td>0.06</td></tr></table>	Description	tCO ₂ e/tProduct	Production	t/yr	CPO	1.61	FFB Processed	150880.76	PK	1.61	CPO Processed	25033.61	Land Use	Ha	OP Planted Area	8158.90	OP Planted on Peat	31.60	Conservation (forested)	0.00	Conservation (non-forested)	0.00	Total	8190.50	OER	16.59 %	KER	4.11 %	Own Crop			Emission source	tCO ₂ e	tCO ₂ e/tFFB	POME	8898.04	0.06	Fuel consumption	962.04	0.01	Grid electricity utilisation	0	0	Credits	0	0	Export of excess electricity to housing & grid	0	0	Sale of PKS	-303.78	0	Sale of EFB	0
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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	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	NO	An SIA for Trong Business Unit was carried out by external consultants in 2016. The SIA report for the TBU dated 29 November 2016 was sighted by the auditor. The 2016 SIA report included reports of each estate within the TBU and the mill. Respective estate map, manpower statement as at Sept 2016, date of focus group discussions held, number

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Clause	Indicators		Comply Yes/No	Findings
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.				of participants who attended each session, number of internal and external stakeholders consulted, stakeholders' perspectives, issues that were raised, and proposed mitigation/enhancement measures were included in the individual report for each estate. Potential impact factors covered included stakeholder mapping, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations. Document sighted showed that no Social Impact Assessment (SIA) was conducted and SIA report made. Record in Social Action Plan and Social Impact Mitigation Plan for both estates for 2018 and 2019 also did not refer to replanting at both locations, hence, a Major NCR (IAM/2 /2019) against Indicator 6.1.1 was therefore, raised.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Review of the SIA report and document review at Batu Pekaka Estate, Kuala Muda Estate, Malakoff Estate, Sothard Estate and Trong Palm Oil Mill showed that the assessment has been carried out with the participation of the affected parties.
	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. Major Compliance	YES	There was evidence that the action plan or " <i>Pelan Tindakan Sosial</i> " for 2019 has been developed at all estates and Trong Palm Oil Mill in Trong BU through consultation with the affected parties as sighted by the auditor.
	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	Each estate and Palm Oil Mill in Trong BU has carried out an update of the SIA (Social Action Plan) in 2018 or 2019. However, no Social Impact Assessment (SIA) was conducted and SIA report made. The Social action Plan was reviewed and updated on yearly basis as dated specified in 6.1.3. During interviews with workers (sprayers, harvester, general workers) in the field and Palm Oil Mill, the reviewed action plan was confirmed. This was also confirmed through consultations with local communities.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	There were no smallholder schemes in Trong BU.
C 6.2	6.2.1	Consultation and communication	YES	The estates and mill have maintained its consultation and communication procedures

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Clause	Indicators		Comply Yes/No	Findings
There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties		procedures shall be documented. Major Compliance		titled 'External Communications Procedures' and a flowchart for complaints to management (internal) for any stakeholders to communicate with the company on any issues concerning their interest. The procedure and flowchart for "aduan" or grievance for both internal stakeholders (workers, staff, contractors etc) and external stakeholders (government agencies, NGO, Statutory bodies, Village heads and others) were available and sighted at each estate and the Palm Oil Mill.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	A Complaint Panel comprising of a Chairman (Estate Manager), a Secretary, and other panel members (which included workers, staff, Hospital Assistant and Auxillary police and others) as the team responsible for any social issues in all estates and for the mill was available.
	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	NO	List of stakeholders and records of all communication (both internal and external) including confirmation of receipt and efforts made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders were maintained at all Estates and Palm oil Mill in Trong BU. The list of stakeholders at mill and estates has been updated in Jan 2019. Minutes of Stakeholder Meeting was verified by the auditor during the audit and confirmed during the consultations with workers and local communities as explained in Indicator 6.1.2 and 6.1.4. However, certain parties were not included in the stakeholder list i.e. Kuala Muda Estate – neighboring rubber estate and Stothard Estate – Kim Seng Estate. Therefore, NCR was raised as MAR 02 2019.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	YES	The same Complaints Form was used at all estates and mill in Trong BU. Any individual (workers, contractors and external stakeholders) can fill up and submit the complaint to the office. Some of the filled forms by the employees were sighted which were mainly request of house repair. Request from Village Heads such road repair, donations etc were also sighted. Requests for donations from schools neighboring Trong BU were also sighted. Most cases recorded in the form were resolved within 2 to 7 days, however, in some cases, short delays in actions taken were sighted. All the complaints forms sighted contain sections for complainants to fill up their names, and in some forms, their job and address.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	There was no dispute in Trong BU. It was confirmed during the consultation with village heads.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with	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	The documented procedures for identifying legal and customary right and for identifying people entitled to compensation were available at Trong BU.
	6.4.2	A procedure for calculating and distributing fair compensation	YES	Fair Compensation procedure details out the procedures for calculating and distributing compensation in a fair manner. This procedure specified that it would take into account

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Clause	Indicators	Comply Yes/No	Findings
through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	(monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance		ethnic group, gender differences, etc. A flowchart to the same effect was also sighted. Nevertheless, no case of compensation related to loss of legal or customary rights of indigenous peoples, local communities or external stakeholders was observed. Fair Compensation procedure has been established for Trong BU.
	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	There was no dispute in Trong BU. It was confirmed during the consultation with village heads.
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	NO	At Trong BU, documentation of pay in the form of monthly pay slips was provided to all workers, staff including workers hired by the contractors. Each employee received a copy of their pay slip every month. The pay slip contains the date, salary payable including any allowances, overtime pay, paid medical leave, minus any deductions such as advances taken, statutory deductions (SOCSSO, EPF), temple/mosque funds, etc. Interviews with workers reveal that they understood the contents of the pay slip and would seek clarifications from the relevant clerk if they were unsure or have questions regarding their remunerations. However, salary slips of Daily rate workers hired by contractor at Stothard Estate did not received Minimum Pay in compliance with Minimum Wage Order 2018 (RM42.31/day). Furthermore, the contract (letter of appointment) for Daily Rated Worker mentioned basic wages amount that did not comply with Minimum Wage Order 2018 (RM42.13) Hence, a Major NCR (IAM/3/2019) was raised against Indicator 6.5.1.
	6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working	YES	Workers and staff have their contracts of employment based on NUPW or AMESU documents, respectively. Details of payments, working hours, deductions, overtime, leave entitlement, reasons for dismissal, etc. were available in the respective documents. Verified contract (letter of employment offer) for all employees (including contractors

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Clause	Indicators	Comply Yes/No	Findings
			workers) were in Bahasa Malaysia and English to be understood by the estate and mill employees.
	6.5.3	YES	Housing facilities were provided to the staffs and workers at all Estates and the Mill at Trong BU. Visit by the Auditor of the linesites found , the houses were in good conditions and comfortable. Interviews with the workers reveal that they were satisfied with the accommodation provided at the linesites. Each family was given one house. Single workers share between 2 to 4 persons per house. All houses were supplied with 24 hours of electricity (from the national grid) and water (from government facilities). Sundry shops and recreational facilities like ping pong table, football field, volleyball and takraw/badminton court are also available. Employees were provided with medical facilities at the estate clinic located next to the office. The Green Book initiative seen at estates and Trong Palm Oil Mill also provide space near the houses for the employees to plant vegetables and fruits trees. Household wastes were cleared weekly. Crèches were also available for younger children. Housing inspection at all linesites was carried out twice in a month by VMO and Hospital Assistant (HA). The facilities provided has complied with the Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446).
	6.5.4	YES	There were no sundry shops were available within the estates premises except at Kuala Muda Estate and Trong POM. Kuala Muda Estate and Trong POM had monitored the sundry items sale and canteen prices on the adequacy, sufficient and affordable food from time to time.
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	6.6.1	YES	A valid freedom of association policy dated in Jan 2011 was available in bilingual (Malay and English). The policy was found to be posted on the company's notice and information wall. Interviews with workers (weeder, sprayer, harvester, general workers) found they are aware of the freedom of association.
	6.6.2	YES	Minutes of meeting between NUPW/AMESU representatives with estate and mill management were documented and as verified.

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Clause	Indicators		Comply Yes/No	Findings
collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.				
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The list of workers sighted contains workers' detail, including their dates of birth were sighted. Observations were also made during field inspection and during interviews with workers (weeder, sprayer, harvester, general workers) confirm that no one below 18 is employed in the estates and the mill. All estates and mill have a written policy against employment of child labour. Additionally, contract between the estate and the manpower contractor specifies the minimum age requirement.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	Equal opportunities policy (or "Polisi Kesamarataan Hak") was sighted at every estate and mill identifying the relevant/affected groups as 'every worker, customer, business partners and members of the public involved in estate and mill activities. Among other things, the policy specifies that management would ensure that all parties directly or indirectly involved with the estate/mill would be accorded fair treatment, and that the estates/mill would not be involved in, nor support any oppression based on race, caste, nationality, religion, disability, age, sexual orientation, union membership or political leanings. Interviews conducted with the staff and workers (including foreign contract workers) at all estates and mill confirm that there was no discrimination of any form at the estates and palm oil mill.
	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	A human rights policy ("Polisi Hak Asasi Manusia") and Equal opportunities policy ("Polisi Kesamarataan Hak") sighted at all estates and mill also state their commitment against unfair and discriminatory practices. The company does not practice discrimination based on race, caste, national, origin, disability, gender, sexual orientation, union membership, political affiliation, or age. A functioning grievance mechanism was in place. The <i>Persatuan Pekerja</i> and Gender Committee also look into allegation of discrimination if reported. Interviews with head and Penghulu of surrounding local communities, migrant workers and female employees confirm that there was no evidence of any form of discriminatory practices by the estates and oil palm mill.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are	YES	Based on interviews with workers/staffs at all estates and mill, their appointment to their respective positions were based on job availability, their experience and qualification. An interview with workers (weeder, sprayer, harvester, general workers) shows the hiring

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Clause	Indicators		Comply Yes/No	Findings
		based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance		was relevant based on their capabilities and fitness.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	A policy on sexual harassment titled 'Polisi Gangguan Seksual', signed by the Plantation Director on 11/01/2011 was available. The policy was also written in Malay language and displayed on the notice boards. No evidence or acts that contradict this policy were observed. All employees interviewed at the estates and mill confirmed that they have not encountered any form of sexual harassment.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The company has established a policy titled 'Hak Reproduksi'. All the estates and the mill adopt a written Reproductive Rights Policy ("Polisi Hak Reproduksi"). Based on interviews with women employees and the Gender Committee at the audited sites members, the female employees were aware of their maternity rights, and that they were to cease any spraying and fertilising works once they get pregnant. Sighted minutes of the Gender Committee meetings and Workers meetings at Trong POM, Batu Pekaka Estate, Malakoff Estate, Stothard estate and Kuala Muda Estate showed female workers has been briefed on their rights.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance	YES	A grievance mechanism has been sighted at all estates and the mill. It was called by various names, such as "Carta Aliran Pengendalian Isu Sosial", or "Carta Aliran Membuat Aduan Kepada Pihak Pengurusan (Luaran)". It involved a flowchart which explains the process of grievance handling for both external and internal parties. At Trong POM, Batu Pekaka Estate, Malakoff Estate, Kuala Muda Estate and Stothard Estate, the flowchart was exhibited prominently near the entrance to the main estate/mill office. The grievance mechanism has been briefed to all workforce during estate/mill management with workers.
C 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.	6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	This CU was to be certified under the Identity Preserved supply chain model. Hence, the POM was not accepting any outsiders FFB from smallholders or another private plantation. Therefore, the mill is not required to display current and past prices for FFB.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB & inputs/ services doc. Major Compliance	YES	Auditor has verified the contract agreements and payment invoices for two Contractors providing labour services and found to be in order. The agreements were renewed annually. The two contractors interviewed acknowledged that the terms of the agreement had been explained to them.
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	Interviews conducted with contractors shown that all parties understood the contractual agreements they entered into, including their rights and obligations. The contractors also acknowledged that dealings with Trong BU had been fair, legal and transparent. Payments are received promptly within one or two months of issuance of invoice.

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Clause	Indicators		Comply Yes/No	Findings
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	Based on interview with contractors and verification on tax invoices, delivery orders, purchase orders and purchase requisitions, it was noted that the payment was made in a timely manner.
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	The estates and the Trong Oil Palm Mill in Trong BU do provide contributions (as CSR activity) to the local communities. Reviewed documents, and interviews with the local community, included the following contributions.
	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	YES	There was no scheme smallholder in Trong BU.
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	All the estates and the mill adopt the Human Rights Policy, which, among others, respects human rights and will not be complicit in human rights infringement. Interviews with workers and staff also confirm that they entered into the employment voluntarily and freely. Equally, they are allowed to terminate their employment as per their terms of employment, without any penalty. Foreign workers also confirm that the job they were doing corresponds with what they were told on their home country. There was no evidence of contract substitution. All employees work 8 hours a day and were paid overtime should this number of hours was exceeded. Workers who work on rest days were also compensated in accordance with the Employment Act, 1955.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	During interview with sampled foreign workers, they confirmed that the current job was as what they were told at their home country. There was no evidence of contract substitution.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	Special labour policy for employment of foreign workers has been addressed in the ' <i>Polisi Pekerja Buruh Asing</i> ' for Trong BU dated in Apr 2016. Based on the Policy, foreign workers shall be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival program will be conducted once arrived for three months. Specific procedures/flowchart for employment of foreign workers titled '2) Sourcing Process for Foreign Workers' Boustead has also been established. The procedure has been implemented for any employment related with foreign workers.
C 6.13 Growers and millers respect human	6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the	YES	Human Rights Policy has been established by Trong BU in Jan 2016. Through interview with workers, found that that the policy has been communicated to all levels of the workforce and operations at Trong BU during workers meeting with estate/mill

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Clause	Indicators		Comply Yes/No	Findings
rights		workforce and operations (see Criteria 1.2 and 2.1). Major Compliance		management or morning 'briefing'. All the estates and the mill adopt the Human Rights Policy, which, among others, respects human rights and will not be complicit in human rights infringement.
	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	Since the estates and mill were located in Peninsular Malaysia, this indicator was not applicable.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Trong BU has no plan for any new planting and no new development of area was observed during the visit. Auditors has verified through checking the www.globalforestwatch.com, GOOGLE Maps, Estate Maps and also through site visit to the sampled estates area. Based on the audit findings, it was confirmed that there were no new planting or new development of areas at Trong BU.

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

Clause	Indicators		Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to:		
	a)	Reduction in use of pesticides (Criterion 4.6);	YES	Trong BU continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of pesticides, the estates have established nurseries for beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> . This was to ensure continuity in the planting of the beneficial plants. The estates were committed to reduce the use of chemicals. The estates have implemented and will continue to only

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Clause	Indicators		Comply Yes/No	Findings
				spray Circles (Strip) and noxious weeds. Spraying was only carried when required. Soft weeds and <i>Nephrolepis bisserata</i> were maintained and encouraged in the inter rows. EFB was applied in single layers and was not dumped in large amounts to prevent breeding of Rhinoceros Beetles. To ensure efficient loose fruit collection, circle raking was carried to avoid VOPs from merged and for the purpose to reduce of chemical usage.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	<p>The CU maintained established and implemented environmental improvement plans and measures. Among the relevant plans and measures were:</p> <ul style="list-style-type: none"> ▪ Environmental Improvement Plan - Environmental Impact Evaluation (EIE). ▪ Waste Management Action Plan 2019. ▪ Environmental Management Programme (EMP). ▪ Identification and Management of Wastewater. ▪ “Prosedur Untuk Pelupusan Sampah Domestik / Bahan Buangan Setempat”. ▪ “Prosedur 3 Kali Pembilasan Bekas Simpanan”. <p>Among content of plans were:</p> <ul style="list-style-type: none"> ▪ reduction of diesel usage / GHG emission. ▪ reduction of POME generation. ▪ maintain water quality. ▪ reduce soil erosion. ▪ reduce usage of chemical. ▪ reduce land contamination ▪ improve soil fertility ▪ reduce waste
	c)	Waste reduction (Criterion 5.3);	YES	<p>Among the type of wastes are agricultural organic wastes, rubbish, used oils, used batteries, empty pesticide containers, clinical waste, scrap iron, wastewater, etc.</p> <p>Non-reusable empty chemical containers were disposed as per relevant requirements of scheduled wastes. Reusable agrochemical containers were used for collecting of triple-rinsing wastewater.</p> <p>Scheduled wastes were labelled with relevant information and hazard sign, and disposed to DOE's licensed contractor.</p> <p>Clinical & Domestic waste disposed via landfill and “Majlis Perbandaran Sungai Petani”.</p>
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	<p>The CU had established and implemented GHG emission reduction plan. Among the plan implemented were replacement of tractors of less fuel consumption, periodical maintenance of tractor and power generator installation 1 unit solid dewatering machine to reduce solid content, application of organic material (biomass) as fertilizer.</p>
	e)	Social impacts (Criterion 6.1);	YES	<p>The Trong POM, Malaya Estate, Taiping Rubber Plantation and Bukit Mertajam Estate have allocated budget FY2018 for social commitment as continuous improvement such as:</p> <ol style="list-style-type: none"> 1. Linesite house upgrading 2. Re-roofing of linesite 3. New guard house

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Clause	Indicators	Comply Yes/No	Findings
			4. Donation to public funds 5. Transportation for school children 6. Medical transportation 7. Contribution to estate Tamil school 8. Water supply subsidy
	f) Encourage optimising the yield of the supply base. Major Compliance	YES	As Trong BU is part of a well-established organisation, Boustead Plantations Berhad, the yield performance has always been the top priority in ensuring long-term economic and financial viability. In order to optimise yields, all Estates were committed to implement best agricultural practices inclusive of timely and proper fertiliser application, Improve on accessibility to maximise crop evacuation, maintaining harvesting interval below 10 days, To collect all loose fruit to minimise losses, Water bodies and water conservation pits were constructed to conserve moisture.

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Clause	Indicators		Comply Yes/No	Findings
4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	For the time-bound plan, Boustead Plantations Berhad has committed to ensure all their business unit (BU) to be certified within 5 years i.e. year 2018 to 2022.
	(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 are seven BU highlighted in the time-bound plan and the certification progress consistent with that in the time-bound plan. The progress was as provided in the TBP in Attachment 7. For another 4 BUs i.e. Lapan Kabu, Sugut, Loagan Bunut & Kanowit, the Sustainability team has conducted the periodic internal audit accordingly.
	(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	YES	No revision of time-bound plan.

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		only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);		
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	Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting and no new development of area was observed.
	(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	Series of Internal Audit on their uncertified unit was conducted on 8-17/10/2018 (Teluk Sengat BU), 25-27/12/2018 (Lepan Kabu), 26-29/11/2018 (Sugut BU), 18-20/7/2018 (Pertama BU) and 10-11/11/2018 (Loagan Bunut and Kanowit BU). The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. Noted that Kanowit BU and Loagan Bunut BU has land conflict and they are being resolved. Meeting with several parties were conducted and minuted.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	Series of Internal Audit on their uncertified unit was conducted as reported above. The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. No case of labour dispute reported in the internal audit report.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Series of Internal Audit on their uncertified unit was conducted as reported above. The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. Several issues of legal non-compliance reported in the internal audit report such as lapses in scheduled waste management and it's being solved progressively.

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	(e)	<p>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 com., with no other supporting doc., shall not be acceptable. Verification of compliance shall be based on the following approach:</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; • Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. • Desktop study e.g. web check on relevant complaints • If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	YES	<p>Based on statement in (a) to (d) above, the CU has assessed the condition of their uncertified unit and has stated full commitment to comply with all relevant requirements as specified above. Sighted the series of Internal Audit on their uncertified unit as conducted and reported accordingly. The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. Evidence of audit attendance list, audit checklist & report were made available to auditor as the supporting evidence. Verification through www.globalforestwatch.com, GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting and no new development of area was observed. With this, it can be concluded that the positive assurance made was justified.</p>
<p>4.6.4</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p>		No additional indicators	Yes	<p>Boustead owned the land as mentioned in 2.2.1 of this checklist. Based on the interviews and this audit finding, it has been confirmed that there was no such case concerning the rights of local communities and indigenous people at Trong BU.</p>
<p>Note:</p> <ol style="list-style-type: none"> 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 Cert. Sys. 				

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Attachment 4

Details of Non-conformities and Corrective Actions Taken for RSPO P&C MYNI 2014

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
4.6.11 DA 01 2019	Major	Findings: Specific annual medical surveillance yet to be conducted. Objective evidence: Kuala Muda Estate yet to be conducted specific annual medical surveillance for pesticide operators and maintenance mechanic as per CHRA recommendation.	Medical surveillance for the year 2019 has been conducted on 29/4/2019 at Poliklinik Dr Azhar dan Rakan-Rakan.	Copy of the letter for the annual medical surveillance has received. Status: Closed
5.6.3 DA 02 2019	Minor	Findings: The data reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools was incorrect. Objective evidence: The data of RSPO Palm GHG version 3.0.1 Calculator was incorrect i.e. OP total planted area, OP planted on peat, conservation area, FFB processed, OER and KER with actual data verification.	The data reporting will be corrected and re-submit to the RSPO.	Corrective action plan accepted. The effectiveness of the corrective action will be verify during next audit. Status: Open
4.1.2 MN 01 2019	Minor	Findings: No appropriate Personal Protective Equipment (PPE) were used by the workers at Trong BU. Objective evidence: 1. It was found that some harvesters in Field PM99C of Kuala Muda Estate do not have safety helmets and goggles while harvesting the tall palms. 2. It was found that the workers in the nurseries of both Malakoff Estate and Batu Pekaka Estate do not have straw hats to prevent them from heat stress.	Training on PPE awareness has been conducted. The training was given by Assistant Manager and Estate Manager.	Corrective action plan accepted. The effectiveness of the corrective action will be verify during next audit. Status: Open
4.8.2 IAM 01 2019	Minor	Findings: Records of training for each employee shall were not available. Objective evidence: Review of training records at Kuala Muda Estate found records of training for each employee not available.	The estate has started established training records for each employee.	Corrective action plan accepted. The effectiveness of the corrective action will be verify during next audit. Status: Open

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6.1.1 IAM 02 2019	Major	<p>Findings: Social Impact Assessment (SIA) prior to Replanting works in Estate was not conducted.</p> <p>Objective evidence: Review of replanting records and field visit to replanted Fields at Kuala Muda and Stothard Estates found the following:</p> <ol style="list-style-type: none"> 1. No Social Impact Assessment (SIA) was conducted and SIA report made prior to replanting in Kuala Muda & Stothard Estate. 2. Record in Social Action Plan and Social Impact Mitigation Plan for both estates for 2018 and 2019 did not refer to replanting at both locations. 	Review of the replanting activities for Social Impact Assessment (SIA) has been done for Kuala Muda and Stothard Estate.	<p>Copy of SIA for replanting activities for Kuala Muda and Stothard Estate has been received.</p> <p>Status: Closed</p>
6.5.1 IAM 03 2019	Major	<p>Findings: Day rate workers did not receive wages in compliance with Minimum Wages Order 2018</p> <p>Objective evidence: Review of salary slips of Daily Rated workers for contract workers at Stothard Estate found: Daily rate workers did not receive Minimum Pay in compliance with Minimum Wage Order 2018 (RM42.31/day). Contract (letter of appointment), Daily Rated Worker mentioned basic wages amount that did not comply to Minimum Wage Order 2018 (RM42.31)</p>	The contractor has been briefed by management to follow the requirement. The workers has been started to pay in accordance with Minimum Wages Order 2018.	<p>Copy of the briefing has been received.</p> <p>Status: Closed</p>
1.1.2 MAR 01 2019	Major	<p>Findings: Records of request and Information regarding Certified Area was found incorrect.</p> <p>Objective evidence: The information given to CB regarding Certified Area at Trong BU since 2018 (Annual Surveillance Audit 1) was not correct due to not tally with stated Land Title.</p>	Management has do the correction as some of the land title was in the HQ office. The correction as per the attachment given.	<p>Auditor has verified the correction. Correction action plan accepted.</p> <p>Status: Closed</p>
6.2.3 MAR 02 2019	Minor	<p>Findings: A list of stakeholders was not included certain parties.</p> <p>Objective evidence: Kuala Muda Estate – neighboring rubber estate Stothard Estate – Kim Seng Estate</p>	The estates is in progress to acquire information pertaining the owner of nearby rubber estate and to obtain written confirmation from the owner.	<p>Corrective action plan accepted.</p> <p>The effectiveness of the corrective action will be verify during next audit.</p> <p>Status: Open</p>

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<p>Criterion 12 Indicator 12.1 (Supply Chain) MZK 01 2019</p>	<p>Major</p>	<p>Findings: The documented procedures for Complaints was not complete. <u>Objective evidence :</u> Sighted that in Clause 17.0 Complaints in the '<i>RSPO: Supply Chain Standard dated March 2019 Revision 6</i>', the clause did not specify detail how to handle collecting and resolving stakeholder complaints.</p>	<p>Mill has been added in the procedure to refer QAM File Section 9 – 9.1.2 Customer Satisfaction Procedure for Off Spec Product to overcome the complaints from customer.</p>	<p>Auditor has received copy of QAM File Section 9 – 9.1.2 Customer Satisfaction Procedure for Off Spec Product to overcome the complaints from customer.</p> <p>Status: Closed</p>
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Attachment 5

RSPO SUPPLY CHAIN : AUDIT CHECKLIST (INCLUDING MULTISITE /GROUP CERTIFICATION OPERATIONS)

SECTION A : GENERAL INFORMATION

1. File Reference No.	: ES10170013
2. Name of facility/ site(s) /entity(ies)	: Boustead Plantation Berhad – Trong POM
3. Site Location (single site/multisite/Group)	: Locked Bag 3,34800 Trong, Taiping, Perak, Malaysia
4. SC model	: Identity Preserved
5. Type of entity	: Mill /Crusher / Refinery / Biodiesel plant / Primary Oleochemical / Secondary Oleochemical / End product manufacturer <i>For oleochemicals and its derivatives, please check the conversion factor against the "RSPO Rules for Oleochemicals and its Derivatives" dated 1st December 2016</i>
6. RSPO Member Number	: 1-0012-04-000-00 Boustead Estates Agency Sdn. Bhd. – Trong Business Unit
7. Annual summary records of certified oil palm products purchased and claimed	: Actual for last year for period of April 18 until March 19 FFB: 126,936.93 CPO Projected: 27,000 mt PK Projected: 6,500.00 mt CPO Produce: 25,237.58 CPO Sell: 20,629.34 mt CPO Claim as Identity Preserved: 17,337.94 mt CPO Claim as Non-RSPO: 3,291.40 mt PK Produce: 6,103.33 PK Sell: 5,857.10 mt PK Claim as Identity Preserved: 0 mt PK Claim as Non-RSPO: 5,857.10 mt

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	NA

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	implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.	
	Audit Process Requirements – SURVEILLANCE AUDIT	
5.3.26	<p>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.</p> <p>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.</p>	<p>Trong POM Organizational, management systems and the operational systems, 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.</p> <p>Sighted Trong palm oil mill documented procedure name integrated RSPO: Supply Chain procedure revised dated March 2019 (revision : 6), describing the procedures on the following activities related on its supply chain certification standard required by the RSPO. The Procedure was sighted and found all elements were covered which included</p> <ul style="list-style-type: none"> • 4.0 Responsibilities • 5.0 Control of Documents • 6.0 Delivery of FFB the Estates (FFB) • 7.0 Receiving FFB at the Mill • 8.0 Process monitoring • 9.0 CPO and PK Despatch • 10.0 Product Claims • 11.0 Outsourced Contractor • 12.0 Training • 13.0 Management Review & Audit • 14.0 Reclassification of Mill's Supply • 15.0 Production Volume <p>There was no evidence that Trong POM seeking certification outsources activities to independent third parties.</p>

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	<p>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.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - For client with SG or IP in the scope, check the weighbridge system, packaging, receiving, loading and storage facility area. 	Trong POM has legal ownership and physically handles RSPO certified sustainable crude palm oil and palm kernel.
1.2	Traders and distributors require a licence obtained from RSPO to sell RSPO certified product but do not themselves require certification.	Not applicable due to Trong POM was a processing facility.

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	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.	
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform	RSPO membership no : 1-0012-04-000-00 Registered under parent company : BOUSTEAD PLANTATIONS BERHAD Company Name: Boustead Estates Agency Sdn. Bhd. – Trong Business Unit
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in Trong POM scope of certification
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. <u>Additional Guidance:</u> - For MB check the conversion factor used and the mass balance table.	Trong POM has aware on the need to downgrading of supply chain model. Incoming FFB and products dispatch record was verified and confirmed no downgrading was implemented.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Trong POM has continued to maintain IP model.
3	Documented procedures	
3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	Trong POM Organizational, management systems and the operational systems, 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. Sighted Trong palm oil mill documented procedure name integrated RSPO: Supply Chain procedure revised dated March 2019 (revision : 6), describing the procedures on the following activities related on its supply chain certification standard required by the RSPO.
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Trong POM Organizational, management systems and the operational systems, 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. Sighted Trong palm oil mill documented procedure name integrated RSPO: Supply Chain procedure revised dated March 2019 (revision : 6), describing the procedures on the following activities related on its supply chain certification standard required by the RSPO. The Procedure was sighted and found all

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		<p>elements were covered which included</p> <ul style="list-style-type: none"> • 4.0 Responsibilities • 5.0 Control of Documents • 6.0 Delivery of FFB the Estates (FFB) • 7.0 Receiving FFB at the Mill • 8.0 Process monitoring • 9.0 CPO and PK Despatch • 10.0 Product Claims • 11.0 Outsourced Contractor • 12.0 Training • 13.0 Management Review & Audit • 14.0 Reclassification of Mill's Supply • 15.0 Production Volume <p>The revised procedure has revised clause 16.0 Process/Continuous Accounting System to add Production Logbook on Daily Basis. Auditor has review the logbook at Lab and found satisfactory. The Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered.</p>
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained.
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.	The RSPO Chairman has the overall responsibility and authority over the implementation of the supply chain requirements. It was noted RSPO Chairman has assigned Trong POM Manager to ensure the implementation of supply chain procedure met the RSPO requirements. Interviewed with relevant person in-charge at critical control point was revealed they are understood on the RSPO standard requirements which requires no mixing of RSPO certified and non RSPO certified material in receiving, processing, storage and delivery.
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>	RSPO internal audit was conducted in March 2019 by the internal auditor. There were 1 OFI were raised by auditor. Audit Attendance sheet, audit plan, audit notes, and OFI was sighted by auditor. Trong POM has taken necessary action to close out the OFI.

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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>	<p>Trong POM had continued received FFB supply from own company estate namely TRP estate, Kuala Muda estate, Malaya estate, Stothard Estate, Batu Pekaka Estate, BMR Estate and Malakoff estate.</p> <p>Sighted FFB consignment note for TRP estate, Kuala Muda estate, Malaya estate, Stothard Estate, Batu Pekaka Estate, BMR Estate and Malakoff estate. from December 2018 till March 2019. Among the information available on the FFB consignment note are estate name, delivery date, date, Description of product, no of FFB bunches, FFB weight.</p>
a)	<p>The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Obtain list of all suppliers and list of purchase orders/invoices issued to the suppliers - Check for agreement/contracts signed with suppliers - Sampling of purchase orders/invoices shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each suppliers. - Ensure the purchase orders/invoices have the supplier's Supply Chain number. 	<p>Trong POM had continued received source of RSPO certified FFB from own group estate.</p> <p>Trong POM has continued to implement and comply with the procedure in handling of purchasing and receiving as per RSPO standard requirements. Among the samples of all document dated from December 2018 till March 2019. related to incoming FFB from TRP estate, Kuala Muda estate, Malaya estate, Stothard Estate, Batu Pekaka Estate, BMR Estate and Malakoff estate.</p>

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b)	<p>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.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request the PIC to demonstrate the use of the RSPO IT platform. 	<p>Trong business unit has registered in IT platform (Palm Trace) Company Name: Boustead Estates Agency Sdn. Bhd. – Trong Business Unit</p>
c)	<p>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.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request for list of suppliers - Request the PIC to demonstrate where in the RSPO IT platform this can be found. 	<p>Trong POM had continued received FFB supply from own company estate namely TRP estate, Kuala Muda estate, Malaya estate, Stothard Estate, Batu Pekaka Estate, BMR Estate and Malakoff estate.</p>
4.2	<p>The site shall have a mechanism in place for handling non-conforming material and/or documents.</p>	<p>Trong POM has established BMS (Boustead management system) is catering to control incoming material and outgoing products. The FFB supplier & Product buyer & its vehicle registration has to been registered in the system prior weighing. RSPO Supply Chain procedure item 7.4 has indicate the mechanism to handle non-conforming material/documents such as validity of certificate supplying estate.</p>
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> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Request for list of appointed subcontractors - Check on the availability of signed agreement or contract on the outsourced activity. 	<p>The only outsource company CPO and PK transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted.</p>
5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ol style="list-style-type: none"> The site has legal ownership of all input material to be included in outsourced processes; The site has an agreement or contract covering the outsourced 	<p>The only outsource company CPO and PK transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted. Inspection was carried out as additional effort to ensure no contamination sighted "Pemeriksaan CSPO".</p>

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	<p>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 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.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> - Check the signed agreement has included a provision as required in para (d) of this requirement. 	
5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	List of contact person for both transporters were made available and up-to-date.
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.	No new contractors used for the processing or production of RSPO certified materials.
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; 	The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Boustead Estate Agency Sdn Bhd., Marketing Department (HQ) on behalf of Trong POM.

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	<ul style="list-style-type: none"> Supply chain certificate number; A unique identification number. <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> Sampling of shipping documents shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each customer Conduct traceability verification during the audit. 	
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>	Trong POM has legal ownership and physical handle RSPO certified sustainable CPO and PK.
8	Training	
8.1	<p>The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> Availability of an approved annual training plan; and Training record (training attendance list) 	Training plan has included the RSPO Supply chain training scheduled in Jan 2019 for staff & workers.
8.2	<p>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.</p> <p>Training shall be specific and relevant to the task(s) performed.</p> <p><u>Additional Guidance:</u></p> <ul style="list-style-type: none"> Request the list of personnel involved in managing the RSPO SC system in the company Check the training identified for the personnel and interview to verify the effectiveness of the training Request for the training materials and check on the training effectiveness 	<p>Training was conducted for staff and workers in March 2019 by the PIC attended by 15 person including Manager, Chief Clerk, Clerk, Weighbridge operator, Fruit Inspector, Lab Assistance and Supervisor. Attendance list & photograph was seen.</p> <p>The lead auditor for RSPO internal audit Mr Azrin has attended the RSPO lead auditor course by RSPO endorsed trainer i.e. David Ogg on 10 & 11 Oct 2016</p>
9	Record keeping	
9.1	The site shall maintain accurate, complete, up-to-date and accessible	Sighted CPO and PK delivery note, weighbridge ticket, production data and internal audit

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	records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	records were found up-to-date.
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 was maintained more than 7 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.	The relevant record reviewed during audit.
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). <u>Additional Guidance:</u> - For secondary oleoderivatives – the quantity based on molecular weight relative (refer to table 4 of the RSPO Rules for Oleochemicals and its Derivatives) to the primary oleochemical feedstock	OER and KER used as conversion factor.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. <u>Additional Guidance:</u> - Request client to demonstrate the conversion factor used and check the mass balance table.	The OER & KER were updated on monthly basis.
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. Trong POM has not use any RSPO trademark.
	RSPO RULES ON COMMUNICATIONS AND CLAIMS – NA. Not in used. General corporate communications	

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12	Complaints	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints. <u>Additional guidance</u> - Procedure shall cover complaints from customers and stakeholders.	Documented procedure has established to address collecting and resolving the complaint. Sighted that in Clause 17.0 Complaints in the 'RSPO: Supply Chain Standard dated March 2019 Revision 6', the clause did not specify detail how to handle collecting and resolving stakeholder complaints. Thus, Major NCR MZK 01 2019 was raised.
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.	Documented procedure has defined management review will be conducted once a year. Sighted in Clause 14.0 Management Review and Audit in the RSPO: Supply Chain Standard.
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 	Management review meeting dated in March 2019 (combine RSPO SC and MSPO traceability) <ul style="list-style-type: none"> • Internal audit – 1 OFI • Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation). • Previous meeting – was highlighted • Changes • Recommendation for improvement – improve the established system
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 	Recommendation for improvement Recourse sufficient.

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

	Module D – CPO Mills: Identity Preserved	
D.3	Documented procedures	
D.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:	Trong POM Organizational, management systems and the operational systems, 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.

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	<p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p> <p>This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>	<p>Sighted Trong palm oil mill documented procedure name integrated RSPO: Supply Chain procedure revised dated March 2019 (revision : 6), describing the procedures on the activities related on its supply chain certification standard required by the RSPO.</p>
D.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	As stated in the procedure An integrated RSPO: Supply Chain procedure revised March 2019 (revision: 6), Receiving of certified and non-certified FFB procedure was stated in section 7.0 (Receiving FFB at the Mill)
D.4	Purchasing and goods in	
D.4.1	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	<p>Upon receiving of the FFBs, the Mill Gate Security will check on the incoming FFB and its accompanying dispatch note issued by the supplying estate before allowing entry. This will be followed by checking and verification by the Weighbridge Clerk to determine details on the dispatch note tallied with the incoming FFB such as supplying estate and weight (volume).</p> <p>All certified FFB came from Trong Business Unit estates. All delivery documents of certified FFB were verified to ensure the certified status of the FFB. Volumes of certified FFBs received by the mill had been properly recorded and monitored.</p>
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Based on the records available, it was found that there is no overproduction for Projected CPO IP and PK.
D.5	Record keeping	
D.5.1	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.	Record of RSPO certified and delivery of RSPO certified CPO and PK was established i.e. weighbridge daily report which indicate estate name, vehicle no. , date & time enter in Nak mill. While the weighbridge summary report also record buyer name, product name i.e. CPO or PK, vehicle no. , date & time of delivery. Trong POM also has maintained the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. The Record titled are <i>"Identity Preserved Record for Trong Oil Mill-year 2019/2018"</i> .
D.6	Processing	
D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified oil palm product including during transport and storage.	RSPO supply chain procedure (rev. 4) clause 9.0 CPO and PK dispatch did required inspection need to be carried out on the vehicle carried sustainable product.

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	The objective is for 100 % segregated material to be reached.	Trong POM does not accept any non-certified FFB.
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Annex 3 – RSPO Rules on Communications and Claims – NA. Not in used.

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Attachment 6

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
4.4.1 RAR 01 2018	Minor	<p>Finding : Water management plan to carried out water sampling on quarterly basis was not complied with</p> <p>Objective evidence : At Malaya Estate sighted last water sampling and analysis has been carried out by NM laboratory Sdn Bhd on 22/12/2015.</p>	<p>The estate conduct quarterly basis monitoring to ensure water quality. Latest water sampling was carried out by Eurofin NM Laboratory Sdn Bhd on 17th April 2018. All relevant point of inlet & outlet were taken for analysis purposes</p>	<p>The water management plans were established and implemented. The water management plans were more towards soil water conservation, pollution prevention and domestic use. The management plan covered dry spell/shortage and in case of water pollution. Workers were advised to conserve water. Water from process was reused for cleaning. Water from triple rinsing of pesticide containers was reused for spraying. Water bodies were established in ravines and slit pits in flat areas and on slopes.</p> <p>At TRP estate water management plan for year 2019 was establish to monitored:</p> <ul style="list-style-type: none"> • Riparian and Buffer zone were maintained and established properly • To maintain soft grasses to prevent erosion • Monitored water quality- to carry out water sampling on yearly basis.sighted water analysis has been conducted by external laboratory Kuala Lumpur Kepong Berhad, 4 sampling point has been carried out for upstream and downstream at Sungai Rusa and Sungai Punggor. The analysis has been carried out on 07/03/2018. Sighted all the parameter such as pH, BOD,

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				<p>turbidity, and etc within the limits.</p> <p>At Malaya estate water management plan for year 2019 has establish to monitored:</p> <ul style="list-style-type: none"> • Riparian and Buffer zone were maintained and established properly • To maintain soft grasses to prevent erosion • Marking water sampling point at Sungai Dendang, Sungai Ijok and Sungai Segar. • The estate conduct quarterly basis monitoring to ensure water quality. Latest water sampling was carried out by Eurofin NM Laboratory Sdn Bhd on 17th April 2018. All relevant point of inlet & outlet were taken for analysis purposes. Previous NCR, RAR 01 2018 was satisfactorily closed. <p>At Bukit Mertajam Rubber Estate water management plan for year 2018 was established to monitored:</p> <ul style="list-style-type: none"> • Identification of water sources – clean water was provided from Syarikat Air Darul Aman (SADA). • To monitored efficient use of water – to monitored of pipe leakage every week, to do repairing as soon as possible if leakage identify, rain water harvesting • Monitored water quality- to carry out water sampling on yearly basis. Latest water sampling record has been carried out by Union Laboratories Sdn Bhd on
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				<p>29/12/2017. Results from analysis has been taken at inlet and outlet point.</p> <p>At TPOM water quality monitoring has been monitored by monthly basis at river Sungai Rusa, and Sungai Punggor. Sighted latest analysis has been conducted by Kuala Lumpur Kepong Berhad on 11/03/2018, 15/02/2018 and 30/01/2018. Result from this analysis were showed all the parameters such as pH, COD, BOD, total nitrogen, ammoniacal nitrogen, total solid, and etc. were within the parameters limit.</p> <p>Status: Closed</p>
4.6.2 MAR 01 2018	Major	<p>Finding : Records of pesticides use i.e. active ingredients applied per Ha and number of applications not provided.</p> <p>Objective evidence : At Malaya Estate record of a.i was not available</p>	Record of pesticide usage was established accordingly and made available at all times including a.i per ha.	<p>All estates visited maintained records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used. The total quantity used, number of applications and active ingredients (ai) per Ha were also recorded. These includes mature and immature areas.</p> <p>Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. Records of pesticides used were available for verification. All estates had documented programs for spraying pesticides and were pasted at the assistants and staff room's board for monitoring purposes. The auditors also verified that the records of pesticides use i.e. active ingredients applied per Ha and number of applications were in order in all estates in Trong BU. Thus, previously NCR No MAR 01 2018 was closed.</p> <p>Status: Closed</p>

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4.7.5 MAR 02 2018	Minor	<p>Finding : First aid kit was not available at worksites.</p> <p>Objective evidence : Taiping Rubber Plantation Estate (spraying operation field PR2015) and Bukit Mertajam Rubber Plantation Estate (harvesting operation field 94E and chemical store). Antiseptic cream was found expired at Malaya Estate (decreeping activity).</p>	<p>-To put First Aid Kit at worksite area (Chemical store/Fertilizer store and Schedule waste store) and logbook for recording usage of its content.</p> <p>-To monitor and checking First Aid Content regularly to ensure it's enough and not over the expire date.</p>	<p>Site inspection at weeding operation, harvesting operation, workshop, chemical & fertilizers store for all estates & mill, noted on evidence that first aid kit is available at all works place with complete contents. The stock of first aid box is regularly check and refill when necessary. Therefore, previous Minor NCR MAR 02 2018 was satisfactory closed.</p> <p>Status: Closed</p>
5.2.4 MZK 01 2018	Minor	<p>Finding : Monitoring of HCV area was not adequate.</p> <p>Objective evidence : Sighted when field visit found that:</p> <ul style="list-style-type: none"> - At Malaya Estate even though the monitoring was carried out on 3 monthly basis, it was not enough due to the HCV area nearing to the Sungai Kerian and the workers always sighted the intrusion from people nearby and the villagers. 	<ul style="list-style-type: none"> - Patrolling of the area was carried out on daily basis by Auxiliary Police. - Record keeping was maintained on weekly basis and made available at all times. 	<p>Monthly monitoring for illegal hunting was conducted by Kuala Muda Estate. Records dated 7/1/2019, 10/2/2019 and 10/3/2019 were sighted. The monitoring activities were recorded in the form 'HCV 6 Rekod Pemantauan Perkuburan and HCV 1.4 Buffer zone Kolam 97A/95A'. For Kuala Muda a log book titled as 'HCV Kubur dan HCV Kuil' was established to monitor the HCV on monthly basis. Last monitoring was conducted on 1/3/2019. Therefore, previously NCR, MZK 01 2018 was satisfactorily closed.</p> <p>Status: Closed</p>
Indicator D.4.2 (RSPO Supply Chain)	Major	<p>Finding: There is projected overproduction of certified tonnage.</p> <p>Objective evidence: Sighted that overproduction Projected PK IP for period March 2017 – Feb 2018 which is projected 7,000 mt and actual 7,060.53 and Trong POM yet to inform the CB and apply extension to the RSPO.</p>	<p>-Estimate the CPO and PK production based on high OER performance will be achieve.</p> <p>-To record and monitor the CPO and PK production by quarterly basis.</p> <p>-request extension approval from RSPO</p>	<p>The extension of volume i.e. additional 100MT was carried out and sighted the approval from RSPO palm trace on 25/04/2018.</p> <p>Status: Closed</p>

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Attachment 7

Details of Time Bound Plan - Boustead Plantations Bhd

No	PMU	Loc	Main Assessment	Certification Status	Status	Updated Information for Partial Certification, Clause 4.5.3 RSPO Time-bound Plan & 4.5.4 Requirements for uncertified management units
1.	Sg. Jernih BU	Pahang	11 Sep 2011	Stage 2	Certification completed	nil
			11 Sep 2016	Re-certification	Recertification completed	nil
2.	Nak BU	Sabah	16 May 2015	Stage 2	Certification completed	nil
			May 2017	Include LTTS	Certification completed	LTTS- Ladang Tabung Tentera Sabah
3.	Trong BU	Perak	20 July 2017	Stage 2	Certification completed	nil
4.	Segaria BU	Sabah	Dec 2017	Stage 2	Certification completed	nil
5.	Segamaha BU	Sabah	Oct 2018	Stage 2	Certification completed	Nil
6.	Telok Sengat BU	Johor	2019	-	Deferred to 2019 (initially 2018)	Boustead Plantations Berhad Sustainability Board Committee (SBC) to put on hold RSPO Certification Scheme for New Business Unit due to: 1.To give priority & speed up the progress and establishment of Malaysian Sustainable Palm Oil (MSPO) Certification in all business unit before 30 th June 2019 2. Low premium prices (for selling CSPO) offered by RSPO
7.	Lepan Kabu	Kelantan	2019	-		Lepan Kabu Mill ceased operation in May 2018
8.	Sugut BU	Sabah	2020	-		
9.	Loagan Bunut BU	Sarawak	2021	-		
10.	Kanowit BU	Sarawak	2022	-		
11.	Pertama BU	Sabah	2021	-		New Acquisition in 2018 from Duta Plantations Berhad. As per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.

	Certified Management Units
	Uncertified Management Units