



SIRIM QAS INTERNATIONAL SDN. BHD.
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File Ref. : EB03320001

RSPO PUBLIC SUMMARY REPORT

CLIENT : BOUSTEAD ESTATES AGENCY SDN BHD – TRONG BUSINESS UNIT

PARENT COMPANY : BOUSTEAD PLANTATIONS BERHAD

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

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

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

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

MAP : See Attachment 1

AUDIT DATE : 22-25 September 2020

DURATION : 14 auditor days

TYPE OF AUDIT : ☒ Annual Surveillance Audit 3

☐ Recertification 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 : 21/07/2017 – 20/07/2022

The following attachments form part of this report:

Non-conformity Report(s) ☒

List of additional site(s) ☐

Report by Audit Team Leader

Name : Mohd Zulfakar Kamaruzaman

Signature :

Date : 18 December 2020

Acknowledgement by Client's Representative

Name : MUHAMMAD HAFIZ B. MAMAT

Signature :

Date : 21/12/2020

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SUMMARY OF AUDITS

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

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

Annual Surveillance Audit 2				
On-site audit date :	15-19 April 2019	No. of auditor days :	20	
Audit team :	Mohd Ab Raouf bin Asis (LA), Dzulfikar bin Azmi (A), Mohd Norddin bin Abdul Jalil (A), Ismail Adnan bin Abdul Malek (A) Mohd Zulfakar Kamaruzaman (A) SCCS only			
No. of major NCR :	5	Indicator: 4.6.11, 6.1.1, 6.5.1, 1.1.2, MZK 01 2019 (Supply Chain)	Closing date :	18/07/2019
No. of minor NCR :	4	Indicator : 5.6.3, 4.1.2, 4.8.2, 6.2.3		

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Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities	Suppliers
	/		/	
	Contract workers	NGOs	Govt. agency	Independent growers
	/			
	Indigenous people	Contractor	Others (Please specify)	
	NA			
Supply base sampled :	Batu Pekaka Estate, Malakoff Estate, Kuala Muda Estate, Stothard Estate			
Changes since the last audit :	Refer to Table 1 – Summary below			
Justification of audit planning :	Total allocation of audit man day for Trong BU were: <ul style="list-style-type: none"> • Mill = 4 days (3 days for safety and health, environment, mill best practices, ghg verification, etc) + (1 day for supply chain certification systems) • Batu Pekaka Estate = 4 days, certified area = 897.80ha, for verified safety and health, environment, good agriculture best practices, GHG verification, etc. • Malakoff Estate = 4 days, 1379.80 ha, for verified safety and health, environment, good agriculture best practices, GHG verification, etc • Kuala Muda Estate = 4 days, 1419.00 ha, for verified safety and health, environment, good agriculture best practices, GHG verification, etc • Stothard Estate = 4 days, 983.10 ha , for verified safety and health, environment, good agriculture best practices, GHG verification, etc 			
Report approved by :	Radziah Mohd Daud		Approval date : 26/07/2019	

Annual Surveillance Audit 3					
On-site audit date	:	22-25 September 2020 (14.0 a.d)		No. of auditor days :	19 Auditor Days
Remote audit date	:	9-11 June 2020 (5.0 a.d)			
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Rozaimiee Ab Rahman, Mohd Raouf Asis, Dzulfikar Azmi			
No. of major NCR	:	6	Indicator: 1.1.3, 1.1.4, 2.1.1, 6.2.2, 6.7.3, 7.12.4		Closing date : 14/12/2020
No. of minor NCR	:	3	Indicator : 3.4.2, 6.3.2, 6.7.4,		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities	Suppliers
		X			X
		Contract workers	NGOs	Govt. agency	Independent growers
				X	X
		Indigenous people	Contractor	Others (Please specify)	
		NA	X		
Supply base sampled	:	TRP Estate, BMR Estate, Malaya Estate, Batu Pekaka Estate Suppose to sample Kuala Muda but due to Covid 19 Pandemic-Cluster Sivagangga, changed to Batu pekaka Estate)			
Changes since the last audit	:	No Changes			
Justification of audit planning	:	Total allocation of audit man day for Trong BU were: <ul style="list-style-type: none">• Mill = 3 days (2 days for safety and health, environment, mill best practices, GHG verification, etc) + (1 day for supply chain certification systems)• Batu Pekaka Estate = 2 days, for safety and health, environment, good agriculture best practices, GHG verification, etc.• TRP Estate = 3 day, for safety and health, environment, good agriculture best practices, GHG verification, etc• Malaya Estate = 3 days, , for verified safety and health, environment, good agriculture best practices, GHG verification, etc• BMR Estate = 3 days for verified safety and health, environment, good agriculture best practices, GHG verification, etc• Remote audit = 5 days.			
Report approved by	:	Kamini Sooriamoorthy		Approval date : 18/12/2020	

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	April 2017 – March 2018	April 2018 – March 2019	**April 2019- March 2020	Sept 2020 to August 2021	
Certified FFB Processed (MT)	147,406.07	122,000.00	129,200.00	150,140.00	
Production of Certified CPO (MT)	29,292.94	27,000.00	28,000.00	33,228.00	
Production of Certified PK (MT)	7,000.00	6,500.00	6,500.00	7,394.00	
Certified Areas (Ha)	9,351.20	9,351.20	*8,805.20	8,805.20	
Planted Area (Ha) (Mature + Immature)	8,927.10	8,927.10	8,148.90	8,148.90	
Production Area (Ha) (Planted – Immature)	7,674.40	7,674.40	6,733.30	6,733.30	
HCV Areas	116.30	116.30	116.30	116.30	
REMARKS	<p>*Acquisition land of Malakoff Estate (Land Disposal) in 2019 (ASA2).</p> <p>**This was the projected period based on audit carried out last year. However, during the conduct of ASA 3 in Sept 2020, the actual reporting period has been extended to 15 months as the surveillance audit was delayed due to Covid-19 pandemic restrictions. The actual reporting period i.e. June 2019-Aug 2020 was reflecting the actual stocks and transactions carried out by the CU.</p>				

TABLE 2

	CPO	PK
Last years certified volume (MT)	28,000.00	6,500.00
Last years actual certified sold (MT)	18,359.60	0.00
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	5,044.69	5141.34
New year certified volume (MT)	33,228.00	7,394.00

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1.0

AUDIT PROCESS

1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and 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
Mohd Zulfakar bin Kamaruzaman	Lead Auditor / Supply Chain, Social (Mill), HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C, MSPO and RSPO Supply Chain.
Rozaimie bin Ab Rahman	Auditor / GAP, Safety and Environment (mill), GHG	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, MSPO and RSPO Supply Chain.
Mohd. Ab Raouf bin Asis	Auditor / Social (estate), TBP	Holds a B.Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. Currently he qualified Lead Auditor for RSPO P&C and MSPO.
Dzulfiqar bin Azmi	Auditor / Safety & Environment (Estate)	Holds a B. Sc. in Agriculture from University Teknologi Mara (UiTM). He had several years of working experience in the oil palm operation. He is a qualified auditor for RSPO P&C and MSPO.

1.3 Audit methodology

The audit covered the Trong palm oil mill and three of its supply base. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. Four supply base covered during the audit were TRP Estate, BMR Estate, Malaya Estate, Batu Pekaka Estate (suppose to sample Kuala Muda but due to Covid 19 Pandemic Cluster Sivagangga decided to change to Batu pekaka Estate). The audit included on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the management of Trong BU, employees, contractors, local NGO's and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

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
1) Employees / Workers Organizations (including migrant workers)	<ul style="list-style-type: none"> Workers work 6 days a week with one rest day (Friday). They work 8 hours with a minimum of 30 minutes' break in between. All workers confirmed that they receive a minimum of RM1100 per month. They receive their salaries before 7th of every month. As of the date of this audit, all sampled workers know about Minimum Wages Order 2020. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. Foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent. Some workers satisfied and some of the workers are generally not satisfied with the way complaints lodged are acted upon. There was evidence of some of the payment was not in line with Employment Act 1955, and this was raised in indicator 2.1.1. Workers state that they have been attended to by the Visiting Medical Officer during any of his visits. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer.
2) Settlers	NA
3) Villagers / Local communities (including women representatives, displaced communities)	Penghulu Kampung Terong, Representative Kampung Wawasan, Kampung Salak, MPKK Kg. Pantai Cicar Kanan, Kg. Titi Ijok, Kg Salak Baru, Kg Padang Bola and Kg. Batu Puteh
4) Suppliers	NA
5) Contract workers	Workers interviewed during audit. Several issues noted as highlighted in the findings.
6) Local & national NGOs	NA
7) Government agencies / Statutory bodies	MPOB (Mill)
8) Independent growers / Smallholders	NA
9) Indigenous people	NA
10) Contractor	Countrywide Logistics Sdn Bhd, Good Harvest Sdn Bhd, Sri Naresh Agency Sn Bhd, Nalvam Enterprise, Low Kuan Yew Sdn Bhd
11) Previous land owner (if any)	NA
12) Others (please specify)	NA

1.5 Audit plan:

Refer to Attachment 2.

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1.6 Date of next audit:

The next surveillance audit will be conducted within 12 months but not sooner than 8 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

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

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

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

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

**Table 1: Actual FFB production by the supply base for the reporting period
(June 2019 to August 2020)**

Estates	FFB Production	
	Tonnes	Percentage (%)
Taiping Rubber Plantations Estate	19649.99	14.67
Malaya Estate	16764.22	12.51
Malakoff Estate	6344.24	4.74
Bukit Mertajam Rubber Estate	32265.12	24.08
Kuala Muda Estate	28738.53	21.45
Stothard Estate	11867.77	8.86
BatuPekaka Estate	18350.30	13.70
Total	133,980.17	100.00

**Table 2: Projected FFB production by supply base for the reporting period
(Sept 2020 to August 2021)**

Estates	FFB Production	
	Tonnes	Percentage (%)
Taiping Rubber Plantations Estate	18110	12.06
Malaya Estate	16700	11.12
Malakoff Estate	7750	5.16
Bukit Mertajam Rubber Estate	39600	26.38
Kuala Muda Estate	33000	21.98
Stothard Estate	15110	10.06
BatuPekaka Estate	19870	13.23
Total	150,140.00	100%

**Table 3: Actual FFB received and CPO & PK dispatch by POM for the last reporting period
(June 2019 to August 2020)**

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	133,980.17
FFB Processed	133,980.17
Certified CPO Production	26,542.28
Certified CPO delivered as RSPO	18,359.60
Certified CPO delivered as non-RSPO	5,044.69
Certified CPO delivered under other sustainable schemes	0.00
Certified PK Production	5,698.19
Certified PK delivered as RSPO	0.00
Certified PK delivered as non-RSPO	5,141.34
Certified PK delivered under other sustainable schemes	0.00
Credits traded through Books and Claim	0.00

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**Table 4: Projected FFB received and CPO & PK dispatch by POM for the last reporting period
(Sept 2020 to August 2021)**

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	150,140.00
FFB Processed	150,140.00
Certified CPO Production	33,228.00
Certified PK Production	7,394.00

Table 5: Planted and certified area of the Trong BU

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

Table 6 : Planting profile for Taiping Rubber Plantations Estate

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

Table 7 : Planting profile for Malaya Estate

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

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2013	2nd	Mature	68.70	8.51
2012	2nd	Mature	52.20	6.47
2011	2nd	Mature	63.80	7.91
2010	2nd	Mature	81.80	10.14
2008	2nd	Mature	117.50	14.56
2007	2nd	Mature	100.10	12.41
2006	2nd	Mature	57.60	7.14
Total			806.90	100.00

Table 8 : Planting profile for Malakoff Estate

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

Table 9: Planting profile for Bukit Mertajam Rubber Estate

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

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Table 10: Planting profile for Stothard Estate

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

Table 11: Planting profile for Batu Pekaka Estate

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

RSPO PUBLIC SUMMARY REPORT

Table 12: Planting profile for Kuala Muda Estate

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

2.3 Organizational Information/Contact Person

The details of the contact person is as shown below:

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

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3.0 AUDIT FINDINGS

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

No Changes

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? ☒ Yes ☐ No

If no, comments on the organization's compliance with the RSPO partial certification rules:

- ii. Are there any changes to the organization's time bound plan? ☐ Yes ☒ No

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

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

If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification? ☐ Yes ☒ No

If no, please state reasons NA

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

N/A

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

No

- 3.4 Status of previous non-conformities * ☒ Closed ☐ Not closed*

** If not closed, minor non conformity will be upgraded to major non conformity*

3.5. Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed.

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4.0 DETAILS OF NON-CONFORMITY REPORT

4.1 For P&C (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s) (details refer to Attachment 4)	List : 3	MAR 04 2020 (3.4.2), MZK 01 2020 (6.3.2), DA 02 2020 (6.7.4)
Total no. of major NCR(s) (details refer to Attachment 4)	List : 6	MAR 03 2020 (1.1.3) MAR 01 2020 (1.1.4), MAR 05 2020 (2.1.1) MAR 02 2020 (6.2.2) DA 01 2020 (6.7.3), MZK 02 2020 (7.12.4)

4.2 For SC (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s) (details refer to Attachment 5)	List : -	NA
Total no. of major NCR(s) (details refer to Attachment 5)	List :-	NA

5.0 AUDIT CONCLUSION

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

RSPO PUBLIC SUMMARY REPORT

6.0 RECOMMENDATION

- ☐ No NCR recorded. Recommended to continue certification.
- ☒ Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.
- Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs.*
- ☒ Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.
- ☒ Recommended to continue certification.
- ☐ Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) which have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

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

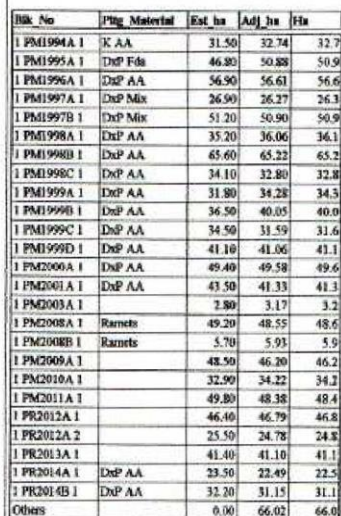
7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.

Audit Team Leader : MOHD ZULFAKAR BIN KAMARUZAMAN
(Name)


(Signature)

14/12/2020
(Date)

Map of Stothard Estate - Trong BU



Remarks.

Est_ha = Current Block area records.

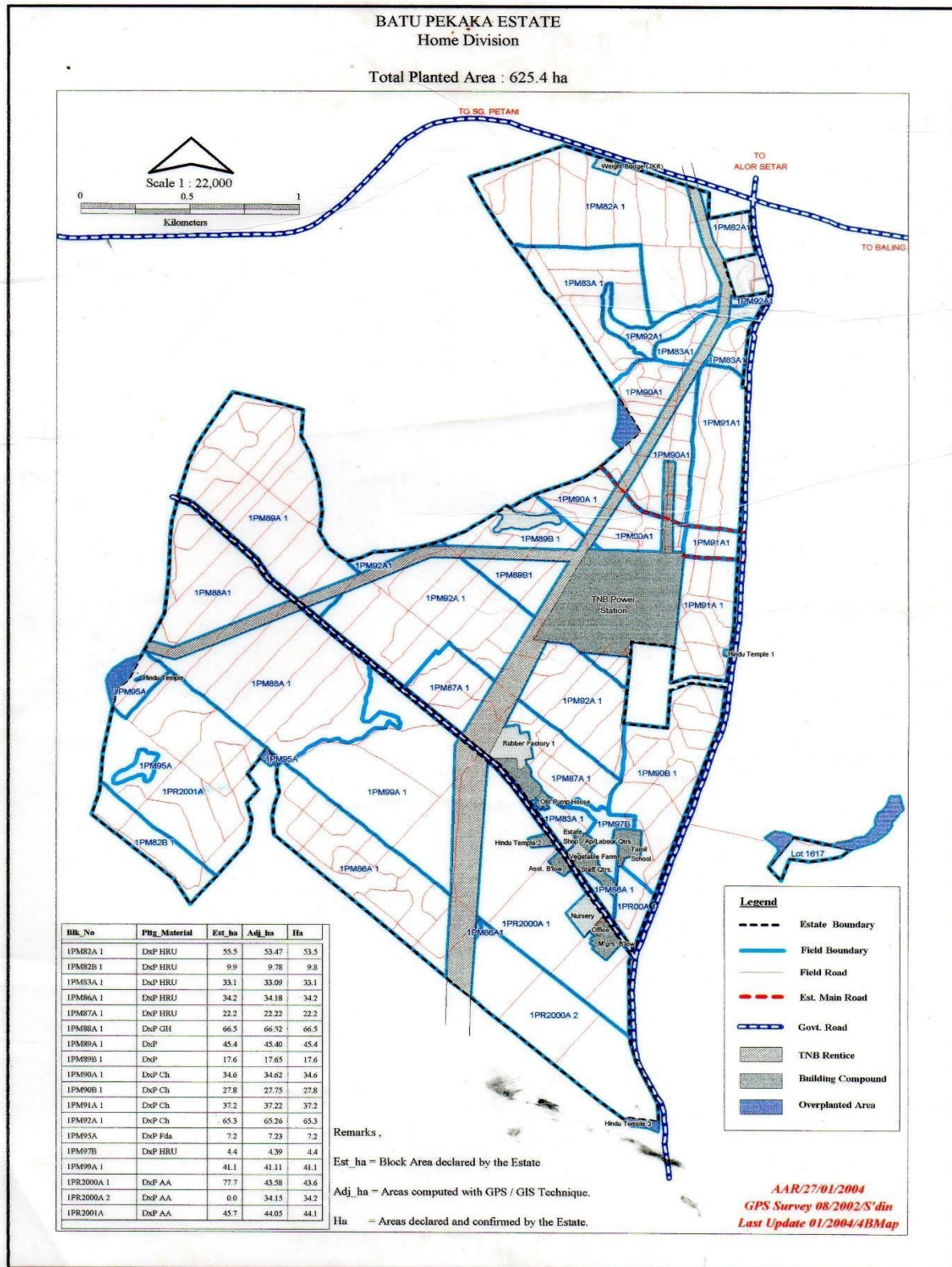
Adj_ha = Block area computed with GPS/GIS.

H1a = Block areas proposed for adoption.

* Coordinate readings in (WGS 84)

RSPO PUBLIC SUMMARY REPORT

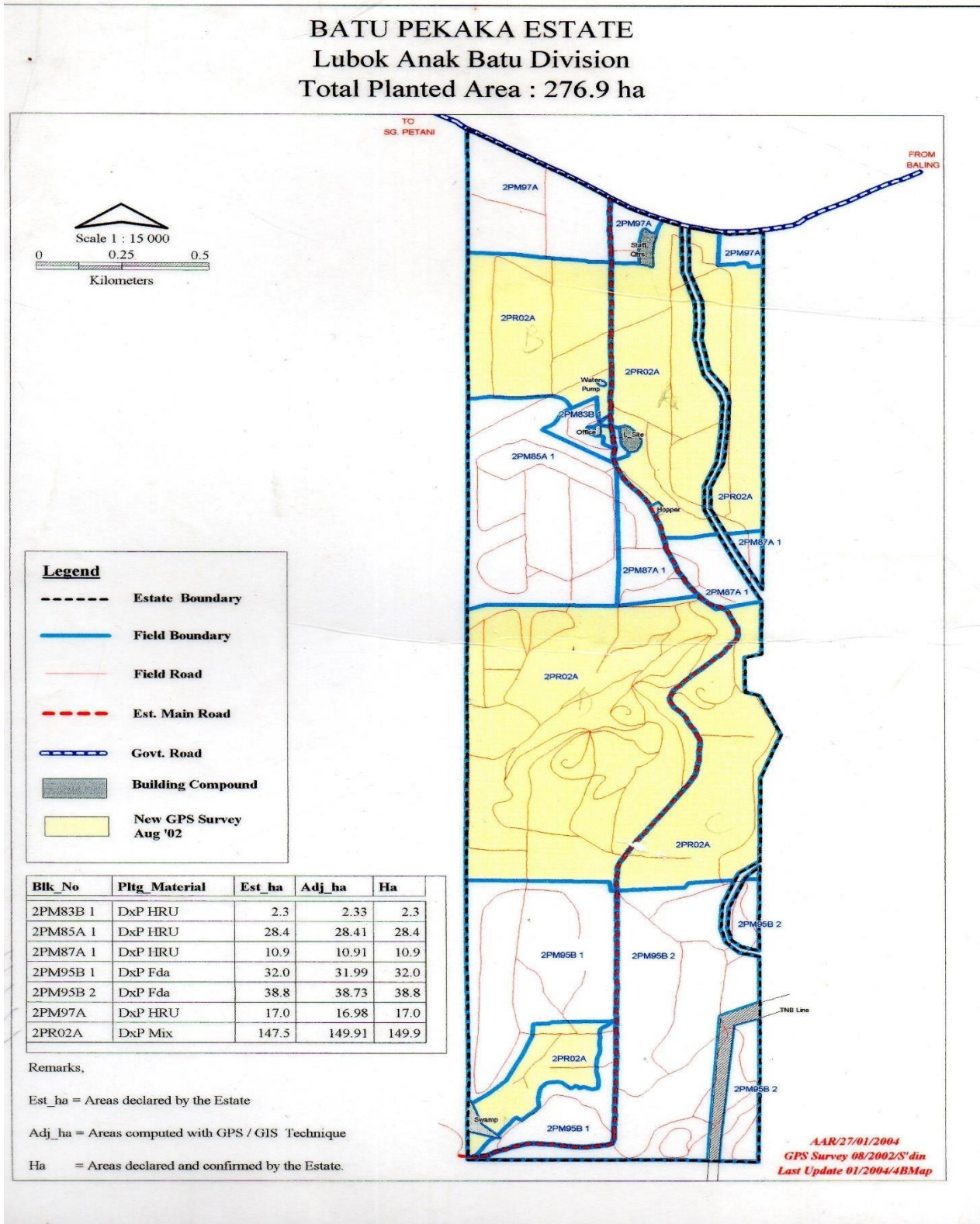
Map of Batu Pekaka Estate (Home Div) - Trong BU



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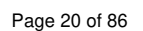
Map of Batu Pekaka Estate (Lubok Anak Batu Div) - Trong BU

BATU PEKAKA ESTATE
Lubok Anak Batu Division
Total Planted Area : 276.9 ha



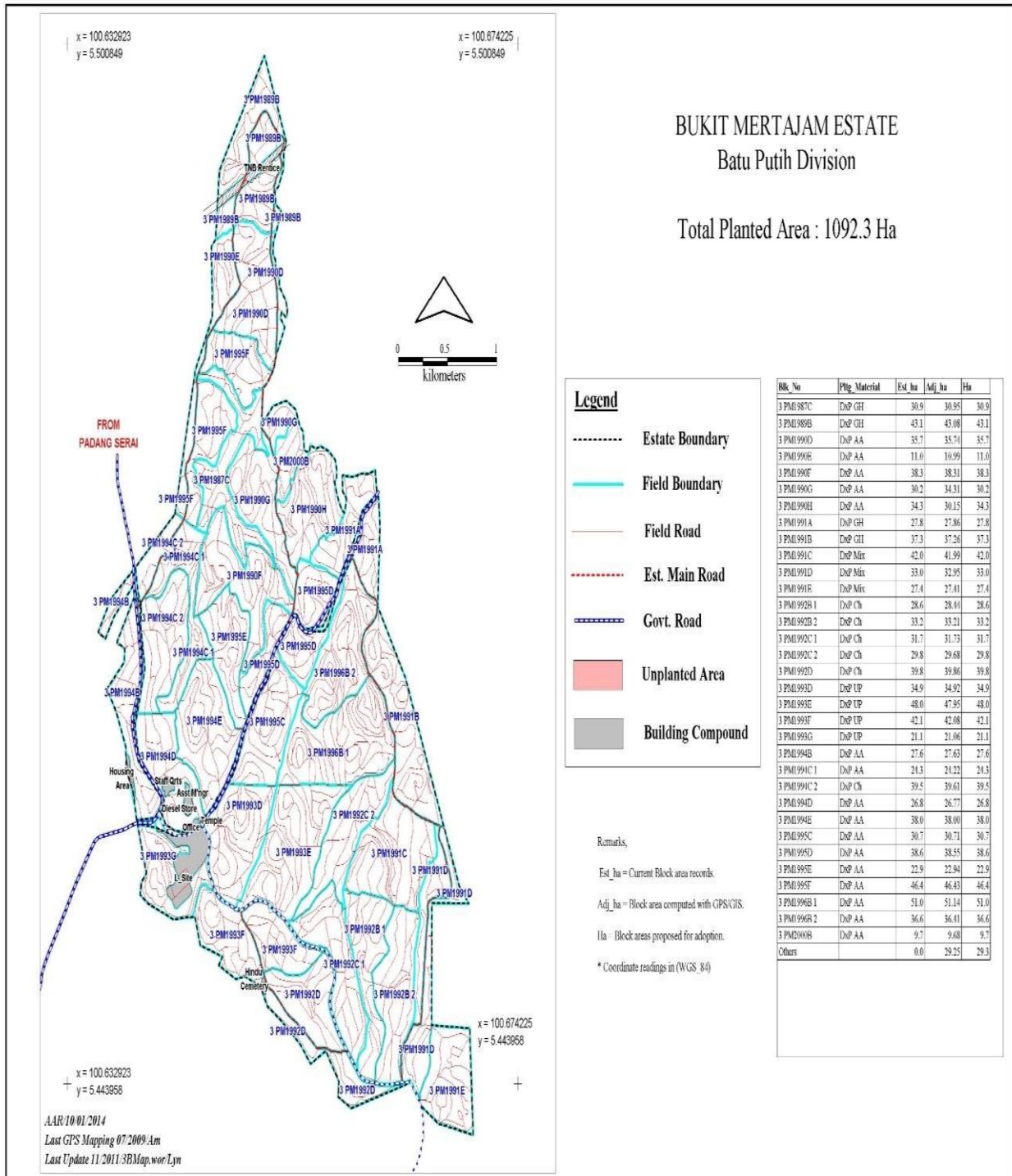
Map of Malakoff Estate (Home Div) - Trong BU

Total Planted Area : 782.2 ha



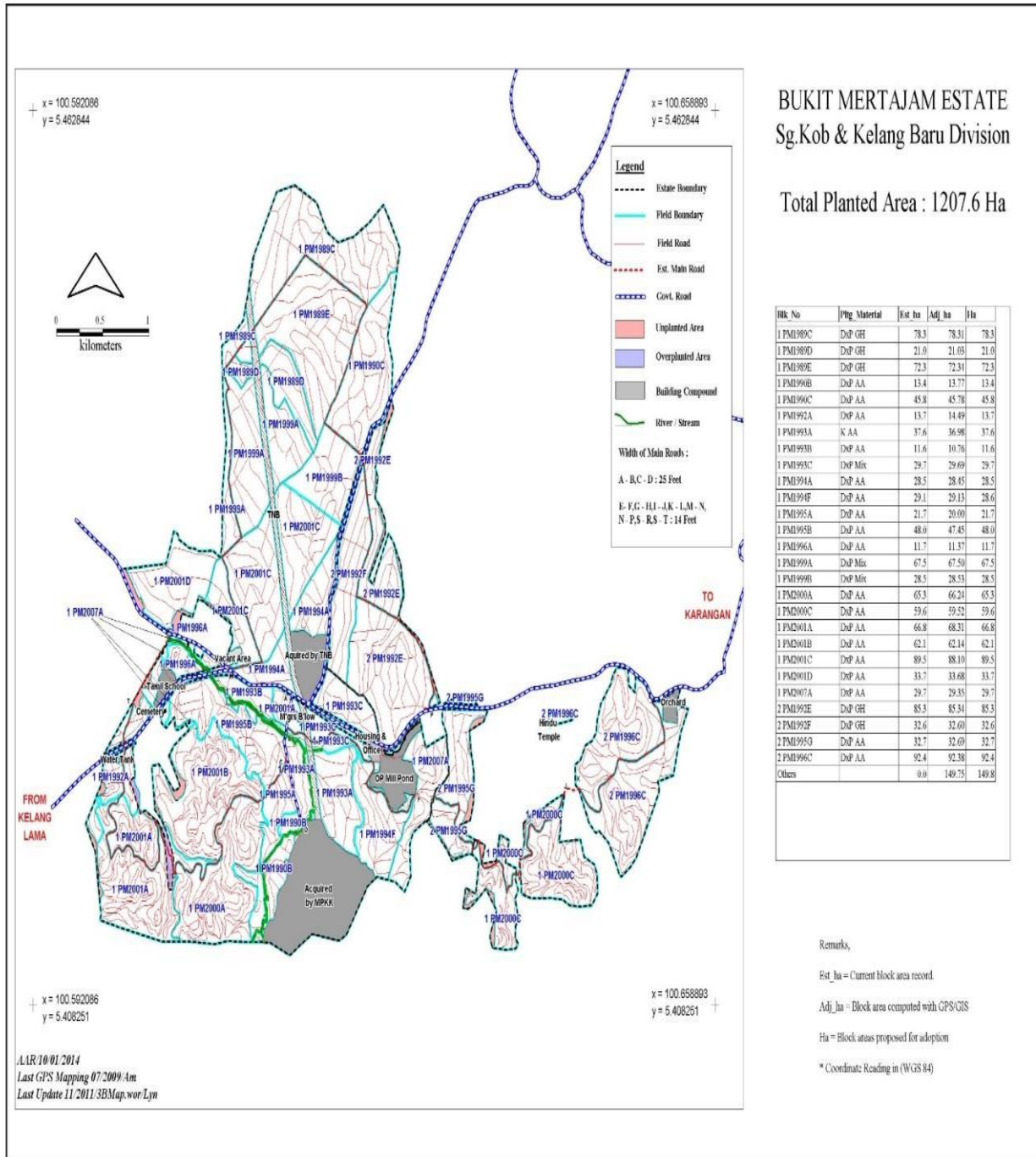
RSPO PUBLIC SUMMARY REPORT

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



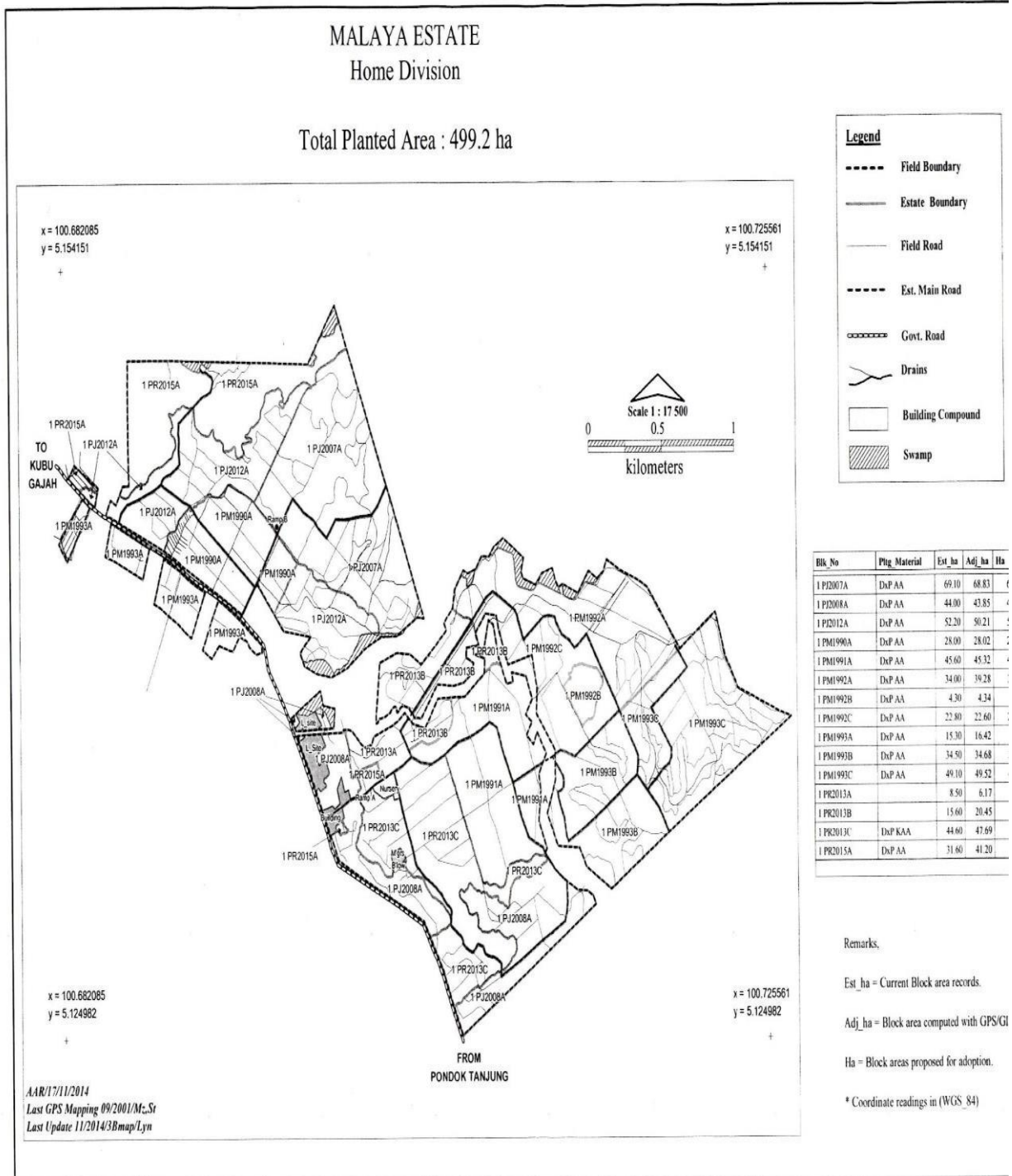
RSPO PUBLIC SUMMARY REPORT

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



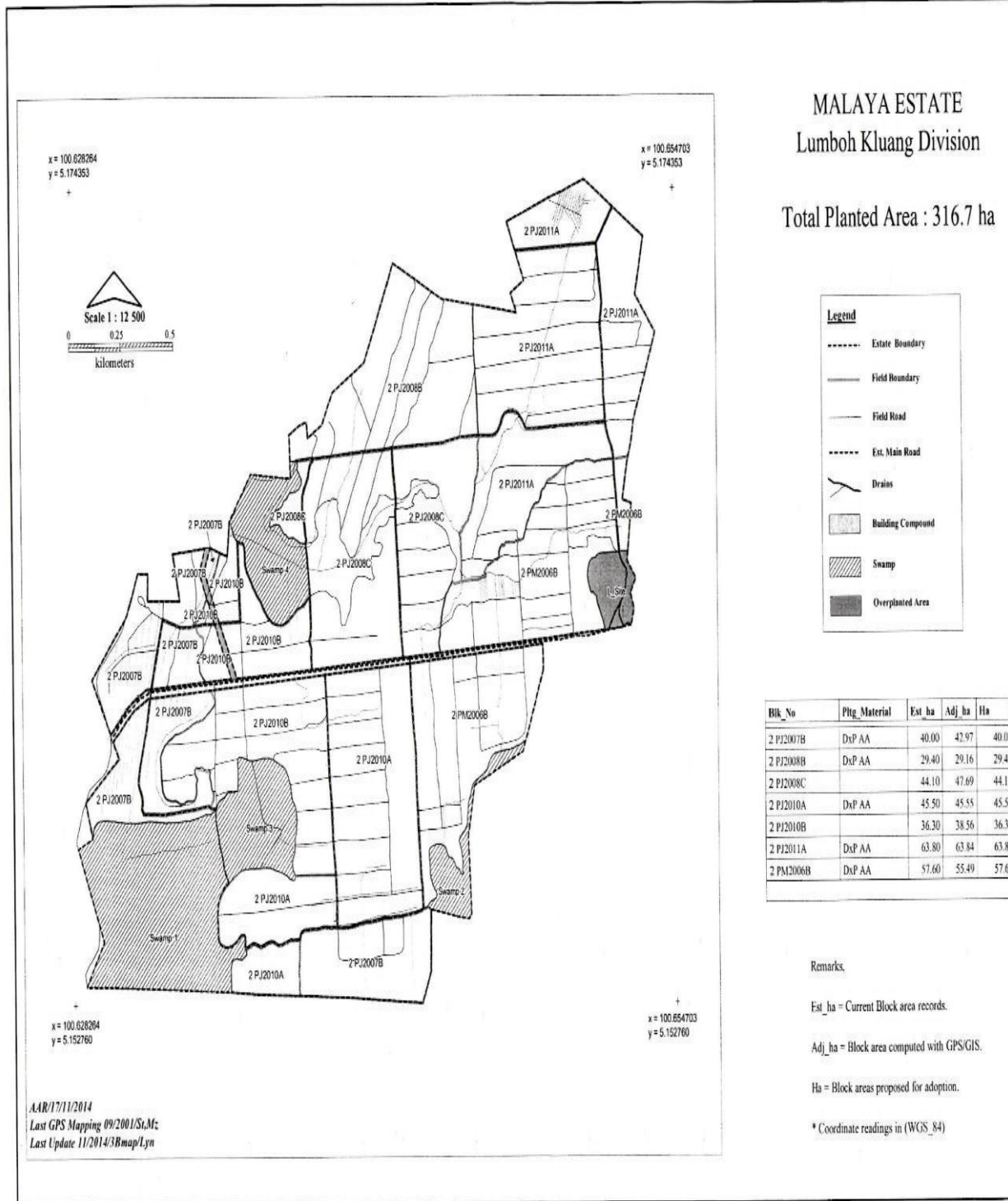
RSPO PUBLIC SUMMARY REPORT

Map of Malaya Estate (Home Div) – Trong BU

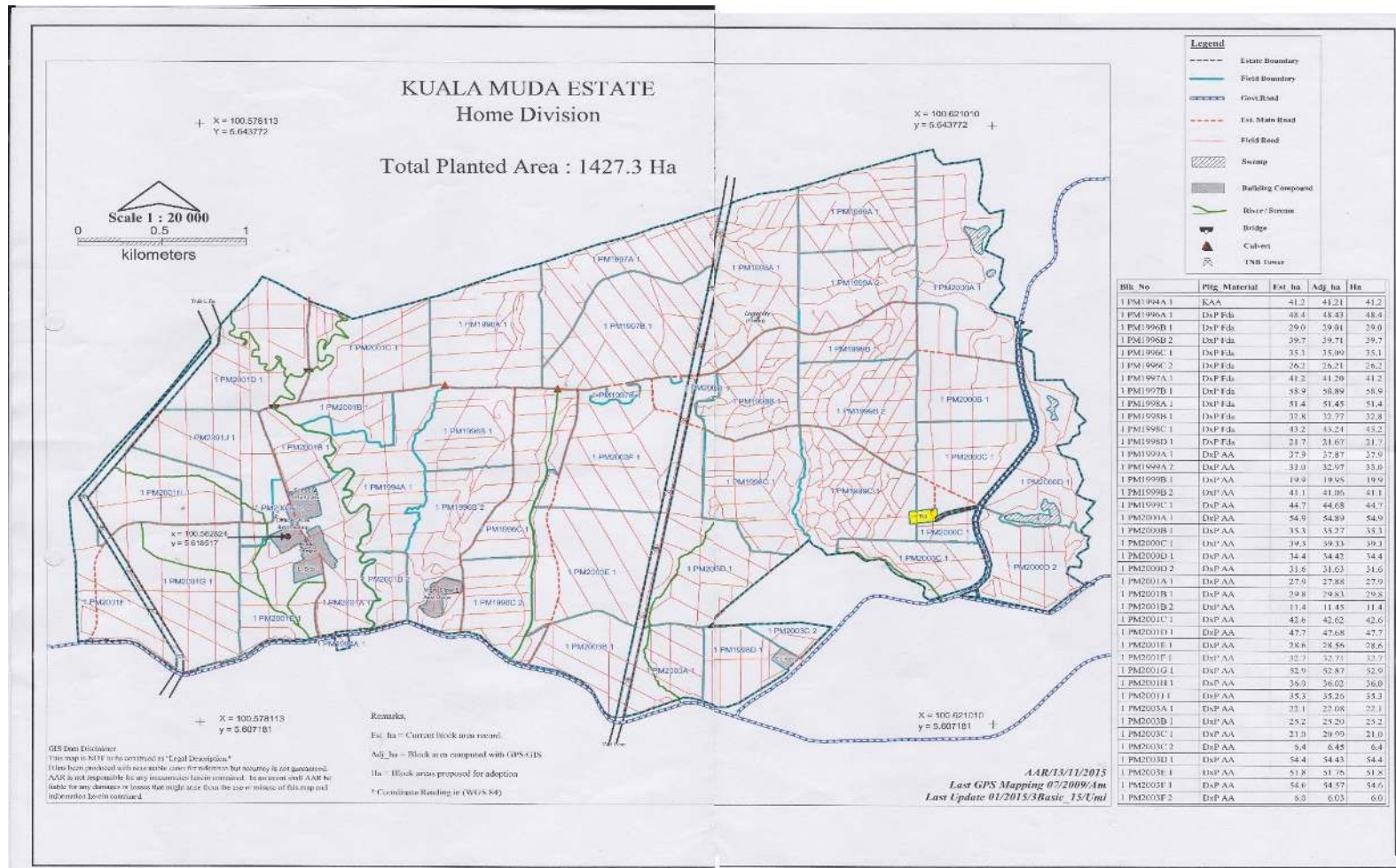


RSPO PUBLIC SUMMARY REPORT

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



Map of Kuala Muda Estate - Trong BU



RSPO SURVEILLANCE 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 : 22-25 September 2020

3. Site of assessment : Boustead Trong Certification Unit;

- (i) Trong POM
- (ii) TRP Estate
- (iii) BMR Estate
- (iv) Malaya Estate
- (v) Batu Pekaka Estate (suppose to sample Kuala Muda but due to Covid 19 Pandemic Cluster Sivagangga decided to change to Batu pekaka Estate)

4. Scope of certification : Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model

5. Reference Standards used :

- (i) RSPO P&C MYNI:2019
- (ii) RSPO Certification Systems, June 2017
- (iii) Company's audit criteria including Company's Manual/Procedures

6. Assessment team members

- (i) Audit Team Leader : Mohd Zulfakar bin Kamaruzaman (Supply chain, Social, HCV)
- (ii) Auditor : i) Rozaimie bin Ab Rahman (Safety, Environment,GAP)
- ii) Mohd Ab Raouf bin Asis (Social, TBP)
- iii) Dzulfiqar Azmi (Safety, Environment)

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

7. **Audit method**

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

8. **Audit Findings**

Audit findings shall be classified as major and/or minor. Major non conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 90 days, the certificate shall be terminated.

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

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

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**

- (i) Language : English
- (ii) Format : Verbal and Written
- (iii) Expected date of issue :2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.

12. **Facilities required**

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

13. Assessment Programme Details :

Day 1: 22/09/2020 (Tuesday)

Time	Activities / areas to be visited				Auditee
9.00am – 9.30am	Opening Meeting at Batu Pekaka <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. 				All
9.30am – 1.00pm	Logistic arrangement				
	To assign each audit team members – site and the P&C requirements				
	DA Batu Pekaka <ul style="list-style-type: none"> Laws and regulations Environmental management Witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Occupational safety & health practice witness activities at site Training and skill development programmes Continuous improvement 	MAR Batu Pekaka <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances Consultation with relevant government agencies Training and skill development programs 	RAR Batu Pekaka <ul style="list-style-type: none"> Commitment to long-term economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. New planting 	MZK Batu Pekaka <ul style="list-style-type: none"> Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone HCV Assessment management plan & implementation Training and skill development programs Continuous improvement Time bound plan and uncertified management units Land titles user rights 	Guide(s) for each auditor
1.00pm – 2.00pm	LUNCH BREAK				All
2.00pm – 5.00pm	Continue assessment / MZK and RAR go to BMR				Guide(s) for each auditor
5.00 pm	Audit team discussion / End of Day 1 audit				All

Day 2: 23/09/2020 (Wednesday)

Time	Activities / areas to be visited				Auditee
8.00am – 1.00pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	DA	MAR	RAR	MZK	Guide(s) for each auditor
	<u>BMR</u> <ul style="list-style-type: none"> ▪ Laws and regulations ▪ Environmental management ▪ Witness activities at site ▪ Waste & chemical management ▪ Interview with workers, safety committee and contractors ▪ Facilities at workplace ▪ Occupational safety & health practice witness activities at site ▪ Training and skill development programmes ▪ Continuous improvement 	<u>BMR</u> <ul style="list-style-type: none"> ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Linesite inspection ▪ Complaints and grievances ▪ Consultation with relevant government agencies ▪ Training and skill development programs 	<u>Malaya</u> <ul style="list-style-type: none"> ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ New planting 	<u>Malaya</u> <ul style="list-style-type: none"> ▪ Inspection of protected sites with HCV attributes ▪ Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone ▪ HCV Assessment management plan & implementation ▪ Training and skill development programs ▪ Continuous improvement ▪ Time bound plan and uncertified management units ▪ Land titles user rights 	
1.00pm – 2.00pm	LUNCH BREAK				All
2.00pm – 5.00pm	Continue assessment / MZK and RAR go to TRP				Guide(s) for each auditor
5.00pm	Audit team discussion / End of Day 2 audit				All

Day 3: 24/09/2020 (Thursday)

Time	Activities / areas to be visited				Auditee
8.00am – 1.00pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	RAR	MZK	DA	MAR	Guide(s) for each auditor
	<u>POM</u> <ul style="list-style-type: none"> ▪ Laws and regulations ▪ Environmental management ▪ Witness activities at site ▪ Waste & chemical management ▪ Interview with workers, safety committee and contractors ▪ Facilities at workplace ▪ Occupational safety & health practice witness activities at site ▪ Training and skill development programmes ▪ Continuous improvement ▪ GHG assessment 	<u>POM</u> <ul style="list-style-type: none"> ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Linesite inspection ▪ Complaints and grievances ▪ Consultation with relevant government agencies ▪ Training and skill development programs 	<u>Malaya</u> <ul style="list-style-type: none"> ▪ Laws and regulations ▪ Environmental management ▪ Witness activities at site ▪ Waste & chemical management ▪ Interview with workers, safety committee and contractors ▪ Facilities at workplace ▪ Occupational safety & health practice witness activities at site ▪ Training and skill development programmes ▪ Continuous improvement 	<u>Malaya</u> <ul style="list-style-type: none"> ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Linesite inspection ▪ Complaints and grievances ▪ Consultation with relevant government agencies Training and skill development programs 	
1.00pm – 2.00pm	LUNCH BREAK				All
2.00pm – 5.00pm	Continue assessment				Guide(s) for each auditor
5.00pm	Audit team discussion / End of Day 3 audit				All

Day 4: 25/09/2020 (Friday)

Time	Activities / areas to be visited				Auditee
8.00am – 1.00pm	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	RAR	MZK	DA	MAR	Guide(s) for each auditor
	POM Site visit and assessment on Supply Chain Implementation including the: <ul style="list-style-type: none"> Model used General Chain of Custody System Requirements for the supply chain Documented procedures Purchasing and goods in Outsourcing activity Sales and goods out Processing Records keeping Registration Training Claims 	POM <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Land titles user rights Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances Consultation with relevant government agencies Training and skill development programs 	TRP <ul style="list-style-type: none"> Laws and regulations Environmental management Witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Occupational safety & health practice witness activities at site Training and skill development programmes Commitment to long-term economic and financial viability Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. New planting Continuous improvement 	TRP <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances Consultation with relevant government agencies Training and skill development programs 	
1.00pm – 2.00pm	LUNCH BREAK/Friday Prayer				All
2.00 – 3.30 pm	Continue Assessment				
3.30 pm – 4.30 pm	Audit Team discussion and preparation of assessment findings				Auditor
4.30 pm – 5.00 pm	Closing meeting at CU / End of audit.				All

MALAYSIA NATIONAL INTERPRETATION 2019 FOR RSPO PRINCIPLE & CRITERIA 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 languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Trong CU continued to implement the procedure for responding to any communication as outlined in their Estate/Mill Quality Management System documents. The records of communication were identified and maintained in different files depending on the stakeholder. Among the records reviewed were correspondences with the authorities and employees. The CU continued to use internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Boustead Plantation website at http://www.bousteadplantations.com.my/home.html
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The Trong CU continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Boustead has revised their website, http://www.bousteadplantations.com.my/home.html to include all management documents relating to the unit's environmental, social and legal issues demonstrating commitment towards compliance to RSPO criteria.
	1.1.3 (C) Records of requests for information and responses are maintained.	NO	The estate and mill continued to maintain the records of requests for information and responses are maintained which included the government agencies, schools, local communities, etc. However, certain records of requests for information and responses are not maintained. During the audit at one of the estates, it was found out that the management did not maintain relevant documents for information i.e payslips, passport, work permits and daily attendance for the contractor workers. Therefore, Major NCR MAR 03 2020 has been raised against this indicator.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	NO	Consultation and communication procedures not implemented and explained to all relevant stakeholders i.e contractor workers. Based on interview held with contractor workers at the estates, the contractor workers did not know about the consultation and communication procedures that caused several grievances not attended. Therefore, Major NCR MAR 01 2020 has been raised against this indicator.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The list of stakeholders for Trong CU are maintained, and made available during the audit. The stakeholders list at Trong CU's are including the contractors, vendors, neighbouring estates/smallholders, villagers and government agencies Records of communications are documented and filed. Records also show actions taken in response to inputs from stakeholders, and that efforts are made to ensure understanding by affected parties.

Clause	Indicators	Comply Yes/No	Findings
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	Documented code of ethical conduct and integrity titled 'Code of Ethics and Conduct' maintained and had been communicated to all level of the workforce of the Trong CU.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	In addition, Boustead Plantation Berhad (BPB) also has a Vendor CODE of ETHICS & CONDUCT which has been developed to outline the standards of behaviour required by Boustead Plantation Berhad's vendors which includes expectation to uphold human rights. The Vendor COBC applies to all its suppliers, consultants, agents, contractors /service providers who have direct dealings with the Group.

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.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	NO	Boustead Trong complied with most of the applicable legal requirements except, these legal reqs.i.e. Employment Act 1955 section 19 (1), section 60 (3) (a) (ii) and section 60F (1) (b) (aa). Therefore, Major NCR MAR 05 2020 has been raised against this indicator.
	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	At Trong CU have a documented system for identifying, updating and tracking changes in legal requirements and monitoring the status of the legal compliance. Document titled "Legal and Other Requirements Register (LORR)" maintained available at Trong CU. The document last updated in Feb 2020 by Sustainability Boustead HQ.
	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	Boundary markers/ marking pegs were available to identify the boundary and were satisfactorily maintained.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	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.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	Evidence of legal due diligence carried out include getting the vendors to sign the undertaking to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption."

Clause	Indicators	Comply Yes/No	Findings
	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.	YES	All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons.
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: <ul style="list-style-type: none"> 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	Fresh Fruit Bunches are supplied from Boustead Plantation Berhad owned estates which are certified to RSPO. Trong POM also is an Identity Preserved Mill. All Information available.
	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	Fresh Fruit Bunches are supplied from Boustead Plantation Berhad owned estates which are certified to RSPO. Trong POM also is an Identity Preserved Mill. Thus, there is no indirectly Sourced FFB used.

Principle 3: Optimise productivity, efficiency, positive impacts and resilience

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 economic and financial viability.	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 business plan and budget were available and kept in soft copy. The documents were categorised as confidential. Information in the documents were sighted and briefed by the Estates/Mill Managers. Generally, the estates business plan was towards sustainable business and prepared in a 3 to 5 year horizon.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Updated once a year and 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	The management review meeting for Boustead Trong CU which were held in Sept 2020 attended by all the managers. It was chaired by Sustainability Chairman. Management has transparently addressed the continuous suitability, adequacy, and effectiveness of the requirements for effective implementation of RSPO.

Clause	Indicators	Comply Yes/No	Findings
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	The management documents in relation to environmental and social plans and impact assessments implemented by the CU were made available and maintained at all audited operating units. The documents among others as listed below; a) Social Impact Assessment b) Management Plan on Social Impact Assessment – Year 2020 c) Environmental Impact and Aspect Assessment & Pollution Prevention Plans 2020 d) Identification of All Pollution Source – Year 2019/2020 e) Identification and Management of Waste – Year 2019/2020 f) Identification & Management of Wastewaters 2018 to 2022 g) Contingency plan during water shortage – Year 2019/2020 h) Water management plan – Year 2019/2020
	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.	N/A	NOT APPLICABLE
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	The Oil Palm Circular (O.P.C) is the manual used for the operations in the estate. The manual is maintained and updated accordingly. The latest update was carried out in March 2019. The manual covered all activities in the estates from seedlings in nursery to planting in the fields, field maintenance, harvesting and dispatch of FFB to the Mill.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by Trong CU are internal audits conducted by Sustainability Team.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	a) Relevant records on implementation and monitoring of OPC and other SOPs at the CU were clearly verified by all levels of the supervisory personnel with records maintained and checked.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	Remote Boustead Trong CU has established its environmental aspects/impacts register associated with their activities. The environmental aspect and impact (EAI) covers the upstream activities such as FFB reception until the downstream processes. At the mill, the identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental receptors are the air emission from the boiler stack, the generation of the palm oil mill effluent (POME) and land contamination which related to the management of scheduled wastes and domestic waste. For all estates, among the environment aspects assessed were agrochemical applications, land and water contamination from hazardous material and farm vehicles, human settlement disturbance and abandonment areas. SIA for Trong Certification Unit Unit was carried out by external consultants in 2016. Potential impact factors covered included stakeholder mapping, employment conditions,

Clause	Indicators	Comply Yes/No	Findings
regularly updated in ongoing operations.			living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations.
	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.	NO	The EIA review process had included stakeholders' consultation with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done had involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighbouring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting. However, the social management and monitoring plans have been developed without participation of affected stakeholders. During documentation review at Batu Pekaka Estate, Bukit Mertajam Rubber Estate, Malaya Estate and Taiping Rubber Plantation, there was found that social management and monitoring plans have been developed without participation of affected stakeholders i.e contractor's workers. Therefore, Major NCR MAR 04 2020 has been raised.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	The SIA plans for Trong CU was reviewed on yearly basis and updated as necessary. The review was conducted with the participation of affected parties such as local communities, NGO's, government agencies, internal stakeholders (Workers, Staff) and contractors. The plan was reviewed on yearly basis. Environmental Plans for mitigation of negative impacts have been established. A timetable with responsibilities for mitigation and monitoring was reviewed and updated accordingly. It was noted that stakeholders meeting were held by the CU to gather inputs during the the process of reviewing and updating the Social and Environmental Management Action Plan for 2020.
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 documented and made available to the workers and their representatives.	YES	Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Hiring of Local workers/Carta Alir Proses Pengambilan Pekerja Trong CU. The procedure details out the process of hiring (application form, screening, interview, requisition approval from HR Manager/Estate Manager, medical check-up and issuance of letter of offer). This procedure was confirmed by a Mill Manager at the Trong CU verified through the worker's personal file. For foreign worker, the employment procedures are contained in Standard Operating Process & Procedures dated in Nov 2017. Employment procedures for retirement and termination are available in the local workers' employment contracts. Similarly, foreign workers' contracts also contain provision for mutual termination. Retirement procedure is not applicable to FWs.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Employment procedures were implemented, and records were maintained. 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.
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	The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Trong CU have conducted the risk assessment on all its operation as well as determining their control measures.

Clause	Indicators	Comply Yes/No	Findings
documented, effectively communicated 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 health and safety (OHS) management plan for Trong CU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2019/2020 were acceptable.
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.	YES	Formal training programmed for 2020 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need has been established with target dates for the training identified.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Trong CU continued to train its executives, staff and workers. Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.
	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	Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in Feb 2020 for transporters and June 2020 which has been attended by 12 person including PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme. Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the	YES	Trong Palm Oil Mill (TPOM) sourced for their FFB only from estates under the same CU which involve Boustead estate. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. Details as in Table 3 of this report.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.		
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	YES	Not applicable since this is IP Mill
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification 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.	YES	This has been made available, as in Table 4 of this report.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Boustead Estates Agency Sdn. Bhd. -Trong Business Unit Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>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:</p> <ul style="list-style-type: none"> • 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 non-certified FFBs. 	YES	<ul style="list-style-type: none"> - The Supply Chain Procedure was revised December 2019, the said procedure was sighted and found all elements of the RSPO Supply Chain standard were covered. The revised procedure has addressed that for palm products despatch i.e CPO and PK, need to perform quality test on individual consignment. - The procedure was kept in file RSPO Supply Chain Manual (SCM/RSPO/SD). Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) conducted. - The RSPO Chairman has the overall responsibility and authority over the implementation of the supply chain requirements. It was noted RSPO Chairman has assigned Trong POM Manager to ensure the implementation of supply chain procedure met the RSPO requirements. Interviewed with relevant person in-charge at critical control point was revealed they are understood on the RSPO standard requirements which requires no mixing of RSPO certified and non RSPO certified material in receiving, processing, storage and delivery - Trong POM has implemented Clause 7.0 – Purchasing and Goods In <i>RSPO: Supply Chain Standard</i> for receiving and processing certified and non-certified FFBs. No non-certified product has been received by the Trong POM as this is an IP Mill.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. 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. 	YES	<p>As describe under para 14.0 SOP, RSPO: Supply Chain, the audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements. RSPO internal audit was conducted in Sept 2020 (delay due to Pandemic covid 19) by the internal lead auditor. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	<p>Trong POM had continued to receive certified FFB from own Estate Which is TRP estate, Kuala Muda estate, Malaya estate, Stothard Estate, Batu Pekaka Estate, BMR Estate and Malakoff estate. The validity of the certificate of the supplier has been checked accordingly. No overproduction. Sighted sample FFB consignment note for TRP estate, Kuala Muda estate, Malaya estate, Stothard Estate, Batu Pekaka Estate, BMR Estate and Malakoff estate. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as <i>"Identity Preserved Records for Oil Mills"</i> has recorded the tonnage of certified FFB and its supplying estate.</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number 	YES	<p>Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket.</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill 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 mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	<p>The only 3 outsource company CPO and PK transporter and all of them have signed the agreement. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them.</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contact person for both transporters were made available and up-to-date in the stakeholder list.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	ii) 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 was maintained for more than 10 years.
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	Trong POM has maintained the continuous accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. The data was the summary from their daily template as mentioned above.
	iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> • Shall record and balance all receipts of RSPO certified 	YES	Not Applicable since this mill is IP Mill

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <ul style="list-style-type: none"> All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.) 		
3.8.13	<p>Extraction rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	YES	<p>Trong POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Statement 2020) to ensure their accuracy as well as monitoring of their ongoing performance.</p>
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	YES	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil</p>	YES	<p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Boustead Estate Agency Sdn Bhd., Marketing Department (HQ) on behalf of Trong POM. For traceability of a specific batch of RSPO certified CPO back to the supplying POM, documentation were available.</p>

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>	YES	The registration of transaction being carried out by Marketing Department (HQ). Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).
3.8.17	Claims - The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Trong POM has not use RSPO corporate logo as well as trademark logo.

Principle 4: Respect community and human rights and deliver benefits

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 cert. respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	All the estates and the mill adopt the Human Rights Policy, which, among others, respects human rights and will not be complicit in human rights infringement, prohibits retaliation against Human Rights Defenders.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As observed during the audit, and in interviews held with local communities and workers, there is no evidence of instigation of violence, harassment in any of the operations at Trong CU.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	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 whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	The mutually agreed system or SOP titled 'Consultation and Grievances Communication Procedure Internal/External' open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensure anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. This procedure is open to all employees and stakeholders. The documented system comes in the form of complaints form/book where complainant can fill up and submit to the office.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting. For foreign workers, the procedure was explained during initial report for duty with assistance of translators.
	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	Trong CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.

Clause	Indicators	Comply Yes/No	Findings
	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 Trong CU in resolving disputes and grievances exists in the procedure called ' <i>Prosedur Cara Cara Mengemukakan Aduan</i> ' and ' <i>Prosedur Aduan/Pendapat</i> '. The Mill and Estates within TBU each has its own Internal Complaint Form/Book and External Communication/Complaint Form/Book available.
4.3 The unit of cert. contributes to local sustainable development 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 were evident.
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 a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	Trong Business Unit maintains and complies with the terms of the land title. The land titles specified the purpose of the planting for either oil palm or agricultural crops for economic value.
	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 of this checklists, it has been verified that the land is now legitimately owned by Trong CU since 1950-1980. The audit team had confirmed that there were no land issues related to previous owners.
	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 of this checklists, it has been verified that the land is now legitimately owned by Trong CU since 1950-1980. The audit team had confirmed that there were no land issues related to previous owners.

Clause	Indicators	Comply Yes/No	Findings
	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 4.4.1 of this checklists, it has been verified that the land is now legitimately owned by Trong CU since 1950-1980. The audit team had confirmed that there were no land issues related to previous owners.
	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 4.4.1 of this checklists, it has been verified that the land is now legitimately owned by Trong CU since 1950-1980. The audit team had confirmed that there were no land issues related to previous owners.
	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 (including neighboring communities where applicable, and relevant authorities).	YES	As reported in 4.4.1 of this checklists, it has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. 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	This requirement in this indicator does not apply to Trong CU.
	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	This requirement in this indicator does not apply to Trong CU.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	This requirement in this indicator does not apply to Trong CU.

Clause	Indicators	Comply Yes/No	Findings
4.5 No new plantings are established on local peoples' land 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 representative institutions.	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 Trong CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. The audit team had confirmed that there were no land issues related to previous owners.
	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 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	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 entered into voluntarily and carried out prior to new operations.	YES	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	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 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.

Clause	Indicators	Comply Yes/No	Findings
	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 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring 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 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring 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 15/11/2018. 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, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative	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 Prosedur Penentuan Hak Pemilikan Tanah / Procedure in resolving land conflict'. The CU had also developed a SOP - Fair Compensation in order to handle any issues related with compensation. In accordance with the 'Prosedur Penentuan Hak Pemilikan Tanah' and SOP - Fair Compensation, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Boustead Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	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	In accordance with the "Prosedur Penentuan Hak Pemilikan Tanah" and SOP - Fair Compensation, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers.

Clause	Indicators	Comply Yes/No	Findings
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 was no scheme small holdings at Boustead Trong CU. The Fresh Fruit Bunches are supplied from Boustead 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 acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	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 'Prosedur Penentuan Hak Pemilikan Tanah' and SOP - Fair Compensation. In accordance with the 'Prosedur Penentuan Hak Pemilikan Tanah' and SOP - Fair Compensation, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Boustead Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	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 and neighbouring estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
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,	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	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.

Clause	Indicators	Comply Yes/No	Findings
customary, or user rights.	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 (see Criteria 4.2 and 4.6) 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.
	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 (Indicators 4.4.2, 4.4.3 and 4.4.4).	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 (including neighboring communities where applicable).	YES	There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders.

Principle 5: Support smallholder inclusion

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 transparently with all smallholders	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	Currently the records of Current and previous period prices paid for FFB are not available since this mill is IP mill.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	No outsider FFB supplies are received from smallholders at Trong BU as this mill is Identity Preserved mill, and therefore this Indicator is not applicable.

Clause	Indicators	Comply Yes/No	Findings
(Independent and Scheme) and other local businesses.	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	In Trong POM Price for FFB adopted the MPOB Pricing. All prices are calculated by the MPOB and the mill take the price and follow what MPOB guided. No outsider FFB supplies are received from smallholders at Trong BU as this mill is Identity Preserved mill, and therefore this Indicator is not applicable.
	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	Not applicable.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	Not applicable.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	Interviews conducted with contractors and suppliers representatives had confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Trong CU has been calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn Bhd in May & Aug 2020.
	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	Boustead Plantation 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. Noted that Trong CU has invited nearby smallholder to promote on RSPO certification. But some smallholder are willing to go for MSPO only.
	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 CU also has developed a Standard Operating Procedure (SOP) on Stakeholder Consultation. It contains procedures for consultation and discussions, solving issues/grievances, records and improvements, which is the responsibility of the Manager and Assistant Manager. It also stipulates that issues and grievances can be raised via comments, complaints, or request for information, and that all issues are to be resolved

Clause	Indicators	Comply Yes/No	Findings
			fairly and within the stipulated timeframe. The SOP also states that Master List of Documents must be available for stakeholders' reference. This SOP are being exhibited at the office notice boards at muster grounds. As at to date there is no complaint by stakeholders.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	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	For Trong POM, being an Identity Preserved Mill, Trong Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.
	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, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	Yes	For Trong POM, being an Identity Preserved Mill, Trong Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	For Trong POM, being an Identity Preserved Mill, Trong Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	For Trong POM, being an Identity Preserved Mill, Trong Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	For Trong POM, being an Identity Preserved Mill, Trong Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.

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 Boustead Equal Opportunity Policy updated in 2 nd December 2019. This Policy states Boustead Policy on equal opportunity in all aspects of its employment including recruitment, training and promotion. The Policy identifies under-represented groups where they are encouraged to apply for training and employment opportunities with the Company, and that where possible, special training will be provided for such groups to prepare them to compete on equal terms for jobs and promotion.
	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	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against. Interviews conducted with workers (male, female, local and migrant) as well as local communities also confirmed that this is so. There is also no evidence of payment of recruitment fees by migrant workers.
	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	As stipulated in the contracts, Job Description and Yearly Salary Scale for workers and Staff the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs. For monthly paid employees, interviews are done by Estate Manager/Mill before a panel of interviewers who would objectively assess the candidate for suitability. Promotions are based on recommendations, Years of service and performance.
	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	As of the date of the audit, there is no pregnant worker at Trong CU. As confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test was done on her own free will. During interview it was confirmed that if they require contact with chemicals, they will allocate to other light works.
	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	Chairman of Gender Committee called 'Persatuan Wanita' at each sites responsible in handling and channeling issue to management, if any. Management has directed chairman of gender committee to respects and protects anonymity and complainants where requested. Complainants can submit in their complaint either in writing or verbally. Workers interviewed know that they can either complaint to their immediate supervisor, or if they wish, to the estate management. A functioning grievance mechanism is in place. The Workers Representative and Gender Committee also looks into allegation of discrimination if reported. Interviews with local workers, foreign workers and female employees confirm that there was no evidence of any form of discriminatory practices by the Trong CU.

Clause	Indicators	Comply Yes/No	Findings
	6.1.6 There is evidence of equal pay for the same work scope.	YES	Comparisons were made of sampled employment contracts and payslips of harvesters from local and harvesters from Indonesia. Evidence is available that sampled workers receive equal pay for equal work.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	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	Trong CU documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthly pay slips and employment contracts were made available and reviewed during the audit. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction. Malaya Estate:
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	NO	The employment contracts and pay slip between unit of certification/contractor and employees does not detailing the conditions of employment e.g regular working days, deductions, overtime, sick leave, holiday entitlement in compliance with national legal requirements. These have been based on samples taken at following estates: Bukit Mertajam Rubber Estate, Malaya Estate and Taiping Rubber Plantation Estate. Therefore, NCR Major MAR 05 2020 has been raised.
	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 is evidence that workers observe regular working hours including overtime hours within the legal confines of the Labour Law. This was verified from the Mill/Estate workers' employment contracts, punch cards/Checkroll books and interviews with the workers themselves. They are also entitled to at least 1 Hour rest after 5 hours of work. This is based on punch cards, check roll books, pay slips reviewed, and interviews held with workers at the POM and Estates. Workers who have been certified ill are given paid medical leave. Salary deductions are made for EPF, SOCSO, EIS (local workers) and there are no deductions for foreign workers except for travel documents.
	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	Yes	Provided.

Clause	Indicators	Comply Yes/No	Findings
	detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.		
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Trong POM has demonstrated effort to monitor once a year the adequacy, sufficient and affordable of food supply and price at the sundry shop within the estate.
	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. • 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 <p>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.</p>	YES	<p>All sampled workers receive at least minimum wages based on Minimum Wages Order 2020. The new Minimum Wages Order 2020 gazetted on 10 Jan 2020 and came into effect on 1 February 2020.</p> <p>Trong POM, TRP, Batu Pekaka, BMR and Malaya had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculating Prevailing Wages.</p>

Clause	Indicators	Comply Yes/No	Findings
	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 the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesian. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
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 association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (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	Remote A policy titled as "Polisi Kebebasan Berpersatuan" dated Feb 2019 is available in the CU. The policy is written in Bahasa and languages understood by the workers is displayed at the public places at all estates/mill. The policy included statements, among others, that the workers are allowed to join any registered organizations or associations. Foreign workers are not allowed to hold any positions in the organizations or associations. The workers whom were consulted had confirmed that they were aware of their rights to join a union.
	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.	NO	Trong POM latest Union Meeting with Management was not made available upon request. Sighted last meeting has been conduct in Oct 2018 and was not updated since the structure of unions in the mill has been changed, thus Minor NCR MZK 2020 has been raised.
	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	Evidence is available that all worker representatives were freely appointed by the workers as confirmed by the workers' representatives themselves as confirmed by a spraying mandore from TRP Estate and Malaya Estate and a weighbridge operator from Trong Palm Oil Mill.
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 included into service contracts and supplier agreements.	YES	The formal Policy on protection of children and non-employment of children is contained in the "Polisi Penggajian Pekerja Kanak-Kanak Dan Had Umur Minima". This undertaking to not hire 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	Documentation review and observations in the field, evidence is available that minimum age requirements are met throughout Trong BU. There also have a documented age screening verification procedure.

Clause	Indicators	Comply Yes/No	Findings
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that any young persons were employed in any of the units at Trong BU as evidenced from documentation review, field observations and interviews.
	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	Based on the documents sighted, communication about its no child labour policy was communicated to all levels of employees and external stakeholders during stakeholder meeting.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	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 on sexual harassment titled ' <i>Polisi Gangguan Seksual</i> ' has been established since 2 December 2019. The policy was signed by the CEO and is available in Malay and English language and communicated to all workforce.
	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	Remote Trong CU has established a policy titled ' <i>Hak Reproduksi</i> ' dated in December 2019. Trong CU have briefed their workers from time to time during muster briefings.
	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	During this audit, there has been no evidence of any new mothers and therefore this indicator could not be verified. However, based on interview conducted with the Gender Committee members at Trong CU, two years ago when she was pregnant, her needs were attended to which included a private room where she could express milk and a fridge for storage were made available.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	A grievance mechanism has been maintained by the CU. Chairman of Gender Committee at each operating units responsible in handling and channeling issue to management. The management has directed the chairman of the Gender Committee to respects and protects anonymity and complainants where requested.
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: <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment 	YES	Collective evidence is available that all sampled workers have entered into employment voluntarily.

Clause	Indicators	Comply Yes/No	Findings
	fees <ul style="list-style-type: none"> • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 		
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	A special labour policy for employment of foreign workers has been addressed in the ' <i>Polisi Pekerja Buruh Asing</i> '. The policy mentioned that all employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival programme will be conducted once arrived for three months. The CU maintained its specific procedure / flowchart for employment of foreign workers titled 'Sourcing Process for Foreign Workers'. The procedure has been implemented for any employment related with foreign workers.
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	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. OSH Committee meetings were held once in three months. At the meetings workers participated in the discussion mainly on housing and safety. All units adopted the agenda as released SQM. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health.
	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 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.	YES	Accident and emergency procedures were available in OSHA Manual, i.e. Chapter 15: Accident, Incident, Non conformity, Corrective and Preventive Action & Chapter 16: Emergency Response and Preparedness. Emergency situations identified were fire, explosions, and medical emergencies, uncontrolled release of hazardous substances, security threats and floods. The estate shall test their emergency response plans at least annually. During site visit, it was sighted Emergency Response Plan was available at Boiler Station, Sterilizer Station, Chemical Store, Workshop, Lubricant Store etc. First aid training was conducted annually. It has been observed that, first aid box is well provided for all the field mandores who's involved in harvesting, manuring and spraying works. The content of first box which is held by harvesting, manuring and spraying mandore was verified. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. The Emergency Response Plan (ERP) was established. Random interview with the estate workers showed that they were aware of accident and emergency procedures.

Clause	Indicators	Comply Yes/No	Findings
	6.7.3 (C) Workers use appropriate personal protective equipment (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.	NO	All staff and workers such as the storekeepers, harvesters and sprayers were continuously trained and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Appropriate PPE were given to employees of estate and mill visited. However, during interview with sampled harvesting contractor's workers, it was noted that the PPE was not free. Thus, Major DA 01 2020 was raised.
	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.	NO	Local & Foreign workers are covered by SOCSO (Pertubuhan Keselamatan Sosial). However, based on interview with sampled contractor's foreign workers and verification of SOCSO contribution, there was no evidences for contractor's foreign workers have been paid for medical care and covered by accident insurance (SOCSO). Minor NCR DA 02 2020 was raised.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. Sighted the Trong CU has maintained and updated the LTA Summary by monthly basis. Form JKPP 8 for 2019 was submitted to DOSH on timely manner.

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 appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	For year 2020. Integrated pest management (IPM) has been focusing on rat damage issues. CU has established barn owl installation planning. It has been planned to increase the Box.
	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	YES	During site visits there was no use of fire has been used for pest control. Management has using pheromone trap at immature areas to capture Rhinoceros beetles and planted beneficial plants for control bagworm.

Clause	Indicators	Comply Yes/No	Findings
	effective methods exist, and with prior approval of government authorities.		
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	All pesticides used were those officially registered under the Pesticide Act 1974. All chemicals purchases are made through approval by the Head Office. No illegal agrochemicals (stated by local and international laws) Paraquat was used in the estates.
	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 number of applications) are provided.	YES	Trong CU continued to record areas where pesticides were used. a) Pesticides were used only when justified and as programmed. Records of pesticides used by area, quantity used, hectares applied, LD 50 and Ai/Ha were made available to auditors. b) Records were maintained in store issue chits, bin cards, program sheets, field cost books and progress reports
	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 the estates on Trong CU continued to apply pesticides by proven methods that minimise risk and impacts. Application of pesticides was based on and guided by the following documents: a) CHRA b) MSDS/SDS supplied by the manufacturer c) OPC Manual d) Safe work procedure Manual
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	Trong CU is committed to minimize the usage of agrochemicals by implementing IPM with the increased in the planting of beneficial plants such as <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> .
	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:	YES	The estate confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. <ul style="list-style-type: none"> The review of the chemical register concluded that all pesticides used are of class II, III & class IV. The use of <i>paraquat</i> had ceased effective 2016. Class IA <i>monocrotophos</i> chemical is used for the trunk injection for the bagworms treatment Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements met.

Clause	Indicators	Comply Yes/No	Findings
	7.2.5a Judgment of the threat and verify why this is a major threat.	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 paraquat had been used. Hence, the need for a judgment of the threat assessment does not apply on the Trong CU.
	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 paraquat had been used.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	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 paraquat had been used.
	7.2.5d What is the process to limit the negative impacts of the application.	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 paraquat had been used.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	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 paraquat had been used.
	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	The estates and mill had a SOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. The estate and mill had a SOP for handling of chemical/pesticide. The employees involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers were trained in chemical handling.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The storage of pesticides at Trong CU was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorized personnel i.e. storekeeper. The stores in estate and mill were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. During site visit at all estates i.e. chemical and fertilizer store, sighted relevant SDS were seen displayed. Adequate safety signage has been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the

Clause	Indicators	Comply Yes/No	Findings
			washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Empty pesticide containers was punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at Trong CU not more than 180 days @ 20mt.
	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	There was no aerial spraying has been practiced in the Trong CU Estate. <i>Neproliphis biserata</i> was maintained and encouraged to be planted in Trong CU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Remote Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. Several workers involved or handlings pesticides has been conducted the medical surveillance. From the results, all workers were fit to handle chemical.
	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	The Trong CU had a policy "handling high toxic pesticide" dated Dec 2019 which stated that no work with pesticides shall be undertaken by pregnant or breast-feeding women. On all 4 estates sampled, identification of pregnancy was done by the HA based on interview with their women workers on the last menstrual period dates. This interview was done during the monthly medical check-up. Pregnancy test was carried on doubtful cases. Monthly medical check-up for women sprayer was also being carried out by VMO.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible	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 on the routine operation.

Clause	Indicators	Comply Yes/No	Findings
manner.	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation. 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. Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. Scheduled wastes had been disposed of through a licensed contractor approved by DOE. Each house was provided with dustbin. The wastes were removed weekly and the line-sweepers removed all recycle items like plastic, glass, paper and metal to a recycle item store and disposed to vendors. All domestic wastes (household and food waste only) at Trong CU has been disposed via landfill.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at all units of certification, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Trong CU has been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	The CU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the SOPs content among others as stated in sections of the following documents; SOP - O.P.C The process of the fertilizer application commences from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire fertiliser requirement in the field identified.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Remote Evidence of periodic tissue foliar and soil analysis to monitor the changes in nutrient status was available and presented in the report by <i>Applied Agriculture Resources Sdn Bhd</i> visit. The results of the analysis were used by the agronomist for their recommendation for fertilizers applications programs year 2020.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of EFB, POME, palm residues and optimal use of inorganic fertilisers.	YES	All 4 Estates had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of Solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decompose.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Records of fertilizer inputs were maintained.
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	There were no fragile/marginal soils in both estates visited based on the soil maps provided sourced from Applied Agricultural Resources Sdn Bhd. The soils series in 4 Estates were categorized as follows:

Clause	Indicators	Comply Yes/No	Findings			
			No	Estate	Soil series	
			1	Batu Pekaka	Bungor Tebok Gajah Mati	Padang Besar Local Alluvium
			2	Kuala Muda Estate	Gajah mati Jitra Kedah Kuah Local alluvium	Prang Rasau Serdang Terap/terap red variant
			3	Malaya Estate	Bungor Harimau Lating Local Alluvium Medang RA (clayey)	Serdang Sogomana Tavy Tawar Tebok Peat
			4	TRP Estate	Alluvium Holyrood Jerangau	Lanchang Rasau Tebok
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	The estates visited in Trong CU continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: a) Slope & River Protection Policy b) Buffer Zone & 25-degree slope c) Land Preparation for terracing in OPC Manual.			
	7.5.3 There is no new planting of oil palm on steep terrain.		This compliance being specified in the following guidelines. “This compliance being addressed in the “Slope and River Protection” signed by the CEO dated Dec 2019 stating the following among others - Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly”. 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	There were no marginal and fragile soils, this was evidence during site visits and report from soil survey Applied Agricultural Resources Sdn Bhd.			
	7.6.2 Extensive planting on marginal and fragile soils, is	YES	Based on the soil maps provided and field visits there were no fragile and problem soils in all the estates.			

Clause	Indicators	Comply Yes/No	Findings
incorporated into plans and operations.	avoided, or, if necessary, done in accordance with the soil management plan for best practices.		
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Trong CU had a management strategy in place for plantings on slopes between 9 and 25 degrees. This policy was in the OPC 54a dated January 2018 and all the estates had complied with it. In addition, the estate's SOPs included to minimize soil erosion based on local soil and climate conditions, such as: a) ground cover management (O.P.C.01a), b) Soil Conservation & Water Management, (O.P.C. 08a) c) mulching (O.P.C.08b), d) land preparation (O.P.C. 07c), terracing (O.P.C.54a) and e) natural regeneration of <i>Nephrolepis biserrata</i>
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	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	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it has been confirmed that there were no new planting or new development of areas at Trong CU.
	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	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Aplied Agriculture Resources Sdn Bhd. Hence, this requirement is not applicable.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Aplied Agriculture Resources Sdn Bhd. Hence, this requirement is not applicable.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Aplied Agriculture Resources Sdn Bhd. Hence, this requirement is not applicable.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Aplied Agriculture Resources Sdn Bhd. Hence, this requirement is not applicable.

Clause	Indicators	Comply Yes/No	Findings
	<p>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, 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 is replaced with crops suitable for a higher water table (paludiculture) 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.</p>		
	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.	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Applied Agriculture Resources Sdn Bhd. Hence, this requirement is not applicable.
	7.7.7 (C) All areas 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	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Applied Agriculture Resources Sdn Bhd. Hence, this requirement is not applicable.

Clause	Indicators	Comply Yes/No	Findings
	lines by the unit of certification on peat soils is prohibited; peatlands are 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	Remote Trong CU Water Management Plan has been reviewed annually and latest updated in Jan 2020. Therein has elaborated the management plan in the following areas; <ul style="list-style-type: none"> a) Flood area/water logging area b) Soil erosion/ c) Water quality/Water pollution d) Treated water/water storage tank e) Optimizing usage and reduce wastage f) Drainage system g) Assessment of water usage h) Water rationing
	7.8.1a The unit of certification 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.		
	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	Riparian buffer zones areas were identified and marked. No activities in buffer zone area. Vetiver grass had been planted along the river banks and water catchments. During the field visit, there were evidences that these areas were free from chemical spraying and manuring application. The practices are guided by a policy " <i>Polisi Perlindungan Cerun & Zon Penampungan Sungai</i> ".
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	<ul style="list-style-type: none"> • Final Discharge method – Sprinkler Application Site • Analysis of final discharge was carried out on monthly basis by external accredited laboratory Kuala Lumpur Berhad. The result was within the limit. The quarterly reports were submitted to DOE accordingly.

Clause	Indicators	Comply Yes/No	Findings																																							
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly 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	Remote The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Fossil fuel usage reduction has been included under pollution prevention plan 2020. Among of action has been taken were: <ul style="list-style-type: none">▪ Proper vehicle maintenance scheduled must be followed (preventive maintenance)▪ Plan to route for crop evacuation or others estate practice to reduce the distance required.▪ Avoid over working to the machine to prevent damage and fatigue▪ Practice safe driving, defensive driving and training on proper use on gears▪ Avoid carrying excessive weight																																							
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	GHG emission has been identified and assessed to the all estates and mill through list of waste, EIA, pollution prevention plan, etc. for year 2019, Trong CU calculated the emission through RSPO Palm GHG calculator version 3 (data as table below). Trong BU has calculate GHG using RSPO Palm GHG calculator and use the Option 2. <u>Summary of Net GHG Emissions</u> <table><tr><th>Emissions per Product</th><th>tCO2e/tProduct</th><th>Extraction</th><th>%</th></tr><tr><td>CPO</td><td>1.22</td><td>OER</td><td>19.68</td></tr><tr><td>PK</td><td>1.22</td><td>KER</td><td>4.65</td></tr></table> <table><tr><th>Land Use</th><th>ha</th></tr><tr><td>OP planted area</td><td>8148.90</td></tr><tr><td>OP planted on peat</td><td>0</td></tr><tr><td>Conservation (forested)</td><td>0</td></tr><tr><td>Conservation (non-forested)</td><td>0</td></tr><tr><td>Total</td><td>8148.90</td></tr></table> <u>Summary of Field Emissions and Sinks</u> <table><tr><th></th><th colspan="2">Own Crop</th></tr><tr><th></th><th>tCO2e</th><th>tCO2e/tFFB</th></tr><tr><td>Emissions</td><td></td><td></td></tr><tr><td>Land Conversion</td><td>76452.02</td><td>0.70</td></tr><tr><td>*CO2 Emissions from Fertiliser</td><td>3936.48</td><td>0.04</td></tr></table>	Emissions per Product	tCO2e/tProduct	Extraction	%	CPO	1.22	OER	19.68	PK	1.22	KER	4.65	Land Use	ha	OP planted area	8148.90	OP planted on peat	0	Conservation (forested)	0	Conservation (non-forested)	0	Total	8148.90		Own Crop			tCO2e	tCO2e/tFFB	Emissions			Land Conversion	76452.02	0.70	*CO2 Emissions from Fertiliser	3936.48	0.04
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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	YES	Auditors has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. It is confirmed that there were no new planting or new development of areas at Trong CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																																																																

Clause	Indicators	Comply Yes/No	Findings
	plan to minimise them prepared and implemented (guided by the RSPO GHG 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	The Environmental Impact and Aspect Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place.
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	There was no land preparation in Trong CU by burning ever since Boustead Plantations Berhad practice zero burning as per the policy dated July 99 (revised in Aug 2018) in SOP clearing methods. During the field visit the signages " <i>Dilarang Membakar</i> " were clearly displayed and no evidence of open burning observed.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	There was no land preparation in Trong CU by burning ever since Boustead Plantations Berhad practice zero burning as per the policy dated July 99 (revised in Aug 2018) in SOP Clearing methods. During the field visit the signages " <i>Dilarang Membakar</i> " were clearly displayed and no evidence of open burning observed.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	This is no relevant as Boustead Plantations Berhad practices zero burning throughout the plantation properties within the management.
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 (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	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, in accordance with the RSPO LUCA guidance document.	YES	No new land clearing since Nov 2015 available at Trong CU, thus this Indicator was not Applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The report "High Conservation Value (HCV) Assessment of the estates under Trong Business Unit of Boustead Plantations BHD" is available, completed in 2016. The study had covered all the High Conservation Value (HCV) within and adjacent to the 7 estates under Trong BU. The HCV assessment had identified the HCV 1.1, 1.4, 3, 4.2, 5 and 6 within the 7 estates. The total area reported was 116.30 Ha.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved		

Clause	Indicators	Comply Yes/No	Findings
	<p>assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>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.</p>		
	<p>7.12.4 (C) Where HCVs, HCS forests after 15 November 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 requirements. The integrated management plan is reviewed at least once every five years. The integrated 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).</p>	NO	<p>Identification and assessment of HCV habitats or protected areas was carried out prior to the main assessment through. The report "High Conservation Value (HCV) Assessment of the estates under Trong Business Unit of Boustead Plantations BHD" is available. The study had covered all the High Conservation Value (HCV) within and adjacent to the 7 Estate under Trong BU. However it was found that, The HCV Plan has not been developed with consultation with effected parties such as:</p> <p>BMR : wildlife Dept, Forestry Dept, Villagers. TRP: wildlife Dept, Forestry Dept, Villagers. Malaya: wildlife Dept, Forestry Dept, Villagers. Thus Major NCR MZK 02 2020 has been raised.</p>
	<p>7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15</p>	YES	<p>There was no rights of local communities have been identified in HCV areas at Trong CU. So, this indicator was not applicable with this CU.</p>

Clause	Indicators	Comply Yes/No	Findings
	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.		
	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	Remote In Trong CU the training programs for 2020 has included HCV training programme. HCV briefing were carried out during muster. Attendance lists were available. Trong CU management will notify the relevant authorities immediately if any individual working for the company is found to capture, harm, collect or kill these species. This training and implementation will further verify during On site audit.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Trong BU has developed action plan base on recommendation made by the HCV assessor. HCV Area Management Plan has been updated accordingly. Trong BU is committed to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signages to prohibit hunting were erected at riparian zone and border. Patrolling for Illegal hunting was also being implemented to control the illegal activities.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and	YES	Not applicable since there is no new land clearing.

Clause	Indicators	Comply Yes/No	Findings
	Compensation Procedure (RaCP) applies.		

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Clause	Indicators		Comply Yes/No	Findings
<p>4.5.3 Time-bound plan</p> <p>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;</p>	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	For the time-bound plan, Boustead Plantations Berhad has committed to ensure all their certification unit (CU) to be certified within 5 years i.e. year 2018 to 2022.
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	There are twelve (12) CU highlighted in the time-bound plan and the certification progress consistent with that in the time-bound plan. The progress details as provided in the TBP in Attachment 7. For another 4 CUs i.e. Lapan Kabu / Sugut / Loagan Bunut / Pertama / Kanowit and Tawai, the Sustainability Section team has conducted the periodic internal audit accordingly.
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	There was revision of the time-bound plan being updated on 09/10/2019 (provided to CB in April 2020). Details as per attachment 7. This is due newly acquired properties i.e. Tawai CU in Telupid Sabah in 2019 from Sit Seng & Sons Realty Sdn Bhd. As per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.

4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	Yes	There was Series of External Audit through MSPO Certification on their uncertified unit being made: a) Teluk Sengat Estate (19-22/11/2018) b) Lapan Kabu Estate (21-22/10/2019) c) Rimba Nilai (Sugut) CU (10-15/03/2019) d) Tawai CU (14-18/06/2020) e) Loagan Bunut & Kanowit CU (11-15/11/2019) The audit was conducted against MSPO P&C and MSPO Partial Certification Requirements.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	Yes	Series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above. a) The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. b) There was no case of labour dispute reported in the internal audit report.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	Series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above. a) The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. b) Several issues of legal non-compliance reported in the internal audit report such as lapses in scheduled waste management and it's being solved progressively.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	Yes	Based on statement in (a) to (d) above, the CU has assessed the condition of their uncertified unit and has stated full commitment to comply with all relevant requirements as specified above. a) Sighted the series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit as conducted and reported accordingly. The audit was conducted against RSPO P&C and RSPO Partial Certification

		<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 	Yes	<p>Requirements.</p> <p>b) Evidence of audit attendance list, audit checklist & report were made available to auditor as the supporting evidence.</p> <p>c) Verification through www.globalforestwatch.com, GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting and no new development of area was observed.</p> <p>d) With this, it can be concluded that the positive assurance made was justified.</p>
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 		
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 		
		<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 		
<p>4.6.4</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p>		No additional indicators	Yes	<p>Trong Business Unit maintains and complies with the terms of the land title. The land titles specified the purpose of the planting for either oil palm or agricultural crops for economic value. All the Estate are originated from Boustead Plantation and established from year of 1950, for TRP estate the estate was established in 1959 and planted with Rubber tree and convert to oil palm on 1986, for Malaya Estate the estate was established on 1969 first crop planting was a Rubber planting and convert to oil palm on 1980, The land origin is from Boustead subsidiary named Boustead Silasuka Sdn Bhd and transfer to Boustead Teluk Sengat Sdn Bhd in 1 April 2011 on July 2016 transfer again to Boustead Plantation. Noted that the land title for Batu Pekaka Estate was still in progress to change the ownership from CIMB Trustee Berhad to Boustead. Further details refer to Pnc indicator 4.4.1.</p>
<p>Note:</p> <p>1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C.</p> <p>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;</p> <p>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.</p>				

Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
6.7.3 DA 01 2020	Major	<p>Finding: Appropriate personal protective equipment (PPE) was not provided free of charge to contractor's workers at the place of work to cover all potentially hazardous operations.</p> <p>Objective evidence: During interview with sampled harvesting contractor's workers and verification of "PPE Personal Record", there is no free of charge provided for personal protective equipment i.e. harvesters shoe and cotton glove</p>	The management has penalized the contractor and decided to direct supply PPE for contractor workers and charge to the contractor during payment.	<p>Auditor received and verify the evidence picture PPE has been given to the contractor workers and also evidence the book of PPE Issuance.</p> <p>Status: Closed The effectiveness of implementation will be verified during next audit</p>
6.7.4 DA 02 2020	Minor	<p>Finding: Certain contractors' workers was not provided with medical care and covered by accident insurance.</p> <p>Objective evidence: Based on verification of SOCSO contribution June 2020 to August 2020 for contractor's foreign workers sighted there was no evidences for contractor's foreign workers have been paid for medical care and covered by accident insurance (SOCSO).</p>	It has been clarified that the contractor was covered for Socso, however, the Socso contribution copies were not kept at the estate office. The management has issued a warning letter to the contractor regarding this matter.	<p>Corrective action plan accepted, and the effectiveness of implementation will be verified during next audit</p> <p>Status: Open</p>
6.3.2 MZK 01 2020	Minor	<p>Finding : Latest Minutes of meetings between the unit of certification with trade unions or workers representatives not made available upon request.</p> <p>Objective evidence : At Trong POM latest Union Meeting with Management was not made available upon request. Sighted last meeting has been conduct on 25/10/2018 and was not updated since the structure of unions in the mill has been changed.</p>	<p>Trong Mill The management has signed another person to record and obtain the report to ensure this mistake does not happen again.</p>	<p>Corrective action plan accepted, and the effectiveness of implementation will be verified during next audit</p> <p>Status: Open</p>
7.12.4 MZK 02 2020	Major	<p>Finding : The HVC integrated management plan was not developed in consultation with relevant stakeholders.</p> <p>Objective evidence : HCV Management Plan was not developed with relevant Stakeholder Such as: BMR : wildlife Dept, Forestry Dept, Villagers.</p>	Management Trong CU conducted the Internal & External Stakeholder Consultation Meeting in November and discussed the HCV Plan. All attended stakeholders agreed with the plan presented by all estate management.	Auditor received and verify the evidence Minutes meeting of Trong CU conduct stakeholder meeting with forestry department, Wildlife dept and other interested stakeholder dated 19 November 2020 and Auditor also sighted evidence HCV

		<p>TRP: wildlife Dept, Forestry Dept, Villagers. Malaya: wildlife Dept, Forestry Dept, Villagers.</p>		<p>plan has been agreed by the interested parties.</p> <p>Status: Closed The effectiveness of implementation will be verified during next audit</p>
1.1.4 MAR 01 2020	Major	<p>Finding : Consultation and communication procedures not implemented and explained to all relevant stakeholders i.e contractor workers.</p> <p>Objective evidence : Based on interview held with contractor workers at Batu Pekaka Estate, Malaya Estate and Taiping Rubber Plantation Estate, the contractor workers did not know on the consultation and communication procedures resulted on several grievances did not attend properly.</p>	<p>The management has carried out the refresher training on complaint and grievances to the workers in small group and with translator dated 7/10/20, 13/10/20 and 6/10/20</p>	<p>Auditor received and verify the evidence picture training and attendance dated 7/10/20, 13/10/20 and 6/10/20</p> <p>Status: Closed The effectiveness of implementation will be verified during next audit</p>
6.2.2 MAR 02 2020	Major	<p>Finding : Employment contracts and pay slip between unit of certification/contractor and employees does not detailing the conditions of employment e.g regular working days, deductions, overtime, sick leave, holiday entitlement in compliance with national legal requirements.</p> <p>Objective evidence : Based on sample (employment contracts and payslip) at following estates, there were sighted that both documentation does not detail the conditions of employment.</p>	<p>TRP Estate The management has updated the payslip and repay to the eligible workers besides a warning letter has been issued to the contractor involved.</p> <p>Malaya Estate The management has made an amendment immediately on this payslip with effect from October payslip salary to comply with the requirement. Also, a warning letter has been issued to the contractor.</p> <p>BMR Estate The estate has ensured a contract agreement between the contractor and their workers with a fair contract.</p>	<p>Auditor received and verify the evidence picture warning letter has been sent to the contractor, and also evidence and picture of payslip and contract has stated the details regular working days, sick leave and working on rest day i.e Sunday.</p> <p>Status: Closed The effectiveness of implementation will be verified during next audit</p>
1.1.3 MAR 03 2020	Major	<p>Finding : Records of requests for information and responses are not maintained.</p> <p>Objective evidence : During audit at Batu Pekaka Estate, the management did not maintain relevant documents for information i.e payslips, passport, work permits and daily attendance for the contractor</p>	<p>Batu Pekaka Estate The management has issued a warning letter to the contractor regarding this matter, and management already received all the evidence requested by the auditor during the audit.</p>	<p>Auditor has received and verify the evidence picture warning letter has been sent to the contractor, and also evidence and picture of passport, work permits and daily attendance of contractor nalvam enterprise.</p>

		workers.		Status: Closed The effectiveness of implementation will be verified during next audit
3.4.2 MAR 04 2020	Minor	<p>Finding : Social management and monitoring plans have been developed without participation of affected stakeholders.</p> <p>Objective evidence : During documentation review at Batu Pekaka Estate, Bukit Mertajam Rubber Estate, Malaya Estate and Taiping Rubber Plantation, there was found that social management and monitoring plans have been developed without participation of affected stakeholders i.e contractor's workers</p>	<p>Trong CU The estate management will conduct stakeholder meeting to update the SIA Plan after the MCO is over i.e. December 2020</p>	<p>Corrective action plan accepted, and the effectiveness of implementation will be verified during next audit</p> <p>Status: Open</p>
2.1.1 MAR 05 2020	Major	<p>Finding : Unit of certification did not comply with legal requirement i.e Employment Act 1955 section 19 (1), section 60 (3) (a) (ii) and section 60F (1) (b) (aa).</p> <p>Objective evidence :</p> <ol style="list-style-type: none"> 1. Based on interview and documentation review on Work Order, there was found that Batu Pekaka Estate did not pay the contractor workers not later than the seventh day after the last day of any wage period, which contravene with the Employment Act 1955 19 (1). 2. Based on interview held with 4 workers and contractor, there was found that Batu Pekaka Estate did not pay two (2) days' wages at the ordinary rate pay for the contractor workers worked on rest day (pruning works) in the month of August 2020, which contravene with the Employment Act 1955 section 60 (3) (a) (ii). 3. Based on interview held with 13 workers and contractor, there was found that Bukit Mertajam Rubber Estate did not pay two (2) days' wages at the ordinary rate pay for the contractor workers worked on rest day (harvesting works) in the month of August 2020, which contravene with the Employment Act 1955 section 60 (3) (a) (ii). 4. Based on interview and documentation review on payslip and daily attendance, there was found that Malaya Estate did not pay two (2) days' wages at the ordinary rate pay for the contractor workers worked 	<p>The management has already issued a warning letter to the contractor regarding this matter and ask contractor to repay the workers back and which was done the eligible workers. Estate management also will further look into this and make sure this issue won't happen again.</p>	<p>Auditor has received and verify the evidence picture warning letter has been sent to the contractor, and also evidence and picture of pay slip and chit that contractor already pay back the rest day work and sick day work. And auditor also received evidence that salary of workers Nalvam enterprise already follow the labour law which is not later than the seventh day after the last day of any wage period.</p> <p>Status: Closed The effectiveness of implementation will be verified during next audit</p>

		<p>on rest day dated 9, 16 and 23 for the month of August 2020 (3 workers) doing harvesting and lent labor work, which contravene with the Employment Act 1955 section 60 (3) (a) (ii).</p> <p>5. Based on interview held with workers, there was found that Malaya Estate and Taiping Rubber Plantations did not pay for sick leave for contractor workers for the month of August 2020, which contravene with the Employment Act 1955 section 60F (1) (b) (aa).</p>		
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STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
4.6.11 DA 01 2019	Major	Findings: Specific annual medical surveillance yet to be conducted. Objective evidence: Kuala Muda Estate yet to be conducted specific annual medical surveillance for pesticide operators and maintenance mechanic as per CHRA recommendation.	All estates visited, sighted medical surveillance have been conducted as per CHRA recommendation. The evidences as per indicator 7.2.10. <i>Thus, previous Major NCR DA 01 2019 was satisfactory closed.</i> Status: Closed
5.6.3 DA 02 2019	Minor	Findings: The data reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools was incorrect. Objective evidence: The data of RSPO Palm GHG version 3.0.1 Calculator was incorrect i.e. OP total planted area, OP planted on peat, conservation area, FFB processed, OER and KER with actual data verification.	GHG emission has been identified and assessed to the all estates and mill through list of waste, EIA, pollution prevention plan, etc. for year 2019, Trong CU calculated the emission through RSPO Palm GHG calculator version 3 (data as table below). CU also submitted GHG foot print report to the RSPO and RSPO annual communication of progress (ACOP) (publicly available report). Thus past NCR DA 02 2019 has successfully closed. Status: Closed
4.1.2 MN 01 2019	Minor	Findings: No appropriate Personal Protective Equipment (PPE) were used by the workers at Trong BU. Objective evidence: 1. It was found that some harvesters in Field PM99C of Kuala Muda Estate do not have safety helmets and goggles while harvesting the tall palms. 2. It was found that the workers in the nurseries of both Malakoff Estate and Batu Pekaka Estate do not have straw hats to prevent them from heat stress.	During site visit at Batu Pekaka Estate (Field 02B/95B), BMR Estate (Field 14C/95C), sighted harvesters were seen to wearing PPE such as goggles, rubber boots and hard hat to cover all potentially hazardous operations. Observed also Oil Palm Nurseries at Batu Pekaka, BMR and TRP Estate, sighted the workers were seen to wearing straw hats to prevent heat stress. <i>Thus, previous Minor NCR MN01 2019 was satisfactory closed.</i> Status: Closed
4.8.2 IAM 01 2019	Minor	Findings: Records of training for each employee shall were not available Objective evidence:	Observed individual employee training records at all estates visited was available and maintained. The records trainings as per above table in 3.7.2 indicator. <i>Hence, previous Minor NCR IAM 01 2019 was acceptable to closed.</i>

		Review of training records at Kuala Muda Estate found records of training for each employee not available.	
6.1.1 IAM 02 2019	Major	<p>Findings: Social Impact Assessment (SIA) prior to Replanting works in Estate was not conducted.</p> <p>Objective evidence: Review of replanting records and field visit to replanted Fields at Kuala Muda and Stothard Estates found the following:</p> <ol style="list-style-type: none"> 1. No Social Impact Assessment (SIA) was conducted and SIA report made prior to replanting in Field 17A at Kuala Muda Estate. 2. No Social Impact Assessment (SIA) was conducted and SIA report made prior to replanting in Field TR17A (2017), TR 18A(2018) and TR19A (2019) at Sothard Estate. 3. Record in Social Action Plan and Social Impact Mitigation Plan for both estates for 2018 and 2019 did not refer to replanting at both locations. 	<p>Document sighted showed that there was a Social Impact Assessment (SIA) was conducted and SIA report made prior to replanting in Field 18A at Batu Pekaka Estate. Therefore, previous NCR was satisfactorily closed.</p> <p>Status: Closed</p>
6.5.1 IAM 03 2019	Major	<p>Findings: Day rate workers did not receive wages in compliance with Minimum Wages Order 2018</p> <p>Objective evidence: Review of salary slips of Daily Rated workers for contract workers at Sothard Estate found: Daily rate workers did not receive Minimum Pay in compliance with Minimum Wage Order 2018 (RM42.31/day).</p> <ol style="list-style-type: none"> 1. Contract (letter of appointment) for Nalvam Enterprise, Daily Rated Worker mentioned basic wages amount that did not comply to Minimum Wage Order 2018 (RM42.31) 	<p>All workers sampled (refer 6.2.1), their salary are above the RM 1100/ 42.31 per day and comply with the Minimum Wages Order 2018, Hence past NCR IAM/3/2019 was successfully closed.</p> <p>Status: Closed</p>
1.1.2 MAR 01 2019	Major	<p>Findings: Records of request and Information regarding Certified Area was found incorrect.</p> <p>Objective evidence: The information given to CB regarding Certified Area at Trong BU since 2018 (Annual Surveillance Audit</p>	<p>Also auditor has sighted and verify the current stated Land Title was tally with the current certified area given to the auditor, Hence Past NCR MAR 01 2019 was successfully closed. Details refer 4.4.1</p> <p>Status: Closed</p>

		1) was not correct due to not tally with stated Land Title.	
6.2.3 MAR 02 2019	Minor	Findings: A list of stakeholders was not included certain parties. Objective evidence: Neighboring rubber & palm oil estates	Auditor also verify that Stakeholder list at Kuala Muda Estate was included neighboring estates and thus, past NCR MAR 02 2019 has been successfully closed. Status: Closed
Criterion 12 Indicator 12.1 (Supply Chain) MZK 01 2019	Major	Findings: The documented procedures for Complaints was not complete. Objective evidence : Sighted that in Clause 17.0 Complaints in the ' <i>RSPO: Supply Chain Standard dated March 2019 Revision 6</i> ', the clause did not specify detail how to handle collecting and resolving stakeholder complaints.	Auditor has verify the documents and evidence that in Clause 17.0 Complaints in the ' <i>RSPO: Supply Chain Standard</i> ' the clause already Specify detail how to handle collecting and resolving stakeholder complaints. Thus, past Major NCR MZK 01 2019 was successfully closed and the indicator is no more in the new P&C MYNI 2019. Status: Closed

Attachment 6

Boustead Plantations Berhad Time Bound Plan on RSPO Certification.

No	PMU	Loc	Main Assessment	Certification Status	Status	Updated Information for Partial Certification, Clause 4.5.3 RSPO Time-bound Plan & 4.5.4 Requirements for uncertified management units
1.	Sg. Jernih CU	Pahang	11 Sep 2011	Stage 2	Certification completed	nil
			11 Sep 2016	Re-certification	Recertification completed	nil
2.	Nak CU	Sabah	16 May 2015	Stage 2	Certification completed	nil
			May 2017	Include LTTS	Certification completed	nil
3.	Trong CU	Perak	20 July 2017	Stage 2	Certification completed	nil
4.	Segaria CU	Sabah	Dec 2017	Stage 2	Certification completed	nil
5.	Segamaha CU	Sabah	Oct 2018	Stage 2	Certification completed	nil
6.	Telok Sengat CU	Johor	August 2019	Stage 2	Audit completed, Submission of CAP	Corrective Action Plan (CAP) for findings
7.	Lepan Kabu Bekoh Eldred	Kelantan Johor Johor	2020	-	Deferred to 2020 (initially 2019)	Lepan Kabu Mill ceased operation in May 2018. In July 2019, LKE undergo MSPO Audit. Lepan Kabu, Bekoh, and Eldred (All estates without own mill- loose estates)
8.	Rimba Nilai (Sugut) CU	Sabah	2020	-		Rimba Nilai (Sugut) CU is going for the internal audit tentatively on 21 st – 24 th July 2020 and the external audit that will be conducted by BSI tentatively on 7 th - 11 th November 2020.
9.	Loagan Bunut CU	Sarawak	2021	-		The Loagan Bunut CU has been proposed for land acquisition and still in negotiation process. All decision is pending for the Board of Directors discretion and direction.
10.	Pertama CU	Sabah	2021	-		New Acquisition in 2018 from Duta Plantations Berhad. As per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.
11.	Kanowit CU	Sarawak	2022	-		The Kanowit CU has been proposed for disposal and still in negotiation process. All decision is pending for the Board of Directors discretion and direction.
12.	Tawai CU	Sabah	2022	-		New Acquisition in 2019 from Sit Seng & Sons Realty Sdn Bhd as per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.