



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

File Ref. : ES18120002

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT** : Spark Glory Sdn. Bhd.

**PARENT COMPANY** : Spark Glory Sdn. Bhd.

**RSPO MEMBERSHIP No.:** 1-0261-18-000-00

**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	
Spark Glory Sdn Bhd	Spark Glory Sdn Bhd	5° 18' 52" N	118° 34' 34" E	CL 095333467/476/458, 421/430/412/449, Sg Segama, 91117 Kinabatangan District, Lahad Datu, Sabah.

**MAP** : See Attachment 1

**AUDIT DATE** : 19-21 April 2021

**DURATION** : 10 auditor days

**TYPE OF AUDIT** : ☒ Annual Surveillance Audit No.1

☐ Recertification Audit

**STANDARD** : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

**SCOPE OF CERTIFICATION:** Production of Sustainable Fresh Fruit Bunches

**VALIDITY OF RSPO CERTIFICATE** : 24/02/2020 – 23/02/2025

**The following attachments form part of this report:**

Non-conformity Report(s) ☒

List of additional site(s) ☐

**Report by Audit Team Leader**

Name : Rozaimée Ab Rahman

Signature :

Date : 13 July 2021

**Acknowledgement by Client's Representative**

Name : Yvonne Chew

Signature :

Date : 21/7/2021

## SUMMARY OF AUDITS

Stage 2 audit / Recertification audit				
On-site audit date	:	19 – 20 September 2019	No. of auditor days:	6 auditor days
Audit team	:	Mahzan B Munap (LA), Mohd Zulfakar Kamaruzaman, Mohd Ab Raouf Asis and Selvasingam a/l Kandiah, Dzulfihar Azmi		
No. of major NCR	:	2	Indicator: RSPO P&C (4.6.11)	Closing date: 20/01/2020
No. of minor NCR	:	1	Indicator: RSPO P&C (6.5.3)	
Indicate the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
	:	√	-	√
	:	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	:	-	-	-
	:	Indigenous people	Contractor	Others (Please specify)
	:	NA	-	-
Supply base sampled	:	Own plantation – Spark Glory		
Justification of audit planning	:	During stage 2 audit, the audit team visited the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.		
Name of peer reviewer	:	Dr Dzolkhifli Omar		
Report approved by	:	Kamini A/P M.Sooriamoorthy	Approval date : 24/02/2020	

Annual Surveillance Audit 1				
On-site audit date	:	19-21/04/2021	No. of auditor days :	10
Audit team	:	Rozaimiee, Mohd Zulfakar, Ismail Adnan, Selvasingam T Kandiah		
No. of major NCR	:	2	Indicator: 7.10.1 & 7.12.2	Closing date: 9/07/2021
No. of minor NCR	:	1	Indicator: 3.3.2	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
	:	√		√
	:	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	:		√	√
	:	Indigenous people	Contractor	Others (Please specify)
	:	NA		
Supply base sampled	:	Own plantation – Spark Glory		
Changes since the last audit	:	No changes.		
Justification of audit planning	:	The allocated mandays use to cover the following – visits to the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini A/P M.Sooriamoorthy	Approval date : 13/07/2021	

## SUMMARY OF INFORMATION

### TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	*October 2019 to September 2020	April 2021 to March 2022			
Certified FFB Processed (MT)	2,380.00	2,000.00			
Production of Certified CPO (MT)	500.00	400.00			
Production of Certified PK (MT)	125.00	100.00			
Certified Areas (Ha)	126.83	126.83			
Planted Areas (Ha)	121.46	121.46			
Production Areas (Ha)	121.46	121.46			
HCV Areas / Conservation Areas (Ha)	1.19	1.19			
REMARKS	*The period stated here was based on projection during the conduct of Stage 2 audit. The client has been certified at the end of Feb 2020, and due to the delay in the conduct of audit during the pandemic season, the actual reporting was covering 12 months period from the date of audit, between April 2020 and March 2021.				

### TABLE 2

FFB last year certified volume (MT)	2,380.00	
FFB actual certified volume (MT)	1,705.64	
Last licence year's actual sold volume of certified FFB (MT, if applicable)	1,705.64	
Last license year's actual sold volume through Book & Claim	0.00	
FFB new year certified volume (MT)	2,000.00	
	PO	PK
Last years certified volume (MT)	500.00	125.00
Last years actual certified sold (MT)	-	-
Last years actual sold under other schemes (MT)	-	-
Last years sold conventional (MT)	-	-
New year certified volume (MT)	400.0	100.0

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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 2014).

### 1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rozaimie bin Ab Rahman	Lead Auditor, Environment, Safety & Health, TBP	Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Ismail Adnan	Auditor, Social / HCV	Has more than 10 years' experience in forestry industries with 25 years' experience as a lecturer in Forestry Department. Universiti Putra Malaysia. He is qualified auditor for RSPO P&C and Forest Management System.
Selvasingam a/ Kandiah	Auditor Good Agricultural Practice / Safety	Holds a B.Sc. of Agriculture University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 28 years of working experience in plantation management covering cocoa, rubber and oil palm.
Mohd Zulfakar Kamaruzaman	Auditor Social / HCV	Holds B.Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operations. He has been trained as a RSPO P&C and SC Lead Auditor.

### 1.3 Audit methodology

The audit covers Spark Glory Sdn Bhd (SGSB) Estate. Since this is an assessment of an outgrower who owns a single estate, a parcel of land with the size of 126.83 ha, the standard sampling formula of  $0.8\sqrt{y}$  does not apply. The audit included an on-site audit of SGSB Estate and its line site to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees and other relevant stakeholders were also conducted during the audit.

#### 1.4 Stakeholder Consultation

Stakeholder consultation was carried out during the on-site audit and the evidence from the stakeholder consultation carried out were as tabulated below: In general, there was no negative comments made against this Certification Unit.

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<ul style="list-style-type: none"> <li>▪ Four (4) interviewed workers constituted local and foreign, all male, daily paid, monthly paid and piece rated at estate. They include Spark Glory Plantation workers – 1 local and 3 foreign.</li> <li>▪ All workers interviewed acknowledged they have signed employment agreements with the estates. The contents of agreement were understood, as these were prepared in English/Bahasa. The contents were explained to them in Bahasa by the management team.</li> <li>▪ Pre-induction briefing on conditions and terms of employment was explained to them during first reporting of duty</li> <li>▪ They are aware of their working hours (8 hours). They also acknowledged being paid overtime for any work in excess of 8 hours. There is no forced overtime. Harvesters were paid piece-rated and do not get overtime. They prefer to have their salaries calculated on piece-rate basis even after 8 hours of work as it allows them to be paid higher. Sprayers understood that they are paid daily rate.</li> <li>▪ They have been getting salaries above RM1,100 since January 2019. Salaries are paid before the 7th of every month.</li> <li>▪ Through worker's interview, they confirmed there are no abuse at work, and no sexual harassment. They understand what constitutes sexual harassment and the function of Gender Committee.</li> <li>▪ There is no discrimination between migrant workers and local workers, between male and female workers.</li> <li>▪ Workers are provided with comfortable housing with free water and electricity. Local workers choose to stay in their houses in the nearby villages.</li> <li>▪ They have access to affordable food from close by Tomanggong Estate canteen/sundry shops. Spark Glory has made arrangement with Hap Seng Plantation Management to allow it workers have access at this canteen/sundry shops.</li> <li>▪ They are entitled to free medical facilities at the Hap Seng Estate clinic. Spark Glory has made arrangement with Hap Seng Plantation Management to debit it for treatment received by its workers.</li> <li>▪ Workers had representatives who attend regular meetings with the management (in the JCC)</li> <li>▪ Workers confirmed knowledge of Grievance complaints procedure, where they can put forward any complaints and or raise any issues. They are aware of the complaints form in the procedure.</li> </ul>

	<p>Books and complaints forms were used to complain about house defects at the Estates.</p> <ul style="list-style-type: none"> <li>▪ They knew the types of work offered at Spark Glory estate when they were still in their own countries (no contract substitution).</li> <li>▪ All migrant workers confirmed that they keep their own passports although some allowed their passport to be kept in the office for safekeeping with their own consent.</li> <li>▪ Indonesians and locals workers were interviewed accordingly.</li> </ul>
2) Settlers	Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> <li>▪ Confirmed there is no land dispute between Spark Glory CU and neighbouring estates Hap Seng Plantation (Kapis Estate) Tabin Wildlife Forest Reserve.</li> <li>▪ No social issues arising from estate workers.</li> <li>▪ Occassionally are called to attend meetings by Spark Glory Estate. The last one was held few months ago.</li> <li>▪ All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings.</li> <li>▪ Kg Litang representative interviewed confirmed no user rights issues between Spark Glory and villagers. Estate operation has no negative impact on village livelihood.</li> </ul>
4) Suppliers	<ul style="list-style-type: none"> <li>▪ Suppliers of crusher runs is from Hap Seng Plantation nearby.</li> <li>▪ Being small, Spark Glory usually buy chemicals, PPE and other estates tools directly from suppliers in Lahad Datu town themselves.</li> <li>▪ Fair dealings with Hap Seng and traders in Lahad Datu.</li> <li>▪ Payments are made within 1 months of invoice.</li> <li>▪ Representatives from suppliers (Jaya Timur Machinery and Sunnite Timur Sdn Bhd) confirmed fair dealings and prompt payments through invoices.</li> </ul>
5) Contract workers	Not applicable as none being used.
6) Local & national NGOs	Not applicable.
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> <li>▪ None at site as invitation letter sent out did not received any comments . See item 1.4 above.</li> <li>▪ Phone interview with District Forest Officer of Lahad Datu confirmed no issues with boundary and enforcement at Spark Glory Estate (shared boundary with Tabin Forest Reserve)</li> </ul>
8) Independent growers / Smallholders	Not applicable.
9) Indigenous people	Not applicable.
10) Contractor	Not applicable as none used.
11) Previous land owner (if any)	Not applicable.
12) Others (please specify)	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

Spark Glory Sdn Bhd is a private company established in 1994. It is located in Kinabatangan District, Sabah, and is about 87 km from Lahad Datu town, 66 km from Kampung Paris and can be accessed through the government road, estate road and ferry. Spark Glory neighbors are Hap Seng Plantations Berhad (Kapis Estate) and Tabin Wildlife Forest Reserve.

The estate is fully developed with 100% oil palm planting since 2002. All produced crops are sent to Hap Seng Plantation’s mills.

2.2

Description of the Supply Base (including the planting profile)

Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

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

Division	FFB Production	
	Tonnes	Percentage (%)
Spark Glory Sdn Bhd	1705.64	100.00%
Total	1705.64	100.00%

Table 2: Projected FFB production by supply base for the next reporting period (April 2021 to March 2022)

Division	FFB Production	
	Tonnes	Percentage (%)
Spark Glory Sdn Bhd	2000.00	100.00%
Total	2000.00	100.00%

Table 3: Actual FFB received and CPO & PK dispatch to the Mill for the last reporting period (April 2020 to March 2021)

	Total (MT)
FFB Production	1705.64
CPO Production @ 20%	341.13
PK Production @ 5%	85.28
Product sold under Book & Claim	0.00



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

	Total (MT)
FFB Received	2,000.00
FFB Processed	2,000.00
CPO Production	400.00
PK Production	100.00

**Table 5 Planted and certified area of the CU**

Estate	Planted (ha)	Certified (ha)
Spark Glory Sd Bhd	121.46	126.83
<b>Total</b>	<b>121.46</b>	<b>126.83</b>

**Table 6 Planting profile for the CU**

Year of planting	Planting cycle (1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> , etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2002	1 <sup>st</sup> Generation	Mature	121.46	100.00
<b>TOTAL</b>			<b>121.46</b>	<b>100.00</b>

## 2.3 Organizational Information/Contact Person(s)

The details of the contact person are as shown below:

Name	:	Yvonne Chew Siok Fong
Position	:	Managing Director
Address	:	Room 1401, 14 <sup>th</sup> Floor, Wisma Khoo Siak Chiew, Jln Buli Sim-Sim, 90000 Sandakan, Sabah, Malaysia (Main Office)
Phone no.	:	+60 19 813 8186
Email	:	<a href="mailto:spark.g@hotmail.com">spark.g@hotmail.com</a>

## 3.0 AUDIT FINDINGS

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

No changes on certified products for this CU

### 3.2 Progress and changes in time bound plan

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

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

---

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

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

iii.	Are there associated smallholders (including scheme smallholders) in the CU	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
	If no, please state reasons <u>Single certification - CU was assisted by Hap Seng Plantation</u>				
iv.	Any new acquisition which has replaced primary forests or HCV areas	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.)					
<u>None at the time of audit.</u>					
3.4	Status of previous non-conformities *	<input checked="" type="checkbox"/>	Closed	<input type="checkbox"/>	Not closed*
	* If not closed, minor non conformity will be upgraded to major non conformity				
3.5.	Complaint received from stakeholder (if any)				
	<u>None</u>				
<b>4.0 DETAILS OF NON-CONFORMITY REPORT</b>					
4.1	For P&C (Details checklist refer to Attachment 3) :				
	Total no. of minor NCR(s) (details refer to Attachment 4 )	List :1	3.3.2 (STK 01 2021)		
	Total no. of major NCR(s) (details refer to Attachment 4 )	List :2	7.10.1 (RAR 02 2021) & 7.12.2 (MZK 01 2021)		
4.2	For SC (Details checklist refer to Attachment 5) :				
	Total no. of minor NCR(s) (details refer to Attachment 5)	List : NA			
	Total no. of major NCR(s) (details refer to Attachment 5 )	List : NA			
<b>5.0 AUDIT CONCLUSION</b>					
The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.					

## 6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

☒

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

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

☒

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

☒

Recommended to continue certification.

☐

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... 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 :

Rozaimée Ab Rahman



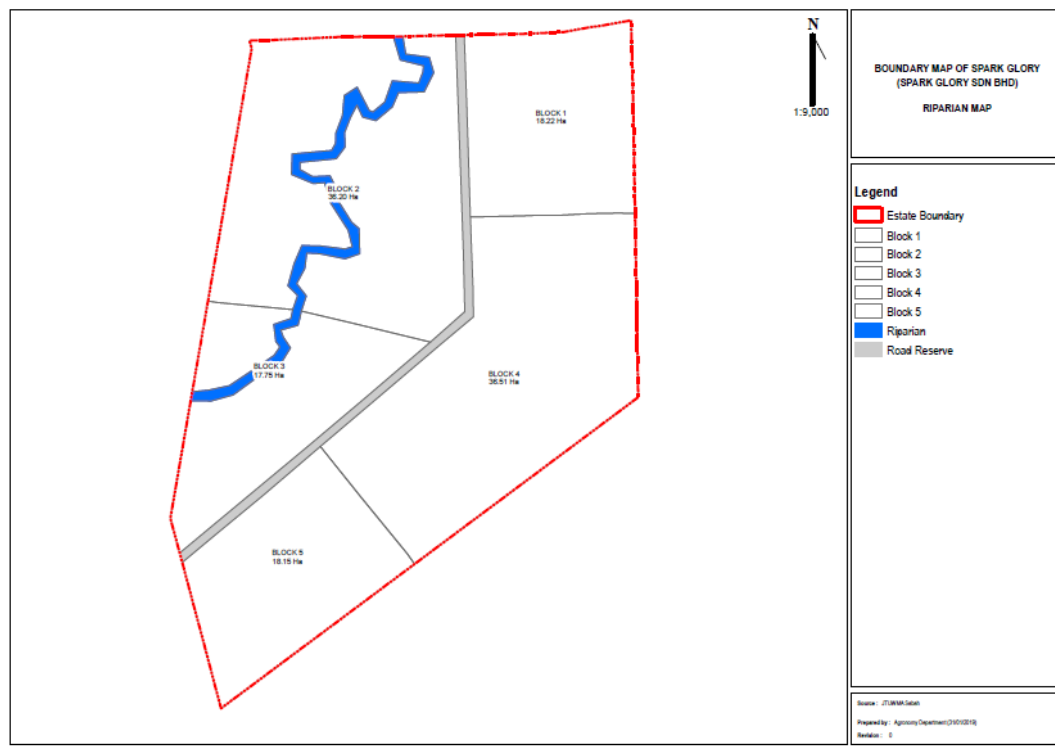
9/07/2021

\_\_\_\_\_  
(Name)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

Maps of Spark Glory Sdn. Bhd.



**ANNUAL SURVEILLANCE 1 AUDIT PLAN**

**1. Objectives**

The objectives of the audit are as follows:

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

**2. Date of assessment** : 19-21 April 2021

**3. Site of assessment** : Spark Glory Sdn Bhd

**4. Scope of certification** : Production of sustainable Fresh Fruit Bunch

**5. Reference Standard:**

- a. MYNI 2019 of RSPO P&C 2018
- b. RSPO Certification Systems, Nov 2020
- c. Company's audit criteria including Company's Manual/Procedures

**6. Assessment Team**

- (i) Audit Team Leader : Rozaimée Ab Rahman (**RAR**) - TBP, Environmental, GHG
- (ii) Auditor : i) Mohd Zulfakar bin Kamaruzaman (**MZK**) - Social, HCV  
ii) Selvasingam T.Kandiah (**STK**) – GAP, Safety  
iii) Ismail Adnan (**IA**) – Social, HCV

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

**7. Audit Method**

Site audits 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.

**8. Audit Findings**

Audit findings shall be classified as major and/or minor. Major nonconformities shall be addressed within 90 days or else the certificate shall be suspended. If the major nonconformities 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. Repeated major non-compliance in consecutive audits will also result in recommendation for suspension.

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

## **9. Confidentiality Requirements**

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

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

## **10. Working Language : English and Bahasa Malaysia**

## **11. Reporting**

- a) Language : English
- b) Format : Verbal and written
- c) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.

## **12. Facilities Required**

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

## **13. Assessment Programme Details : As below**

## RSPO PUBLIC SUMMARY REPORT

### Day 1: 19 April 2021 (Monday)

Time	Activities / areas to be visited				Auditee
8.00am	Opening Meeting – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.				Management Representative
8.30am	Organization Representative - Briefing on RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. Logistics discussion to the sites to be visited.				
9.00am	To assign each audit team members – site and the P&C requirements				
	<b>IA</b>	<b>STK</b>	<b>RAR</b>	<b>MZK</b>	
	Site visit and assessment on implementation: <ul style="list-style-type: none"><li>• Social aspects - SIA, management plan &amp; implementation, workers’ quarters.</li><li>• Interview with gender committee, worker representative, contractors, supplier, etc</li><li>• Linesite inspection</li><li>• Complaints and grievances</li></ul>	<ul style="list-style-type: none"><li>• Good Agriculture practices</li><li>• IPM implementation, training and safe use of agro-chemicals.</li><li>• Occupational safety &amp; health practice</li><li>– witness activities at site</li><li>• Interview with workers, safety committee and contractors</li></ul>	Site visit and assessment on implementation: <ul style="list-style-type: none"><li>• Laws and regulations</li><li>• Environmental management – witness activities at site</li><li>• Chemical store/fertilizer</li><li>• Waste &amp; chemical management</li><li>• Facilities at workplace</li><li>• Training and skill development programmes</li><li>• Interview with workers, environmental issues</li><li>• Continuous improvement</li><li>• Monitoring buffer zones areas</li><li>• Time bound plan and uncertified management units</li></ul>	<ul style="list-style-type: none"><li>• Land titles user rights</li><li>• Stakeholder consultation with affected communities surrounding the CU</li><li>• Consultation with relevant stakeholder/ government /NGO / etc</li></ul>	Guide(s) for each auditor
1.00pm	LUNCH BREAK / ZUHUR PRAYER				All
2.00pm	Continue assessment at Estate				
4.30 - 5.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 1 audit				All
9.00 – 9.30pm	Discussion on potential NCRs				Audit team only

### Day 2: 20 April 2021 (Tuesday)

Time	Activities / areas to be visited				Auditee
8.00am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements				Respective Manager
8.30am	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	<b>IA</b>	<b>STK</b>	<b>RAR</b>	<b>MZK</b>	

## RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>• Linesite inspection</li> <li>• Complaints and grievances</li> <li>• Consultation with relevant government agencies</li> <li>• Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>• Plantation on hilly/swampy/peat area</li> <li>• IPM implementation, training and safe use of agro-chemicals.</li> <li>• Occupational safety &amp; health practice-witness activities at site</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Good agriculture practices monitoring.</li> <li>• New planting</li> </ul>	<ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Environmental management – witness activities at site</li> <li>• Waste &amp; chemical management</li> <li>• Interview with workers, environmental committee and contractors</li> <li>• Facilities at workplace</li> <li>• environmental practice – witness activities at site</li> <li>• Training and skill development programmes</li> <li>• Continuous improvement</li> <li>• Training and skill development programs</li> </ul>	<ul style="list-style-type: none"> <li>• Inspection of protected sites with HCV attributes</li> <li>• Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• HCV Assessment management plan &amp; implementation</li> </ul>	
1.00 pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>				All
2.00 pm	Continue assessment at Estate				
4.30 - 5.00 pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 2 audit				All
9.00 – 10.00pm	Discussion on potential NCRs				Audit team only

### Day 3: 21 February 2021 (Wednesday)

Time	Activities / areas to be visited		Auditee
8.30 am	Continue unfinished assessments		Respective Manager
8.30 am	To assign each audit team members – site and the P&C requirements		Guide(s) for each auditor
	<b>STK</b>	<b>RAR</b>	
	<ul style="list-style-type: none"> <li>• Plantation on hilly/swampy/peat area</li> <li>• IPM implementation, training and safe use of agro-chemicals.</li> <li>• Occupational safety &amp; health practice – witness activities at site</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Good agriculture / milling practices monitoring.</li> <li>• New planting</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Environmental management – witness activities at site</li> <li>• Waste &amp; chemical management</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Facilities at workplace</li> <li>• Occupational safety &amp; health practice – witness activities at site</li> <li>• Training and skill development programmes</li> <li>• Continuous improvement</li> </ul>	



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1.00 pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>	All
2.00 pm	Continue assessment at Estate	All
3.30- 4.00 pm	Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.	All Guide(s) for each auditor
4.00- 5.00 pm	Discussion and acceptance on assessment findings with Management Representative. Closing meeting at CU	

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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	Spark Glory Sdn Bhd has established and implemented document for responding to any communication in an undated Procedure Request for Information. Information made available include matters on environmental, social and/or legal that are relevant to RSPO Criteria. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through request.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	Spark Glory continued to provide information to stakeholders for vendors/suppliers, government agencies, local communities, etc. Requests are supposed to be recorded in Logbook titled Summary Information Requested 2019 was seen maintained as means and evidence of recording information requested by any stakeholders, either internal or external.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	Spark Glory maintain records of communication and consultation with external and internal parties. These includes communication with DOSH, Labour Department, Immigration Department, Department of Environment, suppliers and their own workers. Comments by DOSH and DOE on mill and estate operation were recorded in the respective DOSH and DOE inspection book.
	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 consultation and communication procedures were documented. External and internal communication procedures developed by Spark Glory Sdn Bhd maintained to be followed and available at the audited sites.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The lists of stakeholders were prepared by both the CU and the company headquarters. The lists included government agencies, suppliers, contractors, schools, bus operators, traders.
1.2 The unit of certification commits to ethical conduct in	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Spark Glory has documented policy to committing on integrity for all their staffs and workers by publishing <i>Code Of Conduct And Business Ethics Policy</i> . The CU has communicated the policy for staffs and foreign workers during induction course.

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Clause	Indicators	Comply Yes/No	Findings
all business operations and transactions.	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	Code of ethical conduct and integrity titled 'Code of Conduct and Business Ethics Policy' has been established and distributed to all staff and workers. The Policy has been briefed to all workforces as verified through briefing records and interview with staff and workers. The policy was approved by Managing Director.

### **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.	YES	Generally, Spark Glory complies with the applicable legal requirements.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	The changes in the law were monitored through: <ul style="list-style-type: none"> <li>• News release through daily newspaper</li> <li>• Lawnet</li> <li>• Current law journal</li> <li>• Law change tracked by publisher.</li> <li>• Circular from relevant association e.g MPOA, MPOB, MAPA, etc.</li> </ul> The mechanism was through evaluation of compliance exercise against the legal register by the A Plantation Manager.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	The perimeter boundary of the estate was visibly maintained by erecting pegs along the boundary. During the site review, the physical markers were visibly maintained at Spark Glory Sdn Bhd, especially the ones that are adjacent to other private estate – Hap Seng Plantations Berhad and with Tabin Wildlife Forest Reserve.
2.2 All contractors providing operational	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties is maintained by Spark Glory in stakeholder list. The lists contain name of contractors, designated contact persons, address, telephone/fax/email and type of contracted works done.

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Clause	Indicators	Comply Yes/No	Findings
services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal 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	As of to date in Spark Glory, there is no Contractors/ contracts involved in all works due to this is smallgrower and all work is done by themselves. Their foreign workers also did not through Recruitment agencies, due to worker apply for themselves. Thus, this indicator is not applicable.
	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	As of to date in Spark Glory, there is no Contractors/ contracts involved in all works due to this is smallgrower and All work is done by themselves. Their foreign workers also did not through Recruitment agencies, due to worker apply for themselves. Thus, this indicator is not applicable.
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"> <li>Information on geo-location of FFB origins.</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul>		There is no mill involve in this small grower certification. Thus, this indicator is not applicable.
	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	There is no mill involve in this small grower certification. Thus, this indicator is not applicable.

### **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	3.1.1 (C) A business or management plan (minimum three years) is documented that	YES	Spark Glory Sdn Bhd had documented its business plan with projections until the financial year 2025. The budget provisions covered Revenue and Expenditure on Production Cost, Field upkeep and General Charges. Attention was given to crop projection, cost of production, cost per ton and per

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Clause	Indicators	Comply Yes/No	Findings
management plan for the unit of certification that aims to achieve long-term economic and financial viability.	includes, where applicable, a jointly developed business case for Scheme Smallholders.		hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	There was no replanting planned for the next 5 years, as the existing oil palms were planted only in 2002. Replanting could only take place around 2027.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	Management review has been carried out in Oct 2020. The agenda of the meeting was to discuss related to RSPO/MSPO internal audit results especially and corrective action plans to be taken based on assessment findings. For reviewing process performance management has carried out internally meeting & during muster call to discuss related crop quality.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	SGSB has established the Social Impact Assessment Management Action Plan and Continuous Improvement Plan dated in Jan 2019 and reviewed in Dec 2020. Continual Improvement Plan covers issues related to continued and improved relationship with neighbouring Estates, Government agencies, Palm Oil Mills and both internal and external stakeholders (including suppliers, work force etc) in general. Person responsible for social issues (internal and external stakeholders) and monitoring them had been appointed. had been plan and person responsible to monitor the implementation. Spark Glory has established an "Environmental Impact Assessment, Management Action Plans and Continuous Improvement Plan" to mitigate the negative impacts and promote the positive impacts. Based on the plan, the Plantation Manager has full responsibility to execute the management plan to be followed up for implementation by his Mandore.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	NA
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	Spark Glory Sdn Bhd had adopted the following documented manuals and document as their standard operating procedures: 1. MPOB Code of Good Agricultural Practice for Oil Palm Estates and Small Holdings. 2. Standard Operating Procedure (SOP). 3. Safe and Standard Operating Procedure (SSOP). 4. Spark Glory Agriculture Manual.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	NO	The Plantation Manager was accountable to check on consistent implementation of procedures. Among the means were: i. Periodic reporting to the Managing Director ii. On site visits, inspections and discussions with the Mandore.

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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> <li>iii. Assessments and audits like Internal Audits,</li> <li>iv. Consultation with Management of Hap Seng Plantation Holdings Berhad, Spark Glory mentor for RSPO implementation.</li> <li>v. Information on FFB Quality check as informed by Hap Seng mill</li> </ul> <p>During sight visit it was observed that there was a large number of VOPs and giant yam were sighted in blocks 3 &amp; 5. As consistent implementation of procedures to eradicate the large numbers of VOPs and giant yam, as required as per Doc: SGAM – No.4 “Upkeep of Mature Oil Palms” was not carried out, and Minor NCR STK 01 2021 was issued. Furthermore, extended harvesting rounds due the extreme shortage of workers resulting from MCO was also noticed. At time of visit Spark Glory had only 4 workers.</p>
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Evidence was available that Spark Glory Estate was able to demonstrate that it has maintained records of monitoring and action taken. Records of monitoring and the action taken were maintained and kept for a minimum of 12 months. Monthly Costing and Annual Reports on monitoring of all activities were made available.
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.	YES	There was no new planting or replanting. The estate has established since 2002.
	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	<p>Environmental impacts assessment management action plans and continuous improvement plan was reviewed in Nov 2020. Preparation of EIA was done based on consultation with estate management and site visit.</p> <p>SGSB has established the Social Impact Assessment Management Action Plan and Continuous Improvement Plan which are available and sighted. The report was developed and recently reviewed in Dec 2020. The Continual Improvement Plan which covered issues related to continued and improved relationship with both internal and external stakeholders is not included in the Environmental management Plan for the CU. For implementation and monitoring, a staff had been appointed.</p>
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	The SIA Management Action Plans of SGSB is implemented and monitored ensuing review and update once a year. Areas of concern/key findings were identified together with the action plan, person in charge and respective completion date. There is evidence that the areas of concern /key findings were developed with the consultation of affected parties.

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Clause	Indicators	Comply Yes/No	Findings
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	SGSB has developed Employment procedures for recruitment, selection; hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. The Procedures signed by the Managing Director. The recruitment process was clearly stated in the procedure where the recruitment was based age, medical fitness, etc. There is no discrimination based on religion, gender, nationality and during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Employment procedures are implemented, and records are maintained at Spark Glory.
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	Spark Glory Sdn Bhd had identified and reviewed all operations that has significant hazards and risks and had determined appropriate risk control measures in accordance with DOSH Hazard Identification, Risk Assessment and Risk Control (HIRARC) Guidelines 2008. The HIRARC Register was last reviewed in Dec 2020. Corresponding Standard Operation Procedure and Safe Work Procedure for these activities were documented, implemented and also used during employees training.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	All field workers, FFB lorry driver and harvesting operation were given training on safe work practices. Sighted latest training has been conducted in Sept 2020. PPE appropriate to their job function to cover hazardous operations were given Free of Charge.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	Formal training programs for 2021 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were presented to auditors by both estates. Trainings were either conducted internally by its own manager or by sustainability team from Hap Seng Plantation. Some of the training program includes:
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the	YES	<i>Not applicable- This CU is a single certification without POM.</i>

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Clause	Indicators	Comply Yes/No	Findings
	effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.		

### **SUPPLY CHAIN REQUIREMENTS FOR MILLS – Not applicable**

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 separating them, the inly MB Module is applicable.	NA	<i>Not applicable- This CU is a single certification without POM.</i>
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 <sup>rd</sup> party certified supply base.	NA	<i>Not applicable- This CU is a single certification without POM.</i>
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.	NA	<i>Not applicable- This CU is a single certification without POM.</i>



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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
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).	NA	<i>Not applicable- This CU is a single certification without POM.</i>
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"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• 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.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	NA	<i>Not applicable- This CU is a single certification without POM.</i>
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"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims</li> </ul>	NA	<i>Not applicable- This CU is a single certification without POM.</i>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>Documents.</p> <ul style="list-style-type: none"> <li>Effectively implements and maintains the standard requirements within its organisation.</li> <li>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.</li> </ul>		
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>	NA	<i>Not applicable- This CU is a single certification without POM.</i>

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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"> <li>a) The name and address of buyer;</li> <li>b) The name and address of the seller</li> <li>c) The leading or shipment/delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation</li> <li>i) A unique identification number</li> </ul>	NA	<p><i>Not applicable- This CU is a single certification without POM.</i></p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	NA	<p><i>Not applicable- This CU is a single certification without POM.</i></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.	NA	<i>Not applicable- This CU is a single certification without POM.</i>
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.	NA	<i>Not applicable- This CU is a single certification without POM.</i>
3.8.12	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.	NA	<i>Not applicable- This CU is a single certification without POM.</i>
	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.	NA	<i>Not applicable- This CU is a single certification without POM.</i>
	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.	NA	<i>Not applicable- This CU is a single certification without POM.</i>
	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 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.)	NA	<i>Not applicable- This CU is a single certification without POM.</i>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
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.	NA	Not applicable- This CU is a single certification without POM.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	NA	
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.	NA	Not applicable- This CU is a single certification without POM.
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 damage shall be removed in the RSPO IT platform	NA	Not applicable- This CU is a single certification without POM.
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.	NA	Not applicable- This CU is a single certification without POM.

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### **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 doc. 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, incl. contracted security forces.	Yes	Human Rights policy dated in March 2020 was made available at Spark Glory. There is also a new sustainable Agriculture Policy in Aug 2020 sign by Managing Director contain the clause of prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staffs and workers during morning muster and training.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	As at time of audit, it was confirmed that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Yes	Spark Glory have developed procedures to handle grievances and disputes titled as 'Procedure for reporting complaints and grievances (Prosedur Melapor <i>Aduan dan Permasalahan</i> )' and 'Grievances Procedure – Appendix 1' for staffs and workers, Prosedur Aduan and also company has developed procedure named " Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)" to protect the complainants.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, incl. by illiterate parties.	Yes	Based on interview with stakeholders at Litang Estate, Found the system was understood by the affected parties. The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting.
	4.2.3 The CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and comm. to relevant stakeholders.	Yes	Spark Glory keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders was evident by stakeholders meeting was held at Spark Glory.

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Clause	Indicators	Comply Yes/No	Findings
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Yes	The system used by the Spark Glory in resolving disputes and grievances exists in the procedure called 'Prosedur Melapor Aduan dan Permasalahan' and 'Grievances Procedure – Appendix 1' for staffs and workers, <i>Stakeholders Consultation Procedure – Group Level &amp; Estate Level</i> . The Spark Glory has its own Internal Complaint Form/Book and External Communication/Complaint Form/Book available. The Internal Complaint Books are mostly for employees to lodge complaint pertaining to their houses. The external stakeholder complaint record/book reviewed did not show complaints against the CU. Sighted the new Procedure Title - The Grievance procedure has already included an 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.
4.3 The CU 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	There was no local community lived nearby or within the Spark Glory area. However, the CU has made a donation to NGO in Lahad Datu.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	Yes	The right to use the land at the CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified. At Spark Glory the land was previously owned by a group of smallholders (Chin Chee Man, Chu Vee Len, Chin Mei Kuen, Liew Kok Yong, Tai Chee Keong, Liew Moi Yin and Lee Fook San. Smallholder bought the land from Sabah Land Development Board in 1987 and they developed the land in 2002 with planting of Oil Palm. In 2008 Spark Glory Sdn Bhd purchased the land. There were clear land ownership documents available for review. The original copies of the documents were kept in Spark Glory office in Lahad Datu. Copies of land titles for Spark Glory was also sighted at Estate office.
	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 Spark Glory since 2008. 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	Yes	



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Clause	Indicators	Comply Yes/No	Findings
	affected groups, including information on the steps that are taken to involve them in decision making.		
	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 communities where applicable, and relevant authorities).	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Yes	This requirement in this indicator does not apply to Spark Glory
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or	Yes	This requirement in this indicator does not apply to Spark Glory.

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Clause	Indicators	Comply Yes/No	Findings
	representatives of their own choosing, including by legal counsel if they so choose.		
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	This requirement in this indicator does not apply to Spark Glory.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Yes	Based on Social Impact Assessment (SIA) Report for Spark Glory and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Spark Glory since 2008. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	Yes	Based on Social Impact Assessment (SIA) Report for Spark Glory and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Spark Glory since 2008. The audit team had confirmed that there were no land issues related to previous owners.
	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	Yes	Based on Social Impact Assessment (SIA) Report for Spark Glory and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Spark Glory since 2008. 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
	ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.		
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	Yes	Based on Social Impact Assessment (SIA) Report for Spark Glory and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Spark Glory since 2008. The audit team had confirmed that there were no land issues related to previous owners.
	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 Spark Glory and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Spark Glory since 2008. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	Based on Social Impact Assessment (SIA) Report for Spark Glory and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Spark Glory since 2008. The audit team had confirmed that there were no land issues related to previous owners.
	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 estate as per stated in the land title.

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Clause	Indicators	Comply Yes/No	Findings
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	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the HQ Office Spark Glory. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Yes	In accordance with the ' <i>Prosedur Melapor Aduan dan Permasalahan - Pihak Berkepentingan Luaran dan Dalaman</i> '/ SOP – Land Dispute Management, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at visited estate.
	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	Not applicable since Spark Glory is consider as Small Grower.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Yes	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	No new planting. The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management ".
	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	No new planting. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

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Clause	Indicators	Comply Yes/No	Findings
relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Yes	No new planting. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
4.8 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	No new planting. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.8.3 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 req.	Yes	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

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Clause	Indicators	Comply Yes/No	Findings
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	Yes	There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders such as the Head of Village/ Representative Kampung Litang, Hap Seng Plantation and IOI Plantation. From the interviews, it can be concluded that there was no evidence of any land dispute at Spark Glory.

### **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.	NA	Not Applicable since this Assessment is for single unit certification and a small grower. No Mill is included.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	NA	Not Applicable since this Assessment is for single unit certification and a small grower. No Mill is included.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and doc.	NA	Not Applicable since this Assessment is for single unit certification and a small grower. No Mill is included.
	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	This Assessment is for single unit certification and a small grower. The Director/Owner of Spark Glory is a woman, and this company has been assisted by Hap Seng Plantations.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	This Assessment is for Small Grower and no contractor was appointed since all work has been done internally due to money restrictions.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	This Assessment is for Small Grower and no contractor was appointed since all work has been done internally due to money restrictions.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Spark Glory doesn't have Weighbridge, all weighing has been done by Outsider Mill.

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Clause	Indicators	Comply Yes/No	Findings
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	NA	Not Applicable since this Assessment is for Small Grower and Spark Glory is assisted by Hap Seng Plantations.
	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.	NA	Not Applicable since this Assessment is for Small Grower and Spark Glory is assisted by Hap Seng Plantations.
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.	NA	Not Applicable since this Assessment is for Small Grower and Spark Glory is assisted by Hap Seng Plantations.
	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).	NA	Not Applicable since this Assessment is for Small Grower and Spark Glory is assisted by Hap Seng Plantations.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	NA	Not Applicable since this Assessment is for Small Grower and Spark Glory is assisted by Hap Seng Plantations.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	NA	Not Applicable since this Assessment is for Small Grower and Spark Glory is assisted by Hap Seng Plantations.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	NA	Not Applicable since this Assessment is for Small Grower and Spark Glory is assisted by Hap Seng Plantations.

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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	A publicly available non-discrimination and equal opportunity policy is available at SGSB CU. SGSB is committed to ensure and promote a harmonious, safe and healthy work environment for all employees, hence, relevant policies were established. The available Social policy statements emphasized on worker information, recruitment and selection, training, employee development, terms of service and records of service. These policies are posted on SGSB office notice board.
	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	Apart from the Social Policy which emphasized that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair. Review of pay checks, contracts of employment, and interviews of staff, local and foreign workers showed discriminatory practices on the part of Spark Glory. Foreign workers also accorded the same living standards and accommodations as local 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	Records of hiring were reviewed during the audit. It was noted that the hiring was based on the skills, capabilities, qualities and medical fitness. Interview of candidates was done by Management Staff where an evaluation form is filled up to determine the suitability of the candidate.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	Currently, there were no female workers at SGSB CU. Nevertheless, if there shall be female workers in future, pregnancy test shall not be conducted as a discriminatory measure. Pregnancy test is only permissible when it is legally mandated.
	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	The latest Gender Committee Meeting was held in Sept 2020. The meeting agenda covers, among other things, policy awareness, grievances procedures, newly appointed committee, functions of the Gender Committee, male and female rights, sexual harassment and the activities for the year 2020. The minutes of meeting were verified by auditor and found that gender committee was in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for genders at SGSB CU.



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Clause	Indicators	Comply Yes/No	Findings
	6.1.6 There is evidence of equal pay for the same work scope.	YES	The equal opportunities policy developed by SGSB states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English. Interview with workers the Manager of SGSB, local and foreign male workers, they agreed that in the past when there was a female worker, they acknowledged that female worker received equal pay for the work given same work for example in the sprayer gang being paid by piece rate. All workers receive daily payment as per Minimum Wages Order (Amendment) 2020.
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	The employment contract is in Bahasa Malaysia for foreign workers. Employment contract of foreign worker clearly stated the working hours, annual leave, medical benefits and sick leave, insurance scheme, retirement, and etc. During interview with the foreign workers as mentioned in 6.5.1, they understood the content of their contract of employment and pay slip statement.
	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.	YES	Contracts and conditions of employment are contained in employment contracts signed between Spark Glory management on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Indonesia or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. Details on monthly salary and deductions for every worker and staff are reflected in their pay slips which are issued to the workers during pay day. Conditions of pay are contained in the workers' respective employment contracts. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction. Payslip is the evidence of worker's remuneration. For the local workers, there is evidence in the payslip, the payment of statutory contributions such as EPF, SOCSO and Employment Insurance Scheme are being made in accordance with the relevant legal provisions.
	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	YES	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 .in Spark Glory's Letter of Employment Offer to its workers. Spark Glory CU has complied with legal requirements of Sabah Labour Ordinance on regular working hours, deductions, overtime, sickness, holiday entitlement,

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Clause	Indicators	Comply Yes/No	Findings
	labour requirements.		maternity leave, reasons for dismissal, period of notice and other legal labour requirements.
	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	Spark Glory Sdn Bhd has provided adequate housing, water supplies, medical and welfare amenities. The houses were all in good conditions, and each house has between 2 – 3 bedrooms. The houses are generally well-maintained with not more than 6 persons live in each house. They are also furnished with the basic necessities such as cupboard, mattresses, pillows and cooking facilities. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner. Spark Glory workers are entitled to free medical facilities at the Hap Seng Estate clinic. Spark Glory has made arrangement with Hap Seng Plantation Management to debit it for treatment received by its workers.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Workers' access to adequate, sufficient and affordable food is via place order with Estate Manager and going nearby Tamu in Jeroco or a sundry shop at Hap Seng Estate. Workers interviewed informed that they normally place the order with Estate Manager and sometime buying at Tamu or sundry shop nearby Jeroco. Among the items ordered include sugar, rice, flour, cooking oil, eggs, detergent and other daily necessities.
	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: <ul style="list-style-type: none"> <li>An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to</li> </ul>	YES	Based on the suggested method(s) by RSPO guideline, an assessment of the Prevailing Wage was conducted for Spark Glory CU and the Prevailing Wage was found to be appropriate.

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Clause	Indicators	Comply Yes/No	Findings
	<p>workers.</p> <ul style="list-style-type: none"> <li>• There is annual progress on the implementation of living wages</li> <li>• 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.</li> <li>• 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’</li> <li>• 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.</li> </ul>		
	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 Spark Glory CU, permanent and full-time workers are used for core work such as Harvesting, Manuring and Spraying. There are no temporary workers and contractors at SGSB.
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	<p>Spark Glory subscribes to the documented policy on Freedom of Association and Right to Collective Bargaining, signed in March 2019. This Policy is available in dual language, i.e. Bahasa Malaysia and English and it recognizes and respects of employees to join trade union of their choice and to bargain collectively subject to the provisions of relevant national legislations. Employment contracts sighted do not contain any prohibitive clause from joining any trade unions.</p> <p>The policy included statements, among others, that the workers are allowed to join any registered organizations or associations. Foreign workers are not allowed to hold any positions in the organizations or associations. The workers who were consulted had confirmed that they were aware of their rights to join a union.</p>

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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.	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	In practice, there was no trade union/workers' union. However, the Company and workers' representatives have formed a Joint Consultative Committee (JCC) comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers. Minutes of meetings with the JCC held in Dec 2020 are documented and sighted during the Audit. Spark Glory Sdn Bhd continues to retain Workers Committee minutes of meeting ( <i>Minit Mesyuarat Persatuan Pekerja Spark Glory Sdn Bhd</i> ).
	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	Spark Glory 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. However, in practice, there was no workers union at SGSB, although the workers are allowed to join any registered organizations or associations they pleased. The Company and workers' representatives have formed a Joint Consultative Committee (JCC) comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and 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	" <i>Polisi Buruh Kanak-Kanak</i> " dated 20/7/2018 is publicly available at Spark Glory estate. The policy statements emphasized on child under 18 years must not be employed to work in hazardous areas. This policy is posted on notice boards in the estate office.
	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	There is evidence that minimum age requirements are met at Spark Glory CU.
	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 the estate has employed anyone below the age of 18 years. This Indicator is not applicable
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	" <i>Polisi Buruh Kanak-Kanak</i> " is publicly available at Spark Glory estate. There was no evidence that the estate had employed anyone below the age of 18 years.

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Clause	Indicators	Comply Yes/No	Findings
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	Spark Glory has and implements and communicated the 'Sexual Harassment, Violence and Abuse Policy'. The Company respects the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: <ul style="list-style-type: none"> <li>• Eliminating Violence and Sexual Harassment: The Company seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.</li> <li>• Eradicating any form of Exploitation: The Company endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</li> </ul>
	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	Spark Glory maintained its documented policy to protect reproductive rights of women, (i.e. " <i>Polisi Hak Reproduksi</i> "). Policy implementation is through periodic meeting reviewing violation of reproductive right policy during Gender Committee meetings, even though at that time, no female worker at Spark Glory.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	During time of Audit, there was no female worker at Spark Glory, hence, assessing the needs of new mothers did not arise. Nevertheless, if there are new mothers at Spark Glory in the future, the needs of the new mothers shall be assessed by interviewing them and recorded for action.
	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	The specific grievance mechanism is available at Spark Glory in flow chart format that documented how to handle complaints and grievances originating from internal and external stakeholders. The mechanism has been communicated to all levels of the workforce as verified by auditor during interview with the workers.
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"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> </ul>	YES	All workers in Spark Glory CU Estate have entered into employment voluntarily; it was verified during the interview with all Indonesian and local workers. The workers know they will work in Oil Palm Sector since from their country. SGSB had not withheld foreign workers passport as verified during workers interviews. Workers also confirmed there is no involuntary overtime as they will work for overtime if management ask to, they also understand their contract which is if they resign from SGSB, prior to 8 weeks of notice, they don't have debt of bondage. Foreign workers also confirmed they pay service fee and the others for passport, visa, medical, food, transportation from village and flight ticket. There was no contract substitution, debt bondage and withheld wages.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>		
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	<p>A special labour policy for employment of foreign workers has been addressed in the social policy. The policy mentioned that foreign employees will be treated fairly in terms of recruitment, terms and conditions of work; provide decent living and no contract substitution.</p> <p>A procedure with flowchart for hiring both local and foreign labor had been established at Spark Glory. Document review showed the procedure had been followed in worker recruitment exercise had been implemented for any employment related with local and foreign workers.</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	Safety and Health Committee organization was established. With Workers and Management representation. The Estate Manager, was appointed as the Chairman of the ESH committee for the estate. The communication forum used in estate is through the safety meeting (mesyuarat j/kuasa keselamatan & kesihatan pekerjaan) apart from other dialogue session and briefing during the weekly gathering. The safety meeting is held every 3 monthly.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	Accident and emergency procedures are in place. Zero accident has been recorded since 2018. There was no accident reported occurring in year-to-date 2021.
	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	YES	<p>All workers involved in potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors.</p> <p>Sanitation facilities for spraying and manuring operator was available at the store area</p>

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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.		with facilities such as shower room, washing machine, PPE rack, soap, etc. All the workers are understood and aware related to SOP after chemical application.
	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	All workers had been 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. Local and foreign workers covered by SOCSO. Verified through 'Jadual Caruman Bulanan'.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Records of all accidents are kept and filed in the Estates. All occupational injuries were recorded using LTA (Lost Time Accident). Cases if any are reviewed during safety meetings. The incidences were summarized in the mandatory JKPP 6, JKPP 7 & JKPP 8 forms. The JKPP 8 form a It is also a mandatory requirement that the JKPP 8 form be submitted to DOSH by January of the subsequent year. Records are kept in the office. For year 2020 there was no accident has been recorded. JKPP 8 has been submitted to DOSH in Jan 2021 as per NADAPOD regulation 2004.

### **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	Spark Glory Sdn Bhd had a documented integrated pest management (IPM) system in place. The IPM program among others included pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and wild boar. The IPM technique included the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera subulata</i> and Spark Glory Sdn Bhd had put up 1 unit wooden barn owl box in Block 1.
	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	None of the Species referenced in the Global Invasive Species Database and CABI.org are used in Spark Glory Sd Bhd.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e.	YES	Spark Glory Sdn Bhd had established and documented a Zero Burning Policy in its Sustainable Agriculture Policy under Environment and Biodiversity. The policy was signed by the Managing Director. The policy advocated: "A strict Zero Burning Policy is practiced

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Clause	Indicators	Comply Yes/No	Findings
	where no other effective methods exist, and with prior approval of government authorities.		for all operations". Furthermore, there had been no pest outbreaks to warrant the use of fire.
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 all pesticides used had been documented in Doc: SGAM – No.4. The use of selective products that are specific to the targeted weed had been demonstrated in the table Appendix 1 of the referred procedure.
	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	Spark Glory Sdn Bhd continued to maintain records to show the types of pesticides used with active ingredients, their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register and in progress reports. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	Spark Glory Sdn Bhd had a Pesticide Reduction and Chemical Reduction Plan. The plan covered planting of nectariferous beneficial plants ( <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera subulata</i> ) as part of the IPM plan. Soft weeds and <i>Nephrolepis bisserata</i> were maintained and encouraged to grow in the inter rows. A Nursery for the beneficial plant planting was available to ensure continuous planting and availability of the beneficial plants stocks, hence reducing the use of insecticides on bagworms and a plan for control of rats by rearing barn owls ( <i>tyto alba</i> ). Spark Glory Sdn Bhd had put up 1unit wooden barn owl box in Block 1. Spraying weeds was carried out as programmed and so as at now, no chemical had been used to control rats and of other leaf eating pest.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	Spark Glory Sdn Bhd did not practice prophylactic use of pesticides. It is specifical mentioned in document SGAM no. 2 dated under item 2.2.
	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	Spark Glory Sdn Bhd only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000).
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used in Spark Glory Sdn Bhd.



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Clause	Indicators	Comply Yes/No	Findings
	7.2.5b Why there is no other alternative which can be used.	YES	There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used in Spark glory Sdn Bhd.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used in Spark glory Sdn Bhd.
	7.2.5d What is the process to limit the negative impacts of the application.	YES	There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used in Spark glory Sdn Bhd.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used in Spark glory Sdn Bhd.
	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	Records showed that pesticides were handled, used and applied by trained persons and as per the MSD and SSOPS of the pesticide. Pesticide operators had been given training on the safe handling/application of pesticides including demonstration on the correct PPE usage in March 2020. Chemical Safety Data Sheet were used and especially precautions attached to the products were explained to the participants. They understood the dangers of the chemicals and the reasoning why to don the required PPE. This was confirmed during interview.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	All pesticides used were found stored in the Pesticides Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Empty pesticide containers were triple rinsed as per SOP SGSB/SSOP/6-18 before being disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	There was no evidence to show that aerial spraying was carried out in Spark Glory Sdn Bhd.

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Clause	Indicators	Comply Yes/No	Findings
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Specific annual medical surveillance for pesticide operators and documented action to treat related health conditions, had been demonstrated on Spark Glory Sdn Bhd. Records showed that medical surveillance had been carried out in Nov 2020 for employees handling chemical and manuring.
	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	At time of visit, there were only 2 male sprayers on Spark Glory Sdn Bhd, hence, no work has been undertaken by pregnant or breast-feeding women.
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	Waste management and disposal plan to avoid or reduce pollution had been documented and implemented. Sighted waste management plan has established in the document "environmental impact assessment management action plans and continuous improvement plan – list of waste generated at waste" were used to guide the waste disposal activities and to reduce pollution during routine operation.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Spark Glory domestic waste from the housing area was well managed and all domestic wastes were disposed via own transport to Majlis Daerah Lahad Datu (MDLD) waste collection bin. Sighted there was no practice of open fires within Spark Glory. The secondary containments, signages, sump pits, spillage kits and SDS were seen effectively displayed and made available at chemical / pesticide store, diesel drum and fertilizer store.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visits there was no evidence fire has been used to dispose a waste. All domestic wastes were disposed via own transport to Majlis Daerah Lahad Datu (MDLD) once per week by manager of estate.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Glory Sdn Bhd had complied with good agriculture practices, as contained in SOPs, to manage soil fertility to optimise yield and minimise environmental impacts. Spark Glory had adopted the following document as their standard operating. The fertilizer application SOP was referred in the Agriculture Manual Ref SGAM No. 3. It covered the Field manuring programs for Mature oil palm on Timing, Placement, Supervision and Nutrient Antagonism.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Spark Glory Sdn Bhd carried out annual foliar and soil sampling on a 5 yearly cycle basis to monitor changes in nutrient status. The annual foliar sampling to determine Ash levels and nutrients levels of N, P, K, Mg, Ca, B, Cu & Zn was conducted in July 2020. The latest soil sampling was also carried out in May 2019. The results of the foliar and soil analysis formed the basis for the fertilizer recommendations to maintain and to improve soil fertility.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of	YES	A nutrient recycling strategy was in place which included stacking pruned fronds and manually weeded weeds / grass that were left to decompose in the respective fields. There

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Clause	Indicators	Comply Yes/No	Findings
	Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.		was no application of Empty Fruit Bunches (EFB) and Palm Oil Mill Effluent (POME) in Spark Glory Sdn Bhd. As mentioned under Indicator 7.4.4 optimal use of inorganic fertilisers was based on the recommendation of fertilizers by Agronomist from Hap Seng Estates Holdings Berhad (Estate Division).
	7.4.4 Records of fertiliser inputs are maintained.	YES	Spark Glory Sdn Bhd continued to monitor record their fertilizer inputs as recommended by their agronomist. The information was available in the Manuring Schedule for FY 2020. The fertilizers recommended for 2021 were, NK., AS, MOP, RP and HGFB.
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	Based on the Soil Map extracted from "The Soils of Sabah" document, by the Agronomy Department of Hap Seng Plantations Holdings Berhad listed there were no fragile soils present in Spark Glory Sdn Bhd. The soils in Spark Glory were of Kinabatangan and Kretam series.
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	As per the Slope Maps prepared by the Agronomy Department, HSPBH there only a small area with 20° slope. There was no steep terrain (greater than 25°).
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	As per the Slope Maps prepared by the Agronomy Department, HSPBH there only a small area with 20° slope. There was no steep terrain (greater than 25°).
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	As mentioned under Indicator 7.5.1 Spark Glory Sdn Bhd had prepared both soil map and slope maps 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.
	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	Based on the Soil Map extracted from "The Soils of Sabah" document, by the Agronomic Department of Hap Seng Plantations Holdings Berhad listed there were no fragile soils present in Spark Glory Sdn Bhd.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Yes, based the Soil Map extracted from "The Soils of Sabah" document, by the Agronomic Department of Hap Seng Plantations Holdings Berhad, the planning of drainage and irrigation systems, roads and other infrastructure is carried out.
7.7 No new planting on	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November	YES	No new planting at the CU. Based on the Soil Map extracted from "The Soils of Sabah" document, by the Agronomic Department of Hap Seng Plantations Holdings Berhad listed

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Clause	Indicators	Comply Yes/No	Findings
peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	2018 in existing and new development areas.		there were no Peat soils present in Spark Glory Sdn Bhd.
	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	No new planting and no peat.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	No new planting and no peat.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	No new planting and no peat.
	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,	YES	No new planting and no peat.

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Clause	Indicators	Comply Yes/No	Findings
	company could submit other alternate methodologies to be considered by RSPO for recognition.		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	No new planting and no peat.
	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	No new planting and no peat.
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	Spark Glory Water Management Plan has been reviewed and updated in Jan 2019. This plan is confined to only Spark Glory, covering only the water used for daily operation. Among the water management plans are: <ol style="list-style-type: none"> <li>1) Soil Moisture Conservation Programme</li> <li>2) Buffer zone / riparian reserve of the streams</li> <li>3) Water for domestic use</li> <li>4) Contingency plan during drought season</li> <li>5) Sewage and septic tank</li> <li>6) Lubricant and fertilizer store</li> <li>7) Rainfall records</li> </ol>
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities.
	7.8.1b Workers have adequate access to clean water.	YES	Water for domestic use is supplied from the rainwater for washing and shower. Proper filtration and treatment is yet to be installed. The company has provided a tank or jar for a worker to get treated water from Sg Mas Mill. During sending FFB to the mill driver or

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			mandore will collected the treated water and bring back to the housing complexes.
	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	At Spark Glory the water quality of the river whether upstream and downstream are being tested once a year by external lab: Hap Seng Plantation Central Laboratory. Sighted latest analysis has been conducted in Jan 2021, to monitored pH, turbidity, total suspend solids, COD, BOD, Ammoniacal nitrogen, DO, oil, and grease. A major river, Sg. Tagas, has been identified located nearby Spark Glory and is linked to Tabin Wildlife Reserve.
	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	Not applicable since CU were individual certification
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Not applicable since CU were individual certification
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	Sighted "Fossil Fuel Management Plan" had been developed and reviewed in Nov 2020. The plan only focusses on diesel usage by FFB Transport and use of fertilizers. Sighted environmental impact and mitigation measure has been identified and documented accordingly.
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.	NO	During document review at Spark Glory (SG) CU, GHG data used was from Bukit Mas POM CU and its supplies-based (Bukit Mas CU & individual certification estates) and data for SG was not accurate as per actual data i.e. FFB produced, diesel consumption, etc. Palm GHG calculator was not yet reported to RSPO as per single certification unit. Thus #Major NCR RAR 01 2021 has been raised.
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditors has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at 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	The significant pollutants in the mill has been identified in the list of waste generated at estate.

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Clause	Indicators	Comply Yes/No	Findings
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	During site visit there was no new planting or replanting.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Estate has established fire prevention and control measures as per procedure SSOP "Pelan Tindakan Menghadapi Kebakaran" sighted a training has been conducted by estate manager to employees and mandore.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Engages with adjacent stakeholders on fire prevention has been conducted during JCC meeting through online meeting conducted in Dec 2020.
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	Not Applicable since there is no new land clearing available. Auditor also has verified planting data, and through website <a href="https://www.globalforestwatch.org/">https://www.globalforestwatch.org/</a> . It was confirmed that no new planting at the CU
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	NO	The report of "Potential High Conservation Value Area Assessment Report of Spark Glory Sdn Bhd" was made available to the auditor. It was noted that the report was prepared by the Sustainable Unit of Hap Seng. The assessment was carried out on 10-12/1/2019. The report was completed on 25/1/19 and review on 24/12/2020 and next review in Dec 2021. Based on the assessment, there was no identified RTE at Spark Glory estate. Spark Glory had identified a Potential HVC4 which the estate has controlled and maintained the river buffer zone for Sg. Tagas Tagas. The Assessor also identify that Estate was adjacent to Tabin Wildlife forest reserve. However, the Assessment was not carried out by RSPO Approved Assessor as per Annex5 –Transition from HCV to HCV–HCS Assessment thus, Major NCR MZK 01 2021 has been raised.
	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.	NO	
	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	No new land clearing.
	7.12.4 (C) Where HCVs, HCS forests after	YES	Spark Glory estate has established HCV action plan for Sg Tagas Tagas titled "HCV areas

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Clause	Indicators	Comply Yes/No	Findings
	15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		Management Action Plans' dated 24/12/2020. The estate planned to maintain the riparian reserve by: <ul style="list-style-type: none"> <li>Prohibiting the cutting down of the tree at the area,</li> <li>Prohibiting manuring and spraying operation at the riparian reserve area</li> <li>Workers are constantly informed not to encroach into the riparian reserve and disturb the area</li> <li>Periodic visit to the riparian reserve to monitor any illegal activities</li> </ul> And also to maintain or enhance measures adjacent with Tabin Wildlife reserve by: <ul style="list-style-type: none"> <li>Prohibition workers entrance to this area</li> <li>Signboard are erected at the boundary</li> <li>Constantly briefed workers regarding RTE</li> <li>Prohibition of logging at the estate boundary</li> <li>Prohibition of illegal hunting</li> </ul> Periodic monitoring to the reserve boundary
	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 Spark Glory. 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 found to capture, harm, collect, trade, possess or kill these species.	YES	Spark Glory continued to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that prohibition signage was erected, that is, <ul style="list-style-type: none"> <li>No hunting, no fishing and no pesticide spraying within buffer area at Sg. Tagas Tagas, and</li> <li>No hunting and no illegal activities at forest border with Tabin Wildlife Forest reserve.</li> </ul>



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Clause	Indicators	Comply Yes/No	Findings
	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	Spark Glory continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the Sg. Tagas Tagas.
	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	Not applicable since there is no new land clearing

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### RSPO Certifications Systems for P&C and RISS, Nov 2020 – Not applicable to Spark Glory

Clause	Indicators		Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>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.</p>	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.
	(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);	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.
	(d)	Where there are isolated lapses in	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.

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		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.		
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 <sup>st</sup> 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;	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.
	(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;	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.
	(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-	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.

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		declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		<ul style="list-style-type: none"> <li>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;</li> </ul>	-	
		<ul style="list-style-type: none"> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>	-	
		<ul style="list-style-type: none"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>	-	
		<ul style="list-style-type: none"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>	-	
	(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 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.	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.
	(g)	Failure to address any outstanding	NA	Not applicable. Spark Glory didn't have other mills or estates within it company.

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		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 Certification Systems.		
<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>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.</p> <p>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.</p>		<p>No additional indicators</p> <p><u>AUDITORS' GUIDE:</u></p> <ol style="list-style-type: none"> <li>1. Identify (and document) the identification of the previous users and owners of the land;</li> <li>2. Identify (i.e., locate a written copy of) the agreements/promises made at the time of the relevant land transfers and/or land use agreements;</li> <li>3. Determine whether the previous users/owners can now be contacted, and do so, as applicable;</li> <li>4. Interview the previous owners/users to assess whether the land transfer and land use agreements were entered into with their free, prior, informed consent;</li> <li>5. Evaluate whether there is ongoing compliance with the agreements (e.g., if promises were made at the original transfer date, to transfer developed land back to communities at a later date, were these promises kept in full?);</li> <li>6. Identify and follow up any disputes.</li> </ol>	YES	<p>Evidence of legal ownership of the land including history of land tenure was verified. At Spark Glory the land was previously owned by a group of smallholders (Chin Chee Man, Chu Vee Len, Chin Mei Kuen, Liew Kok Yong, Tai Chee Keong, Liew Moi Yin and Lee Fook San. Smallholder bought the land from Sabah Land Development Board in 1987 and they developed the land in 2002 with planting of Oil Palm.</p> <p>On 2/7/2008 Spark Glory Sdn Bhd purchased the land. There were clear land ownership documents available for review. The original copies of the documents were kept in Spark Glory office in Lahad Datu. Copies of land titles for Spark Glory was also sighted at Estate office. The Spark Glory estate is under the jurisdiction of Kinabatangan District</p>

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### Attachment 4

#### Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
STK 01 2021  3.3.2	Minor	<p>Finding: Consistent implementation of procedures was not in place.</p> <p>Objective evidence: Consistent implementation of procedures to eradicate the large numbers of VOPs and giant yam sighted in Blocks 3 &amp; 5 as required as per Doc: SGAM – No.4 “Upkeep of Mature Oil Palms” revised on 02/05/2020 was not carried out.</p>	<p>Root cause: Due to pandemic COVID-19, the estate management encountered critically labor shortage which affected SGSB's daily operation hence caused low production FFB of SGSB.</p> <p>Correction: -To adopt more effective and less laborious VOP control method by using chemical spray instead of current manual VOP removing. -SGSB management to ensure the recommendation (VOP control using chemical) in the Agronomic report is implemented.</p>	<p>Corrective action plan accepted; the effectiveness of implementation will be verified during next audit.</p> <p>Status: Open</p>
RAR 01 2021  7.10.1	Major	<p>Finding: Palm GHG calculator was not yet reported to RSPO.</p> <p>Objective evidence: During document review at Spark Glory (SG) CU, GHG data used was from Bukit Mas POM CU and its supplies-based (Bukit Mas CU &amp; individual certification estates) and data for SG was not accurate as per actual data i.e FFB produced, diesel consumption, etc.</p>	<p>Root cause: The estate management did not aware that the GHG emissions data need to be reported under individual SGSB's GHG account since previous GHG data was only reported under POM CU GHG account.</p> <p>Correction: -Spark Glory Sdn Bhd (SGSB) has immediately registered the GHG account and submitted SGSB's GHG emission data through RSPO Palm GHG calculator. -Yearly checking by SGSB management to ensure all the GHG emission data are submitted and reported under the SGSB's GHG account.</p>	<p>Auditor has received and review data GHG version 4 from RSPO on 05/04/2021. Sighted all data such as diesel, FFB produced, etc was as per 2020 usage. However, from link RSPO GHG given column for accepted the data was not in function. Auditor has received another email from RSPO to CU on 28/05/2021 while RSPO are working to resolve that issue. Below summary plantation field emission and sinks for CU:</p>

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				<table><tr><th>Description</th><th>Total Emission (tCO2e)</th><th>tCO2e/ha</th><th>tCO2e/FF B</th></tr><tr><td>Land conversion</td><td>553.20</td><td>4.55</td><td>0.66</td></tr><tr><td>Fuel consumption</td><td>10.17</td><td>0.08</td><td>0.01</td></tr><tr><td>Crop sequestration</td><td>-524.36</td><td>-4.32</td><td>-0.63</td></tr><tr><td>Total</td><td>39.01</td><td>0.32</td><td>0.05</td></tr></table>	Description	Total Emission (tCO2e)	tCO2e/ha	tCO2e/FF B	Land conversion	553.20	4.55	0.66	Fuel consumption	10.17	0.08	0.01	Crop sequestration	-524.36	-4.32	-0.63	Total	39.01	0.32	0.05
Description	Total Emission (tCO2e)	tCO2e/ha	tCO2e/FF B																					
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Crop sequestration	-524.36	-4.32	-0.63																					
Total	39.01	0.32	0.05																					
MZK 01 2021  7.12.2	Major	<p>Finding: The HCV Assessment was not conducted as per Annex5 –Transition from HCV to HCV–HCS Assessment</p> <p>Objective evidence: The HCV Assessment was available, However the Assessment was not carried out as per Annex5 –Transition from HCV to HCV–HCS Assessment</p>	<p>Root cause: The estate management misunderstand on the new requirement of RSPO P&amp;C MYNI 2019's Annex 5 and did not aware that new combined HCV-HCS Assessment is needed to be conducted by the RSPO certified estate that with no land clearing/new planting (after 15th November 2018).</p> <p>Correction: -Spark Glory Sdn Bhd (SGSB) has immediately rectified it with new combined HCV-HCS Assessment. (Attachment 1) -Yearly checking with record by SGSB management on the new requirement of RSPO MYNI 2019.</p>	<p>Auditor has received amendment of HCV to HCV-HCSA report using the HCS Approach Toolkit Module 1, 2, 3 &amp; 4 Version 2.0. Noted that the results showed that there was no HCS forest has been identified in the estate.</p> <p>Status: Closed</p>																				

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### ATTACHMENT 5

#### STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
HMM 01/2019 4.6.11	Major	<b>Finding:</b> No medical surveillance has been conducted for pesticide operators <b>Objective evidence:</b> No record of medical surveillance was available to sight.	Records showed that medical surveillance had been carried out on 9/11/2020 for 2 employees handling chemical and manuring by OHD Mohamad Fikri B Zanal Abidin, JKKP No. HQ/16/DOC/00/557, of Mabello Group of Clinics, Lahad Datu. The 2 employees examined were found fit.
MAR 01 2019 6.5.3	Minor	<b>Finding:</b> Workers' Minimum Standards of Housing and Amenities Act 1990 (Section 23 (1) (b) are not complied with. <b>Objective evidence:</b> Drainage at Spark Glory Sdn. Bhd. does not continuously flow into the monsoon drain at the block of the linesite but flows back into grasses at the back of the linesite.	In this Audit, it was verified that Spark Glory Sdn. Bhd. management has completed construction of the concrete housing perimeter drain. Water continuously flows into the monsoon drain at the back of the linesite. The management also cross checks the housing drainage condition on monthly basis in addition to the current weekly housing inspection at the mandore level.