

SIRIM QAS INTERNATIONAL SDN. BHD.

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

File Ref.: EH04760001

RSPO PUBLIC SUMMARY REPORT

| C | | |
|---|--|--|

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

PARENT COMPANY: HAP SENG PLANTATIONS HOLDINGS BERHAD

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

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

| Certification Mill and Supply Unit Base | Mill and Supply | GPS I | Location | Location |
|---|------------------|------------------|------------------|--------------------------------|
| | | Latitude | Longitude | Location |
| Jeroco Palm Oil Mill 1 | N 5°25'52.002" | E 118°25'02.005" | | |
| 2 2 | Batangan Estate | N 5°24'43.704" | E 118°26'59.803" | Off KM 50, Jalan Jeroco, 91109 |
| Jeroco 1 | Lutong Estate | N 5°21'55.601" | E 118°26'26.201" | Lahad Datu, Sabah, Malaysia |
| - | Lokan Estate | N 5°25'51.800" | E 118°22'57.804" | |
| | Lungmanis Estate | N 5°28'46.304" | E 118°24'11.301" | |

MAP: See Attachment 1 **DURATION: 17 auditor days AUDIT DATE: 20-24 July 2020** Annual Surveillance Audit No. 2 Recertification Audit TYPE OF AUDIT: STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018 SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model VALIDITY OF RSPO CERTIFICATE: 27/9/2018-26/9/2023 The following attachments form part of this report: List of additional site(s) Non-conformity Report(s) Acknowledgement by Client's Representative Report by Audit Team Leader Khairul Najwan Ahmad Jahari Name KEE KEOW C Name Signature Signature Date 23 October 2020 Date

SUMMARY OF AUDITS

| Stage 2 audit / Recertification audit | | | | | | |
|---------------------------------------|---|---|--------------------|---------------------|-------------------------------|--------------------------|
| On-site audit date | : | 24-27 Ju | ly 2018 | | No. of auditor days : | 17 |
| Audit team | : | Khairul N | lajwan, Ru | zita, Mohd Raouf, | Rozaimee & Suzalina | |
| No. of major NCR | : | 1 | 1 Indicator: 4.7.3 | | | Closing date: 20/10/2018 |
| No. of minor NCR | : | 1 | Indicator | : 2.1.2 | | |
| Indicate the stakeholders | : | Employe | es | Settlers | Villagers / Local communities | Suppliers |
| interviewed during the | | ٧ | <u> </u> | - | ✓ | ✓ |
| on-site audit | | Contract | workers | NGOs | Govt. agency | Independent growers |
| | | | • | ✓ | ✓ | - |
| | | Indigeno | us | Contractor | Others (Please specify) | |
| | | people | | | School Teachers | |
| | | | - | ✓ | ✓ | |
| Supply base sampled | : | | | Batangan and Lut | | |
| Justification of audit | : | | | uditor days for Jer | | |
| planning | | | | | alth, environment, mill be | |
| | | | | | for supply chain certifica | |
| | | Estate = 13 days overall for verification of safety and health, environment, good | | | | |
| | | agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verifi- | | | | |
| | | | | of Land History ar | | |
| Report approved by | : | Radziah | Mohd Dau | d | Approval date: 15 | 5/11/2018 |

| | | Annual | Surveillance Aud | it 1 | | |
|--|---|--|----------------------|---|-------------------------|--|
| On-site audit date | : | 1-4 July 2019 | | No. of auditor days: | 17 | |
| Audit team | : | | | ee bin Ab Rahman (A), N (A), Rahayu binti Zulkifli | | |
| No. of major NCR | : | 2 Indicator | : 2.1.1, Clause 5.13 | (Supply Chain) | Closing date: 25/9/2019 | |
| No. of minor NCR | : | 1 Indicator | : 6.5.3 | | | |
| Indicate by ticking the stakeholders interviewed | : | Employees | Settlers | Villagers / Local communities | Suppliers | |
| during the on-site audit | | ✓ | NA | ✓ | ✓ | |
| | | Contract workers | NGOs | Govt. agency | Independent growers | |
| | | - | - | - | NA | |
| | | Indigenous people | Contractor | Others (Please specif | (y) | |
| | | NA | ✓ | - | | |
| Supply base sampled | : | Batangan, Lutong, I | Lokan and Lungmai | nis | | |
| Changes since the last audit | : | No changes | | | | |
| Justification of audit planning | : | Total allocation of auditor days for Jeroco 1 CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Estate = 13 days overall for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. | | | | |
| Report approved by | : | Kamini Sooriamoor | thy | Approval date: 2/ | 10/2019 | |

| Annual Surveillance Audit 2 | | | | | | |
|--|---|---------------|--|------------------|-------------------------------|--------------------------|
| On-site audit date | : | 20-24 July 20 | 020 | | No. of auditor days: | 17 |
| Audit team | : | | Khairul Najwan bin Ahmad Jahari (LA) Mohd Ab Raouf bin Asis (A), Rozaimee bin A Rahman (A), and Tn Hj Norddin (A) | | | s (A), Rozaimee bin Ab |
| No. of major NCR | : | 1 In | 1 Indicator: 7.12.4 | | | Closing date: 19/10/2020 |
| No. of minor NCR | : | 2 In | dicator: | 2.2.3 and 7.11.3 | | |
| Indicate by ticking the stakeholders interviewed | : | Employees | | Settlers | Villagers / Local communities | Suppliers |
| during the on-site audit | | ✓ | | NA | NA | ✓ |
| | | Contract wor | rkers | NGOs | Govt. agency | Independent growers |
| | | - | | - | √ | - |

| | | Indigenous people | Contractor | Others (Please specif | fy) |
|------------------------|---|--|------------------------|---------------------------|------------------------|
| | | | ✓ | | |
| Supply base sampled | : | Batangan, Lutong, I | okan and Lungmar | nis | |
| Changes since the last | : | Changes to new sta | ndard of MYNI 201 | 9 for RSPO Principle & | Criteria 2018 and RSPO |
| audit | | Supply Chain Standard 2017 | | | |
| Justification of audit | : | Total allocation of auditor days for Jeroco 1 CU were: | | | |
| planning | | Mill = 4 days (3 days | s for safety and hea | ılth, environment, mill b | est practices, GHG |
| | | verification and Social at Mill) + (1 day for supply chain certification systems) | | | |
| | | Estate = 13 days ov | erall for verification | of safety and health, e | nvironment, good |
| | | agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification | | | |
| | | plus the verification | of Land History and | d Land Title. | |
| Report approved by | : | Kamini Sooriamoort | hy | Approval date: | 23/10/2020 |

| | | Annual | Surveillance Aud | it 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 | : | Employees | Settlers | Villagers / Local communities | Suppliers |
| during the on-site audit | | | | | |
| | | Contract workers | NGOs | Govt. agency | Independent growers |
| | | | | | |
| | | Indigenous people | Contractor | Others (PI | ease specify) |
| | | | | | |
| Supply base sampled | : | | | | |
| Changes since the last | : | | | | |
| audit | | | | | |
| Justification of audit | : | | | | |
| planning | | | | | |
| Report approved by | : | | | Approval date : | |

| | | Anr | nual | Surveillance Aud | lit 4 | |
|--|---|-----------------|-------|------------------|-------------------------------|---------------------|
| On-site audit date | : | | | | No. of auditor days : | |
| Audit team | : | | | | | |
| No. of major NCR | : | Indica | ator: | | | Closing date : |
| No. of minor NCR | : | Indica | ator | : | | |
| Indicate by ticking the stakeholders interviewed | : | Employees | | Settlers | Villagers / Local communities | Suppliers |
| during the on-site audit | | | | | | |
| | | Contract worker | Š | NGOs | Govt. agency | Independent growers |
| | | | | | | |
| | | Indigenous peop | ple | Contractors | Others (Please specify | y) |
| | | | | | | |
| Supply base sampled | : | | | | | |
| Changes since the last | : | | | | | |
| audit | | | | | | |
| Justification of audit | : | | | | | |
| planning | | | | | | |
| Report approved by | : | | | | Approval date : | |

SUMMARY OF INFORMATION

TABLE 1

| | STAGE 2 / RA | ASA 1 | ASA 2 | ASA 3 | ASA 4 |
|---|---------------------------|---------------------------|---------------------------|-------|-------|
| Projection Period | July 2018 to June 2019 | July 2019 to June 2020 | July 2020 to June 2021 | | |
| Certified FFB Processed (MT) | 199,350.00 | 288,322.00 | 217,101.00 | | |
| Production of Certified CPO (MT) | 43,385.00 | 62,726.00 | 47,326.00 | | |
| Production of Certified PK (MT) | 9,550.00 | 13,814.00 | 10,420.00 | | |
| Certified Areas (Ha) | 11,436.67 | 11,436.67 | 11,436.67 | | |
| Planted Areas (Ha) | 10,380.00 | 10,380.00 | 10,380.00 | | |
| Production Areas (Ha) | 9,267.00 | 9,713.00 | 9,713.00 | | |
| HCV Areas / Conservation Areas (Ha) | 386.34 | 386.34 | 386.34 | | |
| REMARKS | - | | 1 | | 1 |

TABLE 2

| | РО | PK |
|--|------------|------------|
| Last year's certified volume (MT) | *75,720.00 | *16,675.00 |
| Last year's actual certified sold (MT) | 16,993.21 | 11,444.69 |
| Last year's actual sold under other schemes (MT) | 34,241.89 | - |
| Last year's sold conventional (MT) | - | - |
| New year certified volume (MT) | 47,326.00 | 10,420.00 |

^{*}Extension of volume for both CPO (12,994MT) and PK (2,861MT) has been requested and approved by RSPO on 21/10/2020.

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1.0 AUDIT PROCESS

1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited since 2014).

1.2 Qualification of audit team

| Member of the Audit Team | Role/area of RSPO requirements | Qualifications |
|--------------------------------|--|--|
| Khairul Najwan Ahmad Jahari | Lead Auditor/ Social | Possessed B.Sc. of Forestry from Universiti Putra Malaysia with total more than 19 years of working experience in the Forest Management, forest inventories, forest harvesting, remote sensing & GIS. He had 7 years of working experience in the oil palm operation including auditing in HCVF and social issues. He is a qualified Lead Auditor for RSPO P&C, MSPO, and Forest Management (FMC). |
| Rozaimee Ab. Rahman | Auditor/ Environment & Safety, Time Bound Plan and Supply Chain | Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO. |
| Mohd Ab Raouf Asis | Auditor/ Good Agriculture Practice | Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He is a qualified Lead Auditor for RSPO P&C and MSPO. |
| Mohd Norddin Abdul Jalil | Auditor/ Good Agriculture Practice | 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. |

1.3 Audit methodology

The audit covered Jeroco 1 Palm Oil Mill and all four (4) its supply bases of Batangan Estate, Lungmanis Estate, Lutong Estate and Lokan Estate. The audit included an on-site audit to the estates, mill and workers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, and consultations with contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by during the on-site audit. In general, there was no negative comments made against this Certification Unit.

In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

| Stakeholders interviewed | Evidence from stakeholder consultation |
|---|---|
| Employees/ Workers Organizations (including migrant workers) 2) Settlers | The following were confirmed during the conduct of audit as there was no evidence to prove otherwise: All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. They have been getting salaries above RM1,100 since January 2019. Salaries were paid before the 7th of every month. No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. No discrimination between migrant workers and local workers, between male and female workers. Comfortable housing with water and electricity provided. Have access to affordable food from the canteen/sundry shops within the estate/mill premises. Entitled to free medical facilities at the estate clinic. Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. They knew the types of work offered at mill & estate when they were in their own countries. All migrant workers keep their own passports. |
| 3) Villagers/Local communities (including women representatives, displaced communities) | There were no local communities within Jeroco 1 CU |
| 4) Suppliers | Fair dealings with the Jeroco 1 CU Payments are made within 14 days of invoice. |
| 5) Contract workers | There were no contract workers in Jeroco 1 CU |
| 6) Local & national NGOs | Not available for this audit. |
| 7) Government agencies / Statutory bodies | No land claims/disputes and no social issues. Harmonius co-existence. |
| 8) Independent growers / Smallholders | There was no third-party FFBs sent to the mill. No contract involved with smallholder. |

| 9) Indigenous people | No indigenous people living nearby to the Jeroco 1 CU |
|----------------------------------|--|
| 10) Contractor | Consultaions with Syarikat Istimaju, Chong Sun Min, Solid Steel, and Jeroco School Teacher Fair dealings with the Jeroco 1 CU. Payments are made within 1 months of invoice. The mill and estate staff will verify the work done before his invoice can be approved for payment. Signing of contract was with HQ. Contract terms are clear and fair. Renewal of contract is via tender system. Terms and conditions are clear and fair. Have attended RSPO briefing and stakeholder meetings. Gives estate copies of worker details and payslips. |
| 11) Previous land owner (if any) | Not applicable. |
| 12) Others (please specify) | Not applicable. |

1.5 Audit plan: Refer to Attachment 2

Date of next audit: The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit. For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

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

Jeroco 1 CU are surrounded by neighboring oil palm stakeholder and forest reserve, this can be shown in the CU's map and consultations with relevant stakeholders. There was no local communities nearby. Most of the local communities is within the Tomanggong Group of Estate and Sungai Segama Group of Estate.

The JPOM1 has a processing capacity of 60 metric tonnes of fresh fruit bunches (FFB) per hour. The mill only receives and processes crops from HSPHB's certified supply bases. The CU have other management system certification scheme such as HACCP, ISCC and MSPO.

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

The FFB is sourced from company owned estates that were certified. Noted that there were some diversions of FFB from HSPHB's estates certified under different CU. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

<u>Table 1: Actual FFB production by the supply base for the last reporting period</u>
(July 2019 to June 2020) JPOM1

| Estates | FFB Production | | |
|-----------------------------|----------------|----------------|--|
| | Tonnes | Percentage (%) | |
| ¹ Batangan | 78,284.02 | 29.52 | |
| ¹ Lutong | 42,404.08 | 15.99 | |
| ¹ Lokan | 35,541.33 | 13.40 | |
| ² Kapis | 32,025.10 | 12.08 | |
| ¹ Lungmanis | 20,544.70 | 7.75 | |
| ³ Litang | 25,771.81 | 9.72 | |
| ³ Litang (Wecan) | 9,078.32 | 3.42 | |

| ³ Tagas | 17,019.81 | 6.42 |
|---|------------|--------|
| ³ Tagas (Tampilit) | 1,176.71 | 0.44 |
| ⁴ Sungai Segama 1 | 899.07 | 0.34 |
| ⁴ Bukit Mas Estate | 1,939.28 | 0.73 |
| ⁴ Ladang Kawa | 302.20 | 0.11 |
| ⁵ Ladang Kawa - Apas | 150.75 | 0.06 |
| ⁴ Ladang Kawa (Hapseng Properties) | 44.70 | 0.02 |
| Total | 265,220.90 | 100.00 |

Table 2: Projected FFB production by supply base for the next reporting period (July 2020 to June 2021) JPOM1

| CU own estates | FFB Contribution | | |
|----------------|------------------|----------------|--|
| | Tonnes | Percentage (%) | |
| Batangan | 88,570.00 | 40.80 | |
| Lutong | 52,472.00 | 24.17 | |
| Lokan | 46,980.00 | 21.64 | |
| Lungmanis | 29,079.00 | 13.39 | |
| Total | 217,101.00 | 100.00 | |

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period (July 2019 to June 2020) JPOM1

| | Total (MT) |
|--|------------|
| FFB Received | 265,220.90 |
| FFB Processed | 265,220.90 |
| CPO Production | 56,729.84 |
| PK Production | 11,444.69 |
| CPO delivered as RSPO certified | 16,993.21 |
| CPO delivered under other schemes (MT) | 34,241.89 |
| CPO delivered as non-RSPO certified | 0 |
| PK delivered as RSPO certified | 11,444.69 |
| PK delivered under other schemes (MT) | 0 |
| PK delivered as non-RSPO certified | 0 |
| Credits traded thru Book & Claim | 0 |

¹ = Jeroco POM 1 CU; Certified by: SIRIM QAS; Certificate No.: RSPO-PC 00111.

² = Jeroco POM 2 CU; Certified by: SIRIM QAS; Certificate No.: RSPO-PC 00118.

³ = Tomanggong CU; Certified by: SIRIM QAS; Certificate No.: RSPO-PC 00114.

⁴ = Sg. Segama CU & Ladang Kawa CU; Certified by: TUV Rheinland; Certificate No.: 824 502 14016.

Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period (July 2020 to June 2021) JPOM1

| | Total (MT) |
|----------------|------------|
| FFB Received | 217,101.00 |
| FFB Processed | 217,101.00 |
| CPO Production | 47,326.00 |
| PK Production | 10,420.00 |

Table 5 Planted and certified area of the CU

| Estate | Planted (ha) | Certified (ha) |
|------------------|--------------|----------------|
| Batangan Estate | 3,394.00 | 3,632.88 |
| Lutong Estate | 2,194.00 | 2,448.40 |
| Lokan Estate | 2,837.00 | 3,155.39 |
| Lungmanis Estate | 1,955.00 | 2,200.00 |
| Total | 10.380.00 | 11.436.67 |

Table 6: Planting profile for Batangan Estate

| Year of planting | Planting cycle (1st, 2nd, 3rd, etc. Generation) | Mature / Immature | Planted area(ha) | Percentage of planted area (%) |
|------------------|---|----------------------|------------------|--------------------------------|
| 2004 | 2nd | Mature | 450 | 13.24 |
| 2006 | 2nd | Mature | 388 | 11.42 |
| 2008 | 2nd | Mature | 151 | 4.44 |
| 2009 | 2nd | Mature | 148 | 4.36 |
| 2010 | 2nd | Mature | 280 | 8.24 |
| 2011 | 2nd | Mature | 682 | 20.07 |
| 2012 | 2nd | Mature | 458 | 13.48 |
| 2013 | 2nd | Mature | 406 | 11.95 |
| 2014 | 2nd | Mature | 151 | 4.44 |
| 2015 | 2nd | Mature | 280 | 8.24 |
| Total | | | 3,394 | 100.00 |

Table 7: Planting profile for Lutong Estate

| Vasu of planting | Planting cycle | Mature / | Planted area | Percentage of |
|------------------|----------------------------------|----------|--------------|------------------|
| Year of planting | (1st, 2nd, 3rd, etc. Generation) | Immature | (ha) | planted area (%) |
| 1999 | 1st | Mature | 157 | 7.16 |
| 2004 | 1st | Mature | 42 | 1.91 |
| 2006 | 2nd | Mature | 456 | 20.78 |
| 2007 | 2nd | Mature | 159 | 7.25 |
| 2011 | 2nd | Mature | 157 | 7.16 |
| 2012 | 2nd | Mature | 146 | 6.65 |
| 2013 | 2nd | Mature | 306 | 13.95 |
| 2014 | 2nd | Mature | 318 | 14.49 |
| 2015 | 2nd | Mature | 303 | 13.81 |
| 2017 | 2nd | Mature | 150 | 6.84 |
| Total | | | 2,194 | 100 |

Table 8: Planting profile for Lokan Estate

| Year of planting | Planting cycle (1st, 2nd, 3rd, etc. Generation) | Mature / Immature | Planted area(ha) | Percentage of planted area (%) |
|------------------|---|----------------------|------------------|--------------------------------|
| 1998 | 1st | Mature | 439 | 15.47 |
| 1999 | 1st | Mature | 1,309 | 46.14 |
| 2014 | 2nd | Mature | 244 | 8.60 |
| 2015 | 2nd | Mature | 149 | 5.25 |

| 2016 | 2nd | Mature | 296 | 10.43 |
|-------|-----|----------|-------|-------|
| 2017 | 2nd | Immature | 161 | 5.68 |
| 2018 | 2nd | Immature | 239 | 8.43 |
| Total | | | 2,837 | 100 |

Table 9: Planting profile for Lungmanis Estate

| Year of planting | Planting cycle (1st, 2nd, 3rd, etc. Generation) | Mature / Immature | Planted area(ha) | Percentage of planted area (%) |
|------------------|---|----------------------|------------------|--------------------------------|
| 1995 | 1 st | Mature | 765 | 39.13 |
| 1996 | 1 st | Mature | 923 | 47.21 |
| 2018 | 2 nd | Immature | 267 | 13.66 |
| Total | | | 1,955 | 100 |

| 2.3 | Organizational | Information/Contact | Person(s) |
|-----|----------------|---------------------|-----------|
|-----|----------------|---------------------|-----------|

The details of the contact person as shown below:

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

3.0 AUDIT FINDINGS

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

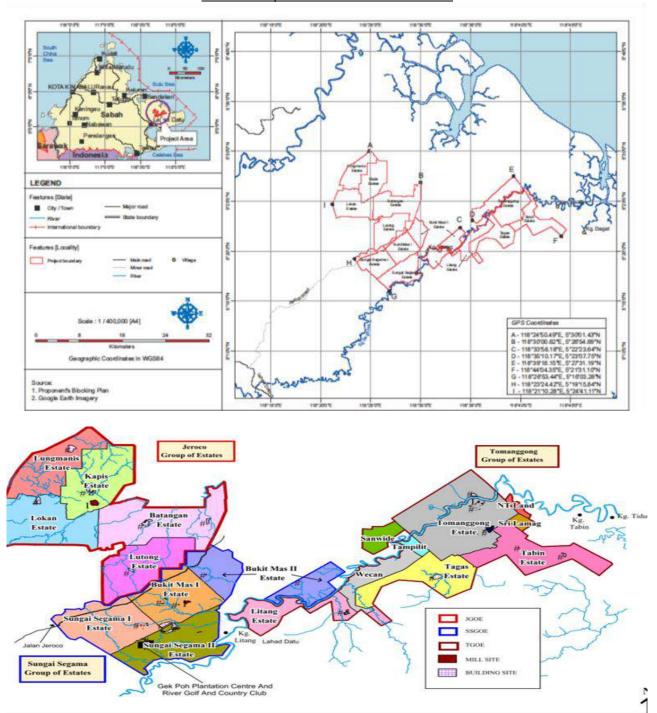
There was no change to the certified products since last assessment.

| 3.2 | Progress and changes in time bound plan (Refer to Attachment 6 for the time bound plan) |
|------|--|
| i. | Have all the estates under the parent company been certified? |
| | If no, comments on the organization's compliance with the RSPO partial certification rules: |
| | Hap Seng Plantations is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details provided in the Time Bound Plan described in Attachment 6. |
| ii. | Are there any changes to the organization's time bound plan? ☐ Yes ✓ No |
| | If yes, comment in terms of acceptance or non-acceptance on the changes in the time-bound plan? |
| iii. | Are there associated smallholders (including scheme smallholders) in the CU Yes 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 Not applicable. There is no associated smallholders supplying FFB to the CU. |
| | |

| 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, all remains the same. | | | | |
| 3.4 | Status of previous non-conformities * * If not closed, minor non conformity will be upgraded to major non conformity | N | ot closed | * | |
| 3.5 | Complaint received from stakeholder (if any) | | | | |
| | No significant complaints from stakeholders were observed. | | | | |

| 4.0 | DETAILS OF NON-CONFORMITY REPORT | | | | | | |
|---------|--|------------|---|-----------------|---|--------------------|--|
| 4.1 | For P&C | (Details | checklist refer to Atta | achment 4) : | | | |
| | Total no. | . of minor | NCR(s) | List: 2 | List: 2 Indicator 2.2.3 (KN01/2020) and (MANJ01/2020) | | |
| | Total no. | of major | NCR(s) | List:1 | Indicator 7.12.4 (KN02/2020) | | |
| 4.2 | For SC (| Details c | hecklist refer to Attac | hment 4): | | | |
| | Total no. | of minor | NCR(s) | List : none | | | |
| | Total no. | of major | r NCR(s) | List : none | | | |
| 5.0 | 5.0 AUDIT CONCLUSION The audit team concludes that the organization has / has not* established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements. | | | | | | |
| 6.0 R | ECOMME | ENDATIC | DN | | | | |
| | 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. | | | | | | |
| | | | inor NCRs raised in t aded to major NCR. | the audit which | are not addressed in the subse | equent audit shall | |
| ✓ | | | | | ementation of the corrective ac ne NCR(s) have been satisfacto | | |
| ✓ | | Recomn | nended to continue co | ertification | | | |
| | 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. | | | | | | |
| / H | 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 T | eam Lead | ler: | Khairul Najwan Ahm | nad Jahari | | 19/10/2020 | |
| | (Name) | | | (Signature) | (Date) | | |

Location map of Jeroco 1 Certification Unit



RSPO Surveillance 2 Audit Plan

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 : 20 – 24 July 2020

3. Site of assessment : Jeroco 1 Certification Unit;

(i) Jeroco Palm Oil Mill 1(ii) Batangan Estate(iii) Lutong Estate(iv) Lokan Estate

(v) Lungmanis Estate

4. Reference Standard:

a. MYNI 2019 for RSPO P&C 2018

b. Company's audit criteria including Company's Manual / Procedures

5. Assessment Team

(i) Audit Team Leader
 (ii) Auditor
 (iii) Auditor
 (iv) Auditor

(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.

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 facilitiese. A guide for each group

13. Assessment Programme Details : As below

| Date / Time | Coverage of assessment / Activity / Site | Najwan | Raouf | Rozaimee | Norddin |
|-------------------|---|--------|-------|----------|---------|
| Day 1 - 20/7/2020 | Opening Meeting – Venue: Plantation Central Office (PCO) | | | | |
| Monday | Audit team Leader - Briefing on assessment objectives, scope, methodology, | | | | |
| 8.00am – 9.00am | confidentiality clarification, audit criteria and programmes | | | | |
| | Organization Representative - Briefing RSPO implementation, significant change on | | | | |
| | organization activity, structure, certified areas, machinery, FFB supply bases, Time | | | | |
| | bound plan, actions taken to address previous audit findings. | | | | |
| | Site observation at Lokan Estate - P1, P2, P3, P4, P5, P6, P7 | | | | |
| | Laws and regulations | | | | |
| | Interview with workers, contractors etc. | | | | |
| | Social aspects -SIA, management plan & implementation, workers' quarters, | | | | |
| | Stakeholder consultation with affected communities | | | | |
| | Interview with gender committee, safety committee, worker representative, | | | | |
| 9.30am – 5.30pm | contractors, supplier, etc | | | | |
| 3.30am 3.30pm | Site observation to JPOM1 | | | | |
| | • Site visit and assessment on Supply Chain Implementation including the 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, Registration, Training, Claims, Internal Audit, | | | | |
| | Management Review. | | | | |
| Date / Time | Coverage of assessment / Activity / Site | Najwan | Raouf | Rozaimee | Norddin |
| Day 2 – 21/7/2020 | Site observation at Lungmanis Estate - P1, P2, P3, P4, P5, P6, P7 | | | | |
| Tuesday | Laws and regulations | | | | |
| 8.30am – 1.00pm | Interview with workers, contractors etc. | | | | |
| | Social aspects - SIA, management plan & implementation, workers' quarters, | | | | |
| | Stakeholder consultation with affected communities | | | | |
| | HCV area | | | | |
| | Site observation to JPOM1 - P2, P3, P4, P6, P7 | | | | |
| | Occupational safety & health aspects, chemical management | | | | |
| | Environment, Occupational safety & health aspects, chemical management | | | | |
| | Interview with gender committee, safety committee, worker representative, | | | | |
| | contractors, supplier, etc | | | | |

| | Site observation to Batangan Estate - P2, P3, P6, P7 | | | | |
|-------------------|---|--------|-------|----------|---------|
| | Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM Environment, Occupational safety & health aspects, chemical management | | | | |
| | New planting | | | | |
| 1.00pm – 2.00pm | Lunch Break | | | | |
| 2.00pm – 5.30pm | Continue assessment at respective site | | | | |
| Date / Time | Coverage of assessment / Activity / Site | Najwan | Raouf | Rozaimee | Norddin |
| Day 3 – 22/7/2020 | Site observation at JPOM1 - P1, P2, P3, P4, P5, P6, P7 | | | | |
| Wednesday | Laws and regulations | | | | |
| 8.30am – 1.00pm | Interview with workers, contractors etc. | | | | |
| | Social aspects -SIA, management plan & implementation, workers' quarters, | | | | |
| | HCV area | | | | |
| | Stakeholder consultation with affected communities | | | | |
| | Interview with gender committee, safety committee, worker representative, | | | | |
| | contractors, supplier, etc | | | | |
| | Site observation at Lungmanis Estate - P1, P2, P3, P4, P5, P6, P7 | | | | |
| | Laws and regulations | | | | |
| | Occupational safety & health aspects, chemical management | | | | |
| | Environment, Occupational safety & health aspects, chemical management | | | | |
| | Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, | | | | |
| | IPM New planting | | | | |
| 1.00pm – 2.00pm | Lunch Break | | | | |
| 2.00pm – 5.30pm | Continue assessment at respective site | | | | |
| Date / Time | Coverage of assessment / Activity / Site | Najwan | Raouf | Rozaimee | Norddin |
| Day 4 – 23/7/2020 | Site observation at Batangan Estate - P1, P2, P3, P4, P5, P6, P7 | | | | |
| Thursday | Laws and regulations | | | | |
| 8.30am – 1.00pm | Interview with workers, contractors etc. | | | | |
| | Social aspects - SIA, management plan & implementation, workers' quarters, | | | | |
| | Interview with gender committee, safety committee, worker representative, | | | | |
| | contractors, supplier, etc | | | | |
| | Environment, Occupational safety & health aspects, | | | | |
| | Stakeholder consultation with affected communities | | | | |

| | HCV area | | | | |
|---|---|--------|-------|----------|---------|
| 1.00pm – 2.00pm 2.00pm – 5.30pm | Site observation to Lutong Estate - P1, P2, P3, P4, P5, P6, P7 Laws and regulations Occupational safety & health aspects, chemical management Environment, Occupational safety & health aspects, chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting Lunch Break | | | | |
| Date / Time | Continue assessment at respective site Coverage of assessment / Activity / Site | Najwan | Raouf | Rozaimee | Norddin |
| Day 5 – 24/7/2020 Friday 8.30am – 11.30am | Site observation at Lutong Estate - P1, P2, P3, P4, P5, P6, P7 Laws and regulations Interview with workers, contractors etc. Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities HCV area | | | | |
| 8.30am – 11.30am | Site observation to Lokan Estate - P2, P3, P6, P7 & Supply Chain Laws and regulations Occupational safety & health aspects, chemical management Environment, Occupational safety & health aspects, chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting | | | | |
| 11.30am – 12.30pm | Audit Team Discussion | | | | |
| 12.30pm-2.30pm | Lunch break and prayer | | | | |
| 2.30pm –3.30pm | Closing meeting | | | | |

Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS (MYNI 2019 FOR RSPO P&C 2018)

Principle 1: Behave ethically and transparently

Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|--|--|
| 1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate | Yes | Jeroco 1 CU continued to providing adequate information to relevant stakeholders via its "Prosedur Memohon Maklumat" (Request for Information Procedure). The procedure had involved internal and external consultation. The procedure provided a form to be filled up by any stakeholder who has the interest to request any information. Nonetheless, the method of requesting information was not limited by filling up the form alone. It was also described in the procedure that other means of request such as verbal or in writing, would also be entertained. | |
| languages and forms to allow for effective participation in decision making. | 1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders. | YES | The CU continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Hap Seng Plantations has revised their website, www.hapsengplantations.com.my to include all management documents relating to the unit's environmental, social and legal issues demonstrating commitment towards compliance to RSPO criteria via Hap Seng Plantation Sustainability Report. |
| | 1.1.3 (C) Records of requests for information and responses are maintained. | Yes | All four (4) Estates and Mill continued to maintain the records of requests for information and responses are maintained which included the government agencies, schools, local communities. This was evident during audit. Records of request for information and responses were being maintained in the respective files. |
| | 1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. | Yes | Jeroco 1 CU continued to implement the consultation and communication procedures identified as Stakeholder Consultation Procedure. This procedure identifies impacts of the Company's operations on its stakeholders based on interview, consultation, discussion and meetings with its stakeholders. The CU also has a Communication Procedure and the document provides the procedures for external and internal stakeholders to lodge a complaint or grievance on matters related to safety, health, cleanliness, environ-mental, disputes, thefts, and others. These procedures have been communicated to workers during muster briefings. |
| | 1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives. | Yes | All four (4) Estates and Mill continued to maintain the stakeholder's information (name of parties, address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, CPO/PK customers, and others. |

| 1.2 The unit of certification commits to ethical conduct in all business operations and transactions. | 1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. | Yes | Jeroco 1 CU had a documented policy to committing on integrity for all their staffs and workers. The code of conduct policy (Code of Conduct and Business Ethic Policy) had been communicated to the new staffs and foreign workers during induction course. |
|---|--|-----|--|
| | 1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. | Yes | The system in place to monitor compliance and implementation of the Policy and overall business conducts include Audit finance done by internal from HQ Corporate Internal Audit and External. Jeroco 1 CU was in line in practicing of tender exercise and they have Plantation Management Committee (PMC) meeting before the tender awarded. |

Principle 2: Operate legally and respect rights

Implement legal requirements as the basic principles of operation in any jurisdiction.

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|--|
| 2.1 There is compliance with all applicable local, national and ratified international laws and regulations. 2.2 All contractors providing | 2.1.1 (C) The unit of certification complies with applicable legal requirements. | YES | It was evident that Jeroco 1 CU continue to comply with most of the applicable laws and regulations applicable to their operation. |
| | 2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. | YES | Document titled "List of Legal Register – Estates & Mills" maintained available at Jeroco 1 CU. The document last reviewed and updated by HQ. The system track changes to the laws and regulations. Hap Seng Plantations Holdings Berhad (HSPHB) has established a mechanism for identifying and tracking the updates of the legal requirements through various media such as LawNet, internet, newsletter, etc. The management had updated the legal register accordingly. All the new amendment regulations were included in the legal register. |
| | 2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. | Yes | The legal boundaries of the estates were visibly maintained. This was evident by the presence of white painted pegs along the boundary, especially the ones adjacent to other plantations and forest reserves. Visit to all estate boundaries found there was no planting beyond these legal or authorized boundaries. |
| | 2.2.1 A list of contracted parties is maintained. | YES | The list of contracted parties is maintained by each unit in its respective stakeholder list. The lists contain name of contractors, designated contact persons, address, telephone/fax/email and type of contracted works done. |
| operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | 2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal reqs, and this can be demonstrated by 3rd party. Evidence of legal due diligence of all contracted 3rd parties, recruitment agencies for migrant workers, service | Yes | Each contract issued to suppliers and contractors contain a clause requiring compliance with legal requirements. Legal due diligence is carried out by the Contracts Department at PCO. This include obtaining the contractors' registered company names and addresses, contact numbers, evidence of company registration, details of contractors' principle activities, authorised and paid-up capital, list of shareholders, board of directors, bank details, financial auditors, and current trading/business licences. |

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|--|
| | providers and labour contractors, is available. | | |
| | 2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. | No | All workers in Jeroco 1 CU mostly long-standing workers. Thus, recruitments agencies were no involved in recruiting new workers. It was observed no new foreign workers in all four (4) estates. However, review on Contract Agreement between Jeroco 1 CU and sampled contractors showed that the contracts agreements did not contain clauses disallowing child, forced and trafficked labour. Thus, Minor NCR KN01/2020 was raised. |
| 2.3 All FFB supplies from outside the unit of certification are from legal sources. | 2.3.1 (C) For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license | Yes | All Fresh Fruit Bunches are supplied from Jeroco 1 CU owned estates which are certified to RSPO. There is no third-party FFB sent to the JPOM1. Thus, this Indicator was not applicable to Jeroco 1 CU |
| | 2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. | Yes | As above. |

<u>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</u> Implement plans, procedures and systems for continuous improvement.

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|--|
| 3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term | 3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. | Yes | The Jeroco 1 CU continued to make commitment to long—term economic and financial viability. All four (4) estates visited maintained to have minimum 4 years' business plans. The annual budgets for 2020 to 2024 which included Capital and Operating Expenditures in addition to FFB yield/Ha, OER and CPO were sighted. 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. |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|---|
| economic and financial viability. | 3.1.2 An annual replanting prog. projected for a min 5yrs with yearly review, is available. | Yes | The replanting programme for the next five years had been prepared as sighted in the Long-Range Replanting Programme (LRRP) 2020 to 2024. This programme reviewed once a year and is incorporated in their annual financial budget. |
| | 3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. | Yes | Jeroco 1 CU continued to hold management reviews at planned intervals to discuss on issues related to sustainability such as Jeroco 1 CU meeting (mill and its supply bases), Estate meeting (estates within Jeroco 1 CU) and operation meeting (estate manager and estate key personnel) for effective implementation of RSPO. |
| 3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations. | 3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. | Yes | Jeroco POM 1 has established its environmental aspects / impacts register associated with their activities. Environmental impact assessment (EIA) which covers form upstream activities such as FFB reception until downstream processes was sighted during assessment and established. From the assessments has been conducted Management has established action plans to reduce or mitigate the pollution. A new technology also has been introduced such as construction on ESP to reduce dust and smoke emission. In term of social issues, the action plan was carried out based on consideration of the main social and environmental impacts [Management Plan 2020]. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. |
| | 3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template. | Yes | The indicator was not applicable |
| 3.3 Operating procedures are | 3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place. | YES | Both the mills and estates operations in the organization are guided by the Group Manuals and Standard Operating Procedure. The mill processing guidelines and standards are detailed via the Standard Operation Standard. |
| appropriately documented, consistently implemented and monitored. | 3.3.2 A mechanism to check consistent implementation of procedures is in place. | YES | Various mechanisms of checking the implementation of procedures were conducted. Among the records verified were: Internal audit, Annual Agronomy visit (for fertilizer recommendation), Management Review, Yield Improvement Program, Qualitative (ripeness of FFB) checking records – daily conducted by checkers and by the Agronomy Department. |
| | 3.3.3 Records of monitoring and any actions taken are maintained and available. | Yes | Relevant records on implementation and monitoring of Agriculture Manual and other SOP at the CU were clearly verified. Among the records sighted were: Program sheets, Field cost books, Planting Advisor reports, Agronomic reports, Audits by Sustainability Officers, Harvesting Interval records, Rat baiting records, Fertiliser application records, Monthly Progressive Reports, scheduled wastes records and PPE Checklist. |
| 3.4 Comprehensive Social and Environmental Impact Assessment | 3.4.1 (C) In new plantings or ops. incl. mills, an independent SEIA, undertaken through a participatory meth involving the affected | Yes | A Social Impact Assessment (SIA) covering four (4) estates namely Batangan Estate, Lutong Estate, Lutong Estate and Lungmanis Estate was carried by the Agronomy Department and report prepared by Sustainability Executive. The report titled "Social Impact Assessment, Management Action Plans and Continuous Improvement Plans, Jeroco Group of Estates and Jeroco Palm Oil Mill 1&2. |

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|------------------|--|
| (SEIA) is undertaken prior to new plantings or | stakeholders and including the impacts of any smallholder/ outgrower scheme, is documented. | | |
| operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations. | 3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. | Yes | Jeroco POM 1 has established its environmental aspects / impacts register associated with their activities. Environmental Impact Assessment Management Action Plans and continuous improvement plans were established and reviewed on yearly basis. The SIA Report also included the baseline for socio economic data of all four estates and Jeroco Palm Oil Mill 1 and the profile of each individual Estate and Mill, as well as their stakeholders. Identification of the positive and negative social impacts were also made. The report also contained the estates' and mill's background information, labour policies, grievance procedures, sexual harassment policies, facilities and amenities offered by the estates, and the social impact assessment procedures and results. |
| | 3.4.3 (C) The SEIA management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. | Yes | The social and environmental management and monitoring plan were reviewed at least once a year, implemented, reviewed and updated accordingly in a participatory. Based on the assessment, there was no significant changes done, except for replanting activities in Lungmanis Estate. |
| 3.5 A system for managing human resources is in place. | 3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are doc. and made available to the workers and their representatives where applicable. | Yes | Standard Operating Procedure (SOP) on Recruitment, Selection, Hiring, Termination, Retirement and Promotion, (Local and Foreign) are documented and made available with Chief Clerk of each estates. There were no workers for terminated, retired or promoted in JPOM1. |
| | 3.5.2 Employment procedures are implemented, and records are maintained. | Yes | Audit team has verified all new recruitment workers from Indonesia through personal file by employment number, name of employee, employment contract, offer letter, passport consent form and others. It was found the recruitments were following the SOP and record maintained accordingly. |
| 3.6 An occupational health and safety (H&S) plan is | 3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. | Yes | Risk Assessment has been carried out via 'Hazard identification, Risk Assessment and Risk Control' (HIRARC) matrix. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. |
| documented, effectively comm. and implemented. | 3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. | Yes | Occupational Safety and Health Policy signed by the Chief Executive-Group Plantation was sighted. The policy was dated 31st Dec 2014. The policy had been communicated to all levels of the organization through briefings and also displayed prominently in Bahasa Malaysia and English on notice boards at mill and estate office and Muster Ground. Random interviewed with employees showed that they generally understood the basic requirements of the policy. |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|---|
| 3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained. | 3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training. | | The training programme planned and carried out for the year 2020 which include appropriate training on safe working practice for all categories of workers. The training programme covered the various type of training such as firefighting, firedrill, PPE, exposed to high noise levels and control measure for protection of hearing and audiometric test, understanding MSDS and first aid. All the 4 estates have provided appropriate personal protective equipment (PPE) for all workers in their operations. PPE Issuance and replacement record "PPE Personal Record" seen at estates. The auditors observed that the PPE used by harvesters, LF collectors and sprayers were safety helmet, nitrile gloves, apron, safety shoes and glasses. |
| | 3.7.2 Records of training are maintained, where appropriate on an individual basis. | Yes | Records of training are maintained, where appropriate on an individual basis. This has been verified accordingly |
| | 3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. | Yes | Training on Supply Chain requirements has been conducted in March 2020. The training has been conducted by Assistant mill engineer to AP, weighbridge operator, accountant clerk, and lab operator. The intention on this training was to create awareness on understanding on supply chain requirement. |

SUPPLY CHAIN REQUIREMENTS FOR MILLS

<u>Disclaimer text:</u> The following section is taken verbatim from the RSPO Supply Chain Certification Standard (14 June 2017) (RSPO SCCS), general requirements as well as modules D & E for mills. The RSPO SCCS is the document in vigour for these requirements and should be referred to in any cases of uncertainty. Any references to other modules or sections contained in the table below, refer to the RSPO SCCS document. As per RSPO SCCS, all requirements are major Indicators (i.e. equivalent of critical Indicators in P&C 2018).

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|---|------------------|---|
| Definition | A mill is deemed to be IP if the FFB used | Yes | Jeroco 1 Palm Oil Mill (JPOM1) sourced for their FFB only from estates under the same |
| Identity | by the mill are sourced from plantation/ | | CU which involve, Batangan Estate, Lutong Estate, Lokan Estate, and Lung Manis Estate. |
| Preserved Mill | estates that are certified against the | | Divert crop from other certification units (Bukit Mas estate, Sungai Segama Estate, and |
| D.1 | RSPO P&C, or against the Group | | Ladang Kawa Estate -Sungai Segama Group of Estate). |
| | Certification scheme. Certification for CPO | | |
| | mills is necessary to verify the volumes | | |
| | and sources of certified FFB entering the | | |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|--|---|------------------|--|
| | mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable. | | |
| Definition Mass Balance Mill E.1 | Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB. | Yes | Not Applicable |
| Explanation (Volume and product integrity) D.2 E.2 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. The mill shall also meet all registration and reporting requirements for the appropriate | Yes | Mill had registered through RSPO IT Platform with Member ID of RSPO Palm Trace Registration under Jeroco Plantations Sdn Bhd – Jeroco Palm Oil Mill 1. Details of actual tonnage produced were provided in Table 3 of this report. |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------------------------|--|------------------|---|
| | supply chain through the RSPO supply chain managing organization. | | |
| Documented procedures 5.3.1 D.3 E.3 | 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: Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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 organisation's procedures for the implementation of this standard. The site shall have documented procedures for receiving and processing certified and noncertified FFBs. | Yes | Jeroco 1 POM had used their documented procedure title Standard operating procedures for Supply Chain SOP/COC/001-005. |
| Internal Audit 5.3.2 | The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. | Yes | Under title 'Standard operating procedures for Supply Chain SOP/COC/001-005, there is Flowchart for Internal Audit system indicating the process for memorandum for IA, appointment of team member, the IA review (overall audit process in general). |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|---|--|------------------|---|
| | Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. | | |
| Purchasing Goods In 5.4 D.4.1/ D.4.2 D.4.1/E.4.2 | i)The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii)The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii)The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents. | Yes | The actual FFB production by supply base recorded since last audit were provided in Table 1 of this report.Based on verification of data through RSPO IT Platform and those recorded by J1POM, no overproduction occurred. |
| Outsourcing Activities 5.5 | 5.5.1 In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO SCCS. A CPO mill and independent mill cannot outsource processing activities like refining or crushing. | Yes | JPOM1 had described transportation as their outsourced activity. Contract agreement/ notification (letter for outsourced activity/ addendum agreement) were sighted & found adequate. It had been well acknowledged by the third-party service provider. The transporter had also been listed in contractor list. JPOM1 did not outsource for their kernel crushing process. The kernel being sold to internal and external buyer (contract-dependent). |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|---|------------------|--|
| | This requirement is not applicable to | | |
| | outsourced storage facilities where the | | |
| | management of the oil palm product(s) | | |
| | and instructions for tank movements are | | |
| | controlled by the certified organisation (not | | |
| | the tank farm manager). | | |
| | 5.5.2 Sites which include | Yes | Available. |
| | outsourcing within the scope of their | | |
| | RSPO Supply Chain certificate shall | | |
| | ensure the following: | | |
| | a) The site has legal ownership of all input | | |
| | material to be included in outsourced | | |
| | processes; | | |
| | b) The site has an agreement or contract | | |
| | covering the outsourced process with each contractor through a signed and | | |
| | enforceable agreement with the | | |
| | contractor. The onus is on the site to | | |
| | ensure that certification bodies (CBs) | | |
| | have access to the outsourcing | | |
| | contractor or operation if an audit is | | |
| | deemed necessary. | | |
| | c) The site has a documented control | | |
| | system with explicit procedures for the | | |
| | outsourced process which is communicated to the relevant contractor. | | |
| | d) The site seeking or holding | | |
| | certification shall furthermore ensure | | |
| | (e.g. through contractual arrangements) | | |
| | that independent third parties engaged | | |
| | provide relevant access for duly | | |
| | accredited CBs to their respective | | |
| | operations, systems, and any and all | | |
| | information, when this is announced in | | |
| | advance. | Vaa | List of contractors had been madetal accordingly and had indicated the constituted |
| | 5.5.3 The site shall record the names | Yes | List of contractors had been updated accordingly and had included the appointed |
| | and contact details of all contractors | | transporter. |
| | used for the processing or physical | | |
| | handling of RSPO certified oil palm | | |
| | products. | | |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-----------------------|---|------------------|--|
| | 5.5.4 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 physical handling of RSPO certified oil palm products. | Yes | Not available. |
| Record keeping 5.9 | 5.9.1 The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO SCCS requirements. | Yes | JPOM1 was noted to have well-maintained their records and reports covering all aspects of the standard requirements. |
| | 5.9.2 Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. | Yes | Relevant record pertaining to implementation of RSPO SCCS within JPOM1 retained for minimum 2 years. |
| | 5.9.3 The organisation 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 12 months. | Yes | Figures for volume purchased (input) and claimed (output) over a period of 12 months (since last audit) was sighted and details as per listed in Table 4 of this report. |
| 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. | Yes | RSPO Records for Oil Mills had been updated by relevant personnel and had included the receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK. Their WB.net system also being referred for real-time transaction details as well as daily/ monthly summary of their material movements (FFB, CPO, PK, others). |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------------|--|------------------|---|
| E.5.1 | a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. The site can only deliver MB sales from a positive stock. Positive stock can include product ordered for delivery within 3 months. However, a site is allowed to sell short i.e. product can be sold before it is in stock. | Yes | JPOM1 has maintained to record receipts of RSPO certified FFB and deliveries of RSPO certified CPO & PK using real time basis. Was sighted that all the data were found up to date. |
| Conversion Factors 5.10 | 5.10.2 Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org). 5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. | Yes | Based on nature of their processing activities, JPOM1's conversion factor shall be based on their oil extraction rate (OER) and kernel extraction rate (KER). These rates being monitored on daily basis as part of their process performance evaluation and consolidated at month end. |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------------|---|------------------|---|
| Processing D.6 | The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation. | Yes | JPOM1 shall only receive the RSPO certified FFB which are from Jeroco 1 CU own estates. Monitoring records titled as "J1POM FFB Received" has recorded the tonnage of certified FFB and other relevant process details. |
| Sales and goods out 5.6 | 5.6.1 The supplying site shall ensure that the following minimum info for RSPO certified products is made available in document form: The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; Supply chain certificate number of the seller; A unique identification number. Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. | Yes | The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Hap Seng Commodities Trading Department (HQ) on behalf of JPOM1. Sample of deliveries document were sighted during the audit and it was found all related information were adequate. Jeroco 1 POM's RSPO certificate number and product name together with model used were stated in the delivery documents. |

| Indicators | Comply Yes/No | Findings |
|--|--|---|
| 5.7.1 Supply chain actors who: are mills, traders, crushers and refineries; and take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. | Yes JPOM1 through usually handled by procedure in handling of sale and delivery was sign and found adequate. Sales activities usually handled by Hap Seng Commodities Tra | JPOM1 through usually handled by procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Hap Seng Commodities Trading Department (HQ) on behalf of Jeroco 1 POM. The Personnel updated the RSPO IT platform system upon confirmed contract. |
| 5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. | | |
| The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures. Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. | Yes | |
| | 5.7.1 Supply chain actors who: are mills, traders, crushers and refineries; and take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures. Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. Remove: RSPO certified volumes sold under other scheme or as conventional, or | 5.7.1 Supply chain actors who: • are mills, traders, crushers and refineries; and • take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures. Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|------------------|---|
| | Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. | | |
| Claims 5.11 | 5.11.1 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 Market Communications & Claims. | Yes | Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Jeroco 1 POM has not use RSPO corporate logo as well as trademark logo |

<u>Principle 4: Respect community and human rights and deliver benefits</u>
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|---|
| 4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders. | ertification respects uman rights, which includes respecting ne rights of Human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB | Yes | A Human Rights Policy had stated commitment to protection of Human Rights for workers, contractors, indigenous people, local communities and anyone affected by the company's operations. The company also has a Sustainable Agriculture Policy which contains a declaration to "Respect and Support the Universal Declaration of Human Rights" [clause 3.1]. Labour policy for foreign workers was made available at all estates and Jeroco POM 1 as displayed at notice board. The policy had included statement as described by specific guidance in the indicator of Statement of the non-discriminatory practices and No contract substitution |
| | 4.1.2 The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. | Yes | It has been verified that Jeroco Group of Estate (JGOE) legitimately owned the said lands as Country Lease Land Title (CL) from the Sabah State Government. The land was not previously owned by any users and subject to customary rights of local communities and indigenous people. |
| 4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is | 4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and | Yes | The system used by the Jeroco 1 CU in resolving disputes and grievances exists in the procedure called Procedures for reporting complaints and grievances. The Mill and Estates within Jeroco 1 CU has its own Internal Complaint Book and External Communication Book. The Internal Complaint Books are for employees to lodge complaint pertaining to their houses. The external book was reviewed and found no complaints against the Jeroco 1 CU. |

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|---|
| implemented and accepted by all affected parties. | whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. | | |
| | 4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, incl. by illiterate parties. | Yes | The procedures were explained from time to time latest in Apr 2019. Attendance list and copy of presentation was reviewed by auditor. |
| | 4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. | Yes | The Jeroco 1 CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders through stakeholders meeting. |
| | 4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. | Yes | The system used by the Jeroco 1 CU in resolving disputes and grievances exists in the procedure called Procedures for reporting complaints and grievances. The Mill and Estates within Jeroco 1 CU has its own Internal Complaint Book and External Communication Book. The Internal Complaint Books are for employees to lodge complaint pertaining to their houses. The external book was reviewed and found no complaints against the Jeroco 1 CU. |
| 4.3 The unit of certification contributes to local sustainable dev. as agreed by local communities. | 4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated. | Yes | Contributions to community development that are based on the results of consultation with local communities. |
| 4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. | 4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through an FPIC process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available. | Yes | The right to use the land at Jeroco 1 CU can be demonstrated and not disputed by any party. Auditor had sighted that there were clear land ownership documents. Land titles were available in documents. The original copies of the documents however, were kept in Plantation Central Office (PCO), Sg. Segama. Copies of land titles for all estates were sighted. All the estates were under the jurisdiction of Kinabatangan District. Review of the land titles show that the requirements that the land title for all the estates namely for cultivation of an agricultural crop of economic value have been complied with. |
| | 4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: | Yes | As reported in 4.4.1, it has been verified that the land is legitimately owned by Jeroco 1 CU. The audit team had confirmed that there were no land issues as is owned by Sabah State (State Land). |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|------------------|---|
| | 4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. | Yes | As reported in 4.4.1, it has been verified that the land is legitimately owned by Jeroco 1 CU. The audit team had confirmed that there were no land issues as is owned by Sabah State (State Land). |
| | 4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. | Yes | As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since 1 January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate. |
| | 4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. | Yes | As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since 1 January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate. |
| | 4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties. | Yes | As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since 1 January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate. |
| | 4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. | Yes | The requirement in this indicator does not apply to Jeroco 1 CU |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|---|
| | 4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. | Yes | The requirement in this indicator does not apply to Jeroco 1 CU |
| | 4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. | Yes | The requirement in this indicator does not apply to Jeroco 1 CU |
| 4.5 No new plantings are established on local peoples' land | 4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. | Yes | Based on Social Impact Assessment (SIA) Report for Jeroco 1 CU and as reported in Indicator 3.4, there was no new plantings are established in this CU. |
| where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own | 4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. | Yes | As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate. |
| representative institutions. | 4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and | Yes | As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate. |

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|---|
| | entered into voluntarily and carried out prior to new operations. | | |
| | 4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. | Yes | As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate. |
| | 4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. | Yes | As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate. |
| | 4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. | Yes | As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate. |
| | 4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. | Yes | There were no new lands acquired for plantation and mills after 15 November 2018. The current operation area including mill and estates as per stated in the land title. |
| 4.6 Any negotiations concerning compensation for loss of legal, | 4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. | Yes | The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Land Dispute Management and Sustainable Agriculture Policy. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Plantation Advisory Department particularly the Group Compliance Department at the Kuala Lumpur Head Office. The procedure stipulates the involvement of the respective estate management, professional |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|--|
| customary or user rights are dealt with | | | consultant as the land surveyors with reference to relevant authorities such land authority and the affected parties in the negotiation procedures. |
| thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative | 4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. | Yes | The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Land Dispute Management. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Plantation Advisory Department particularly the Group Compliance Department at the Kuala Lumpur Head Office. The procedure stipulates the involvement of the respective estate management, professional consultant as the land surveyors with reference to relevant authorities such land authority and the affected parties in the negotiation procedures. |
| institutions. | 4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. | Yes | There were no scheme small holdings at Jeroco 1 CU. The Fresh Fruit Bunches are supplied from owned estates which are certified to RSPO. |
| | 4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. | Yes | There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties. |
| 4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land | 4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place. | Yes | The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Land Dispute Management and Sustainable Agriculture Policy. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Plantation Advisory Department particularly the Group Compliance Department at the Kuala Lumpur Head Office. The procedure stipulates the involvement of the respective estate management, professional consultant as the land surveyors with reference to relevant authorities such land authority and the affected parties in the negotiation procedures. |
| acquisitions and relinquishment of rights, subject to their FPIC and negotiated | 4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. | Yes | There was no issue regarding compensation (monetary or otherwise) with villagers, local community due to no local communities within Jeroco 1 CU. Furthermore, the surrounding of Jeroco 1 CU is owned by IOI Plantations, Morissem 2 Plantation (IOI), Amalania Estate. |
| agreements. | 4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. | Yes | It has been verified that the land is legitimately owned by Jeroco 1 CU since January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|---|
| 4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. | 4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. | Yes | It has been verified that the land is legitimately owned by Jeroco 1 CU since January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. |
| inginio. | 4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. | Yes | Land conflict is not present in the area of the unit of certification. It was no records on any complaint or information from stakeholders during the 9 th Stakeholders Meeting |
| | 4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements. | Yes | There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. |
| | 4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (incl. neighboring communities where applicable). | Yes | There was no conflict or dispute over the land. |

<u>Principle 5: Support smallholder inclusion</u>
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|--|
| 5.1 The unit of certification deals fairly and | 5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders. | Yes | Fresh Fruit Bunches were supplied from Jeroco 1 CU owned estates of Lokan, Lungmanis, Batangan and Lutong which are certified to RSPO Using the Identity Preserved Supply Chain Model. There was no third-party FFB's sent to the mill. Thus, no contract involved with smallholder. |
| transparently with all smallholders (Independent and Scheme) and other local businesses. | 5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. | Yes | Fresh Fruit Bunches were supplied from Jeroco 1 CU owned estates of Lokan, Lungmanis, Batangan and Lutong which are certified to RSPO Using the Identity Preserved Supply Chain Model. There was no third-party FFB's sent to the mill. Thus, no contract involved with smallholder. |
| local businesses. | 5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. | Yes | Fresh Fruit Bunches were supplied from Jeroco 1 CU owned estates of Lokan, Lungmanis, Batangan and Lutong which are certified to RSPO Using the Identity Preserved Supply Chain Model. There was no third-party FFB's sent to the mill. Thus, no contract involved with smallholder. |
| | 5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. | Yes | Fresh Fruit Bunches were supplied from Jeroco 1 CU owned estates of Lokan, Lungmanis, Batangan and Lutong which are certified to RSPO Using the Identity Preserved Supply Chain Model. There was no third-party FFB's sent to the mill. Thus, no contract involved with smallholder. |
| | 5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe. | Yes | Consultation with contractors and suppliers' representatives confirmed they are understood of their rights and obligations under the contract or Minor Job Contract (MJC). There was no third-party FFB sent to the mil, Thus, no contract involved with smallholder. |
| | 5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. | Yes | These contractors interviewed confirmed that payments are made in a timely manner, namely within 14 days of invoice. |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|---|
| | 5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government). | Yes | Weighing Equipment in Jeroco POM 1 (JPOM1) has been calibrated on yearly basis by Metrology Corporation Malaysia Sdn Bhd. |
| | 5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. | Yes | Hap Seng Plantations Group supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the Internal Control System (ICS), who holds the certificates, and who holds and sells the certified material. |
| | 5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. | Yes | The system used by the Jeroco 1 CU in resolving disputes and grievances exists in the procedure called Procedures for reporting complaints and grievances. The Mill and Estates within Jeroco 1 CU has its own Internal Complaint Book and External Communication Book. The Internal Complaint Books are for employees to lodge complaint pertaining to their houses. The external book was reviewed and found no complaints against the Jeroco 1 CU. |
| The unit of certification supports improved livelihoods of smallholders and their inclusion in | 5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. | Yes | Fresh Fruit Bunches were supplied from Jeroco 1 CU owned estates of Lokan, Lungmanis, Batangan and Lutong which are certified to RSPO Using the Identity Preserved Supply Chain Model. There was no third-party FFB's sent to the mill. Thus, no contract involved with smallholder. |
| sustainable palm oil value chains. | 5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organizational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for ISH). | Yes | Hap Seng Plantations Group supports Independent Smallholders to improve smallholder livelihood and build their capacity to enhance productivity, quality, organizational and managerial competencies, and specific elements of RSPO certification. |
| | 5.2.3 Where applicable, the unit of certification provides support to small holders to promote legality of FFB production. | Yes | Hap Seng Plantations Group supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. |
| | 5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. | Yes | These smallholders were trained by Jeroco 2 CU. Thus, this indicator was not audited in Jeroco 1 CU. |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|------------------|---|
| | 5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. | Yes | Fresh Fruit Bunches were supplied from Jeroco 1 CU owned estates which are certified to RSPO using the Identity Preserved Supply Chain Model. There was no third-party FFB's sent to the mill. Thus, no contract involved with smallholder. |

Principle 6: Respect workers' rights and conditions

Protect workers' rights and ensure safe and decent working conditions.

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|--|
| 6.1 Any form of discrimination is prohibited. | 6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. | Yes | The CU has an Equal Opportunities Policy including words of prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. It states that equal opportunities for hiring, promotions, benefits, etc. shall be provided to all workers regardless of race, religion or gender. |
| | 6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers. | Yes | No complaints of discrimination were observed from all the workers interviewed (sprayers, harvesters and mill workers which comprise local and foreign men and women). They confirmed that pay and benefits received were the same regardless of job functions and there was no evidence of discrimination in any form. |
| | 6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. | Yes | It has been demonstrated during the surveillance audit that recruitment selection, hiring and promotion are based on skill, qualities, capabilities and medical fitness, while vacancy notices for higher positions do not contain any discriminatory elements. Vacancies are made known among local populations based on word of mouth. Employment of foreign workers, follow Company SOP entitled 'Syarat-syarat Penggajian Pekerja Asing'. There is no indication of discrimination related to locality, gender, race and origins (nationality). Every worker could achieve positions as long as meet the requirements. |
| | 6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. | Yes | Based on documents, it was confirmed by the Health Assistants and workers at the Lokan, Lutong, Lungmanis and Batangan Estates, pregnancy tests were conducted when the workers presented themselves at the estate clinic and not conducted in a discriminatory manner. One general worker (sweeper) at the Lokan Estate and one worker at Batangan Estate (manurer/sprayer) confirmed that they had gone to the clinic voluntarily and upon confirmation of their pregnancies. They were allowed to continue with their employment, |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|--|
| | | | but the manurer/sprayer who confirmed her pregnancy was immediately re-assigned to an alternative employment i.e. sweeper. |
| | 6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. | Yes | A gender committee throughout the Jeroco 1 CU are known as the Gender Committee. Membership comprise female employees and the employees' wives. The meeting agenda covers, among other things, policy awareness, grievances procedures, newly appointed committee, functions of the Gender Committee, woman health and reproductive, and the activities for the year 2019-2020. |
| | 6.1.6 There is evidence of equal pay for the same work scope. | Yes | Interviews with local and foreign workers (male and female), found that they agreed that they received equal pay for the same work scope. Interviewed sprayer gang has been paid by piece rate and the same gang also receive the piece rate pay, for harvester also they receive same rate as the all harvester in the estate. For mill and estate general workers they receive daily payment as per Minimum Wages order 2019. |
| 6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are | 6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. | Yes | The employment contracts issued to all Jeroco 1 CU workers (local and foreign) have been prepared in Bahasa Malaysia and are generally available to the workers. The documents have been the prepared in accordance with the requirements of the Sabah Labour Ordinance. Pay conditions are also contained in the employment contracts. |
| standards and are sufficient to provide decent living wages (DLW). | 6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. | Yes | The employment contracts signed between the Jeroco 1 CU management and their employees contain employment and payment terms and provisions covering contract duration, minimum age requirement, retirement age, place of work, job specifications, workers' obligations, employer's obligations, payment of foreign workers' levy by employer, salary payable, working hours and overtime, payment of passport and PLKS by workers, designated public holidays, workers' annual leave, medical expenses, sick leave, maternity leave and allowances, insurance scheme, EPF for local workers, rights to join union, salary deduction to be in accordance with the Sabah Labour Ordinance, mutual termination of contract, contract extension, etc. |
| | 6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. | Yes | There was evidence that workers observe regular working hours including overtime hours within the legal confines of the Sabah Labor Ordinance. The same applies for Salary deductions i.e. statutory deductions such as SOCSO, EPF, and EIS. For non-statutory deductions such as for payment of electricity and water bills, records are available of written permits from the Department of Labour, Sabah. |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|---|------------------|---|
| | 6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure. | Yes | Visits were made to the workers' housing facilities of each estate reveal that generally, the Estates and Mills provide adequate housing to their employees. All workers are provided with free accommodation as stated in their employment contracts, and free electricity and water supplies. With the exception mentioned below, the houses are generally in good state of repair in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. |
| | 6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. | Yes | Generally, all units within Jeroco 1 CU have their own canteen/grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within the expiry dates. Workers interviewed informed that they purchase items from these stores, and are able to either pay in cash, or on credit. |
| | 6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. | Yes | Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,100 per month, or more. Jeroco 1 CU also has carried out the calculation of prevailing wages and in-kind benefits as evidenced from prevailing wages calculation. The calculation took into account i.e. housing, electricity, water, education, child care and healthcare. Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is reasonable and in line with RSPO Guidance on calculating prevailing wages. |

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|--|
| | The unit of certification may choose to implement the "living wage" payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation. Until such time where the Malaysian version of "decent living wage" has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid. | | |
| | 6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. | Yes | All workers in Jeroco 1 CU is a permanent and full-time worker and all the workers used for core work such as Harvesting, Manuring, Spraying, Milling Operation, Grading, Engine driver and workshop. There are no temporary workers use in the CU. Site visit found no full-time workers were observed performing work of a casual worker and vice versa. |
| 6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of | 6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented. | Yes | Jeroco 1 Group subscribes to the documented policy on Freedom of Association and Right to Collective Bargaining. This Policy is available in dual language, i.e. Bahasa Malaysia and English and it recognizes and respects of employees to join trade union of their choice and to bargain collectively subject to the provisions of relevant national legislations. Employment contracts sighted do not contain any prohibitive clause from joining any trade unions. The language used in both Policies were English and Bahasa Malaysia. This was appropriate for workers as most were Malaysians and Indonesians whose main language was in Bahasa. |
| association and collective bargaining are restricted under law, the employer facilitates parallel | 6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. | Yes | The Joint Consultative Committee (JCC) have been established at every unit in Jeroco 1 CU. The Committee comprise management and worker representatives. Evidence is available that management holds regular meetings with the Joint Consultative Committee (JCC). Based on the minutes meeting sighted, certain problems raised since last year resolved while certain problems were in progress with action taken from the management. |
| means of independent and free association and bargaining for all such personnel. | 6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. | Yes | Workers' representatives that sit in the Joint Consultative Committee (JCC) have been independently and freely elected by the workers themselves. No evidence of any management interference was observed. |
| 6.4 Children are not employed or exploited. | 6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and | Yes | Jeroco 1 CU subscribes to Hap Seng Plantations Holdings Berhad Child Labour Policy. The Policy states Hap Seng does not tolerate child labour, any forms of child exploitation and child abuse. This includes awareness trainings for all employees and contractors, schools should encourage and motivate children to attend school, parents to be advised |

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|---|
| | included into service contracts and supplier agreements. | | and warned verbally on the spot not to allow children to assist them, and the child sent home or to an appropriate child care facility. The prohibition against child labour is included in all service contracts and supplier agreements. |
| | 6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. | Yes | Based on documentation review (master check roll, personal files containing copies of passport, KTP or Malaysian IC), interviews conducted and observations in the field, all employees were above the age of 18 when they commenced work at Jeroco 1 CU. Evidence is available that minimum age requirements are met. |
| | 6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. | Yes | Jeroco 1 CU has a guidance document which defines young person as someone below 18 years of age and is applicable for employment of local and foreign workers. This include house cleaning, weighbridge clerk, gardening, loose fruit picking (excluding loading), FFB checker, filling polybags, EFB mulching, creche helper, sundry shop helper, and line sweeping. |
| | 6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. | Yes | Child Protection Policy states that Jeroco 1 CU does not tolerate child labour, any forms of child exploitation and child abuse. It was explained to external stakeholders during stakeholder meeting. The policy briefings to workers, and during induction trainings for new workers. |
| 6.5 There is no harassment or abuse in the workplace, and | 6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. | Yes | A Policy against sexual harassment, violence, and abuse has been established. This Policy was used to guide procedures to be taken in the event of sexual harassment incident, and communicated to all staffs and workers during morning muster and via the Gender Representative Committee meetings. Interviews held with workers (male, female, local, foreign) confirmed their understanding of this Policy. |
| reproductive rights are protected. | 6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. | Yes | A Policy to protect reproductive rights of all, especially women is implemented. This Policy namely Reproductive Rights Policy gives the employees the right to decide freely and responsibly of their planning to have children, and to make decisions concerning reproduction free of discrimination, coercion and violence. |
| | 6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. | Yes | Gender Committees have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights and need of new mothers. Interviews held with female workers who had given birth before, found their needs have been taken into account such as providing a private place for expressing milk and access to a fridge for storage, and permission granted enabling them to go home to breastfeed their babies. |
| | 6.5.4 A grievance mechanism, which respects anonymity and protects | Yes | A grievance mechanism which respects anonymity and protects complainants is in place at the CU as per Grievance Procedure, and the detailed procedure is known as Reporting |

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|--|
| | complainants where requested, is established, implemented and communicated to all levels of the workforce. | | of Complaints and Grievances: Internal and Stakeholders. This system is open to all affected parties to resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistle blowers. |
| 6.6 No forms of forced or trafficked labour are used. | 6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty to the workers for termination of employment Debt bondage Withholding of wages | Yes | Based on interviews conducted with foreign workers, review of documents signed by workers agreeing to voluntarily keep their passports at the estate /mill office, as well as observations made, there is evidence that workers are given an option to either keep their own passports, or to keep them at the office. Those who chose to keep the passports at the office, keep them in locked pigeon holes with one key each kept by the worker, and one by the office. Workers have full access to their own passports and have given written confirmation of their agreement to keep their passports with the office. The estates and mill do not charge their workers recruitment fee. The Company is also responsible for worker levy, medical check-up, work pass, agency processing fees and insurance. The worker only pays fees related to passport renewal. This breakdown in payment is agreed between the hiring Company and the recruitment agents. There was no form of contract substitution. All foreign workers interviewed confirmed that while still in their home countries, they were briefed by the recruitment agents of the types of job they would be doing in Malaysia. There was no evidence of involuntary overtime and all overtime work is done on a mutual basis, as confirmed by general workers, sprayers, and mill workers interviewed. |
| 6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. | | Yes | The CU has a documented Labour Policy for Foreign Workers dated 15/4/2019 which states a commitment to non-discrimination, no contract substitution, post arrival orientation program (which includes briefing on language, safety, labour laws, cultural practices, and others) and provision of decent living conditions for foreign workers. The policy was posted on the main estate notice board. |
| 6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health. | 6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. | Yes | The letter of appointment for the Managers signed by the General Manager was sighted. The Managers subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. All estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. Minutes of meetings held by the mill and estates were verified. |
| | 6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned | Yes | ERT consisting of trained First Aiders, mill/field staffs, mandores, admin clerk, workshop operator and security personnel. Interviews with mill/estate staffs and mandores revealed they understood and were aware of the emergency procedures requirements. It was observed that all operating units were provided with first aid boxes which were checked on a monthly basis by the Hospital Assistants. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|------------------|--|
| | operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed. | | of the PIC, Police Station, Fire Brigade, and Hospital were also included. Jeroco 1 CU had emergency response plan updated on April 2020 and had been prepared by ESHS officer. |
| | 6.7.3 (C) Workers use appropriate PPE, which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. | Yes | All workers involved in potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures. |
| | 6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law. | Yes | The Mill and Estates had provided medical care and insurance coverage for all the workers. Local and and foreign workers have been covered by SOCSO and FWCS. In addition, the estates and mill provide medical care to all workers using own Medical Assistant services. Cases requiring additional/serious treatment are referred to Hospital Lahad Datu 80 km away. |
| | 6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics. | Yes | Jeroco 1 CU had maintained and updated the Lost Time Incident (LTI) Summary by monthly basis. JKKP8 Form for year 2019 was submitted to DOSH timely in Jan 2020. Accident statistics were being maintained in a satisfactory manner and injury record were recorded using Lost Time Accident (LTA) metrics. The CU recorded 2 minor accidents below than 4 days MC, and 3 accidents more than 4 days MC. The accidents were reported in JKKP 6 form to DOSH accordingly and the management had already taken the necessary actions addressing the accidents with accident investigation, corrective actions and preventions, safety trainings and updating the HIRARC. |

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

Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|------------------|---|
| 7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using | 7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control. | Yes | In order to minimize the use of pesticides, Jeroco 1 CU continued to implement IPM in 4 estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the HSPHB Oil Palm Agriculture Policy covering topics nursery management, replanting, immature, mature and fertilizer application. The IPM program among others includes pest and diseases management of rats, bagworms, nettle caterpillars, rhinoceros beetles and Ganoderma. The program includes the planting of beneficial plants with maps indicating areas planted. All estates carried out the census on rat damage and diseases like Ganoderma. |
| appropriate Integrated Pest Management (IPM) techniques. | 7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. | Yes | There was no evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and as per the stakeholder consultation with relevant workers. |
| | 7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. | Yes | Jeroco 1 CU maintained a Zero Burning Policy in relation to all new plantings, replanting or other development in the CU. Visit to replanting area since 2018, 2019 and 2020 during the audit in all estates, it was found that all palms were felled, shredded, windrowed and left to decompose. It was found there was no use of fire for pest control and no evidence that all the estates have do so. |
| 7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | 7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized. | Yes | Jeroco 1 CU continued to use agrochemicals based on HSPHB Oil Palm Agriculture Policy (OPAP) covering topics such as nursery management, replanting, immature and mature upkeep where written justifications of all pesticides used had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease and the correct dosage of agrochemicals to be used. All chemicals usage was based on the "need to do basis" to enhance field operations. It was found that no Class I chemicals had been used. The procedures also covered the use of PPE when handling these chemicals. The estates continued to use pesticides as per the SOPs. |
| he environment. | 7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and no. of applic) are provided. | Yes | Jeroco 1 CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients applied per ha. Pesticides are used only when justified and areas used were recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. The 4 estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification. |

| Clause | Indicators | Comply Yes/No | Findings |
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| | 7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. | Yes | All estates continued to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the HSPHB Oil Palm Agriculture Policy. |
| | 7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. | Yes | There was no evidence of prophylactic use of pesticides except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practiced for the pest and Diseases management such as control of Rhinoceros Beetle as per SOPs. |
| | 7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: | | Jeroco 1 CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. |
| | 7.2.5a Judgment of the threat and verify why this is a major threat.7.2.5b Why there is no other alternative which can be used. | Yes | As mentioned above in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and no paraquat had been used. Hence, the need for a judgment of the threat assessment does not apply on the Jeroco 1 CU. |
| | 7.2.5c Which process was applied to verify why there is no other less hazardous alternative. | Yes | |
| | 7.2.5d What is the process to limit the negative impacts of the application. | Yes | |
| | 7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. | Yes | |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|------------------|---|
| | 7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers. Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. | Yes | Jeroco 1 CU had records showing that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. |
| | 7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices. | Yes | The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and used were maintained. All of the stores were equipped with exhaust fans and the door was secured and keys held by only the storekeeper and attendant. Only authorized personnel are allowed to handle the chemicals. All chemicals were segregated and fertilisers were well stacked. Relevant MSDS/CSDS were available in the stores. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal. |
| | 7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes. | Yes | The documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material e.g. EFB and POME. |
| | 7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. | Yes | Aerial spraying of pesticides is not a practice in Jeroco 1 CU. There was no evidence to show that such a method being used in all estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit. |

| Clause | Indicators | Comply Yes/No | Findings |
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| | 7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. | Yes | CHRA has been conducted from Chemsain Konsultant Sdn Bhd. It has been recommended by the assessor for the estate management to conduct medical surveillance to all pesticide operators, fertilizer applicators, workshop technicians, water treatment chemical operator, drivers and storekeepers. The annual medical surveillance was conducted by a common DOSH registered doctor and result were reviewed accordingly. |
| | 7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. | Yes | There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in the estates. Workers interviewed were aware that pregnant and breast-feeding women should not handle chemicals. During the monthly check-up by the MA, pregnancy status was remarked and if of any cases the worker will be withdrawn from spraying duties. |
| 7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially | 7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. | Yes | 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. |
| responsible manner. | 7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. | Yes | The documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material e.g. EFB and POME. |
| | 7.3.3 The unit of certification does not use open fire for waste disposal. | Yes | The Jeroco 1 CU had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting activity in Lokan and Lungmanis Estates. All palms were chipped and left decomposed in the field. |
| 7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained | 7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise env. impacts. | Yes | Jeroco 1 CU practiced the maintenance of long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention and some EFB application, water management and by maintaining soft weeds within interlines. Fertilizer application, which was of paramount importance for maintenance of soil fertility, was carried out based on the recommendation made by the agronomist from the Agronomy Department. Annual fertilizer recommendations were made based on annual foliar sampling. The recommendation by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled. |
| yield. | 7.4.2 Periodic tissue and soil sampling is carried out to | Yes | Periodic tissue and soil sampling were carried out in Jeroco 1 CU to monitor changes in the nutrient status of the palms. |

| Clause | Indicators | Comply Yes/No | Findings |
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| | monitor and manage changes in soil fertility and plant health. | | |
| | 7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. | Yes | Jeroco 1 CU had a nutrient recycling strategy in place. Palm fronds were stacked in the inter row to decompose and Empty Fruit Bunches (EFB) application were given to replants, immature fields and young mature areas. No compost and POME were applied in both estates. |
| | 7.4.4 Records of fertiliser inputs are maintained. | Yes | Jeroco 1 CU continued to monitor their fertilizer inputs as recommended by their agronomist, who visited the estates during the annual foliar sampling. Fertiliser application programs were monitored using records like reconciliation of fertiliser application schedule, program sheets, bin cards, field cost book and manuring audits through GAP Progress Report. |
| 7.5 Practices minimise and control erosion and degradation of | 7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available. | Yes | During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Jeroco 1 CU. |
| soils. | 7.5.2 No replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification. | Yes | Jeroco 1 CU had a management strategy for planting on slopes and to minimise and control erosion and degradation of soils. The plantings on slopes was guided by its Oil Palm Agriculture Policy. The agronomy department guided by Land Survey Department to established slope map for all estates. |
| | 7.5.3 There is no new planting of oil palm on steep terrain. | Yes | Jeroco 1 CU had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. It was observed that there is no new planting of oil palm on steep terrain. |
| 7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are | 7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. | Yes | Jeroco 1 CU had a management strategy for palm oil cultivation, taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Jeroco 1 CU. |
| incorporated into plans and operations. | 7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. | Yes | There were no marginal and fragile soils in the Jeroco 1 CU. |

| Clause | Indicators | Comply Yes/No | Findings |
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| | 7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. | Yes | Jeroco 1 CU had a management strategy for palm oil cultivation, taking into account the soil surveys and topographic information in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information were provided and reviewed by the auditors. |
| 7.7 No new planting on peat, regardless of depth after 15 | 7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. | Yes | During the field visit and the soil maps provided and reviewed by the auditors it was observed that there was no peat soil in Jeroco 1 CU. |
| November 2018 and all peatlands are managed responsibly. | 7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). | Yes | During the field visit and the soil maps provided and reviewed by the auditors it was observed that there was no peat soil in Jeroco 1 CU. |
| | 7.7.3 (C) Subsidence of peat is monitored, documented and minimised. | Yes | During the field visit and the soil maps provided and reviewed by the auditors it was observed that there was no peat soil in Jeroco 1 CU. |
| | 7.7.4 (C) A documented water and ground cover management programme is in place. | Yes | During the field visit and the soil maps provided and reviewed by the auditors it was observed that there was no peat soil in Jeroco 1 CU. |
| | 7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, | Yes | During the field visit and the soil maps provided and reviewed by the auditors it was observed that there was no peat soil in Jeroco 1 CU. |

| as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it ii is replaced with crops suitable for a higher water table (paldiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. 7.7.6 (C) All existing plantings on peat are managed according to the "RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat, version 2 (2018) and associated audit guidance. 7.7.7 (C) All are as of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are | Clause | Indicators | Comply Yes/No | Findings |
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| | | prohibited; peatlands are | | |

| Clause | Indicators | Comply Yes/No | Findings |
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| | managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance. | | |
| 7.8 Practices maintain the quality and availability of surface and groundwater. | 7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: | Yes | Water management plans has been prepared by sustainability executive to cover for the Jeroco Group Estates and POM. |
| | 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. | Yes | Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. |
| | 7.8.1b Workers have adequate access to clean water. | Yes | Treated water has been supplied through water treatment plan at JPOM 1. As stated in water management plans. Chemist from agronomy department currently monitoring and taking sample from water treatment plants and main storage to housing complex. |
| | 7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). | Yes | Jeroco 1 CU continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along all-natural waterways within the estates. The boundary marker for buffer was sufficiently maintained. It was clear that Hap Seng Plantations Holdings Berhad's had a policy to maintain the buffer by restricting agrochemicals application. There was no sign of agrochemicals applied. The signboard for riparian buffer zone were erected and it contain several order and instruction such as prohibited for intrusion, spraying of agrochemical, fishing, open burning and planting. |
| | 7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially BOD, is regularly monitored. | Yes | Treated effluent discharge method for land irrigation in the estate and five parameters were monitored such as pH, Total Nitrogen (TN), Suspended Solid (SS) and Oil & Gris (OG) and their result were within the stipulated limit stated in "Jadual Pematuhan". Monthly monitoring on effluent has been carried out by external accredited laboratory. |

| Clause | Indicators | Comply Yes/No | | | Findings | | | |
|---|--|------------------|---|-----------------------------|--------------------------------------|------------------------------------|----------|--|
| | 7.8.4 Mill water use per tonne of FFB is monitored and recorded. | Yes | Mill management has reviewed and updated the plan by yearly basis. | | | | | |
| 7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised. | 7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. | Yes | Sighted "Fossil Fuel Management Plan" has developed and reviewed accordingly. | | | | | |
| 7.10 Plans to reduce pollution and emissions, | 7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are | Yes | Greenhouse gases management plans were established and has been reviewed CU had used RSPO Palm GHG version 4 Calculator as a tool to calculate the GHC data was verified and the following were determined: | | | | | |
| including greenhouse gases | implemented, monitored | | Description | tCO ₂ e/tProduct | Production | t/y | r | |
| (GHG), are | through the Palm GHG calculator and publicly reported. | | CPO | 0.56 | FFB Processed | 29 | 0,782.07 | |
| developed, implemented and | calculator and publicly reported. | | PK | 0.56 | CPO Processed | 5 | 5,005.03 | |
| monitored and new developments are designed to minimise GHG emissions. | designed to minimise GHG | | OP Planted Area OP Planted on Peat | - 40 | Ha 28557.00 0.00 | | | |
| | | | Conservation (forest | , | 386.34 | - | | |
| | | | Conservation (non-fo | | 0.00 | | | |
| | | | Milling extraction rate: | | | | | |
| | | | OER | 21.05 | | | | |
| | | | KER | 4.56 | | | | |
| | | | Mill Emission Emission source POME Fuel consumption Grid electricity utilisat | Own Cro | tCO2e 6943.11 270.79 467.25 | tCO2e/tFFB 0.02 0.00 0.00 | | |
| | | | Credits Export of excess elections grid | ctricity to housing & | 0.00 -12.81 | 0.00 | | |

| Clause | Indicators | Comply Yes/No | Findings | | | | | | | |
|--------|---|------------------|---|-----------------------------|-------------------------------|------------------------------|--------------|--------------|---------------------|--|
| | | | Sale of PKS | | | 0 | 0 | | | |
| | | | Sale of EFB | | | 0.00 | 0.00 | | | |
| | | | Total | | | 7668.34 | 0.02 | | | |
| | | | | | | | 0.02 |] | | |
| | | | Plantation / field emission | | | | | | | |
| | | | | Own Crop | | | | group | | |
| | | | Emission sources | tCO2e | tCO2e/ha | tCO2e/FFB | tCO2e | tCO2e/ha | tCO2e/FFB | |
| | | | Land Conversion | 102181.20 | 8.04 | 0.53 | 44388.87 | 2.80 | 0.45 | |
| | | | *CO2 Emissions from Fertiliser | 2881.42 | 0.23 | 0.02 | 966.72 | 0.06 | 0.01 | |
| | | | N2O Emissions fertilizer | 3663.38 | 0.29 | 0.02 | 1213.59 | 0.08 | 0.01 | |
| | | | Fuel Consumption | 3889.94 | 0.29 | 0.02 | 1213.59 | 0.08 | 0.01 | |
| | | | Peat Oxidation | 0.00 | 0.00 | 0.00 | | | | |
| | | | Sinks | 0.00 | 0.00 | 0.00 | | | | |
| | | | Crop Sequestration | -96854.21 | -7.62 | -0.51 | -30929.81 | -1.95 | -0.31 | |
| | | | Conservation Sequestration | 0.00 | 0.00 | 0.00 | | | | |
| | | | Total | 15761.73 | 1.24 | 0.08 | 18386.56 | 1.16 | 0.19 | |
| | | | Palm Oil Mill Effluent (POID Diverted to condition of the Diverted to anaero | ompost | | 0% | | | | |
| | | | Diverted to Anaerobic Dig | estion | | | | | | |
| | | | Diverted to | anaerobic por | nd | 0% | | | | |
| | | | Diverted to meth | ane capture (| flaring) | 33% | | | | |
| | | | Diverted to methane cap | | |) 67% | | | | |
| | 7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG | Yes | Auditor has verified thr also through site visit confirmed that there we GHG Assessment Prod | to the samp ere no new p | led estates planting or ne | areas. Based ew developme | on the obser | vation durin | ig the audit, it is | |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|--|
| | Assessment Procedure for New Development). | | |
| | 7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. | Yes | Jeroco 1 CU has maintained its documented identified wastes and sources of pollution in Waste Management Plan. The Waste Management Plan among others contains information pertaining to mitigate and control the identified wastes and source of pollution. Among significant environmental receptors for the estates and mill operations were: • Air – sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – biogas emission) - GHG. • Water – cleaning of processing stations (hydro cyclone/claybath /sterilizer condensate/clarification) and boiler blowdown. • Land – Source from generation of solid wastes, including scheduled waste, domestic waste and industrial/process wastes |
| 7.11 Fire is not used for preparing land and is prevented in the | 7.11.1 (C) Land for new planting or replanting is not prepared by burning. | Yes | Jeroco 1 CU continued to use Hap Seng Plantations Holdings Berhad's policy of no open burning. As advocated, all the 4 estates practised Zero burning. In the 2017, 2018, and 2020 replants visited during the audit in the 4 estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. |
| managed area. | 7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management. | Yes | Jeroco 1 CU had established the fire prevention and control measures for the areas under its direct management. Accident and emergency procedures were available in adherence to the Hap Seng Plantations Holdings Berhad's policy on 'Fire Emergency Response' Plan. Each estate had a standard procedure for emergencies situation. There was formation of ERP Team & ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information to the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by Agronomy Department and amended to tailor to the situation differences in the estates and mills. |
| | 7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures. | No | The CU had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting activity. However, during the audit, it was found that there were no engagements with adjacent stakeholders on fire prevention and control measures at Lutong Estate. Thus, Minor NCR MNAJ01/2020 was raised |
| 7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock | 7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, | Yes | There was no new land clearing since November 2005 in Jeroco 1 CU. |

| Clause | Indicators | Comply Yes/No | Findings |
|---------------------------------|---|------------------|---|
| (HCS) forest. | in accordance with the RSPO | | |
| HCVs and HCS | LUCA guidance document. | | |
| forests in the | 7.12.2 (C) HCVs, HCS forests | | |
| managed area are identified and | and other conservation areas | | |
| | are identified as follows: | | |
| protected or enhanced. | 7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. | Yes | Jeroco 1 CU has conducted HCV Assessment available in report "Potential High Conservation Value Area Assessment Report in Lutong Estate, Batangan Estate, Lokan Estate, Lungmanis Estate and Jeroco Palm Oil Mill 1 (JGOE 1)". This report was prepared by the Sustainability Executive and was made available during the surveillance audit. The report has identified all the HCV areas within and adjacent to the Jeroco 1 CU, as well as rare, threatened and endangered species (RTEs) for Lutong, Lungmanis, Batangan, and Lokan Estates. The management and action plans for the HCV areas has been Included in the report. The report has also identified 8 potential HCV areas with the total area of 386.34Ha. |
| | 7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. | Yes | Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no new land clearing in existing plantations or new plantings at Jeroco 1 CU after 15 November 2018. |
| | 7.12.4 (C) Where HCVs, HCS forests after 15 Nov 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring reqs. The integrated management plan is reviewed at least once every 5yrs. The integrated | No | Measures taken to maintain/enhance this species as stated in the HCV Action Plan include monthly monitoring, maintain riparian reserve, prohibiting against cutting down trees, spraying, periodic visit to monitor illegal activities, awareness briefings to the workforce during muster on the prohibition against hunting, spraying and manuring within buffer zones. Visits are also being conducted to HCV sites to check on indiscriminate spraying, monitor for illegal activities, monitor housing area for any capture of protected wildlife, and continuation of buffer zone maintenance. During this audit, it was found the consultations with relevant stakeholders in April 2018 and 6 th Stakeholder Consultation Meeting in April 2019, regarding the developed HCV management plan, includes the directly managed area and any relevant wider landscape level considerations (where these are identified) were not clearly recorded and discussed in "Potential High Conservation Value Area Assessment Report in Lutong Estate, Batangan Estate, Lokan Estate, Lungmanis Estate and Jeroco Palm Oil Mill 1 (JGOE 1)" during the revision in June 2020. Records of consultation with relevant stakeholders regarding the developed HCV management plan, includes the directly managed area and any relevant wider landscape level considerations (where these are identified) were not sufficient. Thus, Major NCR KN02/2020 was raised |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|------------------|---|
| | management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). | | |
| | 7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. | Yes | There are no local communities living adjacent to or nearby Jeroco 1 CU. Thus, this indicator was not audited. |
| | 7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. | Yes | The list of RTE species found in the Jeroco 1 CU has made available in HCV Report [Table 4]. Thus, Jeroco 1 CU established their own disciplinary measures if any of their staff or workers found to capture, harm, collect or kill the RTE species. The Jeroco 1 CU will notify the relevant authorities immediately if any individual or workers for the company is found to capture, harm, collect or kill these species or if found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Wildlife Department immediately. This is in-line with Policy on Rare, Threatened & Endangered Species Policy. There is evidence that monitoring of HCV are being conducted by all the Estates under Jeroco 1 CU on a monthly basis. |
| | 7.12.7 The status of HCVs, HCS forests after 15 Nov 2018, other natural ecosystems, | Yes | Progress of implementation of the HCV Management Plan FY2019 for Jeroco 1 CU were reviewed and verified on the ground. |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|----------------------------------|------------------|---|
| | peatland conservation areas | | |
| | and RTE species is monitored. | | |
| | Outcomes of this monitoring are | | |
| | fed back into the mgmt. plan. | | |
| | 7.12.8 (C) Where there has | Yes | Observation and document and records on all estates found no new planting in Jeroco 1 CU. |
| | been land clearing without prior | | |
| | HCV assessment since Nov | | |
| | 2005, or without prior HCV- | | |
| | HCSA assessment since 15 | | |
| | Nov 2018, the RaCP applies. | | |

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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 | HSP was committed towards getting the 100% RSPO certification. The target year for certification was revised to 2022 (as in ACOP 2019). Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). A meeting was held at RSPO office with RSPO Compensation Manager Ms Khing Su Li to discuss on the revise of Concept Note. HSP have response after the meeting by providing revised Concept Note and documents on 11/01/2020. Meanwhile, based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest S/B) there were no clearance of primary forest at Pelipikan Estate. However, there were land clearing made on May 2006, September 2010 and February 2011. Whereas clearing was made without HCV assessment. HSP received the reviewer's comment on the LUCA assessment and provide clarification accordingly. |
| | (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 CE shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness; | | There were no changes to the current time bound plan. It was confirmed during audit with representative of HSPHB. |

| | (c) | Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent); | YES | The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP. |
|--|-----|---|-----|---|
| 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 1st 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 | Assessment of compliance to RSPO Partial Certification Requirements was conducted in Northbank and Tabin Estate on 15-18/07/2019 and for Pelipikan Estate on 18-22/02/2020. From the assessment, the status of the uncertified management unit was summarized as follows: Northbank and Tabin Estate a) HCV Assessment at Northbank and Tabin Estate has been conducted in year 2013 and completed the report on 20 November 2013. b) Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). A meeting was held at RSPO office with RSPO Compensation Manager Ms Khing Su Li to discuss on the revise of Concept Note. HSP have response after the meeting by providing revised Concept Note and documents on 11/01/2020. Pelipikan Estate a) Based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest Sdn. Bhd.) there were no clearance of primary forest at Pelipikan Estate. However, there were land clearing made on May 2006, September 2010 and February 2011. Whereas clearing was made without HCV assessment. b) HSP received the reviewer's comment on the LUCA assessment and needs to provide major clarification. |
| | (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 | The latest internal assessment has been made to Northbank and Tabin Estate on 15-18/07/2019 and for Pelipikan Estate on 18-22/02/2020: Northbank and Tabin Estate Land conflict are still under court case. Please refer Hap Seng Plantations 2018 Annual Report – refer page 115 (b) |

| - | , | | T = = |
|-----|---|------|--|
| | | \/T0 | Pelipikan Estate Land conflict was resolved with the affected and relevant parties. Please refer Hap Seng Plantations 2018 Annual Report – refer page 269 (c) |
| (c) | Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3; | YES | The latest internal assessment has been made to Northbank and Tabin Estate on 15-18/07/2019 and for Pelipikan Estate on 18-22/02/2020: Northbank and Tabin Estate JCC meeting with stakeholder which include local communities was conducted on 28/08/2018. The result of the meeting had no significant negative impact by the local community. Pelipikan Estate There were no labour dispute reported during JCC with stakeholder meeting conducted on 09/04/2020. Overall no negative impacts. |
| (d) | Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C | YES | The latest internal assessment has been made to Northbank and Tabin Estate on 15-18/07/2019 and for Pelipikan Estate on 18-22/02/2020, there was no issue on legal non-compliance for all uncertified unit. |
| (e) | The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach: 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 noncompliance with the requirements. | YES | Based on the latest internal assessment carried out in Feb 2020, the progress of the certification was concluded as non-compliance against 4.5.4. (a-d) on new planting requirement, HCV, legal compliance and labour disputes for Tabin, Northbank and Pelipikan Estate. With regards to the land disputes, the action to address the issues were ongoing. It was evident that in handling uncertified management unit has conducted the Joint Consultation Committee (JCC) meeting on 28/08/2018 (Northbank and Tabin Estate) and 09/04/2020 (Pelipikan Estate) to address unresolved issues. Actions in progress. Further information can be obtained from https://document.rspo.org/Hap Seng Plantations Holdings Bhd AC OP2019.pdf |

| 4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements. | No additional indicators | Yes | The right to use the land at Jeroco 1 CU can be demonstrated and not disputed by any party. Auditor had sighted that there were clear land ownership documents. Land titles were available in documents. The original copies of the documents however, were kept in Plantation Central Office (PCO), Sg. Segama. Copies of land titles for all estates were sighted. All the estates were under the jurisdiction of Kinabatangan District. Review of the land titles show that the requirements that the land title for all the estates namely for cultivation of an agricultural crop of economic value have been complied with. |
|---|--------------------------|-----|---|
|---|--------------------------|-----|---|

Note:

For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;

2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.

^{1.} For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C.

Attachment 4

Details of Non-conformities and Corrective Actions Taken (2020)

| P & C Indicator and Specification | Detail Non-conformances | Corrective Action | Verification by Assessor | | |
|---|--|--|--|--|--|
| Indicator 2.2.3 Minor KN01/2020 | Finding: Contracts agreements does not contain clauses disallowing child, forced and trafficked labour. where young workers are employed, the contracts include a clause for their protection. Objective evidence: Contract Agreement between Jeroco 1 CU and sampled contractors showed no clauses on disallowing child, forced and trafficked labour, and clause for young workers protection (if employed). | Due to new requirement 2018 RSPO P&C, the estate management has missed out the clauses of "disallowing child, forced and trafficked labour and where young workers are employed are protected" in the contract agreement between Jeroco 1 CU and Sundry Shop & Replanting contractor that handled by central office. The contract agreement between Jeroco 1 CU and Estate Shop (Attachment 1a,1b,1c,1d) & Replanting agreements (Attachment 2a) have been immediately included with the clauses of "disallowing child, forced and trafficked labor and where young worker are employed are protected" Sustainability Team will carry out yearly cross checking to ensure the clauses of "disallowing child, forced and trafficked labour and where young worker are employed are protected" are included in the contract agreement whenever there is a new suppliers/contractor. | The contract agreement includes the required. Status: Closed. The effectiveness of the action taken to be verified during the next audit. | | |
| Indicator 7.12.4 (C) Major KN02/2020 | Finding: Records of consultation with relevant stakeholders regarding the developed HCV management plan, includes the directly managed area and any relevant wider landscape level considerations (where these are identified) were not sufficient Objective evidence: Consultations with relevant stakeholders and 6th Stakeholder Consultation Meeting, regarding the developed HCV management plan, includes the directly managed area and any relevant wider landscape level considerations (where these are identified) were not clearly recorded and discussed in "Potential High Conservation Value Area Assessment Report in Lutong Estate, Batangan Estate, Lokan | The developed HCV management plan that including the directly managed area were discussed in the 6th JCC Stakeholder meeting. However, the details of developed HCV management plan were not included in the report due to inadequate understanding of RSPO P&C 7.12.4. The 2020 HCV Management Plan has immediately included the clear record of the matter regarding "the developed HCV Management Plan includes the directly managed area and any relevant wider landscape level considerations (where these are identified)" | The HCV Management Plan has immediately included the clear record of the matter regarding "the developed HCV Management Plan includes the directly managed area and any relevant wider landscape level considerations. The minutes of meeting includes attendance list of various stakeholders, map and frequency of monitoring were included in the report. Status: Closed | | |

| | Estate, Lungmanis Estate and Jeroco Palm Oil Mill 1 (JGOE 1)" during the revision in June 2020. | Estate will ensure the developed HCV management plan (includes the directly managed area and any relevant wider landscape level considerations (where these are identified)) be added into the agenda of JCC Stakeholder meeting and include the details of the developed HCV management plan in the reports. | |
|-------------|---|---|--|
| Indicator | Finding: There was no engagement with adjacent | Due to new requirement 2018 RSPO P&C, the | Minutes of meeting on Engagement with |
| 7.11.3 | stakeholders on fire prevention and control measures. | estate management has missed out to discuss on | Adjacent Stakeholders of conducted in Aug |
| | Objective evidence: | fire prevention and control measures with adjacent | 2020 on the preventive control measures |
| Minor | The were no engagement with adjacent stakeholders | stakeholders during Joint Consultative Committee | and control measure at Lutong Estate has |
| | of Amalania Estate on fire prevention and control | (JCC) stakeholder meeting. | been verified by auditor. This includes |
| MANJ01/2020 | measures at Lutong Estate | The engagement with adjacent stakeholders on the | records of attendance list of the meeting. |
| | | preventive control measures and control measure | |
| | | at Lutong Estate has been immediately conducted | Status: Closed. The effectiveness of the |
| | | in Aug 2020. The estate management will include | action taken to be verified during the |
| | | fire prevention and control measures in their | next audit. |
| | | agenda for future JCC stakeholder meeting. | |

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED (2019)

| P & C Indicator | Specification Major/Minor | Detail Non-conformances | Verification by Assessor |
|-----------------------------------|------------------------------|--|--|
| 2.1.1 NCR RAR 01 2019 | Major | Findings: Recommendation made by OHD was not complied with. Objective evidence: Fail to conduct the recommendation made by OHD (after reviewing the annual and baseline audiograms on 15 & 18/01/2019). They were required to conduct retest for 3 workers who have standard threshold level within three months from the last date of the audiometric. | Audiometric test was carried out annually. The last audiogram was conducted on 21/08/2019 & 11-12/09/2019 for 26 workers/staff by a registered OHD. Results from the assessment were all the workers were fits and need to provide with hearing protector. Status Closed. |
| 6.5.3: NCR RZ 01 2019 | Minor | Findings: Lungmanis Estate did not comply with the requirements of Section 10(3) of the Workers' Minimum Standards of Housing and Amenities Act 1990. Objective evidence: Toddlers placed at the Lungmanis Estate creche are not provided with milk and play equipment. This contravenes Section 10(3) of the Workers' Minimum Standards of Housing and Amenities Act 1990 which requires that on each day a dependant is accommodated at the nursery, he shall be provided by the employer at his own expense with a supply of milk in sufficient quantity and of good quality, and play equipment. | Toddlers placed at the Lungmanis Estate creche was provided with milk and play equipment. Visit to the creche found Dutch Lady and Fernleaf milk were made available, as well as play equipment. Records showed the milk were provided accordingly. Status: Closed. |
| Clause 6.13 NCR MZK 01 2019 | Major | Findings: Management Review has been conducted but not enough to cover the input and output as stated in the indicator. Objective evidence: These were not available: Input: Changes that could affect the management system Output: Improvement of the effectiveness of the management system and its processes & Resource needs. | Management review has been conducted on 11/06/2020 and has covered input that could affect the management system and also include the output review on improvement in the effectiveness of the SCCS system and its process Status: Closed |

ATTACHMENT 6 – Timebound Plan

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

| No. | CU | Location | Date of Certification | Valid until | CAB |
|-----|---|-------------|----------------------------|----------------|------------------|
| 1 | Hap Seng Plantations (River Estates) Sdn Bhd - Sg Segama Group of Estate & Bukit Mas Palm Oil Mill | Lahad Datu | 24/05/2017 | 23/05/2022 | PT TUV Rheinland |
| 2 | Jeroco Plantations Sdn Bhd Jeroco Palm Oil Mill 1 | Lahad Datu | 27/09/2018 | 26/09/2023 | SIRIM QAS |
| 3 | Jeroco Plantations Sdn Bhd Jeroco Palm Oil Mill 2 | Lahad Datu | 27/09/2018 | 26/09/2023 | SIRIM QAS |
| 4 | Hap Seng Plantations (River Estates) Sdn Bhd - Tomanggong Group of Estates | Lahad Datu | 09/01/2020 | 08/01/2025 | SIRIM QAS |
| 5 | Kawa Estate and Hap Seng Estate, Hap Seng Plantations (Ladang Kawa) Sdn Bhd | Tawau | 16/10/2015 | 15/10/2020 | PT TUV Rheinland |
| 6 | Pelipikan Estate | Kota Marudu | 2022 (as per ACOP 2019) | Not Applicable | Not Applicable |
| 7 | Hap Seng Plantations (River Estates) Sdn Bhd – Tomanggong Group Of Estates – North Bank Estate and Tabin Estate | Lahad Datu | 2022 (as per ACOP 2019) | Not Applicable | Not Applicable |