



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

File Ref. : EB02930002

RSPO PUBLIC SUMMARY REPORT

CLIENT : BOUSTEAD RIMBA NILAI SDN BHD – SEGAMAHA CU

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	
SEGAMAHA CU	Segamaha Palm Oil Mill	05° 12.63' N	117° 48.63' E	KKS Segamaha, Lot CL 115343336, 91114, Lahad Datu, Sabah, Malaysia
	Bukit Segamaha Estate	05° 12.55' N	117° 45.57' E	Ladang Bukit Segamaha, KM 50.5, Jalan Lahad Datu-Sandakan, Kampung Paris 2, 91114, Lahad Datu, Sabah, Malaysia
	Sungai Segamaha Estate	05° 12.18' N	117° 48.50' E	Ladang Sungai Segamaha, KM 50.5, Jalan Lahad Datu-Sandakan Off Road 30 KM, Kampung Paris 2, 91114, Lahad Datu, Sabah, Malaysia
	G&G Estate	05° 9.90' N	117° 46.65' E	Ladang G&G, KM 50.5, Jalan Lahad Datu-Sandakan, Off Road 40 KM, Kampung Paris 2, 91114, Lahad Datu, Sabah, Malaysia
	Tabung Tentera Estate	05° 9.80' N	117° 46.75' E	Ladang Tabung Tentera Sabah, KM 50.5 Jalan Lahad Datu-Sandakan Off 16km, Kampung Paris 2, 91114, Lahad Datu, Sabah.

MAP : See Attachment 1

AUDIT DATE : 3 – 8 MAY 2021

DURATION : 24 auditor days (onsite)

TYPE OF AUDIT : ☒ Annual Surveillance Audit No. 1 (2020) & No. 2 (2021)

☐ Recertification Audit

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 28/05/2019 TO 27/05/2024

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 BIN KAMARUZAMAN**
Signature : 
Date : **6/08/2021**

Acknowledgement by Client's Representative

Name : **HAFIZI BONIRAN**
Signature : 
Date : **10/8/2021**

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SUMMARY OF AUDITS

Stage 2 audit				
On-site audit date	:	1-4 & 15-18 Oct 2018 (audit reschedule for HCV & social)	No. of auditor days	: 17
Audit team	:	Mohd Ab Raouf bin Asis (LA), Ruzita binti Abdul Gani (A), Mohd Razman bin Salim (A), Rozaimee bin Ab Rahman (A), Dzulfqar bin Azmi (TA), Suzalina Kamaralarifin (A)		
No. of major NCR	:	10	Indicator: 1.1.2, 2.1.1, 4.4.2, 4.6.11, 4.7.2, 5.3.2, 6.5.2, 6.9.1, 5.3.1 (SC), 5.3.2 (SC).	Closing date: 29/4/2019
No. of minor NCR	:	5	Indicator: 2.1.2, 4.1.2, 5.1.2, 4.8.2, 6.5.3	
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
	:	/	/	/
	:	Contract workers	NGOs	Govt. agency
	:	Indigenous people	Contractor	Others (Please specify)
	:	NA		
Supply base sampled	:	Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Ladang Tabung Tentera Sabah.		
Justification of audit planning	:	Total allocation of auditor days for Segamaha CU were: 17.0 auditor days Mill = 5 days (4 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). Estate = 3 days each for the four estates (Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Ladang Tabung Tentera Sabah) for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Report approved by	:	Radziah binti Mohd Daud	Approval date : 28/05/2019	

Annual Surveillance Audit 1				
Audit date	:	13 – 15 May 2020 (REMOTE)	No. of auditor days:	6 Auditor days
Audit team	:	Dzulfqar Azmi (TLA), Mohd Ab Raouf bin Asis, Rozaimee bin Ab Rahman (SC)		
No. of major NCR	:	1	Indicator: 3.8.7 (Supply Chain)	Closing date: 17/07/2020
No. of minor NCR	:	0	Indicator: NA	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
	:			
	:	Contract workers	NGOs	Govt. agency
	:	Indigenous people	Contractor	Others (Please specify)
	:			
Supply base sampled	:	Bukit Segamaha Estate, Sungai Segamaha Estate and Ladang Tabung Tentera Sabah. G&G Estate not sampled due to COVID 19 matters.		
Changes since the last audit	:	No changes.		
Justification of audit planning	:	Total allocation of auditor days for Segamaha CU were: <ul style="list-style-type: none"> Mill = 1 days (For safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) All estate = Total 5 days for verification on safety and health, environment, good agriculture best practices, GHG verification. 		
Report approved by	:	Kamini a/p M. Sooriamorthy	Approval date : NA	

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Annual Surveillance Audit 2 (Combine with Surveillance Audit 1)				
On-site audit date	:	3 – 8 May 2021	No. of auditor days:	24 Auditor days
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Mohd Ab Raouf Asis, Mohd Norddin Abd Jalil, Amir Bahari, Ismail Adnan, Rohazimi Mat Nawi (Trainee auditor)		
No. of major NCR	:	6	Indicator: 2.1.1, 3.4.3, 3.8.9, 6.2.2, 6.2.3, 6.7.3	Closing date: 28/07/2021
No. of minor NCR	:	5	Indicator: 2.1.2, 2.1.3, 3.3.2, 4.2.4, 7.11.3	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
		√		√
		Contract workers	NGOs	Govt. agency
		Indigenous people	Contractor	Others (Please specify)
		NA		
Supply base sampled	:	Bukit Segamaha Estate, Sungai Segamaha Estate, Ladang Tabung Tentera Sabah and G&G Estate		
Changes since the last audit	:	No changes.		
Justification of audit planning	:	Allocation of mandays during onsite: 5-man days for each site units (estates) and as for POM 4-man days. Combined audit ASA 1-2020 & ASA 2-2021.		
Report approved by	:	Kamini Sooriamoorthy	Approval date : 6/08/2021	

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Oct. 2018 – Sep. 2019	May 2020 – Apr. 2021	May 2021 – Apr 2022		
Certified FFB Processed (MT)	137,474.00	193,123.00	164,700.00		
Production of Certified CPO (MT)	27,494.80	40,556.00	35,822.25		
Production of Certified PK (MT)	6,190.00	8,208.00	7,609.14		
Certified Areas (Ha)	10,092.80	10,092.80	10,092.80		
Planted Areas (Ha)	9,377.40	9,377.40	9,377.40		
Production Areas (Ha)	7,617.30	7,762.90	7,762.90		
HCV Areas / Conservation Areas (Ha)	199.57	199.57	199.57		
REMARKS	The client has been certified in May 2019. ASA 1 – partial remote. ASA 2 – onsite (combine mandays for ASA 1).				

TABLE 2 – ASA 1 & ASA 2

	PO	PK
Last years certified volume (MT) – ASA 1 & ASA 2	*79,873.80	*15,313.00
Last years actual certified sold (MT)	63,414.22	12,080.93
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	0.00	0.00
New year certified volume (MT) – ASA 3	35,822.25	7,609.14

*Last year actual certified sold for CPO and PK were more than approved certified volume and it has been noted during the conduct of remote audit in 2020. Major NCR has been raised under indicator Supply Chain 3.8.7. This column indicated the newly revised volume which has been applied and approved by RSPO (1) to address the issuance of NC, and (2) to cater for production volume prior to submission of this report. The extensions of volumes were carried out on 3/06/2020, 23/08/2020, 19/12/2020, 21/04/2021 and 22/06/2021.

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar Kamaruzaman	Lead Auditor Supply Chain, Social & HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Mohd Ab Raouf Asis	Auditor / Social, HCV	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He has been trained as RSPO as well as MSPO auditor.
Amir Bahari	Auditor, Occupational health and safety & Environment	Possessed B Sc (Hons) USM and Diploma Palm Oil Milling Technology/Management 1996 MPOB. Working experience for 30 years in the oil palm industry including in the mill and estates. A qualified RSPO P & C Auditor with experience in ISO, EMS and RSPO/MSPO auditing.
Mohd Norddin Abd Jalil	Auditor / Good Agricultural Practices (GAP)	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation.
Ismail Adnan Abdul Malek	Auditor / Social	Holds a Master of Forestry, University of British Columbia, Canada. experience as Sub Assistant Conservator, involved with Forest Administration/Management and Enforcement. seven years as Forest Officer/Logging Superintendent. Senior Lecturer, UPM. A qualified RSPO P & C Auditor with experience in Forest, Social and MSPO auditing.
Rohazimi Mat Nawi	Trainee Auditor Safety & Environment	Hold B. Sc (Hons) Chemical Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill more than 5 years. He was qualified in the auditing line with experienced in Sustainability (MSPO), QMS, EMS, OHSMS and RSPO/MSPO Supply Chain audit.

1.3 Audit methodology

The audit covered Segamaha palm oil mill and all four Segamaha CU supply bases; Sungai Segamaha, Bukit Segamaha. Tabung Tentera Sabah Estate and G&G Estate. The audit included an on-site audit to the estates, mill, line sites, amenities and facilities to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

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1.4 Stakeholder Consultation

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>The following were confirmed during the conduct of audit as there was justify through evidence to prove otherwise:</p> <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 workers sampled aware on the new Minimum Wages (Amendment 2020). Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. Gender Committee – At all OU's, membership of the Gender Committees are open to male and female employees, where they have separate committees to address issues such as domestic violence, sexual harassment and reproductive rights. Joint Consultative Committees – each estate and mill has its own JCC to discuss issues related to health, safety and welfare of workers. The JCC comprise of worker and employer representatives. The worker representative were chosen from those elected by the workers. They confirmed that they are able to make decisions independently. Sungai Segamaha could not demonstrate evidence of legal compliance for working on rest day (Friday). This has been raised as NCR under indicator 6.2.3. There were some parts in the social management plan was not updated i.e on dependants passports and price determination for harvesting contractor, however this was raised under indicator 3.4.3.
2) Settlers	<ul style="list-style-type: none"> Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> Confirmed there is no land dispute between Segamaha CU and neighbouring estates Kwantas Corp Bhd and Tung Hap Plantation Sdn Bhd from interviews. No social issues arising from estate workers. Occasionally are called to attend meetings by Segamaha CU. The last one was held through questionnaires a few months ago. All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings (prior the MCO restrictions). Neighbouring villages representative interviewed confirmed no user rights issues between Segamaha CU and villagers. Estate operation has no negative impact on village livelihood
4) Suppliers	<ul style="list-style-type: none"> Interviewed representatives of suppliers confirmed fair dealings between them and Segamaha. Payments are from made within 1 month of invoice produced by suppliers for purchased items.
5) Contract workers	<ul style="list-style-type: none"> Workers employed by contractors were present in the CU. There were some parts in the social management plan was not updated i.e on price determination for harvesting contractor, however this was raised under indicator 3.4.3.
6) Local & national NGOs	<ul style="list-style-type: none"> Local and national NGOs listed in the Mill and Estates Stakeholders' lists were contacted by SIRIM QAS Int Sdn Bhd for comments. However, no comments were received. Nevertheless, document review confirmed no grievances and user rights issues raised through them.
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> None at site as invitation letter sent out did not receive any comments.

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Stakeholders interviewed	Evidence from stakeholder consultation
8) Independent growers / Smallholders	<ul style="list-style-type: none"> Independent growers / Smallholders supported by Segamaha CU are only contracted FFB suppliers. No conflict or grievance raised by the FFB suppliers.
9) Indigenous people	<ul style="list-style-type: none"> Not applicable as no indigenous people lives within Segamaha CU units
10) Contractor	Contractors in Segamaha CU were interviewed and they confirmed fair dealings between them and Segamaha units. Payments are from made within 1 months of invoice produced by contractors for rendered services
11) Previous land owner (if any)	<ul style="list-style-type: none"> No issue with previous landowner, hence, not applicable
12) Others (please specify)	<ul style="list-style-type: none"> Not applicable

1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Boustead Segamaha Certified Unit is one of the business units registered under the Boustead Estates Agency Sdn. Bhd., a subsidiary company of Boustead Plantation Bhd (BPB). The CU is located about 80 km away from Lahad Datu town. The mill located with the Ladang Sungai Segamaha and consisted of the 4 other estates namely the Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Ladang Tabung Tentera Sabah (LTTS) Estate.

Segamaha Palm Oil Mill was established and commission in July 1996 with the capacity of 55 MT FFB per hour. The mill has received FFB from own estate such as Ladang Sungai Segamaha, Ladang Bukit Segamaha, Ladang Tabung Tentera and Ladang G&G. The mill also received FFB from other plantation such as Tobe Property Sdn Bhd, Tawau Cacao Imports and Exports, Hektar Pujian, Pasir Citra, Grandeed Sdn Bhd, Pertanian Selangor (Ldg PKPS Irat) and Magna Jadi Sdn Bhd, and smallholders like Tan Chok Peng, Tan Leong Kee and Chong Shu Min. All the estates within the CU have been fully developed before the year of 2005.

Boustead Segamaha CU have ISO 9001 quality management system certification beside of RSPO P&C and Supply Chain.

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

The FFB sourced from company owned estates that are certified, outside plantations and smallholders. Details of the FFB contribution from each source to the Segamaha POM are shown in the following tables:

Table 1: Actual FFB production by the supply base for the reporting period (May 2020 to April 2021)

FFB Supplier	FFB Production	
	Tonnes	Percentage (%)
Bukit Segamaha Estate	36138.08	19.01
Sungai Segamaha Estate	48969.52	25.76
G&G Estate	37741.26	19.85
TabungTentera Estate	24554.5	12.92
Ladang Sutera	825.29	0.43
Outsider		
Tawau Cacao	1465.81	0.77
Tobe Property	5624.52	2.96
HektarPujian	2371.66	1.25
Magna Jadi	3804.71	2.00
Pasir Citra	5161.99	2.72
Tan Chok Peng	3312.19	1.74
Ladang Perbadanan Kemajuan Pertanian Selangor	12662.14	6.66
Grandeed	5906.1	3.11
Tang Leong Kee	1585.15	0.83
Total	190,122.92	100.00

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Table 2: Projected FFB production by supply base for the reporting period May 2021 to April 2022

FFB Supplier	FFB Production	
	Tonnes	Percentage (%)
Bukit Segamaha Estate	45,400	22.70
Sungai Segamaha Estate	57,800	28.90
G&G Estate	35,800	17.90
TabungTentera Estate	25,700	12.85
Outsider		
Chong Shu Min	35,300	17.65
Tawau Cacao		
Tobe Property		
HektarPujian		
Magna Jadi		
Pasir Citra		
Tan Chok Peng		
Ladang PerbadananKemajuanPertanian Selangor		
Grandeed		
Tang Leong Kee		
TOTAL	200,000	100

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period for ASA 1 (May 2019 to April 2020) & ASA 2 (May 2020 to April 2021)

RSPO Supply Chain Model : Mass Balance	May 2020 – April 2021 (ASA2)	May 2019 – April 2020 (ASA1)	Total (MT)
FFB Received	190,122.92	180,057.84	
FFB Processed	190,122.92	180,057.84	
Certified FFB Processed	148,228.65	138,510.52	
Non-certified FFB Processed	41,894.27	41,547.32	
Crude Palm Oil (CPO)			
Overall CPO Production	41,431.00	37,812.15	
Certified CPO Production	32,301.53	32,646.51	64,948.04
Certified CPO delivered as RSPO	30,767.71	32,646.51	63,414.22
Certified CPO delivered as non-RSPO	0.00	0.00	0.00
Certified CPO delivered under other sustainable schemes	0.00	0.00	0.00
Palm Kernel (PK)			
Overall PK Production	7,021.00	7,652.46	
Certified PK Production	5,473.90	6,607.03	12,080.93
Certified PK delivered as RSPO	5,473.90	6,607.03	12,080.93
Certified PK delivered as non-RSPO	0.00	0.00	0.00
Certified CPO delivered under other sustainable schemes	0.00	0.00	0.00
Credit traded under Book & Claim	0.00	0.00	0.00

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**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
May 2021 to April 2022**

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	200,000.00
FFB Processed	200,000.00
Certified FFB Processed	164,700.00
Non-certified FFB Processed	35,300.00
Certified CPO Production	35,822.25
Certified PK Production	7,609.14

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Bukit Segamaha Estate	2,267.70	2,415.50
Sungai Segamaha Estate	2,884.50	3,244.50
Tabung Tentera Sabah Estate	1,950.60	2,023.00
G&G Estate	2,274.60	2,409.80
Total	9,377.40	10,092.80

Table 6 Planting profile

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature >3 years (Ha)</u>	<u>Immature < 3 years(Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Bukit Segamaha	2013	2	237.70	-	237.70	10.48	-
	2014	2	538.30	-	538.30	23.74	-
	2015	2	530.70	-	530.70	23.40	-
	2016	2	313.50	-	313.50	13.82	-
	2017	2	323.10	-	323.10	14.25	-
	2018	2	-	324.40	324.40	-	14.31
Total			1943.30	324.40	2267.70	85.69	14.31
Sungai Segamaha	1999	1	21.00	-	21.00	0.73	-
	2007	2	251.20	-	251.20	8.70	-
	2008	2	209.50	-	209.50	7.26	-
	2009	2	182.40	-	182.40	6.32	-
	2012	2	212.00	-	212.00	7.35	-
	2013	2	224.70	-	224.70	7.79	-
	2014	2	524.80	-	524.80	18.2	-
	2015	2	446.60	-	446.60	15.48	-
	2016	2	280.10	-	280.10	9.71	-
	2018	2	-	273.70	273.70	-	9.50
	2019	2	-	258.50	258.50	-	8.96
Total			2352.30	532.20	2884.50	81.54	18.46
Tabung Tentera Sabah	1994	1	276.00	-	276.00	14.15	-
	1998	1	238.50	-	238.50	12.23	-
	2006	2	81.80	-	81.80	4.19	-
	2007	2	68.10	-	68.10	3.49	-
	2008	2	56.90	-	56.90	2.92	-
	2009	2	83.40	-	83.40	4.28	-
	2014	2	194.60	-	194.60	9.98	-
	2015	2	193.40	-	193.40	9.90	-
	2018	2	-	245.30	245.30	-	12.58
	2019	2	-	254.50	254.50	-	13.05
	2020	2	-	258.10	258.10	-	13.23
Total			1192.70	757.90	1950.60	61.14	38.86

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Table 6 Planting profile

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature >3 years (Ha)</u>	<u>Immature < 3 years(Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
G & G	1997	1	1909.10	-	1909.10	83.93	-
	1999	1	365.50	-	365.50	16.07	-
Total			2274.60	-	2274.60	100.00	-
Sub Total			7762.90	1614.50	9377.40	82.78	17.22

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	OSMAN BIN NUSA
Position	:	MILL MANAGER / ENGINEER
Address	:	SEGAMAHA PALM OIL MILL
Phone no.	:	089-870352
Fax no.	:	089-870352
Email	:	segamahamill@bplant.com.my

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 :

Boustead is in progress to certify all the 6 new Business Units from 2019 to 2022 as verified through the Time Bound Plan (updated in December 2019). The BUs are Loagan Bunut, Lapan Kabu, Sugut, Pertama, Kanowit & Tawai.

- 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 Not applicable.

There is no associated smallholder supplying FFB to the CU.

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

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

No changes, all remains the same.

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

3.5. Complaint received from stakeholder (if any)
Not Applicable

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 : 5	2.1.2 (RMN 02 2021), 2.1.3 (AB 01 2021), 3.3.2 (MNAJ 03 2021), 4.2.4 (IA 01 2021), 7.11.3 (MNAJ 02 2021)
Total no. of major NCR(s) (details refer to Attachment 4)	List : 6	2.1.1 (RMN 01 2021), 3.4.3 (MAR 01 2021), 3.8.9 (MZK 01 2021), 6.2.2 (IA 02 2021, MAR 02 2021), 6.2.3 (MAR 03 2021), 6.7.3 (MNAJ 01 2021)

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

Total no. of major NCR(s) (details refer to Attachment 4)	List : NA	NA
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5.0 AUDIT CONCLUSION

The audit team concludes that the organization has / ~~has not~~* established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

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6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

☒

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

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

☒

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

☒

Recommended to continue certification.

☐

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

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

Audit Team Leader
:

**MOHD ZULFAKAR
KAMARUZAMAN**

(Name)

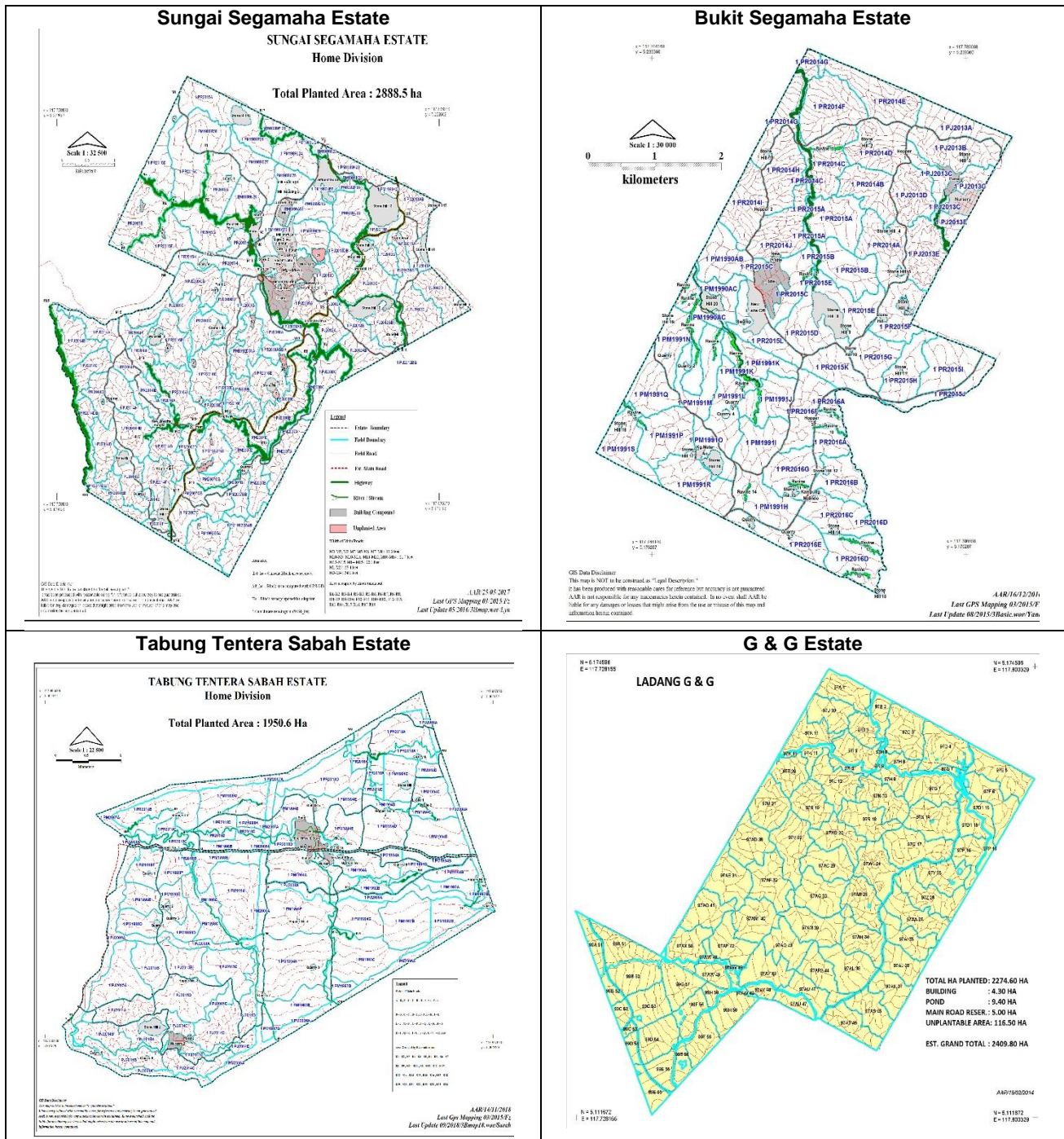


(Signature)

28/07/2021

(Date)

Map of Segamaha CU



AUDIT PLAN

1. Type of Audit

- | | | |
|--|--|--|
| <input type="checkbox"/> Stage 1 Audit | <input type="checkbox"/> Stage 2 Audit | <input checked="" type="checkbox"/> Surveillance Audit |
| <input type="checkbox"/> Recertification Audit | <input type="checkbox"/> Special Audit | <input type="checkbox"/> Transfer Audit |

2. Audit objectives

- ☒ To review certification scheme documented information
- ☐ To verify client readiness to proceed for Stage 2 Audit by gaining a sufficient understanding of the client's certification system and site operations in the context of the standard or other normative document
- ☒ To evaluate the implementation, including effectiveness, of the client's certification system
- ☒ To evaluate the continued compliance of the client's certification system to the requirements of the standard and ability of the certification system to ensure client meets applicable statutory, regulatory and contractual requirements, where applicable
- ☒ To confirm the continued conformity and effectiveness of the certification system as a whole, and its continued relevance and applicability for the scope of certification
- ☐ To evaluate the implementation, including effectiveness, of the client's certification system due to transfer of certification from previous CB
- ☒ To verify adequacy and effectiveness implementation of corrections and corrective actions to close NCR arising from the findings of previous audit
- ☒ Others (please specify):
 - To evaluate **Boustead Segamaha CU** continued conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI).
 - To make appropriate recommendations based on the assessment findings.

3. Date of audit : 3 to 8 May 2021

4. Site of audit :

Boustead Segamaha Certification Unit

- | | |
|---|------------------------|
| ▪ | Segamaha POM |
| ▪ | Bukit Segamaha Estate |
| ▪ | Sungai Segamaha Estate |
| ▪ | G&G Estate |
| ▪ | Tabung Tentera Estate |

5. Scope of certification:

Production of sustainable crude palm oil and palm kernel using the **Mass Balance** supply chain model

6. Audit criteria

- a) RSPO P&C MYNI:2019
- b) RSPO Certification Systems, 2020
- c) Company's audit criteria including Company's Manual/Procedures
- d) Client's documentation

7. Audit team & role

- | | | |
|----------------------|---|---|
| a) Audit Team Leader | : | Mohd Zulfakar Kamaruzaman (HCV, GHG, TBP, Land Title, SCCS) |
|----------------------|---|---|

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b) Auditor : Ismail Adnan (Social)
Amir Bahari (Safety, Environment)
Mohd Ab Raouf Asis (Social and Safety)
Mohd Norddin Abd Jalil (GAP, Safety Estate only)

c) Trainee auditor/ ~~Observer~~ : Rohazimi Mat Nawi (Safety, Environment)
~~Technical Expert/ Translator/~~
~~Interpreter etc.~~

(If there is any objection to the proposed audit team, the client is required to inform the Audit Team Leader/ Head of Section in writing with reason(s) for the objection)

8. Methodology of audit

Site audits or field checks including observation of practices, interviews with internal and external stakeholders and interested parties (employees, nearby population, etc.), documentation review and evaluation of records.

9. Confidentiality requirements

The members of the audit team from SIRIM QAS International Sdn. Bhd. undertake not to disclose any confidential information obtained during the audit including information contained in the final report to any third party, without the express approval of the client unless required by law.

10. Working language : English and Bahasa Melayu

11. Reporting

i) Language : English
ii) Format : Verbal and written
iii) Expected date of issue : In accordance with RSPO P&C System Document
iv) Distribution List : Softcopy of final report issued to the client and hardcopy maintained in the client file.
A public summary of the report will be submitted to RSPO thru the Palm Trace System for license renewal.

12. Facilities and assistance required:

i) Room for discussion
ii) Relevant document and record
iii) Personnel protective equipment if required
iv) Photocopy facilities

13. 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. Recurring major non-conformities on the same indicator in successive surveillance audits shall result in the immediate suspension of the RSPO P & C certification shall be recommended.

The documents for review are needed preferably prior to the conduct of audit. For any records needed but not made available latest during the conduct of audit, an NCR will be raised in accordance with the clause reviewed.

14. Details of audit plan : As follows

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DETAILS OF AUDIT PLAN

Date / Time	Coverage of assessment / Activity / Site	Zul	Raouf	Ismail	Amir	Norddin	Rohazimi
Day 1: 3 May 2021 (Monday)							
8.00am – 8.30am	Opening Meeting – Venue: (Decided by Management) <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. 	/	/	/	/	NA	/
8.30am – 1.00pm	Site observation to POM RSPO Supply Chain 2017 <ul style="list-style-type: none"> RSPO Supply chain standard implementation including model requirements P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 	/			/	NA	/
8.30am – 1.00pm	Site observation to Bukit Segamaha Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. 		/	/		NA	

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	<ul style="list-style-type: none"> Environmental management, waste & chemical management 						
1.00pm	Lunch Break	/	/	/	/	NA	/
2.00pm – 4.00pm	Continue assessment at respective sites	/	/	/	/	NA	/
Date / Time	Coverage of assessment / Activity / Site	Zul	Raouf	Ismail	Amir	Norddin	Rohazimi
Day 2: 4 May 2021 (Tuesday)							
8.30am – 1.00pm	Site observation to Bukit Segamaha Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 	/			/	/	/
8.30am – 1.00pm	Site observation to Sungai Segamaha Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 		/	/			
1.00pm	Lunch Break	/	/	/	/	/	/
2.00pm – 4.00pm	Continue assessment at respective sites	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	Zul	Raouf	Ismail	Amir	Norddin	Rohazimi
Day 3: 5 May 2021 (Wednesday)							
8.30am – 1.00pm	Site observation to Sungai Segamaha Estate <ul style="list-style-type: none"> P1, P2, P3, P4, P5, P6, P7 Occupational safety & health aspects, chemical management Interview with workers, contractors etc. 	/			/	/	/

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	<ul style="list-style-type: none"> Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 						
8.30am – 1.00pm	Site observation to LTT Sabah Estate <ul style="list-style-type: none"> P1, P2, P3, P4, P5, P6, P7 Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 		/	/			
1.00pm	Lunch Break	/	/	/	/	/	/
2.00pm – 4.00pm	Continue assessment at respective sites	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	Zul	Raouf	Ismail	Amir	Norddin	Rohazimi
Day 4: 6 May 2021 (Thursday)							
8.30am – 1.00pm	Site observation to LTT Sabah Estate <ul style="list-style-type: none"> P1, P2, P3, P4, P5, P6, P7 Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Interview with workers, contractors etc. Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management 	/			/	/	/

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8.30am – 1.00pm	Site observation to G&G Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 		/	/			
1.00pm	Lunch Break	/	/	/	/	/	/
2.00pm – 4.00pm	Continue assessment at respective sites	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	Zul	Raouf	Ismail	Amir	Norddin	Rohazimi
Day 5: 7 May 2021 (Friday)							
8.30am – 1.00pm	Site observation to G&G Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 	/			/	/	/
8.30am – 12.00pm	Site observation to Segamaha POM <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting 		/	/			

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	<ul style="list-style-type: none"> • Interview with workers, contractors etc. • Occupational safety & health aspects, chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management 						
12.00pm	Friday Prayer/Break	/	/	/	/	/	/
1.30pm – 4.00pm	Continue assessment at respective sites	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	Zul	Raouf	Ismail	Amir	Norddin	Rohazimi
Day 6: 8 May 2021 (Saturday)							
8.30am – 12.30pm	Continue unfinished Assessment at All Estates and POM (MSPO Audit) <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Confirmation of time bound plan & review of partial certification 	/	/	/	/	/	/
1.00pm	Lunch Break	/	/	/	/	/	/
2.00pm – 3.30pm	Continue assessment at respective sites	/	/	/	/	/	/
3.30pm – 4.00pm	<ul style="list-style-type: none"> • Verification on outstanding issues • Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any) 	/	/	/	/	/	/
4.00pm - 5.00pm	<ul style="list-style-type: none"> • Closing meeting – venue at Decided by Management • Presentation of audit findings, positive comment, Question & answer 	/	/	/	/	/	/

Note : This audit plan is subject to change whenever necessary, and the Client's representative will be informed of any changes prior to the audit.

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate 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	The Segamaha 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	Information are available both in Bahasa Malaysia and English and accessible to the relevant stakeholders through correspondence and request as sighted in the "Communication Record Book" and "Communication" . The Boustead Plantation website address is available in English at http://www.bousteadplantations.com.my/overview.html
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The Segamaha CU have identified personnel responsible for complaints. Records of communication (classified as internal and external) were identified and maintained in different files, depending on the stakeholders. Among the records reviewed were correspondences with the authorities, local communities and employees. The latest communications sighted in these records were the "Borang Aduan" requesting repairs of the employee's houses.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The CU has established a procedure in order to comply with the requirement and it describe the procedures and mechanism to be taken should any stakeholders (either external or internal) wish to communicate with the company on any issues concerning their interest.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Latest stakeholders list at Segamaha CU were updated in January 2021. Identified in the list were also those relevant to the company's operation including local communities, local authorities, NGOs and neighboring smallholders.

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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 CU.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	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, contractor's/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	Relevant information on applicable legal were checked and it has been noted that, <ol style="list-style-type: none"> 1. There are no evidence at all estates (Sg Segamaha, Bkt Segamaha, Tabung Tenera, G&G) estates had conducted identification excessive risk and Noise Risk Assessment. 2. At Tabung Tenera Estate, sighted that chemical register dated 02/01/2021 was not updated with latest pesticide used.- Cyphermetrin 3. At Bkt and Sg Segamaha Estates was found that both CHRA made by Klinik Mansor Sdn Bhd on 22/10/15 had expired the 5-year duration. 4. At Sg Segamaha Estate sighted that one-unit air compressor SB PMT 13692 certificate of fitness (CF) expired on 3/2/2021. Thus, Major NCR RMN 01 2021 has been raised.
	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.	NO	The organization had established and maintained Legal and Other Requirements Register with latest updated in Apr 2021. Appointed person in charge to track changes was evidence while for the evaluation conducted by managers. The organization also been registered with LawNet to track changes to any new Acts and Regulations. However sighted LORR at Sungai Segamaha, G&G and LTTS Estate was not comprehensive with latest Regulations; Minimum wages order 2020, Prevention and Control of Infectious Disease for Covid 19, Workers Minimum Standards of Housing and Amenities Act 2019. Hence, the LORR need to be update and this had been highlighted as minor NCR RMN 02.

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Clause	Indicators	Comply Yes/No	Findings
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	NO	The estates have installed boundary markers as sighted during the visit at the estates. This confirmed that they have maintained boundary markers by installing the red/white pole and signage. However, there are points whereby the boundary area were not clearly demarcated at the following locations and boundaries to distinguish areas of between the 2 properties. <i>Hence an NCR AB 01 of 2021 is raised.</i>
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 available in the stakeholder lists of all units within Segamaha CU and duly updated when necessary. 20 contractors have been listed in the stakeholder list. They include harvesting contractors, suppliers, transporters, replanting contractors, etc.
	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	There is evidence that agreements with third parties contain clauses on meeting applicable requirements. Additionally, contractors' background checks were also done as sighted at Segamaha POM where corporate background of vendors was sought before a contract was signed.
	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	A list of contracted parties is maintained. As at documents reviewed, 20 contractors have listed in the stakeholder list. Based on records available, interviews conducted, and observations made during the audit, there was no evidence of any young persons employed within Segamaha CU.
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	Segamaha POM is currently on the drafting for the following for the directly source of FFB: <ul style="list-style-type: none"> a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder The evidence of currently document in draft is available in the 'Smallholder Mapping'.

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Clause	Indicators	Comply Yes/No	Findings
	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	Currently in Segamaha POM there is no practice of indirectly source of FFB. All FFB are received direct from the suppliers.

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	Segamaha CU continued to achieve long term economic and financial viability through documented management plan projected to year 2024. All the estates had a standard budgeting format. The records were reviewed during the audit. The Business Plan also included a 5-year budget/forecast financial plan (i.e. 2021-2025) with allocation on the following Crop yielding area / Prime mature, Total mature / Cost/ha, General charges/upkeep/collection/depreciation, CAPEX.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Segamaha CU continued to have the replanting programs in place (2021 to 2025). The long-range replanting programs (LRRP) until 2025 were sighted on the Estates. The program was reviewed once a year and incorporated into 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 Segamaha CU was held in February 2021 attended by all the managers. It was chaired by Sustainability Chairman. The Management was transparent in addressing continuous sustainability, adequacy and effectiveness of the requirements for effective implementation of RSPO.
3.2The CU regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous	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 Continuous Improvement Plan 2021 updated in Jan 2021 respectively for all units. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO	YES	Not applicable.

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Clause	Indicators	Comply Yes/No	Findings
improvement in key operations.	Secretariat using the RSPO metrics template.		
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.	NO	There is mechanism in place to check consistent implementation of procedures. Briefing on the SOPs (OPC and Panduan Keselamatan & Kesihatan Pekerja Ladang) and related documents were conducted, and workers were frequently reminded about it during the morning muster. However, the chemical store in G & G Estates do not comply with their SOP, BEA Prosedur 34: Prosedur kerja selamat: Penjaga Setor and the chemical store in LTT Sabah Estate also do not have any ventilation fan to ventilate the store. Therefore, a non-compliance MNAJ 02 2021 is raised against this indicator.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	The implementation of SOPs is monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance.
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 regularly updated in ongoing operations.	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.	NA	Not applicable.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	For Segamaha CU, the SIA and EIA reports separated. The CU has established its environmental aspects / impacts register associated with their activities. Environmental aspect and impact (EAI) which covers form upstream activities such as FFB reception until downstream processes was sighted during assessment and established for 2019/2020. Identification and evaluation of environmental impact was done for all activities and processes related to the mill and estate operation. A Social Impact Assessment report, May 2017 was made available during the audit titled 'Social Impact Assessment (SIA) Sungai Segamaha, Bukit Segamaha, Ghafar and Group Estates and Sungai Segamaha Oil Palm Mill'. The assessment had covered all estates and mill in the CU. The report has covered on stakeholder mapping, wages and decent living

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Clause	Indicators	Comply Yes/No	Findings
			wage, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	NO	<p>Mitigation measures of significant aspects that could negatively affect the environment maintained implemented as per established plans. Among the relevant plans and measures were:</p> <ul style="list-style-type: none"> ▪ Environmental Improvement Plan - Environmental Impact Evaluation (EIE) 2020 ▪ Waste Management Action Plan 2020 ▪ Environmental Management Programme (EMP) 2020 ▪ Pollution Prevention Plan 2020 <p>Social management and monitoring plans have been established. A timetable with responsibilities for mitigation and monitoring was reviewed and updated accordingly. Specific person in charge (PIC) has been identified and be responsible for taking actions on each of the mitigation measures with specific time intervals. Stakeholders meeting were held by the CU to gather inputs during the process of reviewing and updating the 'Management Plan on SIA 2020'. The monitoring records were verified at all sampled estates and mill.</p> <p>However, some parts of the social management and monitoring plan not reviewed and updated regularly in a participatory way. Based on documentation review and interview with sampled employees, it was found that several issues was not updated in the social management and monitoring plan i.e:</p> <ol style="list-style-type: none"> 1. Bukit Segamaha, Sungai Segamaha, LTTS and G&G - dependent's passport. 2. Bukit Segamaha, Sungai Segamaha, LTTS and G&G – impact to the employees during COVID 19 pandemic whether impact on daily works, limitation to go back to respective hometown, etc. 3. LTTS – price determination for harvesting contractor because the employee did ask to revise the rates. According to them the rates was old rates. <p>Therefore, NCR was raised against the indicator as MAR 01 2021.</p>
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 where applicable.	YES	Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Hiring of Local workers. 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 Estate Manager at the Segamaha CU verified through the worker's personal file. For foreign worker, the employment procedures are contained in Standard Operating Process & Procedures (SOPP).

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Clause	Indicators	Comply Yes/No	Findings																										
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Based on the documentation review and interview, employment procedures are implemented and records are maintained. Also, there was document sighted i.e “Prosedur Pengambilan Kakitangan Baharu” date effective Feb 2020. It was mentioned that on the process undertaking new employees, report for duty, probationary period and confirmation.																										
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	<p>The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Segamaha CU have conducted the risk assessment on all its operation as well as determining their control measures.</p> <p>The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none">a) Change in work processb) Revision/changes in legislative requirementc) Occurrence of accidents <p>HIRARC for the mill was formalized on in Mac 2011 with review made annually. There are no new activities in both mill and estates. Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estate office and workshop. In general, the control measures were appropriate to the identified risks.</p>																										
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	<p>The implementation of OSH plan was monitored by internal audits conducted by OSH officers from SSD Unit. The OSHA plan among others initiated by the estates/mill are as follows;</p> <table><tr><td></td><td>Task</td><td>Activity</td></tr><tr><td>1</td><td>OSH Legal Compliance</td><td>Review all relevant legal compliance</td></tr><tr><td rowspan="3">2</td><td rowspan="3">Emergency Response Plan</td><td>ERP Training</td></tr><tr><td>Fire drill</td></tr><tr><td>Enforcement Visit</td></tr><tr><td>3</td><td>OSH Management System</td><td>Review documentation</td></tr><tr><td rowspan="3">4</td><td rowspan="3">Risk Management</td><td>HIRARC review</td></tr><tr><td>Identify High Risk Area</td></tr><tr><td>maintenance</td></tr><tr><td rowspan="3">5</td><td rowspan="3">Accident Investigation/ Reporting</td><td>Hygiene Tech</td></tr><tr><td>Accident Investigation</td></tr><tr><td>JKKP 8/6 submission</td></tr><tr><td></td><td></td><td>Chemical Register</td></tr></table>		Task	Activity	1	OSH Legal Compliance	Review all relevant legal compliance	2	Emergency Response Plan	ERP Training	Fire drill	Enforcement Visit	3	OSH Management System	Review documentation	4	Risk Management	HIRARC review	Identify High Risk Area	maintenance	5	Accident Investigation/ Reporting	Hygiene Tech	Accident Investigation	JKKP 8/6 submission		
	Task	Activity																											
1	OSH Legal Compliance	Review all relevant legal compliance																											
2	Emergency Response Plan	ERP Training																											
		Fire drill																											
		Enforcement Visit																											
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4	Risk Management	HIRARC review																											
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		maintenance																											
5	Accident Investigation/ Reporting	Hygiene Tech																											
		Accident Investigation																											
		JKKP 8/6 submission																											
		Chemical Register																											

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Clause	Indicators	Comply Yes/No	Findings
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	The training program for 2021 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. Training identification matrix has been established with target months for of implementation. It has been reviewed during the conduct of audit.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Segamaha CU had trained their staff, workers and records of training were checked and verified. 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	Training on Supply Chain requirements has been conducted in Feb 2020. The training has been conducted by the Visiting Engineer, to mill Assistant, maintenance engineer, assistant mill engineer, admin supervisor, shift supervisor, grader, laboratory assistant, and weighbridge operator. The intention on this training was to create awareness on understanding on supply chain requirement. For year 2021 Segamaha POM has planned to do the Supply Chain Training in June 2021.

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 implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically	YES	Not applicable due to Segamaha POM using Mass Balance model.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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	Segamaha POM received certified FFB from Sungai Segamaha Estate, Bukit Segamaha Estate, Tabung Tentera Sabah Estate, G&G Estate. And Uncertified FFB from Tawau Cacao, Tobe Property, Hektar Pujian, Magna Jadi, Pasir Citra, Tan Chok Peng, Ladang Perbadanan Kemajuan Pertanian Selangor, Grandeed Sdn Bhd, Tan Leong Kee. Thus, Segamaha POM has qualifies for the Mass Balance chain system and module.
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	As in Table 4 in 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 was: Name: Bousted Rimba Nilai Sdn Bhd – Segamaha Business Unit Country: Malaysia Member ID: 1-0012-04-00-00 Member Category: Oil Mil Products: CPO & Palm Kernel Program: MB Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.

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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	<p>The SCCS written procedure is in place. Sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained. Sighted last training on SCCS in Feb 2020. The Mill Manager has the overall responsibility and authority over the implementation of the supply chain requirements in the Segamaha POM. Segamaha 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. Segamaha POM has received non-certified FFB from outside plantations and smallholders.</p>
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. 	YES	<p>The written procedure, the RSPO: Supply Chain, which is following the RSPO Supply Chain Certification Standard Revision 2017 requirements is available. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements and cover module requirements specific to the site – Module E: CPO Mills: Mass Balance. RSPO internal audit was conducted in February 2021 by the internal auditor. There are 1 Major NC and 2 OFI were raised by auditor. Audit Attendance sheet, audit plan, audit notes, and NC was sighted by auditor.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> 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. 		<p>Management review meeting conducted in Feb 2021 (Combine RSPO SC and MSPO traceability and MSPO SCCS). Among the subjects discussed were:</p> <ul style="list-style-type: none"> Internal audit – (1 major, 2 OFI) Customer feedback – Previous meeting – was highlighted Changes Recommendation for improvement – improve the established system
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. 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>The checking on sources of certified & non-certified FFBs was in place. And Segamaha POM has the mechanism to handle non-conforming oil palm products and/or document. However, it was noted that there were overproduction of certified volume and CU not inform the CB immediately. Thus, Major NCR RAR 01 2020 has been raised.</p> <p>During the Onsite Surveillances audit, Auditor has verified that there was no overproduction for period between May 2020 – April 2021. Sighted also evidences via email, approval extension by RSPO dated 03/06/2020 hence, Major NCR RAR 01 2020 is successfully closed.</p>

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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	Documented procedures related to sales and goods out were sighted and found adequate.

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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>	NO	<p>There is contract document between SPOM and the transporters) stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>The RSPO Supply Chain procedure has described on Outsource Contractor and briefed to the contractor on date 19/02/2020 & 9-11/12/2019.</p> <p>Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.</p> <p>However, Boustead Contract and Compliance management Department did not send the contract to the mill, Sighted evidence mill already email requested the contract on 21/4/21 but no response from HQ. Since there is no evidence to approve that thus, Major NCR MZK 01 2021 has been raised.</p>
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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 contractors specifically the transporter which involve in the physical handling of certified materials had been well maintained through the stakeholder listing dated 1/1/2021. Among the details maintained are name, contact no. as well as address of the contractor.
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. Nonetheless, the PIC was aware on the need to inform CB on those new contractors prior to next audit.
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	SPOM found to have maintained an accurate, complete, up-to-date and accessible records and reports pertaining to their traceability/ supply chain system implementation. Among those sighted are as per listed in para 3.8.5 of this report.
	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	All records related to RSPO SC were maintained minimum for 2 years. Sample CPO dispatch note since Jan 2015 until to date was available and well maintained.
	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	NA since this mill is MB Mill
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can	YES	SPOM had continued to keep record and balances of all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table 'Mass Balance Record for Oil Mills'.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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	Extraction rate 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.	YES	Segamaha 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 Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	Marketing Department personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer. They have updated the system based on input provided by SPOM (e.g. of input Projected & Actual FFB Processed template, Mass Balancing Records for Oil Mills (3 monthly), daily production summary report, monthly production summary report etc.).
3.8.16	Registration of Transactions 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. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or	YES	SPOM has view access of their Palm Trace system. Summary of transaction had been generated and found acceptable. Marketing Department personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	damage shall be removed in the RSPO IT platform		
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. SPOM 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 certification 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, 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	Boustead Plantations Berhad have a documented policy "Polisi Hak Asasi Manusia" that prohibits retaliation against Human Rights Defenders. The policy has been communicated to all workers during morning muster and training/briefing sessions and to all External Stakeholders through Joint Consultation meetings.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment, in their operations.	YES	There is no evidence that Segamaha CU instigates any violence or use any form of harassment in its operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and	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	YES	The system used by the Segamaha CU in resolving disputes and grievances exists in the procedure called "Grievance Procedure (Workers (Estates and Mill), Public, Aborigines and others)", "Flowchart for Grievance/Complaint (workers, Public and others)" and "Flowchart for Grievance/Complaint to higher authority". The Mill and Estates within Segamaha CU each have its own Internal Complaint Book and External Communication Book. Forms were provided for grievance and complaints from stakeholders.

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Clause	Indicators	Comply Yes/No	Findings
accepted by all affected parties.	or intimidation and follows the RSPO policy on respect for HRD.		
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	The Segamaha CU maintained affirms that its dispute system is open to any affected parties. Relevant policy titled 'Polisi Pemberian Maklumat (Whistleblowing)' and procedures were available. In accordance with the procedure, the anonymity of complainants and whistle-blowers will not reveal to third parties.
	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	Segamaha CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders through stakeholders meeting as evidenced by Internal and External Stakeholders' minutes.
	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.	NO	Verification of the mechanism for grievance/complaint at Segamaha CU did not include option 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. The procedure did not include text for 3 rd party representation option. Hence, a Minor NCR (IA 01 2021) is raised.
4.3 The unit of certification 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	It was evident that contributions to community development was provided based on consultations.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free,	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	Records of ownership were maintained at respective estate's office. This plantation area was previously owned by Sabah State Government. The land titled was sharing together by these two operations. The owner of land title for Sg. Segamaha Estate is Boustead Rimba Nilai Sdn Bhd. As for LTT Sabah Estate, the land it was originally owned by Lembaga Tabung Angkatan Tentera, Boustead (Lembaga Tabung Angkatan Tentera). They bought the land from Sabah Land Development as Country Lease.

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Clause	Indicators	Comply Yes/No	Findings
prior and informed consent.	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 checklist, it has been verified that the land is now legitimately owned by Segamaha CU. 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	
	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	
	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	
	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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Segamaha CU. The audit team had confirmed that there were no land issues related to previous owners.

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Clause	Indicators	Comply Yes/No	Findings
	communities where applicable, and relevant authorities).		
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	The requirement in this indicator does not apply to Segamaha 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	The requirement in this indicator does not apply to Segamaha CU
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	The requirement in this indicator does not apply to Segamaha CU
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	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 Segamaha CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha and the audit team had confirmed that there were no land issues related to previous owners. Hence, this requirement in this indicator does not apply to Segamaha CU.
	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	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha and the audit team had confirmed that there were no land issues related to previous owners. Hence, this requirement in this indicator does not apply to Segamaha CU.

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Clause	Indicators	Comply Yes/No	Findings
representative institutions.	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	YES	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha and the audit team had confirmed that there were no land issues related to previous owners. Hence, this requirement in this indicator does not apply to Segamaha CU.
	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	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha and the audit team had confirmed that there were no land issues related to previous owners. Hence, this requirement in this indicator does not apply to Segamaha CU.
	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	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha and the audit team had confirmed that there were no land issues related to previous owners. Hence, this requirement in this indicator does not apply to Segamaha CU.
	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	YES	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha and the audit team had confirmed that there were no land issues related to previous owners. Hence, this requirement in this indicator does not apply to Segamaha CU.

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Clause	Indicators	Comply Yes/No	Findings
	issuance of a new concession or land title to the operator.		
	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. The requirement in this indicator does not apply to Segamaha CU.
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 institutions.	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	It has been verified that the land is legitimately owned by Segamaha CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Communities that have lost access and rights to land for plantation expansion did not exist at Segamaha CU, hence, this Indicator is not applicable.
	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 Aduan/Masalah' and 'Stakeholder Engagement/Negotiation' at Segamaha CU include Handling of Boundaries Disputes, calculating and distributing fair and gender-equal compensation (monetary or otherwise). However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and consulted estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There were no scheme small holdings at Segamaha CU. The Fresh Fruit Bunches are supplied from Segamaha owned estates and Contracted FFB suppliers
	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. The requirement in this indicator does not apply to Segamaha CU

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Clause	Indicators	Comply Yes/No	Findings
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	A procedure for identifying legal, customary or user rights, and compensation process is incorporated in the BPB's Sustainability Policy established by the BPB's HQ. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. However, the requirement in this indicator does not apply to Segamaha CU at present.
	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	The 'Prosedur Aduan/Masalah' and 'Stakeholder Engagement/ Negotiation' at Segamaha CU include Handling of Boundaries Disputes, calculating and distributing fair and gender-equal compensation (monetary or otherwise) are documented and available to affected parties. Since there was no land dispute at Segamaha CU at present, the requirement in this indicator does not apply to Segamaha CU.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	It has been verified that the land is legitimately owned by Segamaha CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Communities that have lost access and rights to land for plantation expansion did not exist, hence, this Indicator is not applicable.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	It has been verified that the land is legitimately owned by Segamaha CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The Auditors had confirmed that there was no land claim and user right conflict at Segamaha hence, this Indicator is not applicable.
	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	YES	It has been verified that the land is legitimately owned by Segamaha CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. Land conflict resolution mechanism at Segamaha CU exists in the procedure called "Grievance Procedure (Workers (Estates and Mill), Public, Aborigines and others)", "Flowchart for Grievance/Complaint (workers, Public and others)" and "Flowchart for Grievance/Complaint to higher authority".

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Clause	Indicators	Comply Yes/No	Findings
	unresolved conflict through appropriate conflict resolution mechanisms.		
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements.	YES	It has been verified that the land is legitimately owned by Segamaha CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. There is no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. At the time of audit, there were no issues regarding land with villagers, local community and neighbouring estate. Since, the Auditors had confirmed that there was no land claim and user right conflict at Segamaha hence, this Indicator is not applicable.
	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 neighbouring communities where applicable).	YES	It has been verified that the land is legitimately owned by Segamaha CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. There is no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. At the time of audit, there were no issues regarding land with villagers, local community and neighbouring estate. Since, the Auditors had confirmed that there was no land claim and user right conflict at Segamaha hence, this Indicator is not applicable.

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 (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	The current and past prices for FFB (year 2020, year 2021 Jan – April 2021) are being displayed at the notice board near the Segamaha POM weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	Segamaha POM is currently on Mass Balance as not all of its suppliers are RSPO certified. Segamaha regularly explains the FFB pricing to the smallholders (FFB suppliers) as attachment to the monthly invoice. The calculation of FFB pricing as in the SECOND SCHEDULE was also included as attachment to the FFB Supplier Agreements. Monthly FFB price is also presented in detail and displayed at the notice board near the Segamaha POM weighbridge.

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Clause	Indicators	Comply Yes/No	Findings
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	At Segamaha POM, fair FFB pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base. This was confirmed by the feedback from representatives of FFB suppliers.
	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	At Segamaha CU, there are records kept of parties, including women and independent representative organisations assisting smallholders 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. The requirement of this Indicator is not applicable.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	There is evidence that contracts entered into with FFB suppliers, CPO transporters and other Contractors are fair, legal and transparent. Among others, the contracts are dated, with clear provisions on contract duration, scope of services, payment of fee, obligation and undertaking of parties, provisions related to default and termination, rights and obligations upon termination, clause on dispute, etc. Annexes of the FFB supplier and transporter contracts specify method of FFB pricing calculation, schedule of transportation rates and transport rate adjustment mechanism, respectively.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	Interview with FFB suppliers/smallholders confirmed the agreed payments are made in a timely manner (not later than 30 days) and receipts specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Segamaha POM has been calibrated on yearly basis using third party accredited weighing company.
	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	YES	Segamaha CU 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.

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Clause	Indicators	Comply Yes/No	Findings
	holds the certificates, and who holds and sells the certified material.		
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the Boustead Segamaha CU as per the Grievances Process, Grievances Procedure ", and "Consultation and Grievances Communication Procedure Internal/External" and Land Dispute compensation and calculation procedure. 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	Segamaha CU are interested to provide consultation to interested smallholders (irrespective of type and outside the supply base) including women or other partners to assess their needs for support to improve their livelihoods and their interest in RSPO certification. However, based on available record at the CU, no smallholders outside the supply base had shown interest to Segamaha CU.
	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	Based on available record at the CU, no smallholders outside the supply base had shown interest to Segamaha CU. The requirement of this Indicator is not applicable to Segamaha CU.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Based on available record at the CU, no smallholders outside the supply base had shown interest to Segamaha CU. The requirement of this Indicator is not applicable to Segamaha CU.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	There are no Scheme Smallholders in Segamaha CU FFB supply base. The requirement of this Indicator is not applicable to Segamaha CU.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	There are support programmes for smallholders within the supply base. Segamaha CU regularly reviews and publicly reports on the progress of its smallholder support programme.

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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 'Polisi Kesamarataan Hak' was established in the estate and POM. The policy statements emphasized on worker information, recruitment and selection, training, employee development, terms of service and records of service. This policy is posted on notice boards in the estates/mill office. The Social Policy statements at Segamaha CU generally include aspects of worker information, recruitment and selection, training, employee development, terms of service and records of service. The policy has been communicated to all workers during morning muster and the policy is posted on notice boards in the estates office board. The equal opportunities policy (<i>Polisi Kesamarataan Hak</i>) states that the CU provide equal opportunity to all and does not practice discrimination based on race, caste, national, origin, disability, gender, sexual orientation, union membership, political affiliation, or age. There is no evidence of discrimination from feedback provided by employees interviewed. A functioning grievance mechanism is also in place.
	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	Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Hiring of Local workers. 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 Estate Manager at the Segamaha CU verified through the worker's personal file. For foreign worker, the employment procedures are contained in Standard Operating Process & Procedures (SOPP). 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 foreign workers.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.	YES	As of the date of the audit, there is no pregnant worker at Segamaha BU. As confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in

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Clause	Indicators	Comply Yes/No	Findings
	Alternative equivalent employment is offered for pregnant women.		a discriminatory manner. Pregnancy test was done on her own free will and they confirmed that no sign of pregnancy testing done in discriminatory manner, unless on her own will.
	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 Segamaha BU.
	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	Documentation of pay are available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Briefing on relevant provisions on the Sabah Labor Ordinance (e.g. hours of work, rest day) Minimum Wages Order, were also given to the workers. Pay slips and employment contracts are prepared in English and origin country of each employee.
	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 were reviewed and providing the relevant as requested by the standard. However, Payroll documents i.e. payslip does not give accurate information on compensation for the work performed. Based on documentation review i.e. payslip at Sungai Segamaha, LTTS and G&G, the information on tonnage for the work done by the contract harvester was not stated in the payslip. Therefore, NCR was raised against indicator as MAR 02 2021. Verification of documents at LTTS Estate also found that one contractor did not provide Employment Contracts to its workers that include employment conditions 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, hence, a Major NCR (IA 02 2021) is therefore, raised for this Indicator.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday	NO	There is no evidence of legal compliance for working on rest day (Friday) at Sungai Segamaha Estate. Based on interview and documentation review on payslips and checkroll records, three (3) contractor employee were found working on rest day on the month of Jan

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Clause	Indicators	Comply Yes/No	Findings
	entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		2021, 29 th and Feb 2021, 5 th , 12 th and 19 th , but not be paid twice of rate per piece as per 104 (c) (5) of Sabah Labor Ordinance, an employee employed on piece rates who works on a rest day shall be paid twice his ordinary rate per piece. Therefore, NCR was raised against the indicator as MAR 03 2021.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	It was evident that Segamaha CU provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free. Each house has between 2 to 3 rooms and accommodate between 2 to 5 workers. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises. Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall. There is evidence that housing inspection are being carried out once a week based on housing inspection records. At Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Segamaha POM, the inspections were carried out by the assistant health assistant. Water and electricity are also provided from genset and water treatment at each OU's. Free medical treatment above is provided also to all workers and their dependants.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units have its own canteen and grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within its expiry period. Workers interviewed informed that they purchase items from these stores, but also since the estates and mill are easily accessible to the nearest town, they also go out to the towns. Workers could either pay in cash, or on credit.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:	YES	The new Minimum Wages Order 2020 came into effect on 1 February 2020. Bukit Segamaha, Sungai Segamaha, LTT and Segamaha Mill 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 Calculation Prevailing Wages.

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Clause	Indicators	Comply Yes/No	Findings
	<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>		
	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	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	A policy titled as “Polisi Kebebasan Berpersatuan” is available in the CU. The policy is written in Bahasa and languages. 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.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely	YES	Meetings with the employees were held in Feb & March 2021 for the estates and mill. The meetings discussed i.e. child labor which the company didn’t allowed any person below 18 years old to work in the premise. As pandemic COVID 19 still spreading, management

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Clause	Indicators	Comply Yes/No	Findings
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.	elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.		urged all employees to wear face mask at all times and to follow SOP established by MKN and Boustead. All new policy, which signed by the new CEO were presented by management during the meeting.
	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	Based on the interview at all OU's, it has been confirmed that the employee's representatives were freely elected including migrant and contract workers.
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" signed by CEO in December 2019. This undertaking to not hire child labour is included in all service contracts and supplier agreements. Evidence of legal due diligence carried out include getting the vendors to sign the 'Code of Ethics and Conduct where they undertake 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.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout Segamaha BU. There also have a documented age screening verification procedure.
	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 Segamaha 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	YES	Based on the documents sighted, communication about no child labour Policy was communicated to all levels of employees as evidenced from training records at the Segamaha BU.

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Clause	Indicators	Comply Yes/No	Findings
	supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.		
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. The policy was signed by the Chief Executive Officer and is available in Malay language. The policy is displayed on the notice boards at the mill and the estates offices. No evidence or acts that contradict this policy were observed as interviewed the women workers/staffs and gender committee during the audit in the BU.
	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	The CU also maintained implemented the policy through continued having meeting for reviewing of violation of reproductive right policy. The Gender Committee meeting minute was reviewed as well as interviewed with committee members carried out during audit. No case of violation was observed.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	Gender Committee have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights and need of new mothers. Awareness on reproductive rights need of new mothers are also briefed during muster and Gender Committee meetings held at each Mill and Estates. However, no new mothers have been reported during the audit, therefore all OU's still continuing disseminate awareness on issues relating to reproductive rights and need of new mothers.
	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. The mechanism has been communicated to all levels of the workforce as verified by auditor during interview with female workers at all estates and Mill.
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 fees • Contract substitution • Involuntary overtime 	YES	Collective evidence is available that all sampled workers have entered into employment voluntarily. It was following what the standard required.

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> • 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	<p>'POLISI PEKERJA BURUH ASING' signed by Chief Executive Officer dated 2 December 2019 was made display at estates and mill notice board. Para 2 of the policy stated that policy of Boustead allows employees to get the Minimum Wages, and no discrimination and contract substitution. 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.</p> <p>Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc.</p>
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	<p>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. Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2020 was available. The Estate/Mill Manager is the chairman, and the Mill Engineer/Assistant Manager is the secretary. OSH Committee meetings were held once in three months. Minutes meetings were reviewed during the conduct of audit.</p> <p>OSH Committee meetings confirmed that among the agenda discussed, included the following:</p> <ul style="list-style-type: none"> ▪ Passing of previous minutes and arising matters. ▪ Accident report (Monthly Data of Mill/Estate Safety Performance) ▪ Workplace inspection ▪ Safety report and programme

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Clause	Indicators	Comply Yes/No	Findings
	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	<p>Accident and emergency procedures were available and the emergency situations identified were fire, explosions, and medical emergencies, uncontrolled release of hazardous substances, security threats and floods. Furthermore, sighted also COVID-19 preparedness and response plan flow for operating unit with medical access limitation.</p> <p>The estate tested their emergency response plans at least annually. First aid training was also conducted annually. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident (LTA) metrics. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.</p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedure's guidelines were issued by SSD and amended to tailor to the situation differences in the estates and mill.</p> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training. Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Manday MC.) This is summarized officially in the JKPP 8. Accident Statistics are being maintained in a satisfactory manner. In general all major incidences were attended to with proper documents maintained to address root causes and prevention measures. This has been reviewed accordingly. In summary;</p> <ol style="list-style-type: none"> (1) The mill had an accident in June 2021 involving a general worker cutting grass at housing complex. (2) Bkt Segamaha had a fatal case with a field staff riding motorcycle hitting a trailer in motion. (3) G&G estate had incidences relating to motorcycle riding while commuting to work site.
	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	NO	<p>The mill and estates issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire & PPE. Acknowledgement of receipt was recorded. However, it was found that harvesters in Sungai Segamaha and G & G Estates bought their own PPE (Wellington Boots). It was not provided to them for free of charge. A Major non- compliance MNAJ 01 2021 was raised.</p>

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Clause	Indicators	Comply Yes/No	Findings
	pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	Both the Estates and Mill in the Segamaha CU uses SOCSO for the coverage for the local and foreign workers.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Manday MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory 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	Segamaha CU continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. b) Census records for Ganoderma affected palms were sighted c) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year were recommended by the PA /Agronomist. Baiting is continued until bait acceptance level fall below 20%.
	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	This is not practiced in the 4 estates. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.

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Clause	Indicators	Comply Yes/No	Findings
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	Segamaha CU continued to use the Boustead Plantation Berhad's Sustainability Policy of no open burning. As advocated, all 4 estates practised Zero burning thus no use of fire for pest control. In the 2018 and 2019 replants visited during the audit in the estates, it was evident that all palms were felled, shredded, windrowed, and left to decompose.
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	Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in the internal established SOPs. The Manual had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. All the Estates had maintained chemical registers and were updated periodically i.e. March-Apr 2020.
	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	Segamaha CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients applied per ha. Pesticides are used only when justified and areas used were recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. All the estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	Segamaha CU continued to implement Integrated Pest Management (IPM) in all Estates. All estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by its SOP. They were committed to minimise the usage of pesticides by implementing Integrated Pest Management (IPM) in all estates. All estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques and the latest Integrated Pest Management Plan.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of prophylactic use of pesticides in Segamaha CU except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practised for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOP. Segamaha CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that most pesticides used are of Class II, Class III & class IV.

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	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	There was no evidence to show that Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, were used in all 3 estates visited. a) The Estates had used only Class II, Class III and Class IV chemicals. b) All the pesticides used were those registered under the Pesticides Act 1974 (Act 149). <table><tr><td></td><td>Chemical name</td><td>Class</td><td></td><td>Chemical name</td><td>Class</td></tr><tr><td>1</td><td>Glyphosate isopropylamine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Sodium chlorate</td><td>III</td><td>7</td><td>Triclopyr butoxy e/ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>Canyon 20G</td><td>IV</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Amine 2.4 D</td><td>II</td></tr><tr><td>5</td><td>Metsulfuron methy 20% w/w</td><td>III</td><td>10</td><td>Bayfolan</td><td>III</td></tr></table>		Chemical name	Class		Chemical name	Class	1	Glyphosate isopropylamine	III	6	Cypermethrin	III	2	Sodium chlorate	III	7	Triclopyr butoxy e/ester	III	3	Glufosinate ammonium	III	8	Canyon 20G	IV	4	Triclopyr butoxy	III	9	Amine 2.4 D	II	5	Metsulfuron methy 20% w/w	III	10	Bayfolan	III
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	7.2.5a Judgment of the threat and verify why this is a major threat.	YES																																					
	7.2.5b Why there is no other alternative which can be used.	YES																																					
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES																																					
	7.2.5d What is the process to limit the negative impacts of the application.	YES																																					
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES																																					
	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 (see Criterion 3.6). 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 management. The employees involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers were trained in chemical handling. The trade and generic names of the chemicals were made known to them through the SDS. Chemical handlings training was conducted and record sighted.																																				
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES		The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and use were maintained. All of the stores were equipped with exhaust																																			

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			fans and the door was secured and keys held by only the storekeeper and attendant. Only authorized personnel are allowed to handle the chemicals. All chemicals were segregated and fertilisers were well stacked. Relevant MSDS/CSDS were available in the stores.																																						
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	In Segamaha CU, all empty pesticides containers were triple-rinsed at washing station prior to storage and disposed through a recycle company. All empty pesticides containers and SW in the CU are disposed DOE-approved license. The SOP on Scheduled Waste disposal is established and implemented, accordingly.																																						
	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	In Segamaha CU, aerial spraying of pesticides was not practised by all the estates. This is confirmed through records verification and observation during the site visit, estate complex and interview with the employees																																						
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	The medical surveillance was performed accordingly at two clinics in Sandakan. The results for the entire workers were positive and declared FIT to handle chemicals.																																						
	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	All the estates and mill in the CU complied with procedure and guidelines provided in the <i>Polisi Pengendalian Racun Perosak Bertoksik Tinggi</i> . They maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance																																						
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	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	<div>The Estates and Mill had established the waste and pollution management plan 2021 as shown below. The PIC and time frame was also shown in the management plan.</div> <table><tr><td></td><td>Activities</td><td>Source</td><td>Waste /Pollution</td><td>Affected Environment</td></tr><tr><td>1</td><td>Gen store</td><td>Petrol oil, lubricant</td><td>Spillage & contamination</td><td>Land, water</td></tr><tr><td></td><td></td><td>Chemical</td><td></td><td></td></tr><tr><td>2</td><td>SW store</td><td>Scheduled waste</td><td>All type of SW</td><td>Environmental</td></tr><tr><td>3</td><td>office</td><td>Domestic/office waste</td><td>paper plastic</td><td rowspan="3">Land, water</td></tr><tr><td></td><td></td><td>Toilet & kitchen</td><td>sewage</td></tr><tr><td>4</td><td>Workshop</td><td>Used oil & grease</td><td>Spillage</td></tr><tr><td></td><td></td><td>Metal waste</td><td>Wastage</td><td>Recycled</td></tr></table>		Activities	Source	Waste /Pollution	Affected Environment	1	Gen store	Petrol oil, lubricant	Spillage & contamination	Land, water			Chemical			2	SW store	Scheduled waste	All type of SW	Environmental	3	office	Domestic/office waste	paper plastic	Land, water			Toilet & kitchen	sewage	4	Workshop	Used oil & grease	Spillage			Metal waste	Wastage	Recycled
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						Oil drum/tank		Land, water
				5	Labour line	Domestic waste	Solid waste	
						Toilet/kitchen waste	sewage	
				.	Activities	Source	Prevention	Action Plan
				1	Gen store	Petrol oil, lubricant	Keep items in designated area i.e. bund 110% of capacity	Establish recovery procedure - accidental spillage. Kit available
						Chemical		
				2	SW store	Scheduled waste	Comply to EQA requirement	Dispose as SW & maintain record.
				3	office	Domestic/office waste	Implement recycling of waste Provide bins	Continuous education on environmental issues and program.
						Toilet & kitchen		
				4	Workshop	Used oil & grease	Display signboards & provide litter bins	Provide training on recycling
						Metal waste	Collect discarded materials for recycling	
						Oil drum/tank		
				5	Labour line	Domestic waste	Display signboards & provide litter bins	Provide training on recycling
					Labour line	Toilet & kitchen waste	Ensure no accidental spillage	Cease using facilities in event of non-functional.
		7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Domestic waste generated from workers quarters was disposed in respective land fill for Segamaha CU estates and mill. The landfills were located away i.e. about 2-3 km from water sources. Site visit to landfill area observed its well maintained and no sign of pollution to water source. The SOP on Scheduled Waste disposal is established and implemented. All scheduled wastes disposed to DOE-approved contractors while SW404 disposed via respective VMO.				
		7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at Segamaha CU units, there were no evidence on waste material has been disposed using fire. All the waste material (domestic & scheduled waste) has been disposed accordingly. Site visits respectively at replanting areas PR2019 and PR2020 all the palms have been chipped and left for decomposed.				
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Segamaha CU continued to implement the good agriculture practices as per Oil Palm Circular Manual (O.P.C.) to ensure optimal and sustained yield and complied with recommendations for the application of the fertilizer in as recommended by Applied Agricultural Resources Sdn. Bhd. (AAR). Fertilizers application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the Applied Agricultural Resources Sdn Bhd. Annual fertilizer recommendations were made based on annual foliar sampling. Soil sampling was carried out yearly consistence with foliar sampling.					

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ensures optimal and sustained yield.			Fertilizer application program was monitored using program sheets, bin cards, Field Cost book and Fertilizer Quality Assessment by Applied Agricultural Resources Sdn Bhd.																																																																
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Periodic foliar and soil sampling were carried out by the Applied Agricultural Resources Sdn.Bhd. (AAR) and its result formed part of the basis for the fertilizers input recommendation. Foliar samplings and Soil sampling, which is conducted together, were carried out between Feb to June 2020.																																																																
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	All the Estates continued to have a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and EFB applied. EFB was applied at 40 tons /Ha/year in single layers in plots between palms. Records of application and maps were reviewed by the audit team. On Sg. Segamaha Estate POME application (land Irrigation by Sprinkler) was land applied.																																																																
	7.4.4 Records of fertiliser inputs are maintained.	YES	Fertiliser inputs were based on recommendation by the Applied Agricultural Resources Sdn Bhd. The application programs were monitored using manuring program sheets, bin cards and field cost book. Records of programs and applications of fertilisers were available. Records showed that actual applied in 2020 was in line with recommendations in all estates.																																																																
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	Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows as updated on 2012/2018 subject to the requirement of the estates																																																																
			No	Soil Series	Sg. Segamaha Estate	Bukit Segamaha Estate	TTS Estate	1	Kelawat	-	/	-	2	Luba	-	/	-	3	Tg Lipat	/	/	/	4	Kumansi	/	/	/	5	Inanam	-	/	-	6	M/Waku	-	/	-	7	Bangkawat	-	/	-	8	Masaum	/	/	-	9	Luasong	-	/	/	10	Laab	-	/	/	11	Pallu	-	-	/	12	Batang Family	/	-	-
			No	Soil Series	Sg. Segamaha Estate	Bukit Segamaha Estate	TTS Estate																																																												
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			6	M/Waku	-	/	-																																																												
			7	Bangkawat	-	/	-																																																												
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12	Batang Family	/	-	-																																																															
There were no problematic soils (e.g. podzols and acid sulphate soils) on Segamaha CU. The estates maintained the following maps and documents for proof of recognized legal rights. Documents were sighted and verified. A scale of map at 1:10000 to 1: 15000 is established. Maps were prepared by AAR formalized in 2015.																																																																			

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			<table><tr><th>No</th><th>Details</th><th>Sg. Segamaha Estate</th><th>Bukit Segamaha Estate</th><th>TTS Estate</th></tr><tr><td>1</td><td>GPS survey</td><td>/</td><td>/</td><td>/</td></tr><tr><td>2</td><td>Soil series</td><td>/</td><td>/</td><td>/</td></tr><tr><td>3</td><td>Topography</td><td>/</td><td>/</td><td>/</td></tr><tr><td>4</td><td>Water ways model</td><td>/</td><td>/</td><td>/</td></tr><tr><td>5</td><td>Field boundary</td><td>/</td><td>/</td><td>/</td></tr><tr><td>6</td><td>Boundary stone</td><td>/</td><td>/</td><td>/</td></tr></table>	No	Details	Sg. Segamaha Estate	Bukit Segamaha Estate	TTS Estate	1	GPS survey	/	/	/	2	Soil series	/	/	/	3	Topography	/	/	/	4	Water ways model	/	/	/	5	Field boundary	/	/	/	6	Boundary stone	/	/	/
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	7.5.2 No replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	Segamaha CU had a management strategy for planting on slopes and to minimise and control erosion and degradation of soils. The plantings on slopes were guided by its SOPs to minimise soil erosion based on local soil and climate conditions, ground cover management (OPC 01.a), biomass recycling (OPC 08.b.), terracing (OPC 54.a) and natural regeneration of Nephrolepis biserrata. It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the SOU.																																			
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	Segamaha CU had a management strategy for planting on slopes and to minimise and control erosion and degradation of soils. It was observed that there is no new planting of oil palm on steep terrain.																																			
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	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	Segamaha CU had a management strategy for palm oil cultivation,taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Segamaha CU. Periodic foliar and soil sampling were carried out by the Applied Agricultural Resources Sdn.Bhd. (AAR) and its result formed part of the basis for the fertilizers input recommendation. There were no problematic soils (e.g. podzols and acid sulphate soils) In Segamaha CU as reported above.																																			
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	There were no problematic soils (e.g. podzols and acid sulphate soils) In Segamaha CU. Maps were prepared by AAR formalized in 2015.																																			
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	During the field visit and the soil maps provided and reviewed by the auditors, it was observed that no fragile or marginal soils were found in Segamaha CU. There were no problematic soils (e.g. podzols and acid sulphate soils) in Segamaha CU. The estates maintained the following maps and documents for proof of recognized legal rights, prepared by AAR.																																			
7.7 No new planting on peat, regardless of depth after 15	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	This is <i>not applicable</i> as there is no peat soil in the entire 3 estates in the CU as supported by the soil maps of respective estates.																																			

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November 2018 and all peatlands are managed responsibly.	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Segamaha CU as supported by the soil maps of respective estates
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Segamaha CU as supported by the soil maps of respective estates
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Segamaha CU as supported by the soil maps of respective estates
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, 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	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Segamaha CU as supported by the soil maps of respective estates

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	alternate methodologies to be considered by RSPO for recognition.		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Segamaha CU as supported by the soil maps of respective estates.
	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 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.	YES	This is <i>not applicable</i> as there is no peat soil in the entire 4 estates in the Segamaha CU as supported by the soil maps of respective estates.
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	In the Water Management Plan, the CU has also identified actions to be taken in the event of water supply shortage, though both estates received supply of piped treated water from the local state authorities for the domestic consumption. The continued availability of water sources and to avoid negative impacts on other users in the catchment has been conclude in the Environmental Compliance Report (ECR). The CU has also identified actions to be taken in the event of water supply shortage, as the estates reply on the rainwater and owned water catchment. for the domestic consumption. The water analysis (drinking water) was taken by the estate management for supply to the entire complexes upon treatment. Frequency is taken at 6-monthly. Analysis made by third party lab appointed by the Company. Results within standard compliance.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Supplies are made to all housing areas and office complexes in the respective estates as the sources are from the internal water pond and catchment. For general uses rainwater harvesting are practiced via collection into the poly tank supplied to the residences.

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	7.8.1b Workers have adequate access to clean water.	YES	Supplies are made to all housing areas and office complexes in the respective estates as the sources are from the internal water pond and catchment. For general uses rainwater harvesting are practiced via collection into the poly tank supplied to the residences.
	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	The Estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The signboards were displayed accordingly at the site where applicable. The guideline was issued by the SSD Unit. During the field visit there was no spraying activities or signs left in the visited areas. Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Riparian buffer zones areas were identified and marked. No activities in buffer zone area. Vetiver grass had been planted along the riverbanks and water catchments. During the field visit, there were evidence that these areas were free from chemical spraying and manuring application. The practices are guided by a policy " <i>Polisi Perlindungan Cerun & Zon Penampian Sungai</i> " signed by the CEO of Boustead Plantation Berhad.
	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	Site visit to the effluent treatment plant and interview with operator in charge confirmed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. Submissions to DOE reviewed and the results from final discharge were in compliance with the parameters limit.
	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, with average at >2.2litre/FFB in 2020.
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	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. Among the plan for improving fossil fuel are: <ul style="list-style-type: none"> ▪ Closely monitored operation of tractors ▪ Minimise the electricity usage at workers housing ▪ Replace light bulb with energy saving bulb ▪ To switch off and unplug all the electrical equipment after used ▪ Minimise the lubricant oil usage through using small tractor for FFB evacuation Documents was reviewed showed evident that they are compiling the data and document it for further action to improve on their efficiency of using the renewable and non-renewable

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			<p>energy. Apart from use of grid electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler.</p> <p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report 2021 as follows:</p> <table><tr><td></td><td>Target</td><td>Objective</td><td>Action plan</td></tr><tr><td>1</td><td>Backhoe tractor</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td></tr><tr><td>2</td><td>Van / Supervisory vehicle</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td></tr><tr><td>3</td><td>Electrical supply</td><td>To reduce reliance on gen-sets for power supply</td><td>To run steam turbine during non-processing min 2 hours</td></tr><tr><td>4</td><td>Electrical supply</td><td>Reduce electricity usage</td><td>Use time switches and daylight sensors for outside lighting</td></tr><tr><td>5</td><td>Electrical supply</td><td>Reduce electricity usage</td><td>Install solar panel in estates in 2021</td></tr></table>		Target	Objective	Action plan	1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	3	Electrical supply	To reduce reliance on gen-sets for power supply	To run steam turbine during non-processing min 2 hours	4	Electrical supply	Reduce electricity usage	Use time switches and daylight sensors for outside lighting	5	Electrical supply	Reduce electricity usage	Install solar panel in estates in 2021
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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	<p>Segamaha CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends to RSPO on 03/05/2021 and auditor checked. The input data was verified need to repair and auditor approved back on 8/5/2021, and the following were determined:</p> <table><tr><td>Description</td><td>tCO₂e/tProduct</td><td>Production</td><td>t/yr</td></tr><tr><td>CPO</td><td>0.50</td><td>FFB Processed</td><td>195,156.60</td></tr><tr><td>PK</td><td>0.50</td><td>CPO Processed</td><td>42,954</td></tr></table> <table><tr><td>Land Use</td><td>Ha</td></tr><tr><td>OP Planted Area</td><td>14362.92</td></tr><tr><td>OP Planted on Peat</td><td>0.00</td></tr><tr><td>Conservation (forested)</td><td>0.00</td></tr><tr><td>Conservation (non-forested)</td><td>139.01</td></tr></table>	Description	tCO ₂ e/tProduct	Production	t/yr	CPO	0.50	FFB Processed	195,156.60	PK	0.50	CPO Processed	42,954	Land Use	Ha	OP Planted Area	14362.92	OP Planted on Peat	0.00	Conservation (forested)	0.00	Conservation (non-forested)	139.01		
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7.10.2 (C) Starting 2014, the carbon stock of the proposed development area	YES	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas.																																																																																			

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	and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).		Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Boustead Segamaha CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.												
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	<p>Among others the significant environmental receptors for the estates and mill operations were:</p> <table><tr><td></td><td>Environmental Receptors</td><td>Source</td></tr><tr><td>1</td><td>Air</td><td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td></tr><tr><td>2</td><td>Water</td><td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td></tr><tr><td>3</td><td>land</td><td>Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td></tr></table> <p>Segamaha Palm Oil Mill conducted boiler stack sampling for each of the boiler stack. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). Results were within the acceptable limit. Among other action taken by the CU were:</p> <ul style="list-style-type: none">a) Management of Scheduled wastes – were disposed to DOE-approved contractors.b) Domestic wastes are disposed to respective landfill designated area located far from housing complexes and waterways for Segamaha CU.c) Full compliance to zero burning practices.		Environmental Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.
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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	Boustead Plantations Bhd has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants PR2019 and PR2020 visited during the audit in the Tabung Tentera Sabah Estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for the Oil Palm cultivation.												
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	<p>This is established in the ERP procedure <i>Pelan Tindakan Kecemasan Kebakaran</i>, containing</p> <ul style="list-style-type: none">a) Objectiveb) Activity and prevention.c) Function of Fire and Rescue Teamd) Emergency Evacuation Plan / Drill												

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			The procedure was formalised for use in all certification units in BPB Estates and mills. Training related to fire drill are conducted annually.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	NO	Segamaha CU did not hold any engagement with the adjacent stakeholders forthrough briefing sessions on fire prevention and control measures. Therefore, a non-compliance MNAJ 03 2021 is raised against this indicator.
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	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Segamaha CU since Nov 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The CU conducted HCV assessment as verified through HCV report titled 'The Assessment of High Conservation Value Sites within Sungai Segamaha, Bukit Segamaha and Ghafar & Group Estates and Mill Complex in Sabah'. The study was conducted by S.K Yap Forestry and Landscape Services and the report was completed in April 2017. The study had covered all the High Conservation Value (HCV) within and adjacent to the Segamaha CU. The HCV assessment had identified the rare, threatened and endangered species (RTEs) for estate named Sungai Segamaha, Bukit Segamaha and Ghafar & Group Estates including the management and action plan. For LTT Estate A report "High Conservation Value Assessment (HCV) Tabung Tentera Sabah Estate" is available. The study was conducted by S.K Yap Forestry and Landscape Services and the report was completed in March 2017. The total area was reported as 199.57 Ha.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	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	YES	Segamaha CU has established and reviewed the action plan and monitoring programme for HCVs area after consultation with relevant stakeholders. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action.

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	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).		There were no major changes to the integrated management plan, except awareness training, continuous monitoring for HCVs area. Bukit The estates established HCV action plan titled 'HCV Management Plans'. The estate planned to maintain the HCV area by: <ul style="list-style-type: none"> • Appropriate signage • Regular briefing • Demarcation HCV Area • Allow natural vegetation • Planted signage and boundary Marking • Periodic visit and monitoring HCV Area
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	There were no local communities living nearby with Segamaha CU only surrounding with Small grower and Plantation Estate. So, this indicator was not applicable with this CU.
	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	YES	Training provided. An appropriate disciplinary measure was instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species, and also Policy and Statement has been developed for disciplinary measures. The statement also available at AP Post surrounding the Segamaha CU.

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	found to capture, harm, collect, trade, possess or kill these species.		
	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	Segamaha CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the HCV Area. It was noted that AP has been monitoring surrounding the estate to control everything including any illegal activities. The monitoring activities was recorded in the Book Rekod Rondaan HCV.
	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 Compensation Procedure (RaCP) Applies.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Segamaha CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

RSPO Certifications Systems for P&C and RISS, Nov 2020

Clause	Indicators		Comply Yes/No	Findings
5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(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.		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 2019 to 2023.
	(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		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.

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		appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;		
	(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);		There was revision of the time-bound plan being updated on 25 May 2021. 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.
	(d)	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.		The details of the Time Bound Plan described as per attachment 6. Boustead Plantation Berhad is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP. As of this audit and Verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan
5.5.3 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;		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.

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	(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 4.4, 4.5, 4.6, 4.7 and 4.8;	<p>It is confirmed that land conflict was resolved through FPIC processes which facilitates compliance with requirement of RSPO, accordance to:</p> <ul style="list-style-type: none"> • Criteria 4.4 – on adequate participation and negotiated agreements (Sighted PMC minutes of meeting) • Criteria 4.6 – on land acquisition whereby the right to use the land is demonstrated. (Refer Memorandum of Consent (MOC) between NCR Landowners & LCDA (as Managing Agent), (Refer Joint Venture Agreement (JVA) between Boustead Plantation Berhad, BPB and Pelita Holding Sdn Bhd (PHSB) to develop land into oil palm plantation) • Criteria 4.7 – on mutual agreement for identifying people entitled to compensation is in place. • Criteria 4.8 – on the condition of land use as per land title to show evidence that necessary action has been taken to resolve the conflict with relevant parties. <p>These were reviewed - MRRS: Q-021053- 05/2012; Q-02-105405/2012; Q-01-282-06/2012. (Refer www.kehakiman.gov.my/judgment/file/Q-02-1053-052012) and application no. 08(f)-449-09/2014(Q) Appellate Jurisdiction)</p> <p>The management of BPKSB have conforms & respect all parties by adopting FPIC to protects community rights and investors from risks. In addition, those mechanism is part of best practice standards and requirement of RSPO</p> <p>There was also Series of External Audit through MSPO Certification on their uncertified unit being made:</p> <ol style="list-style-type: none"> Teluk Sengat Estate (19-22/11/2018) Lapan Kabu Estate (21-22/10/2019) Rimba Nilai (Sugut) CU (10-15/03/2019) Tawai CU (14-18/06/2020) Loagan Bunut & Kanowit CU (11-15/11/2019) <p>The audit was conducted against MSPO P&C and MSPO Partial Certification Requirements.</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	<p>Series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above.</p> <ol style="list-style-type: none"> The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements.

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			<p>b) There was no case of labour dispute reported in the internal audit report.</p> <p>The management also has established grievances, compliant, and disputes mechanism which is open to all affected parties and ensures anonymity of complainant. There is "Carta Organisasi Panel Aduan" (Panel of Complaint Committee) to handle complaint or grievance, including related to gender issues.</p> <p>The management had taken prudent action by conduct engagement and recommended action plans to:</p> <ul style="list-style-type: none"> a) Improved communication and engagement (PMC Meeting-With present of LCDA, Land Survey, BPKSB b) Personnel, BEA), MCCM Meeting, Estate Management Meeting) c) Review communication and consultation as well as complaint and grievance procedures. d) Trained staff and create awareness among stakeholder on the Procedures (RSPO UBU Internal Assessment)
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	<p>Series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above.</p> <ul style="list-style-type: none"> 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. <p>The management also has established a list on "Legal and Other Requirement Register" There are 15 sections of requirements subscribed to the Plantations & Mills operation. Among the requirements stated such as: Occupational Safety and Health Act, 1994; Factory and Machinery Act, 1967; Minimum Wages Order 2020; Employees' Minimum Standards of Housing, Accommodations and Amenities Act, 1990 (Amendment 2019); etc.</p> <p>The management has in place a license & permits register which captures all applicable local & national legal requirements such as:</p> <p>MPOB Licenses (menjual dan mengalih FFB). KPDNKK Permit Barang Kawalan berjadual for Diesel.</p>

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	(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 5.5.3 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		<p>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.</p> <p>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 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"> 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; 		
		<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. 		
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the		As of this audit, Boustead Plantation Berhad still on track and follow the requirement of uncertified requirement units, Further information can be obtained from Boustead ACOP. The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.

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		current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.		Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Cert Systems.		As of this audit, Boustead Plantation Berhad still on track and follow the requirement of uncertified requirement units, Further information can be obtained from Boustead ACOP. The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
5.6.6 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. The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit. The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.		No additional indicators		Segamaha 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. It has been verified that for Segamaha POM, Bukit Segamaha and Sungai Segamaha Estate, the Segamaha Development Sdn Bhd (Boustead) has bought the land in 1990, as Country Lease. It was previously owned by Arissan Plantations. Boustead has acquired the land in 1990 and change the name to Boustead Rimba Nilai Sdn Bhd in May 2005. For GnG Estate, as Country Lease, the land Title was previously owned by G&G Plantations Sdn Bhd and for another Division is K T (S) Plantation Sdn Bhd which is they bought the land from Sabah Land Development. Boustead Rimba Nilai Sdn Bhd has bought the land from the company in 2014. The Land Title was stated the company has leased since 1979 for GnG and 1986 for KT(S), for 99 years (as per land Title). And, for LTT Sabah Estate the land it was originally owned by Lembaga Tabung Angkatan Tentera. Boustead has bought the land in 1985 from Sabah Land Development as Country Lease. All The land titles were for planting either oil palm or agricultural crops for economic value. Auditor has made an attempt to verify through transfer process, however all of the company were not traceable due to termination or change the name. Verify through the Land Title It has been confirmed that Boustead Plantations has the right to use the land which is legitimately owned by their company.

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Attachment 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
2.1.1 RMN 01 2021	Major	<p>Requirement : Indicator 2.1.1 (C) The unit of certification complies with applicable legal requirements.</p> <p>Finding : The organization did not comply with a.OSH (Noise Exposure) Regulations 2019 b.OSH (USECHH) Regulations 2000 c.FM (Notification, Certificate Of Fitness And Inspection) Regulations 1970</p> <p>Objective evidence : 1.There are no evidence at all estates (Sg Segamaha, Bkt Segamaha, Tabung Tentera,G&G) estates had conducted identification excessive risk and Noise Risk Assessment. 2. At Tabung Tentera Estate, sighted that chemical register dated 02/01/2021 was not updated with latest pesticide used.- Cyphermetrin 3. At Bkt and Sg Segamaha Estates was found that both CHRA made by Klinik Mansor Sdn Bhd on 22/10/15 had expired the 5-year duration. 4. At Sg Segamaha Estate sighted that one unit air compressor SB PMT 13692 certificate of fitness (CF) expired on 3/2/2021.</p>	<p>Root cause:</p> <ol style="list-style-type: none"> 1. The identification excessive risk and Noise Risk Assessment Regulation 2019 was not conducted due to this regulation is new regulation and all PIC at Sg Segamaha, Bkt Segamaha, Tabung Tentera,G&G was not given the guidance How to conduct this Assessment. And also since This Pandemic Covid 19 outbreak, estate has been quarantine a few time and all PIC has been forgotten about this regulation, that's why the assessment has not conducted. 2. Tabung Tentera Estate PIC was not updated the Cypermethrin to chemical register due to the assistant in charge has been transferred to another estate and resulting the new PIC was not aware and understand this legal, PIC LTT admit the mistake and will update the Register. 3. On last year 2020 at Bukit and Sungai Segamaha Estate, wehad managed to get 3 quotations from the Certified Clinic to conduct CHRA, unfortunately since MCO and This Pandemic Covid 19 outbreak, estate has been quarantine a few time and as to 	<p>Auditor has verified the evidence:</p> <ol style="list-style-type: none"> 1. The excessive risk and Noise Risk Assessment Regulation 2019 has been awarded to the safe tech Solution on letter dated 9th July 2021. 2. The Chemical register at LTT Estate has already updated to include the Cypermethrin on 1/6/21. 3. The evidence of CHRA Assessment has been done on 6th July 2021 at Both Estate 4. Evidence JKPP has been coming to assess the compressor at the Sungai Segamaha Estate on 7th July 2021 <p>Status: Closed.</p>

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			<p>avoid this pandemic to spread we have to postponed the assessment.</p> <p>4. At Sungai Segamaha Estate the estate failed to renew the CF due to the PIC thought the Air compressor is exempted from CF, actually is not and estate admit the mistake and will renew the licenses.</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. The excessive risk and Noise Risk Assessment Regulation 2019 has been tendered and awarded to the safe tech Solution on 9th July 2021. All Estates will follow the recommendation from Assessment once the assessment report has been done. 2. The Chemical register at LTT Estate has been updated to include the Cypermethrin on 1/6/21 and LTT estate will keep updated this every year. 3. The CHRA at Bukit and Sungai Segamaha Estate has been tendered and awarded to Chemclass Sdn Bhd and the Assessment has been done on 6th July 2021. Both Estates will follow the recommendation from Assessment once the assessment report has been done. 4. Sungai Segamaha Estate already submit the request to renew the CF on 5th July 2021 and JKKP has been coming to assess the compressor at the Estate on 7th 	
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			July 2021 (refer picture attached). Estate will include the renewal in the Safety Plan.	
2.1.2 RMN 02 2021	Minor	<p>Requirement : 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.</p> <p>Finding : The organization (HQ) did not updated changes to new laws and regulations in the Legal and Other Requirements Register (LORR)</p> <p>Objective evidence : Sighted LORR at Sg Segamaha Estate,G&G Estate rev 07 dated 2/5/2020 & Ladang Tabung Tentera rev 06 dated 20/7/2020 was not comprehensive with latest Regulations as per below: a.Minimum wages order 2020 b.Prevention and Control of Infectious Disease for Covid 19 c.Workers Minimum Standards Of Housing and Amenities Act 2019</p>	<p>Root cause: Legal Department (HQ) was not updated the changes of Legal Register due to the department has been reshuffle and the new PIC has taken place and miscommunication with PIC at Sg Segamaha Estate, G&G and Ladang Tabung Tentera regarding the changes and Updated LORR.</p> <p>Corrective Action: The Action has been taken by all Estate PIC by notify the HQ on 1st of July to update the LORR. The latest changes that included Minimum wages order 2020, Prevention and Control of Infectious Disease for Covid 19 and Workers Minimum Standards Of Housing and Amenities Act 2019 was updated by Boustead Plantation Sustainability and Safety Department and the record was updated in the Estate file.</p>	<p>Corrective action Plan Accepted, However the effectiveness of the Plan will be verified during the next Assessment.</p> <p>Status: Open</p>
2.1.3 AB 01 2021	Minor	<p>Requirement: Indicator 2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>Finding : The requirement was not complied with.</p> <p>Objective evidence : Bkt Segamaha Estate - There was no clear markers/ physical line to demarcate boundary line at field no PM13A and Kwantas Corporation as visited on 04/5/2021. Sg Segamaha Estate - There was no clear markers/ physical line to demarcate boundary line at field no PM13A and Rainbow Estate as visited on 05/5/2021.</p>	<p>Root cause: Bukit and Sungai Segamaha Estate previously the markers actually already been painted white and red along the boundary with Kwantas and Rainbow Estate, but it not maintained due to no complaint and dispute regarding the boundaries and the estate PIC was left the markers without maintained and the markers already faded and fell.</p> <p>Corrective Action: As to ensure this markers well maintained, Both Estate already appoint the PIC which is staff and already marked the boundary</p>	<p>Corrective action Plan Accepted, However the effectiveness of the Plan will be verified during the next Assessment.</p> <p>Status: Open</p>

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			with Kwantas and Rainbow Estate and all along the boundary Estate (refer Picture). Assistant will make sure this problem won't happen again.	
3.3.2 MNAJ 03 2021	Minor	<p>Requirement: Indicator 3.3.2 A mechanism to check consistent implementation of procedures is in place.</p> <p>Finding : Non consistent implementation of procedures 'Prosedur kerja Selamat Penjaga Setor' Prosedur no: 34 ref :1</p> <p>Objective evidence : The chemical stores in LTT Sabah did not any exhaust fans and G & G Estates do not follow the SOP requirement to enter the store.</p>	<p>Root cause: At chemical store both LTT and G&G estate, the exhaust fan actually was not construct due to ventilation are in order. The estate personnel were mistaken and not follow the SOP 'Prosedur kerja Selamat Penjaga Setor' Prosedur no: 34 ref :1. The estate will construct the new exhaust fan</p> <p>Corrective Action: For both LTT Sabah and G&G estate, the new exhaust fan will include in the budget 2022. Estate will follow the SOP and conduct the training for store keeper and PIC.</p>	<p>Corrective action Plan Accepted, However the effectiveness of the Plan will be verified during the next Assessment.</p> <p>Status: Open</p>
3.4.3 MAR 01 2021	Major	<p>Requirement: Indicator 3.4.3 (c): The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Finding : Social management and monitoring plan not reviewed and updated regularly in a participatory way.</p> <p>Objective evidence : Based on documentation review and interview with sampled employees, it was found that several issues was not updated in the social management and monitoring plan i.e: 1. Bukit Segamaha, Sungai Segamaha, LTTS and G&G - dependent's passport. 2. Bukit Segamaha, Sungai Segamaha, LTTS and G&G – impact to the employees during COVID 19 pandemic whether impact on daily works, limitation to go back to respective hometown, etc.</p>	<p>Root cause: 1. The legalization of illegal workers is always be our priority and we keep continuously focus to expedite on their legalization process until they have their own passport and work permit and currently we success to do that and at the same time their dependent were are in progress of legalization. However, since last year 2020, the process for legalize their dependent had been stopped temporarily by the Malaysian Immigration Department and Indonesian consulate due to Covid-19 Pandemic outbreaks. And until now there is still a</p>	<p>Auditor has verify the evidence: Segamaha CU are appointing Agensi Pekerjaan Sri Kencana Sdn, Bhd as an Agent representing Segamaha Complex to liaise with Indonesian Embassy on letter dated 17 June 2021. And sighted that this issue already updated in the Plan The assessment impact during COVID 19 pandemic has already updated in the Social Plan at All Estate LTT Sabah Estate already included determined the price for Harvesting contractor in their Social Action Plan.</p> <p>Status: Closed.</p>

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		3. LTTS – price determination for harvesting contractor.	<p>problem to legalize the dependent and to get a new worker.</p> <p>2. The assessment on the impact during COVID 19 pandemic has already carried out during morning muster, however it not documented in the social action Plan</p> <p>3. The price determination for harvesting contractor actually has been discussed during meeting with contractor workers and during muster with them, however it not documented in the plan.</p> <p>Corrective Action:</p> <p>1. The action has been taken by the estate on 17 June 2021. Segamaha CU are appointing Agensi Pekerjaan Sri Kencana Sdn, Bhd as an Agent representing Segamaha Complex to liaise with Indonesian Embassy pertaining the Legalization of Worker's Dependent Process. And estate already updated in the Plan</p> <p>2. The assessment impact The assessment on the impact during COVID 19 pandemic has already updated in the Social Plan at All Estate</p> <p>3. LTT Sabah Estate already revised the Plan to determined the price for Harvesting contractor in the Social Action Plan.</p>	However, the effectiveness of the Social Action Plan will be verify during the next Assessment.
3.8.9. MZK 01 2021	Major	Requirement: Indicator 3.8.9. (ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes.	Root cause: The contract of outsourced transporter actually already have an addendum that include statement above, however, HQ	Auditor has verified the evidence: The addendum document to the existing transport agreement Chong Shu min, Pengangkutan Ya Hen,

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		<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> <p>Finding : Segamaha POM did not have agreement covering the outsourced process, explicit procedures for the outsourced process not communicated to the relevant contractor.</p> <p>Objective evidence : There is a contract Agreement between Chong Shu Min Trading Pengangkutan Dagang Tera Sdn Bhd, and Pengangkutan Ya Hen Sdn Bhd. However, there is no statement 'The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary statement' and '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' in the contract dated 1/9/2018. Mill Representative stated that the statement already there in the new contract, However, Boustead Marketing Department did not send the contract to the Segamaha POM.</p>	<p>person cannot give the contract during the Audit due to miscommunication with estate personnel.</p> <p>Corrective Action: Mill already acquired the addendum document The addendum document to the existing transport agreement Chong Shu min, Pengangkutan Ya Hen, Pengangkutan Dagang Tera dated 1 September 2020 from marketing Department by email on 1/7/21. And the statement "the contractor shall upon request by the company, allow CB access to audit contractor premises or operation if deemed necessary is available in the Addendum.</p>	<p>Pengangkutan Dagang Tera dated 1 September 2020</p> <p>Status: Closed.</p>
4.2.4 IA 01 2021	Minor	<p>Requirement : Indicator 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.</p>	<p>Root cause: The conflict resolution mechanism was not updated to include 'option 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' due to all Estate PIC did not well understand the</p>	<p>Corrective action Plan Accepted, However the effectiveness of the Plan will be verified during the next Assessment.</p> <p>Status: Open</p>

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		<p>Finding : Boustead Segamaha CU conflict resolution mechanism did not include option for observers as well as the option of a third-party representation</p> <p>Objective evidence : Review of Boustead Boustead Segamaha CU conflict resolution mechanism did not include option 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. The procedure did not include text for 3rd party representation option.</p>	<p>current MYNI 2019 requirement and did not updated the HQ personnel regarding this issue.</p> <p>Corrective Action: Estate personnel will request to HQ training regarding the RSPO P&C MYNI 2019 requirement and also The Procedure already include the statement option 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'</p>	
6.2.2 IA 02 2021	Major	<p>1 of 2 Requirement : 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.</p> <p>Finding : Boustead Segamaha BU contractor Aiman Enterprise at LTTS Estate did not provide employment contracts that meets legal compliance to its workers.</p> <p>Objective evidence : Verification of documents at LTTS Estate found Contractor Aiman Enterprise did not provide Employment Contracts to its workers that include employment conditions 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.</p>	<p>Root cause: The agreement between contractor and estate is already there, But the Agreement between contractor workers and contractor was not there due to the misunderstanding between contractor and Estate. The contractors thought that Estate already provide the contract to their workers due to all the payment to workers directly from estate.</p> <p>Corrective Action: The Contractor Aiman Enterprise already create a contract to their workers that include regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. and in compliance with national legal requirements</p>	<p>Auditor has verified the evidence: Contract of Workers of Aiman Enterprise named Hasan Mudin and Ahidin Naya that include regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice dated 10/5/2021 .</p> <p>Status: Closed. However, the effectiveness of the Action Plan will be verified during the next Assessment.</p>

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<p>6.2.2 MAR 02 2021</p>	<p>Major</p>	<p>2 of 2</p> <p>Requirement: Indicator 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.</p> <p>Finding : Payroll documents i.e payslip does not give accurate information on compensation for the work performed.</p> <p>Objective evidence : Based on documentation review i.e payslip at Sungai Segamaha, LTTS and G&G, there was information i.e tonnage for the work done by the contract harvester was not stated in the payslip.</p>	<p>Root cause: The payslip for all Boustead Operation is actually using the system and the system do not captured the tonnage even though Estates key-in the Tonnage work done by contract harvester. Estate will correct this issue.</p> <p>Corrective Action: Estate already updated the system and during the salary May 2021 onwards the tonnage of harvester will appear in the Pay slip. (refer picture).</p>	<p>Auditor has verify the evidence: All the sample payslip of Estate Sungai Segamaha, LTTS and G&G already have tonnage inside the Payslip. .</p> <p>Status: Closed. However, the effectiveness of the Action Plan will be verified during the next Assessment.</p>
<p>6.2.3 MAR 03 2021</p>	<p>Major</p>	<p>Requirement: Indicator 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.</p> <p>Finding : Non-compliance against act 104 (c) (5) of Sabah Labor Ordinance 'an employee employed on piece rates who works on a rest day shall be paid twice his ordinary rate per piece'.</p> <p>Objective evidence : Based on interview and documentation review on payslips and checkroll records, three (3) contractor employee (Hajah Badariah) was found working on rest day on the month of Jan 2021, 29th and Feb 2021, 5th, 12th and 19th, but not paid twice of rate per piece as per 104 (c) (5) of Sabah Labor Ordinance.</p>	<p>Root cause: The Estate management thought that if workers work under the piece rate the payment for working on rest day is same with normal day, and management admit the mistake due to not understand the legal requirement. the management will pay back the salary to the said workers.</p> <p>Corrective Action: The management already Payback to the stated workers double pay based on their eligibility as stated in the Sabah Labour Ordinance 'an employee employed on piece rates who works on a rest day shall be paid twice his ordinary rate per piece' on 30 June 2021.</p>	<p>Auditor has verified the evidence invoice 30 June 2021 that estate already paid back to the workers the stated amount</p> <p>Status: Closed.</p>

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<p>6.7.3 MNAJ 01 2021</p>	<p>Major</p>	<p>Requirement: Indicator 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.</p> <p>Finding : Workers personal protective equipment (PPE) was not provided free of charge.</p> <p>Objective evidence : The harvesters of contractor Aiman Trading and Badaria in Sungai Segamaha and G & G Estates found bought their own PPE (Wellington Boots).</p>	<p>Root cause: As per current estate practice and SOP, PPE is provided free of charge. This SOP also applicable to all workers contractor who work in the estate. All contractors including Aiman Trading and Badaria already comply with this SOP. Estate and Contractor short of stock during that Time and during this Pandemic time, the contractor had the hard time to get the PPE due to restriction to go to town to buy proper PPE as per stated in the Boustead SOP (wellington Boots). And workers already buy the PPE at grocery shop in estate due to no replacement for their PPE.</p> <p>Corrective Action: Both Estates already provided the Wellington Boots (PPE) to all contractor's worker (see Picture).</p>	<p>Auditor has verified the evidence of PPE Issuance to the contractor workers.</p> <p>Status: Closed. However, the effectiveness of the Corrective Action will be verified during the next Assessment.</p>
<p>7.11.3 MNAJ 02 2021</p>	<p>Minor</p>	<p>Requirement: Indicator. 7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>Finding : Boustead Segamaha CU has not engaged with adjacent stakeholders on fire prevention and control measures</p> <p>Objective evidence : Boustead Segamaha CU do not do any engagement with adjacent stakeholders on fire prevention and control measures.</p>	<p>Root cause: All PIC Estates at Segamaha CU actually misunderstanding this indicator which is think this indicator is not applicable to the estate due to surrounding is actually Boustead complex. And all surrounding only smallgrowers and smallholder (estate individual) only.</p> <p>Corrective Action: Segamaha CU Complex had conducted meeting with our adjacent stakeholders on fire prevention and control measures on 15th May 2021 at Segamaha POM and good collaboration have achieved in this meeting.</p>	<p>Corrective action Plan Accepted, However the effectiveness of the Plan will be verified during the next Assessment.</p> <p>Status: Open</p>

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Attachment 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

Remote Audit 2020 of MYNI 2019

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor									
Supply Chain 3.8.7	Major	<p>Requirement: ii)The mill shall inform the CB immediately if there is a projected overproduction of certified volume</p> <p>Finding: The mill was not informed the CB about overproduction of certified volume.</p> <p>Objective evidence:</p> <table><tr><td>Items</td><td>Projection certified volume</td><td>Actual certified volume</td></tr><tr><td>CPO</td><td>27,494.80 mt</td><td>32,646.51mt</td></tr><tr><td>PKO</td><td>6,190.00 mt</td><td>6,607.03mt</td></tr></table>	Items	Projection certified volume	Actual certified volume	CPO	27,494.80 mt	32,646.51mt	PKO	6,190.00 mt	6,607.03mt	<p>Corrective action by the CU:</p> <p>1) Sustainability team will monitor accordingly based on projection period in future.</p> <p>2) This information will be shared with marketing department.</p> <p>3) Extension projection has been informing to the CB.</p>	<p>During This Onsite and Surveillances audit, Auditor has verify that there is no over production for year projection May 2020 – April 2021. Sighted also evidences via email, approval extension by RSPO on date 03/06/2020 to amount CSPO @ 11,000mt and CSPK @ 2,000mt Related to past NCR. Thus Major NCR RAR 01 2020 is successfully closed.</p> <p>Status: Closed</p>
Items	Projection certified volume	Actual certified volume											
CPO	27,494.80 mt	32,646.51mt											
PKO	6,190.00 mt	6,607.03mt											

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MYNI 2014

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
MYNI 2014 2.1.1 MRS 01 2018 MYNI 2019 2.1.1	Major	Findings: 1. Sungai Segamaha, G&G and Bukit Segamaha ('Estates') do not comply with relevant legal requirements such as: a. Immigration Act 1959 (Act 155) and Regulation and Orders. 2. Deduction of worker wages without approval from Sabah Labour Department, Section 113(4), Labour Ordinance (Sabah Ch.67). Objective evidence: 1. The following estates permit undocumented migrant workers to enter or remain at any premises, in contravention with Section 55E Immigration Act): a. Sungai Segamaha Estate b. G&G Estate c. Bukit Segamaha Estate 2. Segamaha POM has made deduction for Cash Advance and Welfare Fund as verified through payslip 'Monthly Pay Slip September 2018' without approval from Sabah Labour Department.	During this audit, Auditor has interviewed workers and verify all workers in Sungai Segamaha Estate, G&G Estate, Bukit Segamaha Estate had work Permit and Passport as per above, and also auditor verify Segamaha POM has pay back the amount deducted and obtain the permit to deduct from Sabah Labour Department under Permit No JTK.H.SDK.600-4/1/1/10401/000238. Thus, Previous NCR MRS 01 2018 of MYNI 2014 has successfully closed. This NC is under Different standard which is MYNI 2014 and even though NCR has been raised under this indicator, it cannot be categorized under recurrence NC as this is different standard Status: Closed
MYNI 2014 6.5.2 MRS 02 2018 MYNI 2019 6.2.3	Major	Findings: Contract agreement for employee did not stated in detail termination clause and period of notice. Objective evidence: Auditor has found that contract agreement for contractor's employees (Contractor: Ong Sing Chai & Badaria Mohd) at Sg. Segamaha Estate did not stated in detail termination clause and period of notice.	The employment contracts for contractor's employees i.e. Sykt Wesin Development, Ong Sing Chai & Badaria Mohd signed between the estate/mill management contains employment and payment terms and provisions covering duration of employment, place of work, salary, working hours, medical, accommodation, SOCSO, transportation, public holidays, sick leave, annual leave, and details termination clause with period of notice. Status: Closed.
MYNI 2014 6.5.3 MRS 03 2018 MYNI 2019 6.2.4	Minor	Findings: Linesite inspection was not conducted by weekly as per requirements Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446). Objective evidence: Inspection of linesite was not conducted by weekly at Segamaha POM. The linesite inspection was conducted on 10 Oct 2018, 25 Sept 2018 and 26 May 2018.	There is evidence that housing inspection are being carried out once a week based on housing inspection records. At Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Segamaha POM, the inspections were carried out by the assistant health assistant. Thus, Previous NCR MRS 03 2018 of MYNI 2014 under indicator 6.5.3 was successfully closed Status: Closed.

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<p>MYNI 2014 6.9.1 MRS 04 2018</p> <p>MYNI 2019 6.5.1</p>	Major	<p>Findings: Gender Committee Meeting did not discuss the matters that required as stated in the specific guidance.</p> <p>Objective evidence: Based on Gender Committee Meeting minute at Bukit Segamaha Estate and Segamaha POM, the committee was not discussed the following matters:</p> <ol style="list-style-type: none"> 1. training on women's rights; 2. counselling for women affected by violence; 3. child care facilities to be provided by the growers and millers; 4. women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks; and 5. women to be given specific break times to enable effective breastfeeding. 	<p>Based on Gender Committee Meeting minute at Sg. Segamaha, Segamaha Estate and Segamaha POM, it was noted that the committee had discussed the following matters:</p> <ul style="list-style-type: none"> ▪ training on women's rights; ▪ counselling for women affected by violence; ▪ child care facilities to be provided by the growers and millers; ▪ women to be allowed to breastfeed up to nine months before resuming chemical spraying or ▪ usage tasks; and ▪ women to be given specific break times to enable effective breastfeeding <p>Status: Closed</p>
<p>MYNI 2014 1.1.2 RAG 01 2018</p> <p>MYNI 2019 1.1.3</p>	Major	<p>Findings: Record of request from Department of Environment (DOE) related to new boiler and scrubber was not made available during the audit.</p> <p>Objective evidence: Letter from DOE: ASSH(B)31/152/000/059 Jld7, dated 13 May 2016 Pemberitahuan Mengenai Pembinaan Baru 1 unit Dandang, 1 unit Perangkap Habuk Empar, 1 Unit Penggahar dan 1 Unit Cerobong oleh Segamaha Palm Oil Mill.</p> <p>Item 4 ~ Borang pengisytiharan bertulis dan lukisan sebagaimana binaan yang menunjukkan kedudukan / structure alat system kawalan pencemaran.</p>	<p>Auditor has sighted the copy of the 'Application for approval to install one (1) unit 35,000 kg/hr Model: BMWVT3525SAT Bi-Drum Water Tube Boiler, One (1) Unit Multicyclone Dust Collector, One (1) Unit Chimney (1.8m dia x 38.1 m height) and One (1) Unit Wet Scrubber System (SF-57) at Segamaha Palm Oil Mill, Lahad Datu, Sabah dated 22/3/2016. Furthermore, sighted copy of " Pemberitahuan Bertulis Punca Pencemaran Udara (Sistem KAwalan Pencemaran Udara Perangkap Habuk Empar) Di Bawah Peraturan 5, Peraturan-Peraturan Kualiti Alam Sekeliling (Udara Bersih) 2014 dated 22/3/2016.</p> <p>Status: Closed</p>
<p>MYNI 2014 4.1.2 RAG 02 2018</p> <p>MYNI 2019 3.3.2</p>	Minor	<p>Findings: In consistent implementation of the effluent treatment procedure</p> <p>Objective evidence: Mill Operational Manual (issue 1 MOM) for Effluent treatment procedure,</p> <ul style="list-style-type: none"> - ensuring all the sprinkler system in good condition (Sprinkle total no. 1362). - ensuring influent flowrate meter in good condition (faulty since May 2018). 	<p>During this Audit, auditor has verify that, There was evidence of mechanism to check on implementation of procedures in mill such as the internal audit conducted by sustainability team from HQ. it was noted that the implementation of the effluent treatment procedure regarding ensuring all the sprinkler system in good condition (Sprinkler total no. 1362) and ensuring influent flowrate meter in good condition has been followed, the sprinkler has been repaired. <i>Therefore</i>, Previous NCR MYNI 2014 under indicator 4.1.2 RAG 02 2018 <i>has been closed</i> . This NC is under Different standard which is MYNI 2014 and this NC is raised under different indicator and even though NCR has been raised under this indicator, it cannot be categorized under recurrence NC as this is different standard</p> <p>Status: Closed</p>
<p>MYNI 2014 4.4.2</p>	Major	<p>Findings: Management did not maintain their buffer zone and prevent from any activities.</p> <p>Objective evidence:</p>	<p>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</p>

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RAR 01 2018 MYNI 2019 7.8.2		During site visit at Sungai Segamaha Estate infringement of buffer zone was sighted near the replanting area and football field areas.	spraying and manuring application. The practices are guided by a policy “ <i>Polisi Perlindungan Cerun & Zon Penampunan Sungai</i> ” signed by the CEO of Boustead Plantation Berhad dated 02/12/2019. Status: Closed
MYNI 2014 4.6.11 RAR 02 2018 MYNI 2019 7.2.10	Major	Findings: 1. Recommendation made by CHRA assessor was not complied. 2.Recommendation made by OHD on audiometry for standard threshold shift (retest in 3 month) was not complied Objective evidence: <ul style="list-style-type: none"> At LTTS Estate – personal air monitoring was not conducted for spraying and manuring activities At G&G Estate - chemical exposure monitoring to monitored air contamination for workshop and manuring activity was not conducted. At Segamaha Palm Oil Mill – audiometry test reported dated on 9 January 2018 for certain employees. 	During onsite visit at LTTS, G&G, it was sighted that personal exposure monitoring has been revoke as per recommend made by CHRA. And at Segamaha POM Audiometry test Summary Report dated 4/2/2020.Latest Audiometric test conducted on 27/4/2021 by Clinic Mabello. Thus, Previous NCR RAR 02 2018 of MYNI 2014 under indicator 4.6.11 was successfully closed. Status: Closed
MYNI 2014 5.1.2 RAR 03 2018 MYNI 2019 3.4.3	Minor	Findings: Waste management program / plan was not implement accordingly. Objective evidence: <ul style="list-style-type: none"> At Sg Segamaha Estate, oil spillage was sighted at parking tractor areas and chemical spillage at contractor store. At LTT Estate, diesel spillage was sighted at nursery area (water pump) 	During this audit, auditor has verify that At Sg Segamaha Estate, parking tractor areas and contractor store already clean and have a checklist and At LTTS Estate, oil spillage nursery (water pump) they already have a tray to prevent leachate. Thus past NCR RAR 03 of MYNI 2014 under indicator 5.1.2 was successfully closed. Status: Closed
MYNI 2014 5.3.2 RAG/DA 01 2018 MYNI 2019 7.2.8	Major	Findings: SW Mgt. not complied with Environmental Quality Act 1974, Environmental Quality (Scheduled Wastes) Regulations 2005, refer to Third Schedule (Regulation 10) Labelling Requirement for Scheduled Wastes and Seventh Schedule (Regulation 13) Information. Objective evidence: G&G Estate: <ul style="list-style-type: none"> No hazard signage on the waste containers and inaccurate date of waste generation for. SW 409, SW 410, SW 102 & SW 305 SW 409 was keep in the non-durable containers i.e. plastic bag. 	During onsite auditor has verify at G&G Estate and Bukit Segamaha Estate, hazard signage date of waste generation for SW 409, SW 410, SW 102 & SW 305 was in accordance with the office records, 7 th schedule / waste information for SW 110, SW 102, SW 409, SW 410, SW 305 was available, and Segamaha CU already have PIC for handling SW. Status: Closed

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		<ul style="list-style-type: none"> 7th schedule / waste information not available for SW 110, SW 102, SW 409, SW 410, SW 305 Interview with Store clerk revealed lack knowledge in handling of scheduled wastes <p>Bukit Segamaha estate:</p> <ul style="list-style-type: none"> 7th schedule / waste information not available for SW 110, SW 102, SW 409, SW 410, SW 305 Interview with store clerk revealed lack knowledge in handling of scheduled wastes 	
MYNI 2014 4.8.2 RAG/DA 02 2018 MYNI 2019 3.7.2	Minor	<p>Findings: Records of training for diesel gen set operator was not maintained.</p> <p>Objective evidence:</p> <p>Sg. Segamaha & G&G Estate:</p> <ul style="list-style-type: none"> Training related to Gen Set operation, emergency response, safe operating procedures 	<p>Segamaha CU had trained their staff, workers and records of training were checked and verified. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Sighted training related to Genset Operation, emergency response and safe work procedure (SWP) i.e. harvesting, manuring was maintained and recorded as per evidences in indicator 3.7.2.</p> <p>Status: Closed</p>
MYNI 2014 4.7.2 RAG/DA 03 2018 MYNI 2019 3.6.1	Major	<p>Findings: Certain operation yet to be risk assessed.</p> <p>Objective evidence:</p> <p>G&G Estate:</p> <p>Certain construction activities at G&G Estate yet to be risk assessed and not updated in the HIRARC: (1)Fertilizer store, (2)Creche, (3)Shop House, (4)General & Chemical Store, (5)Workshop, (6)Clinic, and (7)Workers Quarters (18 doors)</p>	<p>The estates had conducted risk assessment on all its operation as well as determining their control measures annually. Last review was on 01/04/2020 related to all activities. Risk assessment on activities such as fertilizer store, crèche, shop house, general & chemical store, workshop, clinic and worker's quarters (18 doors) have been carried out and control measures determined.</p> <p>Status: Closed</p>
MYNI 2014 2.1.2 MAR 01 2018 MYNI 2019 2.1.2	Minor	<p>Findings: Not all written information on legal requirements have been maintained.</p> <p>Objective evidence:</p> <p>Segamaha POM, Bukit Segamaha and Sungai Segamaha does not have listed Employment Insurance System Act 2017 in legal register.</p>	<p>Sighted the organization had updated their LORR with latest Acts & regulations:</p> <ol style="list-style-type: none"> Workers Minimum Standards Of Housing and Amenities Act 2019 OSH (Noise Exposure) Regulations 2019 Prevention and Control of Infectious Disease for Covid 19 Employment insurance Act 2017, Thus Past NCR MAR 01 2018 has been successfully closed. This NC is under Different standard which is MYNI 2014 and even though NCR has been raised under this indicator, it cannot be categorized under recurrence NC as this is a different standard <p>Status: Closed</p>
MYNI 2014 Supply Chain 5.3.1	Major	<p>Findings: The procedures and/or work instruction related to the implementation of the RSPO Supply Chain Certification Standard within the organization have not fully captured the standard requirements.</p>	<p>The Supply Chain Procedure was revised 8th December 2019 (revision: 8), the said procedure was sighted and found all elements of the RSPO Supply Chain standard were covered which included:</p> <ul style="list-style-type: none"> 4.0 Responsibilities

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SKA 01 2018		Objective evidence: RSPO Supply Chain (SCC) Procedures Issue 1 July 2016 rev 4 (March 2018) sighting old/obsolete standard (2014 revision).	<ul style="list-style-type: none"> • 5.0 Control of Documents • 6.0 Delivery of FFB the Estates (FFB) • 7.0 Purchasing and Goods in • 8.0 Process monitoring • 9.0 CPO and PK Despatch • 10.0 Record Keeping • 11.0 Product Claims • 12.0 Outsourced Contractor • 13.0 Training • 14.0 Management Review & Audit • 15.0 Reclassification of Mill's Supply Chain Model • 16.0 Processing/Continuous Accounting System • 17.0 Complaints • 18.0 Definitions • 19.0 List of Appendix
MYNI 2019 Supply Chain 5.3.1			Status: Closed
MYNI 2014 Supply Chain 5.3.2 SKA 02 2018	Major	Findings: The organization has not fully cover the RSPO Supply Chain Certification Standard requirements during the conduct of internal audit. Objective evidence: Internal audit conducted on March 2018 was based on RSPO Supply Chain Certification Standard, 2014 revision and the audit did not cover module requirement specific to the site – Module E: CPO Mills: Mass Balance.	Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements and cover module requirements specific to the site – Module E: CPO Mills: Mass Balance. RSPO internal audit was conducted on 18 February 2020. There are 3 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, and NC was sighted by auditor.
MYNI 2019 Supply Chain 5.3.2			Status: Closed

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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 BU	Pahang	11 Sep 2011	Stage 2	Certification completed	nil
			11 Sep 2016	Recertification	Recertification completed	nil
2.	Nak BU	Sabah	16 May 2015	Stage 2	Certification completed	nil
			28 Feb 2020	Recertification	Recertification completed	nil
3.	Trong BU	Perak	20 July 2017	Stage 2	Certification completed	nil
4.	Segaria BU	Sabah	Dec 2017	Stage 2	Certification completed	nil
5.	Segamaha BU	Sabah	Oct 2018	Stage 2	Certification completed	nil
6.	Telok Sengat BU	Johor	Sep 2020	Stage 2	Certification completed	nil
7.	Lepan Kabu Bekoh Eldred	Kelantan Johor Johor	2021	-	CB appointment process Deferred to 2021 (initially 2020) <i>(Delayed due to Pandemic Covid-19)</i>	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) BU	Sabah	2021	-	CB appointed Deferred to 2021 (initially 2020) <i>(Delayed due to Pandemic Covid-19)</i>	External audit that scheduled by BSI tentatively on 7 th - 11 th November 2020 has been postponed until further notice due to restrictions entering Sabah state.
9.	Pertama BU	Sabah	2022	-	Deferred to 2022 (initially 2021) <i>(Delayed due to Pandemic Covid-19)</i>	New Acquisition in 2018 from Duta Plantations Berhad. As per RSPO Certification Systems Nov 2020; new acquisitions shall be certified within a three-year timeframe.
10.	Tawai BU	Sabah	2022	-	To combine audit with Pertama BU in 2022 due to same area of location	New Acquisition in 2019 from Sit Seng & Sons Realty Sdn Bhd. As per RSPO Certification Systems Nov 2020; new acquisitions shall be certified within a three-year timeframe.
11.	Loagan Bunut BU	Sarawak	2023	-	Deferred to 2023 (initially 2022) To allow Pertama & Tawai BU first	Loagan Bunut BU has been proposed for disposal and still in negotiation process. (Company internal transformation programme)
12.	Kanowit BU	Sarawak	2023	-	Deferred to 2023 (initially 2022) To allow Pertama & Tawai BU first	Kanowit BU has been proposed for disposal and still in negotiation process. All decision is pending for the Board of Directors discretion and direction. (Company internal transformation programme)

Updated: Tuesday, May 25, 2021