	<b>SIRIM QAS INTERNATIONAL SDN. BHD.</b> Building 4, SIRIM Complex, No. 1, Persiaran Dato' Menteri, Section 2, 40700 Shah Alam, Selangor, Malaysia.	<b>File Ref. : EB03320001</b>
	<b>RSPO PUBLIC SUMMARY REPORT</b>	

**CLIENT : BOUSTEAD ESTATES AGENCY SDN BHD – TRONG CERTIFICATION UNIT**

**PARENT COMPANY : BOUSTEAD PLANTATIONS BERHAD**

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

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

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

**MAP : See Attachment 1**

**AUDIT DATE : 25th to 28th October 2021**      **DURATION : 16 auditor days**



**TYPE OF AUDIT :**      ☒ **Annual Surveillance Audit 4**      ☐ **Recertification Audit**

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

**SCOPE OF CERTIFICATION:** Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model

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

**The following attachments form part of this report:**  
 Non-conformity Report(s) ☒      List of additional site(s) ☐

<p><b><u>Report by Audit Team Leader</u></b></p> <p>Name : DZULFIQAR AZMI</p> <p>Signature : </p> <p>Date : 28 / 01 / 2022</p>	<p><b><u>Acknowledgement by Client's Representative</u></b></p> <p>Name : MITAH BINTI LIMPU</p> <p>Signature : </p> <p>Date : 04 / 02 / 2022</p>
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## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF AUDITS

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

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

## RSPO PUBLIC SUMMARY REPORT

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

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

## RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> <li>Malaya Estate = 3 days, to verify safety and health, environment, good agriculture best practices, GHG verification, etc</li> <li>BMR Estate = 3 days for verified safety and health, environment, good agriculture best practices, GHG verification, etc</li> <li>Remote audit = 5 days.</li> </ul>		
Name of peer reviewer	:	NA	
Report approved by	:	Kamini Sooriamorthy	Approval date: 18/12/2020

Annual Surveillance Audit 4				
On-site audit date	:	25-28/10/2021 (16.0 a.d)	No. of auditor days:	19 Auditor Days
Remote	:	05-07/07/2021 (3.0 a.d)		
Audit team	:	Dzulfiqar Azmi (LA), Mohd Zulfakar Kamaruzaman, Rozaimie Ab Rahman, Mohd Raouf Asis.		
No. of major NCR	:	7	Indicator: 1.1.4 (Recurrence), 2.1.1 (Recurrence), 3.4.2 (Upgraded), 6.2.4, 6.3.1, 6.7.3 (Recurrence), 6.7.4 (Upgraded).	Closing date: 24/01/2022
No. of minor NCR	:	1	Indicator: 7.2.8	
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
				Independent growers / Smallholders
		Indigenous people	Contractors	Others (Please specify)
		NA	/	
Supply base sampled	:	Kuala Muda Estate, Malakoff Estate, Stothard Estate, Bukit Mertajam Rubber Estate		
Changes since the last audit	:	Malakoff Estate was combined into Bt. Mertajam Rubber Estate (as Mayfield Division).		
Justification of audit planning	:	<ul style="list-style-type: none"> <li>Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification, etc.) + (1 day for supply chain certification systems)</li> <li>Kuala Muda Estate = 3 days, for safety and health, environment, good agriculture best practices, GHG verification, etc.</li> <li>Malakoff Estate = 3 day, for safety and health, environment, good agriculture best practices, GHG verification, etc.</li> <li>Stothard Estate = 3 days for verified safety and health, environment, good agriculture best practices, GHG verification, etc.</li> <li>BMR Estate = 3 days for verified safety and health, environment, good agriculture best practices, GHG verification, etc.</li> <li>Remote audit = 3 days.</li> </ul>		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini Sooriamorthy	Approval date : 28/01/2022	

# RSPO PUBLIC SUMMARY REPORT

## SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
<b>*Projection Period / Reporting Period</b>				*Sept 2020 to August 2021	Oct. 2021 to Sept. 2022
<b>Certified FFB Processed (MT)</b>				150,140.00	129,690.00
<b>Production of Certified CPO (MT)</b>				33,228.00	27,221.93
<b>Production of Certified PK (MT)</b>				7,394.00	5,711.88
<b>Certified Areas (Ha)</b>				8,805.20	8,805.20
<b>Planted Area (Ha) (Mature + Immature)</b>				8,148.90	8,148.90
<b>Production Area (Ha) (Planted – Immature)</b>				6,733.30	7,177.00
<b>HCV Areas</b>				116.30	116.30
<b>REMARKS</b>	*This was the projected period based on audit carried out last year. However, during the conduct of ASA4 in Oct. 2021, the actual reporting period has been extended to 13 months as the surveillance 4 audit was delayed due to Covid-19 pandemic restrictions. The actual reporting period i.e. Sep 2020-Sep 2021, was reflecting the actual stocks and transactions carried out by the CU.				

TABLE 2

	PO	PK
<b>Last years certified volume (MT)</b>	33,228.00	7,394.00
<b>Last years actual certified sold (MT)</b>	24,094.79	4,395.28
<b>Last years actual sold under other schemes (MT)</b>	0.00	0.00
<b>Last years sold conventional (MT)</b>	0.00	491.78
<b>Last year actual sold CSPO credits (where applicable)</b>	0.00	0.00
<b>New year certified volume (MT)</b>	27,221.93	5,711.88

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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**

<b>Member of the Audit Team</b>	<b>Role/area of RSPO requirements</b>	<b>Qualifications</b>
Dzulfiqar Azmi	Lead Auditor / Safety & Environment	Holds a B. Sc. in Agriculture from University Teknologi Mara (UiTM). He had 7 years of working experience in the oil palm operation. He is a qualified auditor for RSPO P&C and MSPO.
Mohd Zulfakar Kamaruzaman	Lead Auditor / Social (External), HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C, MSPO and RSPO Supply Chain.
Rozaimée Ab Rahman	Auditor / Supply Chain, GAP, GHG	Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C, MSPO and RSPO Supply Chain.
Mohd. Ab Raouf Asis	Auditor / Social (Internal), TBP	Holds a B.Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. Currently he qualified Lead Auditor for RSPO P&C and MSPO.

### **1.3 Audit methodology**

The audit covered the Trong palm oil mill and 4 of its supply base. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The 4 supply base covered during the audit are Kuala Muda Estate, Malakoff Estate, Stothard Estate and Bukit Mertajam Rubber Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

### **1.4 Stakeholder Consultation**

SIRIM QAS International had initiated the stakeholder consultation by during the on-site audit. In general, there was no negative comments made against this Certification Unit. In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

## RSPO PUBLIC SUMMARY REPORT

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	NCR has been issued pertaining some issues on social as follows: 1.1.4, 2.1.1, 3.4.2, 6.2.4 & 6.3.1.
2) Settlers	NA
3) Villagers / Local communities (including women representatives, displaced communities)	Based on interview, there was no negative feedback from the stakeholders.
4) Suppliers	NA
5) Contract workers (local / foreign / Orang Asli workers / male & female)	Refer as per above no. 1.
6) Local & national NGOs	NA
7) Government agencies / Statutory bodies	MPOB (Mill)
8) Independent growers / Smallholders	NA
9) Indigenous people	NA
10) Contractor	There were issues and findings as highlighted during the audit. Refer as per above no. 1.
11) Previous land owner (if any)	NA
12) Others (please specify)	NA

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. (For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate)

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

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

The Trong Palm Oil Mill commenced its operations in year 2000 with a processing capacity of 60 metric tonnes of Fresh Fruit Bunches (FFB) per hour. All the estates within the CU have been fully developed before the year of 2005. Trong CU have ISO 9001 and MSPO certification beside of RSPO P&C and Supply Chain.

During this reporting period, Boustead Trong CU was suspended between 29 October 2021 and 22 November 2021, due to repeating Major NCRs.



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

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

**Table 1: Actual FFB production by the supply base for the last reporting period  
(September 2020 – September 2021)**

CU own estates	FFB Production	
	Total (MT)	Percentage (%)
Taiping Rubber Plantations Estate	18,699.32	16.49
Malaya Estate	16,863.00	14.87
Bukit Mertajam Rubber Estate	34,078.29	30.05
Kuala Muda Estate	21,754.91	19.18
Stothard Estate	8,389.46	7.40
Batu Pekaka Estate	13,626.11	12.01
<b>Total</b>	<b>113,411.09</b>	<b>100.00</b>

**Table 2: Projected FFB production by supply base for the next reporting period  
(October 2021 – September 2022)**

CU own estates	FFB Production	
	Total (MT)	Percentage (%)
Taiping Rubber Plantations Estate	19,300.00	14.88
Malaya Estate	18,400.00	14.19
Bukit Mertajam Rubber Estate	40,540.00	31.26
Kuala Muda Estate	23,200.00	17.89
Stothard Estate	11,150.00	8.60
Batu Pekaka Estate	17,100.00	13.18
<b>Total</b>	<b>129,690.00</b>	<b>100.00</b>

**Table 3: Actual FFB received and CPO & PK dispatch by Mill for the last reporting period  
(September 2020 – September 2021)**

RSPO Supply Chain Model: IP	Total (MT)
FFB Received	113,411.09
FFB Processed	113,411.09
CPO Production	24,094.79
PK Production	4,887.06
CPO delivered as IP	24,094.79
CPO delivered as non-RSPO certified	0.00
PK delivered as IP	4,395.28
PK delivered as non-RSPO certified	491.78
Product sold under Book & Claim	0.00

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period  
(October 2021 – September 2022)**

RSPO Supply Chain Model: IP	Total (MT)
FFB Received	129,690.00
FFB Processed	129,690.00
CPO Production	27,221.93
PK Production	5,711.88

# RSPO PUBLIC SUMMARY REPORT

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

Estate	Planted (ha)	Certified (ha)
Taiping Rubber Plantations Estate	1,230.80	1,382.80
Malaya Estate	806.90	906.20
Bukit Mertajam Rubber Estate & Mayfield Div.	2,851.50	3,044.90
Kuala Muda Estate	1,419.00	1,519.50
Stothard Estate	942.90	983.10
Batu Pekaka Estate	897.80	968.70
<b>Total</b>	<b>8,148.90</b>	<b>8,805.20</b>

**Table 6 Planting profile for Trong CU**

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature &gt;3 years (Ha)</u>	<u>Immature &lt; 3 years(Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Taiping Rubber Plantations Estate	1996	1st	55.80	0.00	55.80	81.30	18.70
	1997	1st	36.60	0.00	36.60		
	1998	1st	23.90	0.00	23.90		
	1999	1st	60.00	0.00	60.00		
	2000	1st	30.00	0.00	30.00		
	2001	1st	150.80	0.00	150.80		
	2003	1st	45.00	0.00	45.00		
	2004	1st	81.40	0.00	81.40		
	2010	1st	41.80	0.00	41.80		
	2011	2nd	50.70	0.00	50.70		
	2014	2nd	54.20	0.00	54.20		
	2015	2nd	47.60	0.00	47.60		
	2016	2nd	127.00	0.00	127.00		
	2017	2nd	97.90	0.00	97.90		
	2018	2nd	97.90	0.00	97.90		
	2019	2nd	0.00	76.00	76.00		
	2020	2nd	0.00	110.50	110.50		
	2021	2nd	0.00	43.70	43.70		
<b>Total</b>			<b>1,000.60</b>	<b>230.20</b>	<b>1230.80</b>	<b>81.30</b>	<b>18.70</b>
Malaya Estate	2006	2nd	57.60	0.00	57.60	87.74	12.26
	2007	2nd	100.10	0.00	100.10		
	2008	2nd	117.50	0.00	117.50		
	2010	2nd	81.80	0.00	81.80		
	2011	2nd	63.80	0.00	63.80		
	2012	1st	52.20	0.00	52.20		
	2013	1st	68.70	0.00	68.70		
	2016	1st	59.60	0.00	59.60		
	2017	1st	45.60	0.00	45.60		
	2018	1st	61.10	0.00	61.10		
	2019	2nd	0.00	98.90	98.90		
<b>Total</b>			<b>708.00</b>	<b>98.90</b>	<b>806.90</b>	<b>87.74</b>	<b>12.26</b>

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	Bukit Mertajam Rubber Estate	2020	2nd	0.00	200.90	200.90					
		2019	2nd	0.00	186.70	186.70					
		2018	2nd	206.90	0.00	206.90					
		2017	2nd	218.80	0.00	218.80					
		2016	2nd	206.90	0.00	206.90					
		2015	2nd	106.70	0.00	106.70					
		2014	2nd	121.40	0.00	121.40					
		2012	2nd	40.90	0.00	40.90					
		2007	2nd	29.70	0.00	29.70					
		2001	2nd	252.10	0.00	252.10					
		2000	2nd	134.60	0.00	134.60					
		1999	1st	96.00	0.00	96.00					
		1996	1st	191.70	0.00	191.70					
		1995	1st	171.30	0.00	171.30					
		1994	1st	124.70	0.00	124.70					
		1993	1st	21.10	0.00	21.10					
		Mayfield Div.	2017	2nd	68.80	0.00				68.80	
	2016		2nd	48.90	0.00	48.90					
	2003		1st	22.30	0.00	22.30					
	2002		1st	27.90	0.00	27.90					
	2001		1st	26.80	0.00	26.80					
	1999		1st	55.50	0.00	55.50					
	1995		1st	159.70	0.00	159.70					
	1993		1st	30.10	0.00	30.10					
	1992		1st	50.00	0.00	50.00					
	1991		1st	51.10	0.00	51.10					
	Total			2,463.90	387.60	2851.50				86.41	13.59
	Kuala Muda Estate	1996	1st	177.20	0.00	177.20					
		1997	1st	100.10	0.00	100.10					
		1998	1st	149.10	0.00	149.10					
		1999	1st	176.60	0.00	176.60					
		2000	1st	195.50	0.00	195.50					
		2001	1st	340.40	0.00	340.40					
		2003	1st	239.00	0.00	239.00					
		2018	2nd	41.10	0.00	41.10					
	Total			1,419.00	0.00	1,419.00				100.00	0.00
	Stothard Estate	1998	1st	135.50	0.00	135.50					
		1999	1st	145.90	0.00	145.90					
		2001	1st	42.50	0.00	42.50					
		2003	1st	2.40	0.00	2.40					
		2008	1st	54.40	0.00	54.40					
		2009	1st	48.90	0.00	48.90					
		2010	1st	33.70	0.00	33.70					
		2011	1st	51.40	0.00	51.40					
		2012	1st	74.90	0.00	74.90					
		2013	1st	40.50	0.00	40.50					
		2014	1st	53.10	0.00	53.10					
		2017	1st	32.90	0.00	32.90					

## RSPO PUBLIC SUMMARY REPORT

Batu Pekaka Estate	2018	1st	49.80	0.00	49.80			
	2019	2nd	0.00	48.30	48.30			
	2020	2nd	0.00	78.60	78.60			
	2021	2nd	0.00	50.10	50.10			
	Total			765.90	177.00	942.90	81.23	18.77
	1997	1st	17.00	0.00	17.00			
	1997	1st	4.40	0.00	4.40			
	1999	1st	41.10	0.00	41.10			
	2000	1st	34.20	0.00	34.20			
	2000	1st	43.60	0.00	43.60			
	2001	1st	44.10	0.00	44.10			
	2002	1st	39.50	0.00	39.50			
	2002	1st	21.00	0.00	21.00			
	2002	1st	52.00	0.00	52.00			
	2002	1st	38.70	0.00	38.70			
	2008	2nd	9.80	0.00	9.80			
	2008	2nd	53.50	0.00	53.50			
	2009	2nd	39.80	0.00	39.80			
	2010	2nd	30.70	0.00	30.70			
	2011	2nd	34.20	0.00	34.20			
	2012	2nd	22.20	0.00	22.20			
	2012	2nd	10.90	0.00	10.90			
	2013	2nd	64.90	0.00	64.90			
	2014	2nd	58.50	0.00	58.50			
	2015	2nd	61.80	0.00	61.80			
	2016	2nd	37.20	0.00	37.20			
	2017	2nd	60.50	0.00	60.50			
	2020	2nd	0.00	78.20	78.20			
	Total			819.60	78.20	897.80	1048.08	8.71
Sub Total			7,177.00	971.90	8,148.90	88.07	11.93	

### 2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

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

## RSPO PUBLIC SUMMARY REPORT

### 3.0 AUDIT FINDINGS

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

No changes so far.

3.2 Progress and changes in time bound plan (Refer to Attachment 6 for the time bound plan)

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

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

As in the TBP dated May 2021.

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

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

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

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

If no, please state reasons

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

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

NA

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

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

3.5. Complaint received from stakeholder (if any)

No complaint received as at todate.

### 4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) List : 1 7.2.8  
(details refer to Attachment 4)

## RSPO PUBLIC SUMMARY REPORT

Total no. of major NCR(s) List : 7 1.1.4 (Recurrence), 2.1.1 (Recurrence), 3.4.2 (Upgraded), 6.2.4, 6.3.1, 6.7.3 (Recurrence), 6.7.4 (Upgraded).  
(details refer to Attachment 4)

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

Total no. of minor NCR(s) List : NA  
(details refer to Attachment 4)

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

### 5.0 AUDIT CONCLUSION

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

### 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 : DZULFIQAR AZMI

(Name)



(Signature)

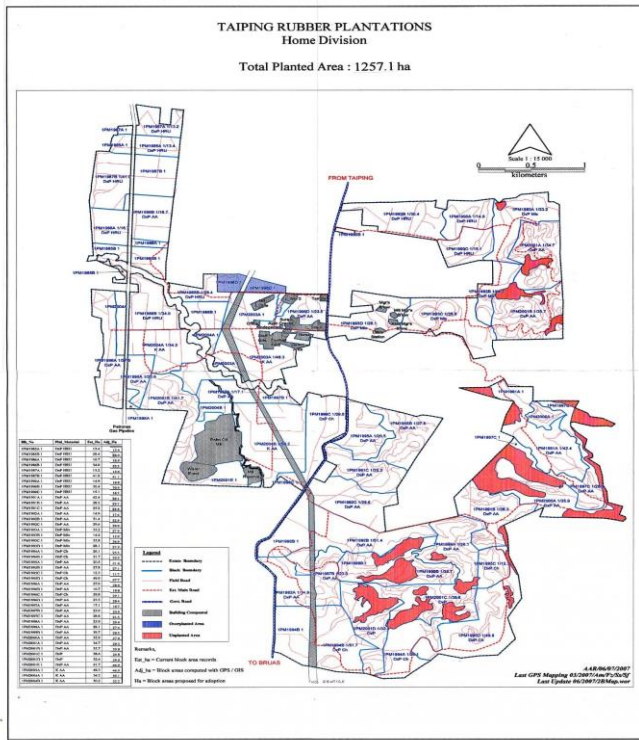
24/01/2022

(Date)

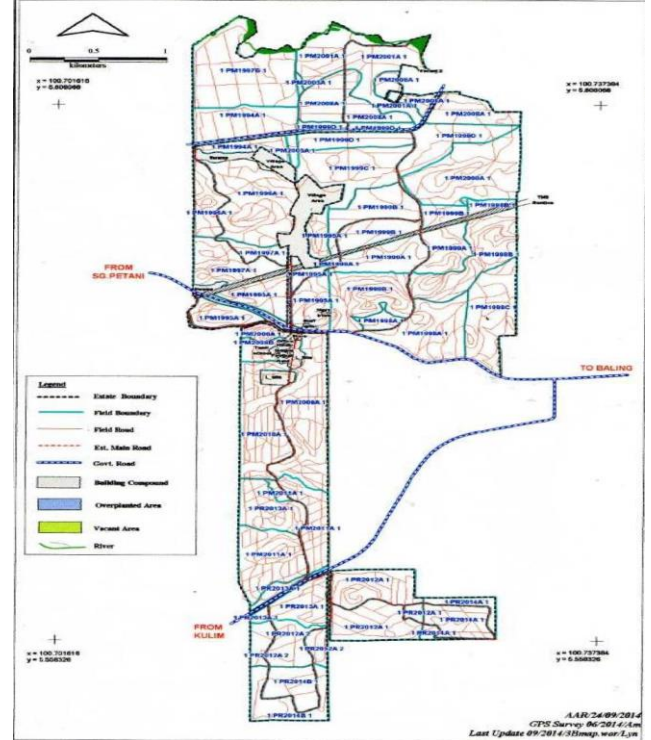
# RSPO PUBLIC SUMMARY REPORT

## Attachment 1 – Map

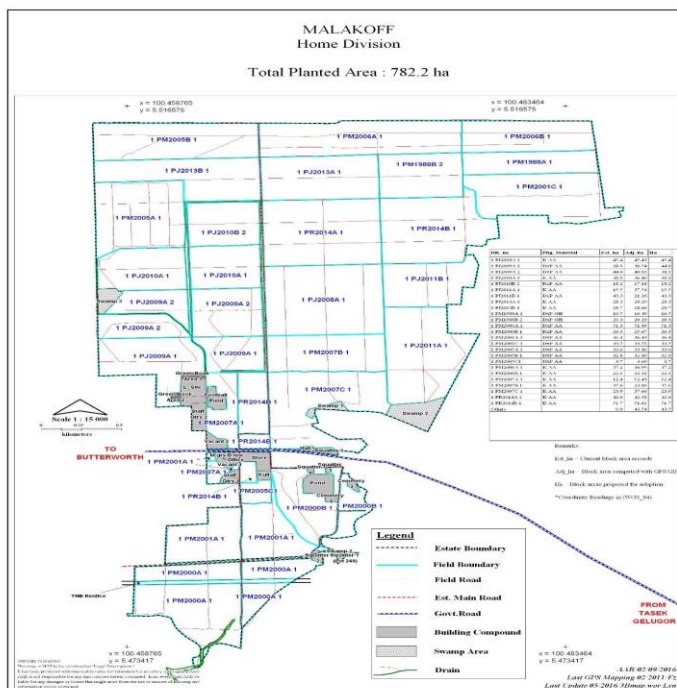
### TRP Estate



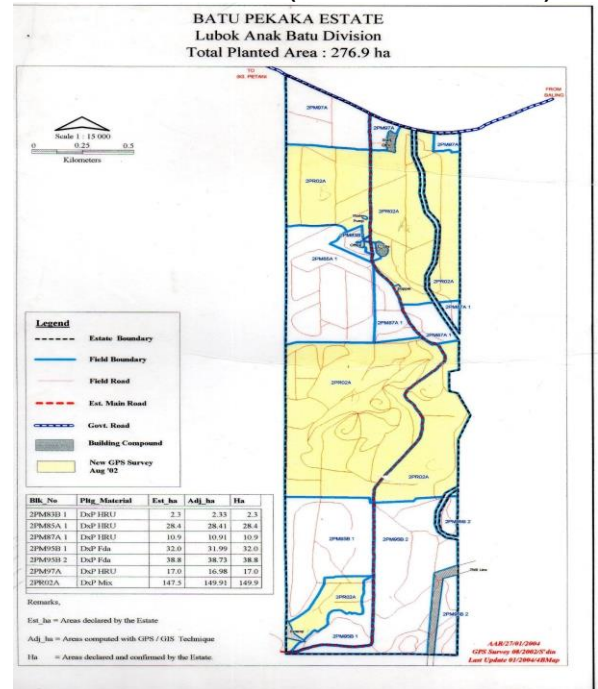
### Stothard Estate



### Batu Pekaka Estate

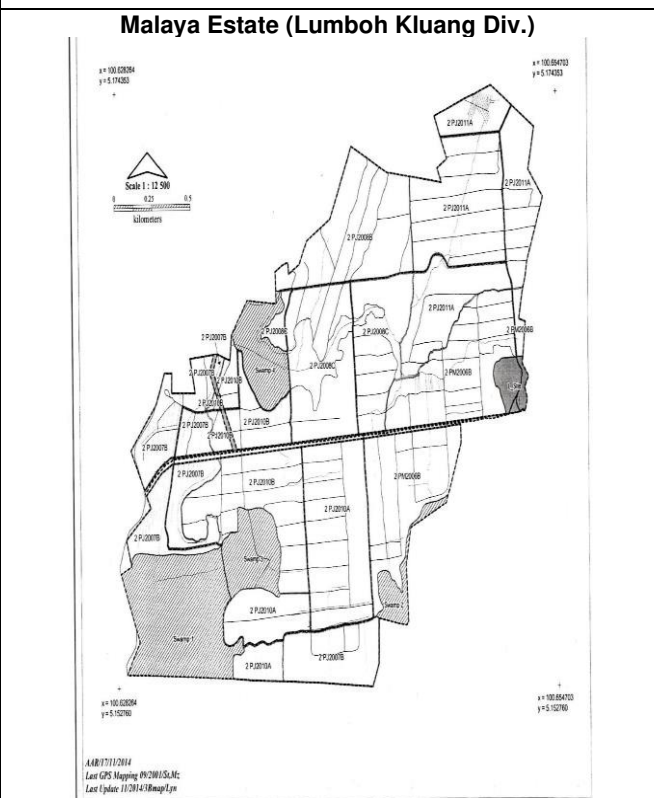
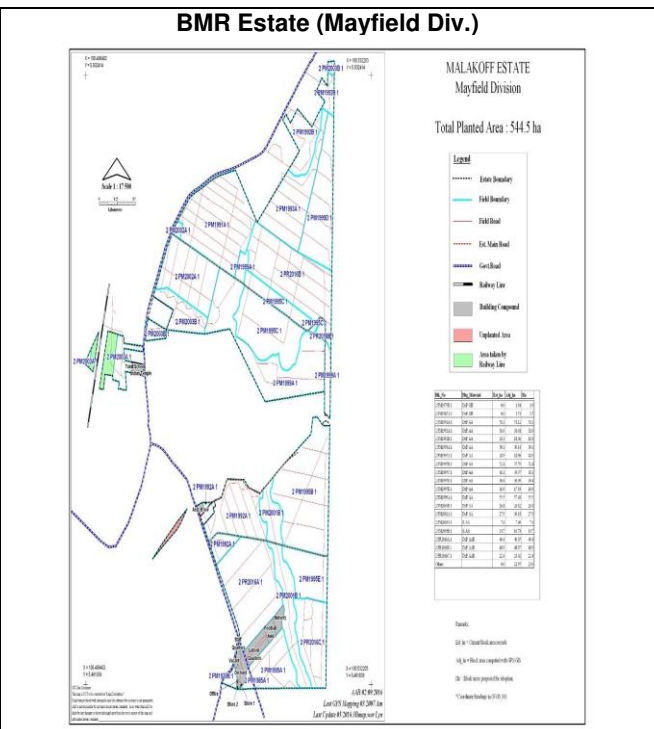


### Batu Pekaka Estate (Lubok Anak Batu Div.)





RSPO PUBLIC SUMMARY REPORT
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**Attachment 2 – Audit Plan**

**Surveillance 4 Audit Plan**

**1. Objectives**

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the relevant certification standards.
- (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** : 25th to 28th October 2021

**3. Site of assessment** : Boustead Trong Certification Unit;  
 i. Trong POM  
 ii. Kuala Muda Estate  
 iii. Malakoff Estate  
 iv. Stothard Estate  
 v. Bukit Mertajam Rubber Estate

**4. Reference Standard:**

- a. MYNI 2019 of RSPO P&C 2018 / RSPO Independent Smallholder Standard, Nov 2019 / RSPO Management System Requirements and Guidance for Group Certification of FFB Production, March 2018
- b. RSPO Certification System Documents
- c. Company's audit criteria including Company's Manual/Procedures

**5. Assessment Team**

Lead Auditor : Dzulfikar Azmi (GAP, Legal, TPB)  
 Auditor : Mohd Ab Raouf Asis (Social - Internal)  
 Rozaimie Abd. Rahman (Supply Chain, Safety, Environmental, GHG)  
 Mohd Zulfakar Kamaruzaman (Social - External, HCV)  
 Observer : N.A.

*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 non conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 90 days, the certificate shall be terminated.

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

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

**9. Confidentiality Requirements**

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

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

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

**11. Reporting**

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

**12. Facilities Required**

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

**13. RSPO 2018 Principles and Criteria (P&C) Metrics Template**

The RSPO 2018 Principles and Criteria (P&C) Metrics Template outlines a set of strategic outcome-based metrics relating directly to the RSPO P&C and is aligned with the RSPO Theory of Change. This Metrics Template comes into effect on 1 June 2021 and all audits against the 2018 P&C or the relevant National Interpretation conducted from 1 June 2021 onwards shall prepare and submit this Metrics Template for the audit team to review during audit.

Please submit the Metrics Template to Lead Auditor according to this period:

- a) Reporting time frames for economic data are:
  - i. Calendar year (January to December): January 2020 to December 2020, and
  - ii. 12-month period counting up to one months before audit month: **Oct. 2020 to Sep. 2021**
- b) Reporting time frames for demographic data:
  - i. For mill and estate workers: as of 31 December 2020
  - ii. For smallholders and outgrowers: January 2020 to December 2020
- c) Reporting time frame for all other social and environmental data:
  - i. January 2020 to December 2020

The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021. All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).

**14. Assessment Programme Details** : As below

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**Day One: 25/10/2021 (Monday)**

Time	Activities / areas to be visited				Auditee
9.00 am	Opening Meeting for <b>Boustead Estates Agency Sdn. Bhd. – Trong Business Unit.</b> Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader. Please be noted that Opening meeting will be conducted once for all to all estates and POM sampling at Stothard Estate. However, due to COVID 19 SOP (Social distancing), Kuala Muda Estate, Malakoff Estate, BMR Estate and TPOM will be using virtual meeting platform to join the opening meeting.				All CU
9.20 am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative.				Management Representative
9.30 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at <b>Stothard Estate</b>				Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements				
	<b>Dzul</b>	<b>Rozaimiee</b>	<b>Raouf</b>	<b>Zulfakar</b>	
	<b>Coverage of assessment: P1, P2, P3, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings.</li> <li>Commitment to long-term economic and financial viability</li> <li>Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Nursery (if any)</li> <li>Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>Training and skill development programs</li> <li>New planting</li> <li>Controlled/open burning</li> <li>Continuous improvement</li> </ul> Other area identified during the assessment	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings.</li> <li>Laws and regulations</li> <li>Waste management including disposal site</li> <li>Aspects/impacts of estate management</li> <li>Safety &amp; Health practice – witness activities at site</li> <li>Hazard identification and Risk Management</li> <li>Chemical management</li> <li>Chemical/ fertilizer store, workshop</li> <li>Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>Controlled/open burning</li> <li>Pollution mitigating plans</li> <li>River system and Water bodies</li> </ul>	<b>Coverage of assessment: P1, P2, P4, P5, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings</li> <li>Laws and regulations</li> <li>Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</li> <li>Interview with Union representatives</li> <li>Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>Workers Issues</li> <li>Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop &amp; etc)</li> <li>Continuous improvement</li> </ul> Other area identified during the assessment	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings</li> <li>Laws and regulations</li> <li>Consultation with relevant government agencies</li> <li>Local communities and stakeholders</li> <li>Local sustainable development</li> <li>Support smallholder inclusion</li> <li>Complaints and grievances</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area</li> <li>Plantation Boundary, adjacent and neighbouring land use</li> <li>Continuous improvement</li> </ul> Other area identified during the assessment	

## RSPO PUBLIC SUMMARY REPORT

		<ul style="list-style-type: none"> <li>Management and disposal of waste including pesticides containers</li> <li>Training and skill development programs</li> <li>Continuous improvement</li> </ul> Other area identified during the assessment		
1.00 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>			
2.00 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit			
9.00pm	Discussion LA and teams on potential NCRs			

### Day Two: 26/10/2021 (Tuesday)

Time	Activities / areas to be visited				Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at <b>Kuala Muda Estate</b>				Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements				
	<b>Dzul</b>	<b>Rozaimie</b>	<b>Raouf</b>	<b>Zulfakar</b>	
	<b>Coverage of assessment: P1, P2, P3, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings.</li> <li>Commitment to long-term economic and financial viability</li> <li>Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Nursery (if any)</li> <li>Plantation on hilly/swampy area</li> <li>IPM implementation, training and</li> </ul>	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings.</li> <li>Laws and regulations</li> <li>Waste management including disposal site</li> <li>Aspects/impacts of estate management</li> <li>Safety &amp; Health practice – witness activities at site</li> <li>Hazard identification and Risk Management</li> </ul>	<b>Coverage of assessment: P1, P2, P4, P5, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings</li> <li>Laws and regulations</li> <li>Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</li> <li>Interview with Union representatives</li> <li>Interview with gender committee, worker representative, contractors,</li> </ul>	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings</li> <li>Laws and regulations</li> <li>Consultation with relevant government agencies</li> <li>Local communities and stakeholders</li> <li>Local sustainable development</li> <li>Support smallholder inclusion</li> <li>Complaints and grievances</li> <li>Inspection of protected sites with HCV attributes</li> </ul>	

## RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> <li>safe use of agro-chemicals.</li> <li>Training and skill development programs</li> <li>New planting</li> <li>Controlled/open burning</li> <li>Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<ul style="list-style-type: none"> <li>Chemical management</li> <li>Chemical/ fertilizer store, workshop</li> <li>Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>Controlled/open burning</li> <li>Pollution mitigating plans</li> <li>River system and Water bodies</li> <li>Management and disposal of waste including pesticides containers</li> <li>Training and skill development programs</li> <li>Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<ul style="list-style-type: none"> <li>supplier, etc</li> <li>Workers Issues</li> <li>Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop &amp; etc)</li> <li>Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<ul style="list-style-type: none"> <li>Forested area</li> <li>Plantation Boundary, adjacent and neighbouring land use</li> <li>Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>
1.00 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>			
2.00 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit			
9.00pm	Discussion LA and teams on potential NCRs			

### Day Three: 27/10/2021 (Wednesday)

Time	Activities / areas to be visited				Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at <b>Bukit Mertajam Rubber Estate and Malakoff Estate</b>				Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements				
	<b>Dzul</b>	<b>Raouf</b>	<b>Rozaimiee</b>	<b>Zulfakar</b>	
	<b>Bukit Mertajam Rubber Estate</b>	<b>Bukit Mertajam Rubber Estate</b>	<b>Malakoff Estate</b>	<b>Malakoff Estate</b>	
	<b>Coverage of assessment: P1, P2, P3, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment</li> </ul>	<b>Coverage of assessment: P1, P2, P4, P5, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment</li> </ul>	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment</li> </ul>	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment</li> </ul>	

## RSPO PUBLIC SUMMARY REPORT

	<p>findings.</p> <ul style="list-style-type: none"> <li>▪ Commitment to long-term economic and financial viability</li> <li>▪ Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>▪ EFB mulching, POME application</li> <li>▪ Nursery (if any)</li> <li>▪ Plantation on hilly/swampy area</li> <li>▪ IPM implementation, training and safe use of agro-chemicals.</li> <li>▪ Training and skill development programs</li> <li>▪ New planting</li> <li>▪ Controlled/open burning</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p>findings</p> <ul style="list-style-type: none"> <li>▪ Laws and regulations</li> <li>▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</li> <li>▪ Interview with Union representatives</li> <li>▪ Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>▪ Workers Issues</li> <li>▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop &amp; etc)</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p>findings.</p> <ul style="list-style-type: none"> <li>▪ Laws and regulations</li> <li>▪ Waste management including disposal site</li> <li>▪ Aspects/impacts of estate management</li> <li>▪ Safety &amp; Health practice – witness activities at site</li> <li>▪ Hazard identification and Risk Management</li> <li>▪ Chemical management</li> <li>▪ Chemical/ fertilizer store, workshop</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>▪ Controlled/open burning</li> <li>▪ Pollution mitigating plans</li> <li>▪ River system and Water bodies</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ Training and skill development programs</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p>findings</p> <ul style="list-style-type: none"> <li>▪ Laws and regulations</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Complaints and grievances</li> <li>▪ Inspection of protected sites with HCV attributes</li> <li>▪ Forested area</li> <li>▪ Plantation Boundary, adjacent and neighbouring land use</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>
1.00 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>			
2.00 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
5.00 pm	Audit team discussion / Interim closing / End of Day 3 audit			
9.00pm	Discussion LA and teams on potential NCRs			

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**Day Four: 28/10/2021 (Thursday)**

Time	Activities / areas to be visited				Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at <b>Trong POM</b>				Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements				
	<b>Dzul</b>	<b>Rozaimiee</b>	<b>Raouf</b>	<b>Zulfakar</b>	
	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings.</li> <li>Laws and regulations</li> <li>Waste management including disposal site</li> <li>Aspects/impacts of mill management</li> <li>Safety &amp; Health practice – witness activities at site</li> <li>Hazard identification and Risk Management</li> <li>Chemical management</li> <li>Chemical/ fertilizer store, workshop</li> <li>Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>Controlled/open burning</li> <li>Pollution mitigating plans</li> <li>River system and Water bodies</li> <li>Management and disposal of waste including pesticides containers</li> <li>Training and skill development programs</li> <li>Mill Best Practice</li> <li>Continuous improvement</li> </ul> <p>Other area identified during the</p>	<b>Site visit and assessment on Supply Chain Implementation including the:</b> <ul style="list-style-type: none"> <li>Model used</li> <li>General Chain of Custody</li> <li>System Requirements for the supply chain</li> <li>Documented procedures</li> <li>Purchasing and goods in</li> <li>Outsourcing activity</li> <li>Sales and goods out</li> <li>Processing</li> <li>Records keeping</li> <li>Registration</li> <li>Training</li> <li>Claims</li> </ul>	<b>Coverage of assessment: P1, P2, P4, P5, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings</li> <li>Laws and regulations</li> <li>Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</li> <li>Interview with Union representatives</li> <li>Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>Workers Issues</li> <li>Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop &amp; etc)</li> <li>Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>Follow up from previous assessment findings</li> <li>Laws and regulations</li> <li>Consultation with relevant government agencies</li> <li>Local communities and stakeholders</li> <li>Local sustainable development</li> <li>Support smallholder inclusion</li> <li>Complaints and grievances</li> <li>Mill Boundary, adjacent and neighbouring land use</li> <li>Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	

## RSPO PUBLIC SUMMARY REPORT

	assessment			
1.00 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>			
2.00 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
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.			
4.30 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager			
5.00pm	Closing meeting at CU / End of audit			

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



## RSPO PUBLIC SUMMARY REPORT

### 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	Trong CU continued to implement the procedure for responding to any communication as outlined in their Estates/Mill quality management system documents. The records of communication were identified and maintained in different files depending on the stakeholder. Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. The CU continued to use internet for disseminating public information at <a href="http://www.bousteadplantations.com.my/home.html">http://www.bousteadplantations.com.my/home.html</a> .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The Trong CU continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Boustead has revised their website, <a href="http://www.bousteadplantations.com.my/home.html">http://www.bousteadplantations.com.my/home.html</a> to include all management documents relating to the unit's environmental, social and legal issues demonstrating commitment towards compliance to RSPO criteria.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The estate and mill continued to maintain the records of requests for information and responses are maintained which included the government agencies, schools, local communities, etc. payslips, passport, work permits and daily attendance.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	NO	The consultation and communication procedures were documented. External and internal communication procedures developed by Boustead Plantation for the estates and mill maintained to be followed and available at the audited sites. The Major NCR MAR 01 2020 was regarding the contractor workers who did not know the consultation and communication procedures, resulted on several grievances were not attended to properly. As this issue was repeated, Major (Recurrence) MAR 01 2021 was raised.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The list of stakeholders for Trong CU are maintained and made available during the audit. The stakeholders list at Trong CU's are including the contractors, vendors, neighbouring estates/smallholders, villagers and government agencies. Records of communications are documented and filed. Records also show actions taken in response to inputs from stakeholders, and that efforts are made to ensure understanding by affected parties.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Documented code of ethical conduct and integrity titled 'Code of Ethics and Conduct' maintained and had been communicated to all level of the workforce of the Trong CU.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	In addition, Boustead Plantation Berhad (BPB) also has a Vendor CODE of ETHICS & CONDUCT which has been developed to outline the standards of behaviour required by Boustead Plantation Berhad's vendors which includes expectation to uphold human rights. The Vendor COBC applies to all its suppliers, consultants, agents, contractors' /service providers who have direct dealings with the Group.

### **Principle 2: Operate legally and respect rights**

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	NO	It was evident that Trong CU continue to comply with most of the applicable laws and regulations. However, it has been noted that the Unit of certification still did not comply with some legal requirement i.e Employment Act 1955 section 19 (1), section 60 (3) (a) (ii). 1. Based on interview and documentation review on Work Order and payment voucher, there was found that Stothard Estate did not pay the contractor workers (Nalvam Enterprise) not later than the seventh day after the last day of any wage period, which contravene with the Employment Act 1955 19 (1). 2. Based on interview held and documentation review with workers and contractor there was found that Stothard, Kuala Muda and Bukit Mertajam Estate did not pay two (2) days' wages at the ordinary rate pay for the contractor workers worked on rest day (harvesting works) in the month of July 2021, Aug 2021 and Sep 2021 which contravene with the Employment Act 1955 section 60 (3) (a) (ii). The previous NCR was unable to be closed satisfactorily and recurred. Hence, Major (Recurrence) MAR 02 2021 was issued again.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	At Trong CU have a documented system for identifying, updating and tracking changes in legal requirements and monitoring the status of the legal compliance. Document titled "Legal and Other Requirements Register (LORR)" maintained available at Trong CU. The document last updated on 05/02/2020 by Sustainability Boustead HQ.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained,	YES	On-site verification at estate boundary between Kuala Muda Estate with Kg. Jerong, OSK

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	and there is no planting beyond these legal or authorised boundaries.		Properties and Kg. Sg. Division confirmed that the boundary marking was available.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties is maintained by each unit in its respective stakeholder list. The lists contain name of contractors, designated contact persons, address, telephone/fax/email, and type of contracted works done.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	There is evidence that agreements with third parties contain clauses on meeting applicable requirements. Evidence of legal due diligence carried out include getting the vendors to sign the undertaking to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption.”.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons. Based on contractor agreement, there is clause 4 disallowing illegal migrant, child, forced and trafficked labour and clause 14 must follow all requirement for sustainability in RSPO and MSPO.
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>	YES	Fresh Fruit Bunches are supplied from Boustead Plantation Berhad owned estates which are certified to RSPO. Trong POM also is an Identity Preserved Mill. All Information on geo-location of FFB origins, Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, One or more supporting documents for claims, Valid MPOB license, is available.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Fresh Fruit Bunches are supplied from Boustead Plantation Berhad owned estates which are certified to RSPO. Trong POM also is an Identity Preserved Mill. Thus, there is not indirectly Sourced FFB used.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	Trong CU have established and implemented its commitment towards long term sustainability and improvements through a “5 YEARS PLANNING HORIZON”. The 5 Years Planning Horizon shows a business plan for the year 2021 to 2025 where the throughput (FFB, CPO), Area statement & Yield, Cost and Capital Expenditure is projected. The business plan shows the commitments of estates and POM towards better management of resources to increase productivity while reducing the cost of expenditure. The Trong CU have a yearly budget prepared by the management and approved by top management that indicates the business plan on an annual basis. This annual budget specifies into the details of the expenditures through better and more sustainable management.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Trong CU had a Long Range Replanting Program up to 2027. The program was reviewed annually.
	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 planned to conduct yearly basis. Sighted latest management review meeting has been conducted (combine RSPO, RSPO SCCS and MSPO) to discuss issues related to audit findings, estate and mill operations.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	The management documents in relation to environmental and social plans and impact assessments implemented by the CU were made available and maintained at all audited operating units.
	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	Auditor has verified all the data in metric template was accurate as per reported.
3.3 Operating procedures are appropriately	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	Trong CU has developed and documented several manuals for its use. Among them were: <ul style="list-style-type: none"> <li>▪ Standard Operating Procedure (SOP) that provide guidelines to staff members in respect of certain major aspects of Estate and Mill operations.</li> <li>▪ Oil Palm Circulars – that provides guidelines Oil Palm from land clearing &amp; planting to</li> </ul>

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
documented, consistently implemented and monitored.			<p>despatch of FFB. It contains 15 chapters.</p> <ul style="list-style-type: none"> <li>▪ Safe Work Procedure for 52 operations (Doc; Trong/SOP/001 to 54).</li> <li>▪ OSHA Manual, Occupational Safety and Health Guidelines.</li> <li>▪ Procedure for the training entitled Sustainability Guidelines: Training (BEA SUS/TRN)</li> </ul> <p>The Oil Palm Circular (O.P.C) is the manual used for the operations in the estate. The manual is maintained and updated accordingly. The latest update was carried out in March 2019. The manual covered all activities in the estates from seedlings in nursery to planting in the fields, field maintenance, harvesting and dispatch of FFB to the Mill.</p>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by Trong CU are internal audits conducted by Sustainability Team. Internal audit covering MSPO & RSPO internal audit has conducted for Trong CU in Aug 2021. Results from the assessment internal audit recorded 2 major NCR and 7 OFI for RSPO MYNI and 1 major 5 OFI for supply chain.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Head of Business Unit, Plantation Advisory Department, Performance Monitoring Unit and Safety & Sustainability Department inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Operating units visited maintain all records of monitoring and available for review. checklists were available and being used by the estates and mill for operations, health and safety monitoring, workers' welfare and environmental issues.
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	Not applicable.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	NO	<p>Boustead Trong CU has established its environmental aspects/impacts register associated with their activities. The environmental aspect and impact (EAI) covers the upstream activities such as FFB reception until the downstream processes. At the mill, the identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental receptors are the air emission from the boiler stack, the generation of the palm oil mill effluent (POME) and land contamination which related to the management of scheduled wastes and domestic waste.</p> <p>For all estates, latest environment aspect impact assessment was reviewed in Jan 2021 covering all activities in estates certification units. The main purposed of this assessment was to evaluate and analyse the operations impact on soil, water, and air associated with the organization activities. Among environment aspects assessed were agrochemical applications, land and water contamination from hazardous material and farm vehicles,</p>

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Clause	Indicators	Comply Yes/No	Findings
			human settlement disturbance and abandonment areas. During documentation review at Stothard Estate, Kuala Muda Estate and Bukit Mertajam Estate, there was found that social management and monitoring plans have been developed without participation of affected stakeholders i.e contractor's workers and local workers (Bukit Mertajam Estate). Therefore, previous NCR, MAR 04 2020 was unable to be closed and upgraded to Major.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	At all estates and Trong POM the Plan had been updated and include action plan for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, with consultations of relevant stakeholders except as stated in indicator 3.4.2.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Hiring of Local workers/'Carta Alir Proses Pengambilan Pekerja Trong CU. The procedure details out the process of hiring (application form, screening, interview, requisition approval from HR Manager/Estate Manager, medical check-up and issuance of letter of offer). This procedure was confirmed by a Mill Manager at the Trong CU verified through the worker's personal file. For foreign worker, the employment procedures are contained in Standard Operating Process & Procedures (SOPP) dated 1 Nov 2017. Employment procedures for retirement and termination are available in the local workers' employment contracts. Similarly, foreign workers' contracts also contain provision for mutual termination. Retirement procedure is not applicable to foreign workers.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Employment procedures were implemented, and records were maintained. Audit team has verified all new recruitment workers from Indonesia through personal file by employment number, name of employee, employment contract, offer letter, passport consent form and others.
3.6 An occupational health and safety (H&S) plan is 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	The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Trong CU have conducted the risk assessment on all its operation as well as determining their control measures. Trong CU have conducted the risk assessment on all its operation as well as determining their control measures.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	Occupational health and safety (OHS) management plan for Trong CU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans were acceptable.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and	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	YES	Formal training programmed for 2021 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need has been established with target dates for the training identified.

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
contract workers are appropriately trained.	covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.		
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Training records was maintained was maintained by workstation at all estates & POM.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Training RSPO/MSPO supply chain has been conducted in Jan 2021 by mill engineer to assistant, store clerk, and for contractor training related SCCS has been conducted in Nov 2020.

### **SUPPLY CHAIN REQUIREMENTS FOR MILLS**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Trong Palm Oil Mill (TPOM) sourced for their FFB only from estates under the same CU which involve Boustead estate. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified	YES	Not Applicable since Trong POM is IP Mill.

## RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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.		
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	YES	Available as in Table 4 in the text.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	<p>(Remote) The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were:  Name: Boustead Estates Agency Sdn. Bhd. -Trong Business Unit  Country: Malaysia.  Member Category: Oil Mil  Core product: Palm Oil</p> <p>Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard. There was no evidence of over selling or trading and auditor has sighted the request to extend volume on 27/9/2021 and RSPO has approved on 04/10/2021.</p>



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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <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> </ul>	YES	<p>The Supply Chain Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered which included</p> <ul style="list-style-type: none"> <li>• 4.0 Responsibilities</li> <li>• 5.0 Control of Documents</li> <li>• 6.0 Delivery of FFB the Estates (FFB)</li> <li>• 7.0 Purchasing and Goods in</li> <li>• 8.0 Process monitoring</li> <li>• 9.0 CPO and PK Despatch</li> <li>• 10.0 Record Keeping</li> <li>• 11.0 Product Claims</li> <li>• 12.0 Outsourced Contractor</li> <li>• 13.0 Training</li> <li>• 14.0 Management Review &amp; Audit</li> <li>• 15.0 Reclassification of Mill's Supply Chain Model</li> <li>• 16.0 Processing/Continuous Accounting System</li> <li>• 17.0 Complaints</li> <li>• 18.0 Definitions</li> <li>• 19.0 List of Appendix</li> </ul> <p>The revised procedure has addressed that for palm products despatch i.e CPO and PK, need to perform quality test on individual consignment.</p> <p>- The procedure was kept in file RSPO Supply Chain (SCC) Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in Jan 2021 by mill engineer to assistant, store clerk, and for contractor training related SCCS has been conducted in Nov 2020.</p> <p>- The RSPO Chairman has the overall responsibility and authority over the implementation of the supply chain requirements. It was noted RSPO Chairman has assigned Trong POM Manager (Ahmad Solihin Adnan) &amp; (Khalil Ahmad) staff sustainability to ensure the implementation of supply chain procedure met the RSPO requirements. Interviewed with relevant person in-charge at critical control point was revealed they are understood on the RSPO standard requirements which requires no mixing of RSPO certified and non RSPO certified material in receiving, processing, storage and delivery</p> <p>- Trong POM has implemented Clause 7.0 – Purchasing and Goods In <i>RSPO: Supply Chain Standard</i> for receiving and processing certified and non-certified FFBs. No non-certified product has been received by the Trong POM as this mill is an IP Mill.</p>

## RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <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>	YES	<p>RSPO internal audit was conducted in Aug 2021 (delayed due to Pandemic covid 19), carried out by internal auditor team. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 1 Major NCR and 4 OFI were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>- Documented procedure has defined management review will be conducted once a year Management review meeting has been conducted in Aug 2021. Thus #Major NCR RAR 02 2021 during remote audit was satisfactory closed.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	<p>Trong POM had continued to receive certified FFB from own Estate Which is TRP estate, Kuala Muda estate, Malaya estate, Stothard Estate, Batu Pekaka Estate, BMR Estate and Malakoff estate. The validity of the certificate of the supplier has been checked accordingly. Sighted sample FFB consignment note for TRP estate, Kuala Muda estate, Malaya estate, Stothard Estate, Batu Pekaka Estate, BMR Estate and Malakoff estate. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as "<i>Identity Preserved Records for Oil Mills</i>" has recorded the tonnage of certified FFB and its supplying estate.</p>

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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>	YES	<p>Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales &amp; goods out especially on notation of applicable Supply Chain model &amp; Certificate number being complied by indicating in weighbridge dispatch ticket. Detail of weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization has been verified by the auditor.</p>

## RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	<p>The only 3 outsource company CPO and PK transporter. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them.</p> <p style="text-align: right;">Page 37 of 91</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contact person for both transporters were made available and up-to-date in the stakeholder list. And was updated on 2/1/2021.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, mass balance accounting recording systems were found up-to-date.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	Relevant record was maintained for more than 10 years as per RSPO: Supply Chain.
	iii ) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	Trong POM has maintained the continuous accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. The data was the summary from their daily template as mentioned above.
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified	YES	Not Applicable since this mill is IP Mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>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.</p> <p>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.)</p>		
3.8.13	<p>Extraction rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	YES	<p>(Remote and Onsite) Trong POM process all the received certified crop &amp; their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). The actual Data of OER &amp; KER as per below:</p> <p>These figures were monitored on daily &amp; monthly basis by the mill using the prepared template (e.g. Monthly Production Statement 2021) to ensure their accuracy as well as monitoring of their ongoing performance.</p>
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	YES	

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Boustead Estate Agency Sdn Bhd., Marketing Department (HQ) on behalf of Trong POM.
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	YES	The registration of transaction being carried out by Marketing Department (HQ) subordinate using the RSPO Member ID.
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Trong POM has not use RSPO corporate logo as well as trademark logo.



## RSPO PUBLIC SUMMARY REPORT

### **Principle 4: Respect community and human rights and deliver benefits**

Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	Human Rights Policy has been established by Boustead Plantations Berhad. Through interview with workers, operators, FFB suppliers and local communities at Trong BU, the Policy was communicated to them through workers meeting with all estates/mill management or during morning 'briefing' and during 'Stakeholders meeting', All the estates and the mill adopt the Human Rights Policy, which, among others, respects human rights and will not be complicit in human rights infringement, prohibits retaliation against Human Rights Defenders.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As 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	The mutually agreed system or SOP titled 'Consultation and Grievances Communication Procedure Internal/External' open to all affected parties, resolves dispute in an effective, timely and appropriate manner, ensure anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. This procedure is open to all employees and stakeholders. The documented system comes in the form of complaints form/book where complainant can fill up and submit to the office.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting. Sighted document for Trong CU showed briefing during the stakeholders meeting. For foreign workers, the procedure was explained during initial report for duty with assistance of translators.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is	YES	Trong CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. Trong BU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders as evidenced by stakeholders meeting.

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Clause	Indicators	Comply Yes/No	Findings
	available and communicated to relevant stakeholders.		
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The system used by the Trong CU in resolving disputes and grievances exists in the procedure called ' <i>Prosedur Cara Cara Mengemukakan Aduan</i> ' and ' <i>Prosedur Aduan/Pendapat</i> '. The Mill and Estates within TBU each has its own Internal Complaint Form/Book and External Communication/Complaint Form/Book available. 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 BU. Nevertheless, a review of the Boustead TBU conflict resolution mechanism found it include an option for observers as well as the option of a third-party representation.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	Contributions to community development that are based on the results of consultation with local communities. This was confirmed through consultation with Interviews with Penghulu Mukim Terong (cover all JKKK and MPKK inside Terong District) during the audit.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	Trong Business Unit maintains and complies with the terms of the land title. The land titles specified the purpose of the planting for either oil palm or agricultural crops for economic value. All the Estate are originated from Boustead Plantation and established from year of 1950, for TRP estate the estate was established in 1959 and planted with Rubber tree and convert to oil palm on 1986, for Malaya Estate the estate was established on 1969 first crop planting was a Rubber planting and convert to oil palm on 1980, The land origin is from Boustead subsidiary named Boustead Silasuka Sdn Bhd and transfer to Boustead Teluk Sengat Sdn Bhd in 1 April 2011 on July 2016 transfer again to Boustead Plantation. Noted that the land title for Batu Pekaka Estate was still in progress to change the ownership from CIMB Trustee Berhad to Boustead.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklists, it has been verified that the land is now legitimately owned by Trong CU since 1950-1980. The audit team had confirmed that there were no land issues related to previous owners. From the interviews, it can be concluded that there was no evidence of any land dispute at Trong CU.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities,	YES	

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Clause	Indicators	Comply Yes/No	Findings
	with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.		
	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 checklists, it has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	This requirement in this indicator does not apply to Trong CU.

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Clause	Indicators	Comply Yes/No	Findings
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	This requirement in this indicator does not apply to Trong CU.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	This requirement in this indicator does not apply to Trong CU.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for Trong CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated	YES	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.

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Clause	Indicators	Comply Yes/No	Findings
	consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.		
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent	YES	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title

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Clause	Indicators	Comply Yes/No	Findings
	domain of the federal and state land acquisition legislations.		
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 'Prosedur Penentuan Hak Pemilikan Tanah / Procedure in resolving land conflict'. The CU had also developed a SOP - Fair Compensation in order to handle any issues related with compensation. In accordance with the 'Prosedur Penentuan Hak Pemilikan Tanah' and SOP - Fair Compensation, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Boustead Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the "Prosedur Penentuan Hak Pemilikan Tanah" and SOP - Fair Compensation, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There were no scheme small holdings at Boustead Trong CU. The Fresh Fruit Bunches are supplied from TPOM owned estates which are certified to RSPO.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the 'Prosedur Penentuan Hak Pemilikan Tanah' and SOP - Fair Compensation. In accordance with the 'Prosedur Penentuan Hak Pemilikan Tanah' and SOP - Fair Compensation, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Boustead Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.

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Clause	Indicators	Comply Yes/No	Findings
user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders and, it can be concluded that there was no evidence of any land dispute at Trong CU.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, 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	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by Trong CU since 1950-1980. All the related documentation regarding the land acquisition was kept in Boustead Plantations HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	Land conflict is not present in the area of the unit of certification.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary	YES	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.

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Clause	Indicators	Comply Yes/No	Findings
	and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements.		
	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 and it can be concluded that there was no evidence of any land dispute at Trong CU.

### **Principle 5: Support smallholder inclusion**

Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	This CU is to be certified under the Identity Preserved supply chain model. Hence, the POM is not accepting any outsiders FFB from smallholders or another private plantation. Therefore, the mill is not required to display current and past prices for FFB
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	No outsider FFB supplies are received from smallholders at Trong BU as this mill is Identity Preserved mill, and therefore this Indicator is not applicable.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	In Trong POM Price for FFB adopted the MPOB Pricing. All prices are calculated by the MPOB and the mill take the price and follow what MPOB guided. No outsider FFB supplies are received from smallholders at Trong BU as this mill is Identity Preserved mill, and therefore this Indicator is not applicable.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through	YES	There is no 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 Fresh Fruit Bunches were supplied from Boustead Plantation Berhad owned estates.



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Clause	Indicators	Comply Yes/No	Findings
	FFB price reductions for replanting and or other support mechanisms where applicable.		
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	Fresh Fruit Bunches were supplied from Boustead Plantation Berhad owned estates. Thus, no contract involved with smallholder.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	Interviews conducted with contractors and suppliers, confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Trong CU has been calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn Bhd and DE Metrology Sdn Bhd.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Boustead Plantation supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. There is no third-party FFB sent to the mill. Noted that Trong CU has invited nearby smallholder to promote on RSPO certification. But some smallholders are willing to go for MSPO only.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	The CU also has developed a Standard Operating Procedure (SOP) on Stakeholder Consultation. It contains procedures for consultation and discussions, solving issues/grievances, records and improvements, which is the responsibility of the Manager and Assistant Manager. It also stipulates that issues and grievances can be raised via comments, complaints, or request for information, and that all issues are to be resolved fairly and within the stipulated timeframe. The SOP also states that Master List of Documents must be available for stakeholders' reference. This SOP are being exhibited at the office notice boards at muster grounds. As at to date there is no complaint by stakeholders.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	YES	For Trong POM, being an Identity Preserved Mill, Trong Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.

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Clause	Indicators	Comply Yes/No	Findings
sustainable palm oil value chains.	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	For Trong POM, being an Identity Preserved Mill, Trong Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	For Trong POM, being an Identity Preserved Mill, Trong Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	For Trong POM, being an Identity Preserved Mill, Trong Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	For Trong POM, being an Identity Preserved Mill, Trong Oil Mill does not purchase FFB from smallholders, and no smallholders are in Trong supply base. Therefore, this indicator is not applicable.

### **Principle 6: Respect workers' rights and conditions**

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	The Boustead Equal Opportunity Policy updated in 2 <sup>nd</sup> December 2019. This Policy states Boustead Policy on equal opportunity in all aspects of its employment including recruitment, training and promotion. The Policy identifies under-represented groups where they are encouraged to apply for training and employment opportunities with the Company, and that where possible, special training will be provided for such groups to prepare them to compete on equal terms for jobs and promotion.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not	YES	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	been discriminated against including charging of recruitment fees for migrant workers.		against. Interviews conducted with workers (male, female, local and migrant) as well as local communities also confirmed that this is so. There is also no evidence of payment of recruitment fees by migrant workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	As stipulated in the contracts, Job Description and Yearly Salary Scale for workers and Staff the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs. For monthly paid employees, interviews are done by Estate Manager/Mill before a panel of interviewers who would objectively assess the candidate for suitability. Promotions are based on recommendations, Years of service and performance.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	As of the date of the audit, there is no pregnant worker at Trong CU. As confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test was done on her own free will. During interview it was confirmed that if they require contact with chemicals, they will allocate to other light works.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	Chairman of Gender Committee called 'Persatuan Wanita' at each sites responsible in handling and channeling issue to management, if any. Management has directed chairman of gender committee to respects and protects anonymity and complainants where requested. Complainants can submit in their complaint either in writing or verbally. Workers interviewed know that they can either complaint to their immediate supervisor, or if they wish, to the estate management. A functioning grievance mechanism is in place. The Workers Representative and Gender Committee also looks into allegation of discrimination if reported. Interviews with local workers, foreign workers and female employees confirm that there was no evidence of any form of discriminatory practices by the Trong CU.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	The Boustead Equal Opportunity Policy is publicly available at the offices of the Trong Palm Oil Mill and all states sampled. This Policy states Boustead Policy on equal opportunity in all aspects of its employment including recruitment, training and promotion. The Policy identifies under-represented groups where they are encouraged to apply for training and employment opportunities with the Company, and that where possible, special training will be provided for such groups to prepare them to compete on equal terms for jobs and promotion. Comparisons were made of sampled employment contracts and payslips of harvesters from local and harvesters from Indonesia. Evidence is available that sampled workers receive equal pay for equal work.
6.2 Pay and conditions for staff and workers and for contract workers always meet	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)	YES	Trong CU documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthly pay slips and employment contracts were made available and reviewed during the audit. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and

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Clause	Indicators	Comply Yes/No	Findings
at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	and explained to them in language they understand.		explained to them by a management during induction. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO and non-statutory such as donation to mosque funds, Temple funds), net salary, annual leave and medical leave taken, etc. Interview with workers reveal that they understand the contents of the pay slips and seeks explanation from the office whenever they needed any clarifications. Samples of payslips were also sighted and verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order (Amendment) 2020 and Employment Act 1955.
	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 the Estates and Mill land respective estates on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Malaysia or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the period of employment, wage rate, work benefits, overtime, annual leave, public holidays, contract termination, 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. For the local workers, there is evidence that 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 labour requirements.	YES	There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Labour Law. This was verified from the Mill/Estate workers' employment contracts, punch cards/Checkroll books and interviews with the workers themselves. They are also entitled to at least 1 Hour rest after 5 hours of work. This is based on punch cards, check roll books, pay slips reviewed, and interviews held with workers at the POM and Estates. Workers who have been certified ill are given paid medical leave. Salary deductions are made for EPF, SOCSO, EIS (local workers) and there are no deductions for foreign workers except for travel documents
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed	NO	However, for certain circumstances, the unit of certification does not provide adequate sanitation facilities and not compliance with employees' minimum standards of housing, accommodations and amenities act 1990. Based on interview and site visit to workers quarters at Bukit Mertajam Estate, it was found that: <ul style="list-style-type: none"> <li>i) Workers has been lodged the complaint on clogged toilet bowl, but there was no action taken resulted the related workers has to defecation at field and sometime at his neighboring house.</li> <li>ii) Workers has been lodged the complaint on bulb, but until 6 months no action taken to replace the bulb.</li> <li>iii) The perimeter drains around each dwelling or block of dwellings including all outlet drains are not kept in a good state of repair and clear of refuse or undergrowth to</li> </ul>

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Clause	Indicators	Comply Yes/No	Findings
	detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.		<p>permit free flow of water (Bukit Mertajam and Kuala Muda).</p> <p>iv) Inadequate dustbin</p> <p>Therefore, major NCR was raised as MAR 04 2021.</p>
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	<p>Trong POM has demonstrated effort to monitor once a year the adequacy, sufficient and affordable of food supply and price at the sundry shop within the estate. The CU maintained has agreement with inside shoppers and ensured price are publicly displayed at shops. Workers' access to adequate, sufficient and affordable food is via sundry shops available near the workers' housing. Prices at the sundry shops are adequately labelled. Workers interviewed informed that the prices in the estate shops are slightly higher than those in town, but the price difference is acceptable and not excessive. Among the items sold include sugar, rice, flour, cooking oil, eggs, detergent and other daily necessities. No perishable items (such as vegetables, fish, meat) are sold at the sundry shops, but the estate allows external third party vendors to enter the estate premises to sell perishable items.</p>
	<p>6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b> A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> <li>• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> <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</li> </ul>	YES	<p>All sampled workers receive at least minimum wages based on Minimum Wages Order 2020. The new Minimum Wages Order 2020 gazetted on 10 Jan 2020 and came into effect on 1 February 2020.</p> <p>Trong POM, Stothard, Kuala Muda and BMR had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculating Prevailing Wages.</p>

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Clause	Indicators	Comply Yes/No	Findings
	<p>Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.</p> <ul style="list-style-type: none"> <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> </ul> <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesian. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	NO	From the interview with sampled workers, the policy of freedom of association is available but not demonstrably implemented. Based on interview with Bangladeshi workers from Stothard Estate, they were informed that they were prohibit from joint the union. This was contravening with the Boustead Plantation Berhad Freedom of Association policy dated 2 Dec 2019. The policy stated that the company give permission to the employees to joint any organization which does not breach to the Malaysia’s law. For that reason, Major NCR MAR 05 2021 was raised.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	The CU continues to retain minutes of meeting with trade unions, NUPW and AMESU representatives. Among the minutes reviewed during the audit include ‘Minit Mesyuarat Majikan Bersama Wakil NUPW dan AMESU bagi Ladang dan Kilang Trong 2021’ in Aug 2021 and other routine management minutes of meeting. There is no issue raised in the meeting.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or	YES	Evidence is available that all worker representatives were freely appointed by the workers as confirmed by the workers’ representatives themselves as confirmed by a spraying mandore from Stothard and Kuala Muda Estate and a weighbridge operator from Trong

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
independent and free association and bargaining for all such personnel.	associations, or other freely elected representatives for all workers including migrant and contract workers.		Palm Oil Mill.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The formal Policy on protection of children and non-employment of children is contained in the "Polisi Penggajian Pekerja Kanak-Kanak Dan Had Umur Minima" signed by CEO. There is addendum in the agreement with contractor This undertaking to not hire child labour is included in all service contracts and supplier agreements.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout Trong CU. There also have a documented age screening verification procedure.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that any young persons were employed in any of the units at Trong BU as evidenced from documentation review, field observations and interviews.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	Based on the documents sighted, communication about its no child labour Policy was communicated to all levels of employees as evidenced from training. The training was also given to external stakeholders during stakeholder meeting.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	A policy on sexual harassment titled ' <i>Polisi Gangguan Seksual</i> ' has been established si. The policy was signed by the CEO and is available in Malay and English language. The policy is displayed on the notice boards at the mill and the estates offices. No evidence or acts that contradict this policy were observed as interviewed the women workers/staffs and gender committee during the audit in the CU.
	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	Trong CU has established a policy titled ' <i>Hak Reproduksi</i> '. Trong POM, Stothard, Kuala Muda and BMR Estate have briefed their workers from time to time during muster briefings. Gender Committee have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights and need of new mothers. Awareness on reproductive rights need of new mothers are also briefed during muster and Gender Committee meetings held at each Mill and Estates. Based on

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Clause	Indicators	Comply Yes/No	Findings
			interview with workers, they basically understood the intent of the policy.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	During this audit, there has been no evidence of any new mothers and therefore this indicator could not be verified. However, based on interview conducted with the Gender Committee members at Trong CU, two years ago when she was pregnant, her needs were attended to which included a private room where she could express milk and a fridge for storage were made available.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	A grievance mechanism has been maintained by the CU. Chairman of Gender Committee at each operating units responsible in handling and channeling issue to management. The management has directed the chairman of the Gender Committee to respects and protects anonymity and complainants where requested. The mechanism has been communicated to all levels of the workforce as verified by auditor during interview with female workers at all estates and Mill.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> <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> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	YES	Collective evidence is available that all sampled workers have entered into employment voluntarily.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	A special labour policy for employment of foreign workers has been addressed in the ' <i>Polisi Pekerja Buruh Asing</i> '. The policy mentioned that all employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival programme will be conducted once arrived for three months. The CU maintained its specific procedure / flowchart for employment of foreign workers titled 'Sourcing Process for Foreign Workers'. The procedure has been implemented for any employment related with foreign workers.



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Clause	Indicators	Comply Yes/No	Findings
			Based on observations and interviews of foreign workers, there is no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2020/2021 was available. The Estate/Mill Manager is the chairman and the Mill Engineer/Assistant Manager is the secretary. OSH Committee meetings were held once in three months.
	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	Emergency Response Plan (ERP) was established. Furthermore, sighted also COVID-19 preparedness and response plan flow for operating unit with medical access limitation. The estate shall test their emergency response plans at least annually. First aid training was conducted annually at Trong CU was sighted and reviewed. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident (LTA) metrics, quarterly reviewed.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	NO	Previous Major NCR was not closed and repeated. During interview with sampled harvesting contractor's workers and verification of "PPE Issuance Records", there is no free of charge provided for personal protective equipment i.e. harvesters shoe and cotton glove and it is only available free for the first time user only. Based on interview with the estate management and site verification, the harvesters shoe and cotton glove was not available at PPE Storage. During site inspection at site, sighted several workers did not wear appropriate PPE according to Safe Work Procedure and HIRARC. i. Sighted 2 harvesters did not wear sickle cover when riding the motorcycle. ii. Sighted 1 harvester did not wear safety helmet while perform their work. iii. Sighted 1 tractor driver did not wear safety helmet when driving the tractor. As a result, Major (Recurrence) DA 01 2021 was raised.

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Clause	Indicators	Comply Yes/No	Findings
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	NO	Based on verification of pay slip and interview with contractor and contractor workers, sighted there was no evidence for contractor's foreign workers covered by accident insurance or SOCSO. Thus, #Major NCR RAR 02 2021 (upgraded) has been raised.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any are reviewed during safety meetings.

### **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	The estates have implemented a yearly IPM plan with the objectives as below: <ul style="list-style-type: none"> <li>• Prevent or minimize loss or damage to palm and yield by pest.</li> <li>• Minimize loss and damages to ripe &amp; unripe fruits and basal tissue of the palm base by rat attacks.</li> <li>• Ensure sufficient food source for natural predators especially barn owl</li> <li>• To reduce the use of pesticides</li> </ul> The effectiveness of the plan is monitored through a number of documents. Amongst the documents sighted are: <ul style="list-style-type: none"> <li>• Beneficial Palms Point Mapping</li> <li>• Monthly A/I record.</li> <li>• Barn Owl Records and Occupancy Census – Rat Baiting Census and application Records.</li> </ul> Though all estate had barn owls, rat damage still existed. Rat attack was treated/controlled by rat baiting using <i>broadifacoum</i> . Application was on campaign basis – 2 campaigns per year. Baiting was stopped when bait acceptance drops to 20%.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There was no evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and as per the stakeholder consultation with relevant workers.
	7.1.3 There is no use of fire for pest	YES	During site visits there was no use of fire has been used for pest control. Management has

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Clause	Indicators	Comply Yes/No	Findings																																																								
	control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.		using pheromone trap at immature areas to capture Rhinoceros beetles and planted beneficial plants for control bagworm.																																																								
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	<p>All pesticides used were those officially registered under the Pesticide Act 1974. All chemicals purchases are made through approval by the Head Office. No illegal agrochemicals (stated by local and international laws) Paraquat was used in the estates. No documented evidence was sighted and further will verify during site audit.</p> <p>(Onsite) Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in</p> <p>a) SOP - O.P.C.No.01b / 01c, b) SOP – O.P.C No 02a / 04b / 04c, c) SOP – O.P.C No 04f / 04g / 05b.</p> <p>The Manual had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. All the Estates had maintained chemical registers and were up dated periodically. The chemical used in the estates as captured from the chemical register among others as listed below;</p> <table><tr><th></th><th>Chemical name</th><th>Class</th><th></th><th>Chemical name</th><th>Class</th></tr><tr><td>1</td><td>Glyphosate isopropylamine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Sodium chlorate</td><td>III</td><td>7</td><td>Triclopyr butoxy e/ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>Canyon 20G</td><td>IV</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Amine 2.4 D</td><td>II</td></tr><tr><td>5</td><td>Metsulfuron methy 20% w/w</td><td>III</td><td>10</td><td>Bayfolan</td><td>III</td></tr></table> <p>The justification of agrochemicals use is available in the Oil Palm circulars OPC.</p> <table><tr><th></th><th>Reference</th><th>Title</th><th>Doc eff date</th></tr><tr><td>1</td><td>OPC 01. b</td><td>Weed management in oil palm</td><td>Jun 02</td></tr><tr><td>2</td><td>OPC 04. b</td><td>Rat control in oil palm</td><td>Jan 18</td></tr><tr><td>3</td><td>OPC 04. f</td><td>Management of Rhinoceros Beetles</td><td>Aug 18</td></tr><tr><td>4</td><td>OPC 04. g</td><td>Control of leaf eating caterpillars</td><td>Aug 18</td></tr></table>		Chemical name	Class		Chemical name	Class	1	Glyphosate isopropylamine	III	6	Cypermethrin	III	2	Sodium chlorate	III	7	Triclopyr butoxy e/ester	III	3	Glufosinate ammonium	III	8	Canyon 20G	IV	4	Triclopyr butoxy	III	9	Amine 2.4 D	II	5	Metsulfuron methy 20% w/w	III	10	Bayfolan	III		Reference	Title	Doc eff date	1	OPC 01. b	Weed management in oil palm	Jun 02	2	OPC 04. b	Rat control in oil palm	Jan 18	3	OPC 04. f	Management of Rhinoceros Beetles	Aug 18	4	OPC 04. g	Control of leaf eating caterpillars	Aug 18
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	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	<p>Trong CU continued to record areas where pesticides were used.</p> <p>a) Pesticides were used only when justified and as programmed. Records of pesticides used by area, quantity used, hectares applied, LD 50 and Ai/Ha were made available to auditors.</p> <p>b) Records were maintained in store issue chits, bin cards, program sheets, field cost books and progress reports.</p>																																																								

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Clause	Indicators	Comply Yes/No	Findings																																																
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	The estate has implemented a long term chemical reduction plan where they are currently monitoring the usage of chemicals on a monthly basis to ensure reduction of chemical use in the long run. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. The estates also have implemented an IPM Plan to further reduce the use of pesticides. Sighted during the site visit the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at intended areas.																																																
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	No prophylactic use of pesticide was identified in all estates.																																																
	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	<p>The estate confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"><li>▪ The review of the chemical register concluded that all pesticides used are of class II, III &amp; class IV. The use of <i>paraquat</i> had ceased effective 2016.</li><li>▪ Class IA <i>monocrotophos</i> chemical is used for the trunk injection for the bagworms treatment</li><li>▪ Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements met.</li></ul> <p>The types of chemicals used by the estates are listed below.</p> <table><tr><th>No.</th><th>Chemical name</th><th>unit</th><th>Class</th><th>No.</th><th>Chemical name</th><th>unit</th><th>class</th></tr><tr><td>1</td><td>Stanex</td><td>liter</td><td>III</td><td>7</td><td>Fendone</td><td>liter</td><td>IV</td></tr><tr><td>2</td><td>Azoforce</td><td>liter</td><td>1A</td><td>8</td><td>Surfactant</td><td>liter</td><td>IV</td></tr><tr><td>3</td><td>Amine</td><td>liter</td><td>II</td><td>9</td><td>Glyphosate 41%</td><td>liter</td><td>III</td></tr><tr><td>4</td><td>Garlon</td><td>liter</td><td>III</td><td>10</td><td>Glyphosate 48.7%</td><td>liter</td><td>III</td></tr><tr><td>5</td><td>Metsulfuron</td><td>can</td><td>IV</td><td>11</td><td>Rat bait</td><td>liter</td><td>IV</td></tr></table>	No.	Chemical name	unit	Class	No.	Chemical name	unit	class	1	Stanex	liter	III	7	Fendone	liter	IV	2	Azoforce	liter	1A	8	Surfactant	liter	IV	3	Amine	liter	II	9	Glyphosate 41%	liter	III	4	Garlon	liter	III	10	Glyphosate 48.7%	liter	III	5	Metsulfuron	can	IV	11	Rat bait	liter	IV
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	7.2.5a Judgment of the threat and verify why this is a major threat.	YES																																																	
	7.2.5b Why there is no other alternative which can be used.	YES																																																	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES																																																	
	7.2.5d What is the process to limit the negative impacts of the application.	YES																																																	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	<p>(Onsite) There was no evidence to show that Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, were used in all 3 estates visited.</p> <p>a) The Estates had used only Class II, Class III and Class IV chemicals.</p> <p>b) All the pesticides used were those registered under the Pesticides Act 1974 (Act 149).</p> <table><tr><th>No.</th><th>Chemical name</th><th>Class</th><th>No.</th><th>Chemical name</th><th>Class</th></tr><tr><td>1</td><td>Glyphosate isopropylamine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Sodium chlorate</td><td>III</td><td>7</td><td>Triclopyr butoxy e/ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>Canyon 20G</td><td>IV</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Amine 2.4 D</td><td>II</td></tr></table>	No.	Chemical name	Class	No.	Chemical name	Class	1	Glyphosate isopropylamine	III	6	Cypermethrin	III	2	Sodium chlorate	III	7	Triclopyr butoxy e/ester	III	3	Glufosinate ammonium	III	8	Canyon 20G	IV	4	Triclopyr butoxy	III	9	Amine 2.4 D	II																		
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	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	The estates and mill had a SOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. The estate and mill had a SOP for handling of chemical/pesticide. The employees involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers were trained in chemical handling.																																										
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The storage of pesticides at Trong CU was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorized personnel i.e. storekeeper. The stores in estate and mill were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. During site visit at Trong Palm Mill and Estates i.e. chemical and fertilizer store, sighted relevant SDS were seen displayed. Adequate safety signage has been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of																																										

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			chemicals to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	NO	During document review at BMR Estate, Malakoff Estate, Stothard Estate, and Kuala Muda Estate no record of pesticide container (Scheduled waste) has been disposed since year 2020. Thus, #minor NCR RAR 01 2021 has been raised.
	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	No aerial spraying have been done in the estates to date.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	The estates and mill had a SOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. The estate and mill had a SOP for handling of chemical/pesticide. The employees involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers were trained in chemical handling. Medical Surveillance has been conducted by competent person and the results from assessments indicated that all workers fit to handle chemicals.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	The Trong CU had a policy "handling high toxic pesticide" dated 02/12/2019 which stated that no work with pesticides shall be undertaken by pregnant or breast-feeding women. On all 4 estates sampled, identification of pregnancy was done by the HA based on interview with their women workers on the last menstrual period dates. This interview was done during the monthly medical check-up. Pregnancy test was carried on doubtful cases. Monthly medical check-up for women sprayer was also being carried out by VMO. There was no evidence that the work with pesticides was 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. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation. In the sampled estates and mill, the waste management program and plan seen incorporated with environmental impact aspect assessments and pollution prevention plan. The assessment seen effectively covers on matured maintenance, FFB collection, workshop, schedule waste / chemical / fertilizer store and etc.

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Clause	Indicators	Comply Yes/No	Findings
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Waste management and disposal plan to avoid or reduce pollution had been documented and implemented. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation. In the sampled estate and mill, the waste management program and plan seen incorporated with environmental impact aspect assessments and pollution prevention plan. The assessment seen effectively covers on matured maintenance, FFB collection, workshop, schedule waste / chemical / fertilizer store and etc. Sampled the EFB collection from mill and the area/filed mulched.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at Trong CU, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Trong CU has been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	<p>The CU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the SOPs content among others as stated in sections of the following documents; SOP - O.P.C</p> <p>The process of the fertilizer application commences from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire fertiliser requirement in the field identified</p> <p>(Onsite) Trong BU continued to implement the good agriculture practices as per Oil Palm Circular Manual (O.P.C.) to ensure optimal and sustained yield, and complied with recommendations for the application of the fertilizer in (O.P.C. No.03.b revised) dated April 1996, Mulching (OPC No. 08b) and Oil Palm Manuring Recommendations 2021 by Applied Agricultural Resources Sdn. Bhd. (AAR).</p> <p>a) All the Estates in Trong BU continued to implement the good agriculture practices to maintain long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB application.</p> <p>b) Maintaining soil fertility was guided by its OPC in a related chapter:</p> <ul style="list-style-type: none"> <li>• OPC Chapter 01A – Establishment and Maintenance of Legume Covers</li> <li>• OPC Chapter 03A – Manuring</li> <li>• OPC Chapter 08B – EFB Application</li> </ul> <p>c) Fertilizers application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the Applied Agricultural Resources Sdn Bhd. Annual fertilizer recommendations were made based on annual foliar sampling. Soil sampling was carried out yearly consistence with foliar sampling.</p> <p>d) Fertilizer application program was monitored using program sheets, bin cards, Field Cost book and Fertilizer Quality Assessment by Applied Agricultural Resources Sdn Bhd.</p>

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Clause	Indicators	Comply Yes/No	Findings									
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Evidence of periodic tissue foliar and soil analysis to monitor the changes in nutrient status was available and presented in the report by <i>Applied Agriculture Resources Sdn Bhd</i> visit. The results of the analysis were used by the agronomist for their recommendation for fertilizers applications programs year 2021. The implementation will be verified further. Periodic foliar and soil sampling were carried out by the Applied Agricultural Resources Sdn. Bhd. (AAR) and its result formed part of the basis for the fertilizers input recommendation.									
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	All 3 estates had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of Solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decompose. No compost and POME was applied in all estates.									
	7.4.4 Records of fertiliser inputs are maintained.	YES	The estates continued to monitor the fertilizer inputs through annual fertilizer applications as programmed in the Estate Manuring Programme 2020 and 2021. The process of the fertilizer application follows a flow chart Fertilizer application, commencing from an agronomist visit for a leaf and soil sampling to determine the level of nutrient and fertility. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient and fertility at the desired level. The agronomist will develop a yearly recommendation of fertilizer based on the data collected. Estates will use this fertiliser recommendation for the entire requirement in the field identified. Fertilizers are then applied based on the programme generated. Records of programs and applications of fertilisers were made available to auditors.									
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	<div>There were no fragile/marginal soils in both estates visited based on the soil maps provided sourced from Applied Agricultural Resources Sdn Bhd. The soils series in the estates were categorized as follows:</div> <table><tr><th>No</th><th>Estate</th><th>Soil series</th></tr><tr><td>1</td><td>Stothard</td><td>Padang Besar Batu Lapan Gajah Mati Bungor Tebok Local Alluvium</td></tr><tr><td>2</td><td>Kuala Muda</td><td>Gajah Mati Jitra Kedah Kuah Local Alluvium Prang Rasau Serdang Terap Red Variet</td></tr></table>	No	Estate	Soil series	1	Stothard	Padang Besar Batu Lapan Gajah Mati Bungor Tebok Local Alluvium	2	Kuala Muda	Gajah Mati Jitra Kedah Kuah Local Alluvium Prang Rasau Serdang Terap Red Variet
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## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings			
			3	BMR and Mayfield Division	Durian Jerangau Local Alluvium Malacca Munchong Rengam Colluvium Holyrood Kampung Kubor Organic Clay Muck Stitawan Tawar Tebok	
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	The estates visited in Trong CU continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: <ul style="list-style-type: none"> <li>a) Slope &amp; River Protection Policy</li> <li>b) Buffer Zone &amp; 25-degree slope</li> <li>c) Land Preparation for terracing in OPC Manual.</li> </ul> It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit. The topography maps were provided by AAR with details showing the various terrain and slope categories in the estates.			
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	This compliance being specified in the following guidelines. "This compliance being addressed in the "Slope and River Protection" signed by the CEO dated Dec 2019 stating the following among others - Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly". It was observed that there is no new planting of oil palm on steep terrain.			
7.6 Soil surveys and topographic information are used for site planning in the establishment of	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	There were no marginal and fragile soils, this was evidence during verification report from soil survey Applied Agricultural Resources Sdn Bhd. Based on the maps, all the soil of the estate was of mineral types. There are no recognized marginal and fragile soils including steep terrains within the area of the estate visited.			

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Clause	Indicators	Comply Yes/No	Findings
new plantings, and the results are incorporated into plans and operations.	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Based on the soil maps provided and field visits there were no fragile and problem soils in all the estates.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Soil surveys are conducted by the agronomist (AA Resources) mainly to monitor the soil fertility. Topographic Maps are available in the estates that measures the height of the terrains around the area under the estates. The estates have constructed terraces at the hilly areas as well as well establishment of cover crop such as Mucuna bracteata where appropriate, to minimize soil erosion and improve soil quality. Drainage systems and desilting programmes were sighted in the estates to further improve the water management within the estate.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	Auditors have verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it has been confirmed that there were no new planting or new development of areas at the CU.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Applied Agriculture Resources Sdn. Bhd. Hence, this requirement is not applicable.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Applied Agriculture Resources Sdn. Bhd. Hence, this requirement is not applicable.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Applied Agriculture Resources Sdn. Bhd. Hence, this requirement is not applicable.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Applied Agriculture Resources Sdn. Bhd. Hence, this requirement is not applicable.

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	prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Applied Agriculture Resources Sdn. Bhd. Hence, this requirement is not applicable.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power 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	It has been confirmed that Trong CU did not have peat land. It is consistent with the new soils map provided by Applied Agriculture Resources Sdn. Bhd. Hence, this requirement is not applicable.
7.8	7.8.1 A water management plan is in	YES	Trong CU Water Management Plan has been reviewed annually. Therein has elaborated the

## RSPO PUBLIC SUMMARY REPORT

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Practices maintain the quality and availability of surface and groundwater.	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:		management plan in the following areas; a) Flood area/water logging area b) Soil erosion/ c) Water quality/Water pollution d) Treated water/water storage tank e) Optimizing usage and reduce wastage f) Drainage system g) Assessment of water usage h) Water rationing
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	
	7.8.1b Workers have adequate access to clean water.	YES	The water management plans were established and implemented. The water management plans were more towards soil water conservation, pollution prevention and domestic use. The management plan covered dry spell/shortage and in case of water pollution. Workers were advised to conserve water. Water from process was reused for cleaning. Water from triple rinsing of pesticide containers was reused for spraying. Water bodies were established in ravines and slit pits in flat areas and on slopes. Water quality monitoring has been monitored by monthly basis at river Sungai Rusa, and Sungai Punggor.
	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	During site visit all riparian reserve has been maintained with natural grasses and no evidence on chemical activities at the sites.
	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	Discharge method – Sprinkler Application Site. Analysis of final discharge was carried out on monthly basis by external accredited laboratory and the result was within the limit.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	(Remote and Onsite) The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Fossil fuel usage reduction has been included under pollution prevention plan 2020/2021. Among of action has been taken were: ▪ Proper vehicle maintenance scheduled must be followed (preventive maintenance)

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Clause	Indicators	Comply Yes/No	Findings																																																
			<ul style="list-style-type: none"><li>Plan to route for crop evacuation or others estate practice to reduce the distance required.</li><li>Avoid over working to the machine to prevent damage and fatigue</li><li>Practice safe driving, defensive driving and training on proper use on gears</li><li>Avoid carrying excessive weight</li></ul>																																																
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends to RSPO on 25/10/2021. The input data was verified, and the following were determined:</p> <p><b>Summary of Net GHG Emissions</b></p> <table><tr><th>Emissions per Product</th><th>tCO2e/tProduct</th></tr><tr><td>CPO</td><td>1.64</td></tr><tr><td>PK</td><td>1.64</td></tr></table> <table><tr><th>Land Use</th><th>ha</th></tr><tr><td>OP planted aon mineral soil</td><td>8125.50</td></tr><tr><td>OP planted on peat</td><td>31.60</td></tr><tr><td>Conservation (forested)</td><td>0</td></tr><tr><td>Conservation (non-forested)</td><td>0</td></tr><tr><td><b>Total</b></td><td>8157.10</td></tr></table> <p><b>Summary of Field Emissions and Sinks</b></p> <table><tr><th></th><th colspan="2">Own Crop</th></tr><tr><th></th><th>tCO2e</th><th>tCO2e/tFFB</th></tr><tr><td><b>Emissions</b></td><td></td><td></td></tr><tr><td>Land Conversion</td><td>78606.11</td><td>0.76</td></tr><tr><td>*CO2 Emissions from Fertiliser</td><td>5642.62</td><td>0.05</td></tr><tr><td>**N2O Emissions</td><td>3792.61</td><td>0.04</td></tr><tr><td>Fuel Consumption</td><td>413.66</td><td>0.00</td></tr><tr><td>Peat Oxidation</td><td>1725.36</td><td>0.02</td></tr><tr><td><b>Sinks</b></td><td></td><td></td></tr><tr><td>Crop Sequestration</td><td>-70756.90</td><td>-0.69</td></tr></table>	Emissions per Product	tCO2e/tProduct	CPO	1.64	PK	1.64	Land Use	ha	OP planted aon mineral soil	8125.50	OP planted on peat	31.60	Conservation (forested)	0	Conservation (non-forested)	0	<b>Total</b>	8157.10		Own Crop			tCO2e	tCO2e/tFFB	<b>Emissions</b>			Land Conversion	78606.11	0.76	*CO2 Emissions from Fertiliser	5642.62	0.05	**N2O Emissions	3792.61	0.04	Fuel Consumption	413.66	0.00	Peat Oxidation	1725.36	0.02	<b>Sinks</b>			Crop Sequestration	-70756.90	-0.69
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Clause	Indicators	Comply Yes/No	Findings																																				
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a 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 Trong 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 Environmental Impact and Aspect Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N2O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place.																																				
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	There was no land preparation in Trong CU by burning ever since Boustead Plantations Berhad practice zero burning as per the policy dated July 99 (revised in Aug 2018) in SOP clearing methods. During the field visit the signages “Dilarang Membakar” were clearly displayed and no evidence of open burning observed. It was observed that no fire had been used for land clearing in the 2017, 2018 & 2019 replants visited during time of audit. Palms had been felled, chipped, windrowed and left to decompose.																																				
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	There was no land preparation in Trong CU by burning ever since Boustead Plantations Berhad practice zero burning as per the policy dated July 99 (revised in Aug 2018) in SOP Clearing methods. During the field visit the signages “Dilarang Membakar” were clearly displayed and no evidence of open burning observed. It was observed that no fire had been																																				

## RSPO PUBLIC SUMMARY REPORT

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			used for land clearing in the 2017, 2018 & 2019 replants visited during time of audit. Palms had been felled, chipped, windrowed and left to decompose.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	During external stakeholder meeting dated 27/05/2021 that was carried out at Trong CU, all stakeholder including neighbour was briefed on fire prevention and control measures. Besides that, all operating centres also been prepared Emergency Response Plan (Fire in Field in Own or Neighbouring Estate).
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	Auditors has verified through checking through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing since 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The report "High Conservation Value (HCV) Assessment of the estates under Trong Business Unit of Boustead Plantations BHD" is available. The study was conducted by S.K Yap Forestry and Landscape Services and the report was completed on December 2016. The study had covered all the High Conservation Value (HCV) within and adjacent to the 7 estates under Trong BU. The HCV assessment had identified the HCV 1.1, 1.4, 3, 4.2, 5 and 6 within the 7 estates. In Stothard Estate only HCV 1.4 and HCV 6 is identifying within the estate. HCV 1.2 was identified by the assessor as a potential HCV due to the availability of small water body which could be a feeding ground for water birds and HCV 6 is an old cemetery in the middle of estate. In Kuala Muda Estate only HCV 6 (old cemetery in the estate) was identified. The total HCV area reported for this CU was 116.30 Ha.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified,	YES	Identification and assessment of HCV habitats or protected areas was carried out prior to the main assessment through. The report "High Conservation Value (HCV) Assessment of the estates under Trong Business Unit of Boustead Plantations BHD" is available. The study was

## RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		<p>conducted by S.K Yap Forestry and Landscape Services and the report was completed on December 2017. The study had covered all the High Conservation Value (HCV) within and adjacent to the 7 Estate under Trong BU. The HCV assessment had identified the HCV 1.1, 1.4, 3, 4.2, 5 and 6 within the 7 estate. In general, in Stothard Estate only HCV 1.4 and HCV 6 is identifying within the estate. HCV 1.2 is identified by the assessor as a potential HCV due to the small water body could be a feeding ground for water birds and HCV 6 is an old cemetery in the middle of estate. In Kuala Muda Estate only HCV 6 (old cemetery in the estate) was identified in the estate. The HCV assessor has outlined several recommendations for biodiversity and landscape management by the estate. Among others included the following:</p> <ul style="list-style-type: none"> <li>• to erect visual or pictorial signage depicting prohibition of illegal activities such as hunting, fishing and collecting within the estates.</li> <li>• to plant or allow natural vegetation or native trees as opposed to non-common species to improve survival and for ecosystem compatibility</li> <li>• to manage and conserve all water spring and marked all the water spring in the map and demarcated on the ground.</li> <li>• to protect the cemetery by fencing to prevent encroachment and accidental damage.</li> <li>• to allow next of kin to access the cemetery to pay their respect.</li> </ul>
	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 was no local communities depends and identified in HCV area at Trong BU. 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	YES	In Trong CU the training programs for 2020 has included HCV training programme. HCV briefing were carried out during muster. Attendance lists were available. Trong CU management will notify the relevant authorities immediately if any individual working for the company is found to capture, harm, collect or kill these species.



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Clause	Indicators	Comply Yes/No	Findings
	working for the company is found to capture, harm, collect, trade, possess or kill these species.		
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Trong BU has developed action plan base on recommendation made by the HCV assessor. Trong BU is committed to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signages to prohibit hunting were erected at riparian zone and border. Patrolling for Illegal hunting was also being implemented to control the illegal activities.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Not applicable since there is no new land clearing. Auditors has verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Trong CU since Nov 2005

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

Clause	Indicators		Comply Yes/No	Findings
5.5.2 Time-bound plan  A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	For the time-bound plan, Boustead Plantations Berhad has committed to ensure all their certification unit (CU) to be certified within 5 years i.e. year 2019 to 2023.
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the	YES	There are twelve (12) CU highlighted in the time-bound plan and the certification progress consistent with that in the time-bound plan. The progress details as provided in the TBP in Attachment 7. For another 4 CUs i.e. Lapan Kabu / Sugut / Loagan Bunut / Pertama / Kanowit and Tawai, the Sustainability Section team has conducted the periodic internal audit accordingly.

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		later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;		
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	YES	There was revision of the time-bound plan being updated on 25 May 2021. Details as per attachment 7. This is due newly acquired properties i.e. Tawai CU in Telupid Sabah in 2019 from Sit Seng & Sons Realty Sdn Bhd. As per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	YES	The details of the Time Bound Plan described as per attachment 6. Boustead Plantation Berhad is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP. As of this audit and Verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan.
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. 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;	YES	Verification through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed	YES	It is confirmed that land conflict was resolved through FPIC processes which facilitates compliance with requirement of RSPO, accordance to:

## RSPO PUBLIC SUMMARY REPORT

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

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			<p>The management had taken prudent action by conduct engagement and recommended action plans to:</p> <ul style="list-style-type: none"> <li>a) Improved communication and engagement (PMC Meeting-With present of LCDA, Land Survey, BPKSB</li> <li>b) Personnel, BEA), MCCM Meeting, Estate Management Meeting)</li> <li>c) Review communication and consultation as well as complaint and grievance procedures.</li> <li>d) Trained staff and create awareness among stakeholder on the Procedures (RSPO UBU Internal Assessment)</li> </ul>
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	<p>Series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above.</p> <ul style="list-style-type: none"> <li>a) The audit was conducted against RSPO P&amp;C and RSPO Partial Certification Requirements.</li> <li>b) Several issues of legal non-compliance reported in the internal audit report such as lapses in scheduled waste management and it's being solved progressively.</li> </ul> <p>The management also has established a list on "Legal and Other Requirement Register" There are 15 sections of requirements subscribed to the Plantations &amp; Mills operation. Among the requirements stated such as: Occupational Safety and Health Act, 1994; Factory and Machinery Act, 1967; Minimum Wages Order 2020; Employees' Minimum Standards of Housing, Accommodations and Amenities Act, 1990 (Amendment 2019); etc.</p> <p>The management has in place a license &amp; permits register which captures all applicable local &amp; national legal requirements such as: MPOB Licenses (menjual dan mengalih FFB). KPDNKK Permit Barang Kawalan berjadual for Diesel.</p>
(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,	YES	<p>Based on statement in (a) to (d) above, the CU has assessed the condition of their uncertified unit and has stated full commitment to comply with all relevant requirements as specified above.</p> <ul style="list-style-type: none"> <li>a) Sighted the series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit as conducted and reported accordingly. The audit was conducted against RSPO P&amp;C and RSPO Partial Certification Requirements.</li> <li>b) Evidence of audit attendance list, audit checklist &amp; report were</li> </ul>

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		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		<p>made available to auditor as the supporting evidence.</p> <p>c) Verification through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting and no new development of area was observed.</p> <p>d) With this, it can be concluded that the positive assurance made was justified.</p>
		<ul style="list-style-type: none"> <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>	YES	
		<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>	YES	
		<ul style="list-style-type: none"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>	YES	
		<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>	YES	
	(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.	YES	As of this audit, Boustead Plantation Berhad still on track and follow the requirement of uncertified requirement units, Further information can be obtained from Boustead ACOP. The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above	YES	As of this audit, Boustead Plantation Berhad still on track and follow the requirement of uncertified requirement units, Further information can be

## RSPO PUBLIC SUMMARY REPORT

		may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.		obtained from Boustead ACOP. The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
<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>		No additional indicators	YES	<p>Trong Business Unit maintains and complies with the terms of the land title. The land titles specified the purpose of the planting for either oil palm or agricultural crops for economic value. All the Estate are originated from Boustead Plantation and established from year of 1950, for TRP estate the estate was established in 1959 and planted with Rubber tree and convert to oil palm on 1986, for Malaya Estate the estate was established on 1969 first crop planting was a Rubber planting and convert to oil palm on 1980, The land origin is from Boustead subsidiary named Boustead Silasuka Sdn Bhd and transfer to Boustead Teluk Sengat Sdn Bhd in 1 April 2011 on July 2016 transfer again to Boustead Plantation. Noted that the land title for Batu Pekaka Estate was still in progress to change the ownership from CIMB Trustee Berhad to Boustead. Verify through the Land Title It has been confirmed that Boustead Plantations has the right to use the land which is legitimately owned by their company.</p>

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### ATTACHMENT 4

#### DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
1.1.4 MAR 01 2021	Major (Recurrence)	<p>Finding: Consultation and communication procedures not implemented and explained to all relevant stakeholders i.e contractor and contractor workers.</p> <p>Objective evidence: Based on interview held with contractor workers at Stothard Estate, Kuala Muda Estate and BMR Estate, the contractor workers did not know on the consultation and communication procedures resulted on several grievances did not attend properly.</p>	<p>Root cause:</p> <ol style="list-style-type: none"> <li>1) The internal audit team from HQ was not included contractors in their audit procedure.</li> <li>2) The contractor did not take action from complaints and grievances raised by their workers due to saving on budget.</li> </ol> <p>Corrective Action:</p> <ol style="list-style-type: none"> <li>1) The Internal Audit Procedure was amended for the internal audit team to assess contractors their compliance with applicable requirements.</li> <li>2) Briefing and training by estate management regarding complaints and grievances were conducted to all workers and contractors.</li> </ol>	<p>Evidences below were verified:</p> <ol style="list-style-type: none"> <li>1) Internal Audit Procedure amended on 10/11/2021 by including               <ol style="list-style-type: none"> <li>a. Clause 4.0 Scope – added “Contractors bound to the company's management system will also be assessed their level of compliance with applicable requirements”.</li> </ol> </li> <li>2) Minutes meeting, briefing and training regarding complaints and grievances were conducted to all contractors' workers were sighted. Trong POM, Taiping Rubber Plantations Estate, Malaya Estate, Bukit Mertajam Rubber Estate, Kuala Muda Estate, Stothard Estate and Batu Pekaka Estate conducted the briefing separately dated 29/10/2021, 30/10/2021, 01/11/2021. Attendance list of contractor's workers, feedback form and pictures of the training was reviewed by auditor.</li> <li>3) Social Action Plan dated 10/11/2021 regarding workers' complaint and grievance was updated.</li> </ol> <p><b>Status: Closed</b></p>
2.1.1 MAR 02 2021	Major (Recurrence)	<p>Finding: Unit of certification did not comply with legal requirement i.e Employment Act 1955 section 19 (1), section 60 (3) (a) (ii).</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1. Based on interview and documentation review on Work Order and payment voucher, there was found that Stothard Estate did not pay the contractor workers (Nalvam Enterprise) not later</li> </ol>	<p>Root cause:</p> <ol style="list-style-type: none"> <li>1) HQ released payment for the contractor every 10<sup>th</sup> of the following month, which caused the delayed payment of wages to the contractor's workers.</li> <li>2) Contractor did not comply with the employment act 1995 (pay on rest</li> </ol>	<p>Evidences below were verified:</p> <ol style="list-style-type: none"> <li>1) Sighted payment vouchers and payslips for the month of October 2021, November 2021 and December 2021 have been paid on 03/11/2021, 03/12/2021 and 04/01/2022 to all contractor workers.</li> <li>2) Sighted payment voucher and payslip payment for work on a rest day for July</li> </ol>

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		<p>than the seventh day after the last day of any wage period, which contravene with the Employment Act 1955 19 (1).</p> <p>2. Based on interview held and documentation review with workers and contractor (Hoo Chee Kiong, Eng Eng Resources, Low Kuan Yew Sdn Bhd) , there was found that Stothard, Kuala Muda and Bukit Mertajam Estate did not pay two (2) days' wages at the ordinary rate pay for the contractor workers worked on rest day (harvesting works) in the month of July 2021, Aug 2021 and Sep 2021 which contravene with the Employment Act 1955 section 60 (3) (a) (ii).</p>	<p>day).</p> <p>3) No system from the estates in monitoring workers who work on a rest day.</p> <p>4) The internal audit team from HQ was not included contractors in their audit procedure.</p> <p>Corrective Action:</p> <p>1) The was an instruction given by the Business Unit Head to approve an advanced payment to all contractors.</p> <p>2) The estate had calculated the short payment for work on a rest day for July until September 2021. Payment vouchers were produced to the respective contractors for reimbursement to the workers.</p> <p>3) Briefing session has been conducted by the internal audit to contractor and estate regarding the employment act.</p> <p>4) The estate management had established a monitoring system to check workers work a rest day.</p> <p>5) There is a letter circulated by the General Manager to instruct all estate management to make payment to all workers who work on a rest day.</p>	<p>2021 until September 2021 have been paid and reimbursement to the all contractor workers i.e.</p> <p>i. Kuala Muda Estate – Ramoo a/l Kannan (4 workers), Eng Eng Resources (4 workers), Ho Chee Kiong (12 workers).</p> <p>ii. Stothard Estate – Nalvam Enterprise (5 workers)</p> <p>iii. BMR Estate – Gopalakrishnan a/l Subramaniam, Linggaraj a/l Parthiban (12 workers), Sofian Bin Nemat (8 workers), Low Kuan Yeow Sdn. Bhd. (9 workers).</p> <p>iv. Malaya Estate – Suresh a/l Murthi (8 workers), Zaili Kb Empire, Skk Kiruthiga Enterprise</p> <p>v. Batu Pekaka Estate – Sharmila Global Venture Sdn. Bhd. Mf Agro Farm, Ck Teik Enterprise Sdn. Bhd.</p> <p>vi. TRP Estate – Cheong &amp; Son Contract, LKY Plantations Sdn. Bhd. Koperasi Keluarga Veerappan Taiping Berhad.</p> <p>3) Sighted letter memo from General Manager dated 27/10/2021 regarding compliance to RSPO and MSPO P&amp;C i.e. wages for working during rest day and public holiday, replacement and issuance of PPE, disposal of scheduled wastes, timely wages payment etc. have been circulated to all Business Unit Head.</p> <p>4) Minutes meeting, briefing and training regarding Employment Act, Human Right, were conducted to all contractors' workers were sighted. Trong POM, Taiping Rubber Plantations Estate, Malaya Estate, Bukit Mertajam Rubber Estate,</p>
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				<p>Kuala Muda Estate, Stothard Estate and Batu Pekaka Estate conducted the briefing separately dated 29/10/2021, 30/10/2021, 01/11/2021. Attendance list of contractor's workers, feedback form and pictures of the training was reviewed by auditor.</p> <p>5) Checklist of attendances working on Sunday or Public Holiday with workers signed was sighted as monitoring system to check workers are working Sunday or Public Holiday</p> <p>6) Internal Audit Procedure amended on 10/11/2021 by including</p> <p style="padding-left: 20px;">b. Clause 4.0 Scope – added "Contractors bound to the company's management system will also be assessed their level of compliance with applicable requirements".</p> <p><b>Status: Closed</b></p>
6.7.3 DA 01 2021	Major (Recurrence)	<p><b>Finding:</b></p> <ol style="list-style-type: none"> <li>1) Appropriate personal protective equipment (PPE) was not provided free of charge to contractor's workers and check roll workers at the place of work to cover all potentially hazardous operations.</li> <li>2) Workers did not use appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations, such as harvesting operations.</li> </ol> <p><b>Objective evidence:</b></p> <ol style="list-style-type: none"> <li>1) During interview with sampled harvesting contractor's workers (Ramoo Kannan, Ho Chee Kiong, Eng Eng Resources, Low Kuan Yeow Sdn. Bhd) and verification of "PPE Issuance Records", there is no free of charge provided for personal protective equipment i.e. harvesters shoe and cotton glove and it is only available free for the first time user only. Based on interview with the</li> </ol>	<p><b>Root cause:</b></p> <ol style="list-style-type: none"> <li>1) The estate management failed to provide free harvester shoes and cotton gloves due insufficient budget of PPE.</li> <li>2) Poor of supervision and monitoring regarding PPE implementation and enforcement from the estate management.</li> <li>3) Internal Osha visit procedure was not comprehensive with the requirements and regulations.</li> <li>4) The PPE training given was not comprehensive and effective to the workers.</li> <li>5) Absence visiting and auditing from safety officer from HQ due to COVID</li> </ol>	<p>Evidences below were verified:</p> <ol style="list-style-type: none"> <li>1) Sighted purchase order of PPE i.e. harvesting shoes, cotton gloves, safety helmet, sickle cover, etc. for all estates in Trong CU. The PO of PPE was bought in buck to ensure availability replacement of the PPE.</li> <li>2) Pictures of estate management have distributed and given free harvesting shoes and cotton gloves to all checkroll and contractor workers. Attached also PPE Issuance Records for the month of Oct. 2021 and Nov. 2021.</li> <li>3) Sighted letter memo from General Manager dated 27/10/2021 regarding compliance to RSPO and MSPO P&amp;C i.e. wages for working during rest day and</li> </ol>

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		<p>estate management and site verification, the harvesters shoe and cotton glove was not available at PPE Storage.</p> <p>2) During site inspection at Kuala Muda Estate Field 1999A2 and BMR Estate Field 2015A, sighted several workers did not wear appropriate PPE according to Safe Work Procedure and HIRARC.</p> <ul style="list-style-type: none"> <li>i. Sighted 2 harvesters did not wear sickle cover when riding the motorcycle.</li> <li>ii. Sighted 1 harvester did not wear safety helmet while perform their work.</li> <li>iii. Sighted 1 tractor driver did not wear safety helmet when driving the tractor.</li> </ul>	<p>19 MCO Restriction.</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> <li>1) Internal Osha visit procedure was amended to ensure that the estate comply with the regulation and requirements.</li> <li>2) The estate already put some budget on PPE and bought the harvesting shoe and cotton gloves in bulk and ensure all the PPE are available at all times in the PPE Storage.</li> <li>3) The HQ management instructed the estate to provide inappropriate PPE and free of charge to the workers through a letter from GM dated 27<sup>th</sup> October 2021.</li> <li>4) Briefings and training were conducted for all workers regarding usage of PPE.</li> <li>5) Instruction from the safety officer to all estate for preparing workplace inspection, PPE checklist inspection at the muster call.</li> </ol>	<p>public holiday, replacement and issuance of PPE, disposal of scheduled wastes, timely wages payment etc. have been circulated to all Business Unit Head.</p> <p>4) Minutes meeting, briefing and training regarding using appropriate PPE and awareness were conducted to all contractors' workers and checkroll workers were sighted. Trong POM, Taiping Rubber Plantations Estate, Malaya Estate, Bukit Mertajam Rubber Estate, Kuala Muda Estate, Stothard Estate and Batu Pekaka Estate conducted the briefing separately dated 28/11/2021, 29/10/2021, 30/10/2021, 01/11/2021. Attendance list of contractor's workers, checkroll workers, feedback form and pictures of the training was reviewed by auditor.</p> <p>5) Workplace inspection and PPE checklist was sighted as monitoring and mechanism system to enforce PPE implementation by daily basis.</p> <p>6) Internal OSH visit procedure was amended on 11/10/2021 including enforcement to check on PPE implantations.</p> <p><b>Status: Closed</b></p>
6.7.4 RAR 02 2021	Major (Upgraded)	<p>Finding: contract workers not provided with medical care and not covered by accident insurance.</p> <p>Objective evidence: Based on verification of pay slip and interview with contractor and contractor workers, (Nalvam Enterprise (5 workers)- Stothard Estate), (wandi (8 workers) &amp; Renesh (8 workers)- BMR &amp; Malakoff Estate) sighted there was no evidences for contractor's foreign workers covered by accident insurance or SOCSO.</p>	<p>Root cause: The document was not available during the audit day due to the contractors not giving their copy to the Estate.</p> <p>Corrective Action: The Estate has issued a letter to the contractor regarding this matter. Refer to the letter issued to the contractors, insurance and SOCSO payments attached.</p>	<p>Sighted the last three months' payment (October 2021, November 2021 and December 2021) made to SOCSO on Form 8A and Agro Bank Insurance for contractor workers from Nalvam Enterprise (Stothard Estate), Berani Melangkah Enterprise (BMR Estate) and Mambang berulang Enterprise (BMR Estate) was available for reviewed.</p> <p><b>Status: Closed</b></p>

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<p>3.4.2 MAR 03 2021</p>	<p>Major (Upgraded)</p>	<p>Finding: Social management and monitoring plans have been developed without participation of affected stakeholders. Objective evidence: During documentation review at Stothard Estate, Kuala Muda Estate and Bukit Mertajam Estate, there was found that social management and monitoring plans have been developed without participation of affected stakeholders i.e contractor's workers and local workers (Bukit Mertajam Estate).</p>	<p>Root cause: Kuala Muda Estate The Estate planned to do separate social management meetings with contract workers without interrupting their normal working hours. Upon transition of Kedah from PPN Phase to Phase 2 in 1 October 2021, the Estate are only able to conduct social management meeting with local workers only. Stothard Estate The Estate is unable to conduct the internal stakeholder meeting due to MCO (Movement Control order due to Covid19) until 1 October 2021 (Phase 1) BMR ESTATE The Estate is unable to conduct the internal stakeholder meeting due to MCO (Movement Control order due to Covid19) until 1 October 2021 (Phase 1)  Corrective Action: Kuala Muda Estate Social management meeting with contract workers has conducted on 30.10.2021. Refer to the internal stakeholder meeting and social management and monitoring plan. (Appendix 1) Stothard Estate The Estate Management has conducted the meeting on 23/11/2021. Refer to the internal stakeholder meeting and social management, and monitoring plan. (Appendix 2) BMR Estate The Estate Management has conducted the meeting on 27/11/2021. Refer to the internal stakeholder meeting and social management and monitoring plan. (Appendix 3)</p>	<p>Sighted the social management and monitoring plans have been developed with participation of affected stakeholders i.e contractor's workers and local workers for Stothard Estate dated 23/11/2021, Kuala Muda Estate dated 30/10/2021 and Bukit Mertajam Estate dated 27/11/2021.</p> <p><b>Status: Closed</b></p>
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6.2.4 MAR 04 2021	Major	<p>Finding: Unit of certification does not provide adequate sanitation facilities and not compliance with employees' minimum standards of housing, accommodations and amenities act 1990.</p> <p>Objective evidence: Based on interview and site visit to workers quarters at Bukit Mertajam Estate, there was found that:</p> <ul style="list-style-type: none"> <li>i) Workers has been lodged the complaint on clogged toilet bowl, but there was no action taken resulted the related workers has to defecation at field and sometime at his neighboring house.</li> <li>ii) Workers has been lodged the complaint on bulb, but until 6 months no action taken to replace the bulb.</li> <li>iii) The perimeter drains around each dwelling or block of dwellings including all outlet drains are not kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water (Bukit Mertajam and Kuala Muda).</li> <li>iv) Inadequate dustbin</li> </ul>	<p>Root cause: Kuala Muda Estate Minimal spending on workers' accommodation due to insufficient budget. BMR Estate The estimate for upkeep workers accommodation was insufficient.</p> <p>Corrective Action: Kuala Muda Estate Upkeep &amp; repair for the perimeter drains at linesite was completed at 03/11/2021. Refer to the picture attached. (Appendix 4) BMR Estate The HQ management has approved some amount to the Estate for upkeep workers accommodation. Repairing and reconstructing workers' perimeter drain, clogged toilet bowl, bulb replace and dustbin at the line site are estimated to complete by January 2021. Refer to the picture attached. (Appendix 5)</p>	<p>Kuala Muda Estate Sighted pictorial of upkeep &amp; repair for the perimeter drains at linesite. BMR Estate Sighted approval budget for upkeep workers accommodation. Repairing and reconstructing workers' perimeter drain, clogged toilet bowl, bulb replace and dustbin at the line site. The estimated to complete by January 2021.</p> <p><b>Status: Closed</b></p>
6.3.1 MAR 05 2021	Major	<p>Finding: The policy of freedom of association is available but not demonstrably implemented.</p> <p>Objective evidence: Based on interview with Bangladeshi workers from Stothard Estate, they was informed that they were prohibit from joint the union. This was contravening with the Boustead Plantation Berhad Freedom of Association policy dated 2 Dec 2019. The policy stated that the company give permission to the employees to joint any organization which not breach to the Malaysia's law.</p>	<p>Root cause: The Bangladeshi workers sampled by the SIRIM team were new. Due to that, they still don't know the union's function.</p> <p>Corrective Action: The Estate has invited a representative from the union (NUPW) to brief the workers, and they are allowed to join the union. Refer to the union minute meeting attached. (Appendix 6)</p>	<p>Sighted minutes meeting NUPW was conducted on 09/12/2021 at Stothard Estate. There are 2 representatives from NUPW was presented during the meeting to brie the workrs to joint the union.</p> <p><b>Status: Closed</b></p>
7.2.8 RAR 01 2021	Minor	<p><b>Finding:</b> pesticide container was not disposed handled accordingly</p> <p><b>Objective evidence:</b> During document review at BMR Estate, Malakoff Estate, Stothard Estate, and Kuala Muda Estate no record of pesticide container has been disposed since</p>	<p>Root cause: Due to MCO, the appointed company refused to do the collection. The BU Office made follow-up on this matter.</p> <p>Corrective Action:</p>	<p>Corrective action plan is accepted and will be verified during next audit.</p>

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		year 2019.	The appointment of the collection company is made by centralized tender by BU Office. Refer to the consignment note attached. (Appendix 7,8,9)	
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### ATTACHMENT 5

#### STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
6.7.3 DA 01 2020	Major	<p>Finding: Appropriate personal protective equipment (PPE) was not provided free of charge to contractor's workers at the place of work to cover all potentially hazardous operations.</p> <p>Objective evidence: During interview with sampled harvesting contractor's workers (Nalvam Enterprise, Low Kuan Yeow Sdn. Bhd., Suresh a/l Murthi, Cheong &amp; Son Contract) and verification of "PPE Personal Record", there is no free of charge provided for personal protective equipment i.e. harvesters shoe and cotton glove</p>	The management has penalized the contractor and decided to direct supply PPE for contractor workers and charge to the contractor during payment.	<p>Previous Major NCR was not closed and repeated. During interview with sampled harvesting contractor's workers (Ramoo Kannan, Ho Chee Kiong, Eng Eng Resources, Low Kuan Yeow Sdn. Bhd) and verification of "PPE Issuance Records", there is no free of charge provided for personal protective equipment i.e. harvesters shoe and cotton glove and it is only available free for the first time user only. Based on interview with the estate management and site verification, the harvesters shoe and cotton glove was not available at PPE Storage.</p> <p>During site inspection at Kuala Muda Estate Field 1999A2 and BMR Estate Field 2015A, sighted several workers did not wear appropriate PPE according to Safe Work Procedure and HIRARC.</p> <ul style="list-style-type: none"> <li>i. Sighted 2 harvesters did not wear sickle cover when riding the motorcycle.</li> <li>ii. Sighted 1 harvester did not wear safety helmet while perform their work.</li> <li>iii. Sighted 1 tractor driver did not wear safety helmet when driving the tractor.</li> </ul> <p><b>Status: Open (Recurrence Major)</b></p>
6.7.4 DA 02 2020	Minor	<p>Finding: Certain contractors' workers was not provided with medical care and covered by accident insurance.</p> <p>Objective evidence: Based on verification of SOCSO contribution June 2020 to August 2020 for contractor's foreign workers (Nalvam Enterprise and Low Kuan Yeow Sdn. Bhd.), sighted there was no evidences for contractor's foreign workers have</p>	It has been clarified that the contractor was covered for Socso, however, the Socso contribution copies were not kept at the estate office. The management has issued a warning letter to the contractor regarding this matter.	<p>Based on verification of pay slip and interview with contractor and contractor workers, (Nalvam Enterprise – Stothard Estate), (wandi &amp; Renesh-BMR &amp; Malakoff Estate) sighted there was no evidences for contractor's foreign workers covered by accident insurance or SOCSO.</p> <p><b>Status: Open (Upgraded to Major)</b></p>

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		been paid for medical care and covered by accident insurance (SOCISO).		
6.3.2 MZK 01 2020	Minor	<p>Finding : Latest Minutes of meetings between the unit of certification with trade unions or workers representatives not made available upon request.</p> <p>Objective evidence : At Trong POM latest Union Meeting with Management was not made available upon request. Sighted last meeting has been conduct on 25/10/2018 and was not updated since the structure of unions in the mill has been changed.</p>	<p><b>Trong Mill</b> The management has signed another person to record and obtain the report to ensure this mistake does not happen again.</p>	<p>Minutes of meeting between NUPW/AMESU representatives with estate management were documented and as verified below: Stothard Estate: Minutes of meeting dated 12/01/2021. Kuala Muda Estate: Minutes of meeting dated 24/8/2021. BMR Estate: Minutes of meeting dated 8/03/2021 Trong POM:- Minutes of meeting dated 30/01/2021 Consultations with NUPW/AMESU representatives found they were aware of RSPO requirements and Trong CU has cooperated with them and conform the meeting was conducted as stated above. Latest union meeting at Trong POM was made available.</p> <p><b>Status: Closed</b></p>
7.12.4 MZK 02 2020	Major	<p>Finding : The HVC integrated management plan was not developed in consultation with relevant stakeholders.</p> <p>Objective evidence : HCV Management Plan was not developed with relevant Stakeholder Such as: BMR : wildlife Dept, Forestry Dept, Villagers. TRP: wildlife Dept, Forestry Dept, Villagers. Malaya: wildlife Dept, Forestry Dept, Villagers.</p>	<p>Management Trong CU conducted the Internal &amp; External Stakeholder Consultation Meeting in November and discussed the HCV Plan. All attended stakeholders agreed with the plan presented by all estate management.</p>	<p>HCV Area Management Plan for All Estates has been updated at BMR and Malakoff has been updated on 10/8/21, Kuala Muda on 1/5/21, Stothard 2/1/21 at All Estate and been developed with consultation with effected parties in Stakeholder Meeting dated 26/8/21 (Stothard), 7 and 8 September 2021 (Kuala Muda), BMR and Malakoff Estate and the stakeholders meeting was held on 5/3/20 (external and internal) and they are planned to do next meetings on 15/11/21 (sighted the invitation) due to MCO in Kedah has been upgraded to Phase 3 in October 2021.</p> <p><b>Status: Closed</b></p>
1.1.4 MAR 01 2020	Major	<p>Finding : Consultation and communication procedures not implemented and explained to all relevant stakeholders i.e contractor workers.</p> <p>Objective evidence : Based on interview held with contractor workers at Batu Pekaka Estate, Malaya Estate and Taiping Rubber Plantation Estate, the contractor workers did not know on the consultation and</p>	<p>The management has carried out the refresher training on complaint and grievances to the workers in small group and with translator dated 7/10/20, 13/10/20 and 6/10/20</p>	<p>The contractor workers did not know on the consultation and communication procedures resulted on several grievances did not attend properly, will be verify during onsite audit due to need to confirmed and interviewed the workers. During SA 4, the NCR was unable to closed, due to some grievances from contractor's workers still do not attend properly.</p> <p><b>Status: Open (Recurrence Major)</b></p>

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		communication procedures resulted on several grievances did not attend properly.		
6.2.2 MAR 02 2020	Major	<p><b>Finding :</b> Employment contracts and pay slip between unit of certification/contractor and employees does not detailing the conditions of employment e.g regular working days, deductions, overtime, sick leave, holiday entitlement in compliance with national legal requirements.</p> <p><b>Objective evidence :</b> Based on sample (employment contracts and payslip) at following estates, there were sighted that both documentation does not detail the conditions of employment:</p> <ol style="list-style-type: none"> <li>1. Bukit Mertajam Rubber Estate – no annual leave stated in the agreement for contractor workers (Low Kuan Yew Sdn Bhd).</li> <li>2. Malaya Estate – payslip not stated regular working days, sick leave and working on rest day i.e Sunday.</li> <li>3. Taiping Rubber Plantation Estate- payslip not stated regular working days, sick leave and working on rest day i.e Sunday</li> </ol>	<p><b>TRP Estate</b> The management has updated the payslip and repay to the eligible workers besides a warning letter has been issued to the contractor involved.</p> <p><b>Malaya Estate</b> The management has made an amendment immediately on this payslip with effect from October payslip salary to comply with the requirement. Also, a warning letter has been issued to the contractor.</p> <p><b>BMR Estate</b> The estate has ensured a contract agreement between the contractor and their workers with a fair contract.</p>	<p>Contracts and conditions of employment are contained in employment contracts signed between the Estates and Mill land respective estates on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Malaysia or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the period of employment, wage rate, work benefits, overtime, annual leave, public holidays, contract termination, 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.</p> <p>For the local workers, there is evidence that the payment of statutory contributions such as EPF, SOCSO and Employment Insurance Scheme are being made in accordance with the relevant legal provisions.</p> <p><b>Status: Closed</b></p>
1.1.3 MAR 03 2020	Major	<p><b>Finding :</b> Records of requests for information and responses are not maintained.</p> <p><b>Objective evidence :</b> During audit at Batu Pekaka Estate, the management did not maintain relevant documents for information i.e payslips, passport, work permits and daily attendance for the contractor workers Nalvam Enterprise who are currently working at PM 02B for harvesting work dated 22/9/2020 and pruning works.</p>	<p><b>Batu Pekaka Estate</b> The management has issued a warning letter to the contractor regarding this matter, and management already received all the evidence requested by the auditor during the audit.</p>	<p>The estate and mill continued to maintain the records of requests for information and responses are maintained which included the government agencies, schools, local communities, etc. payslips, passport, work permits and daily attendance for Nalvam Enterprise at Stothard Estate has been available.</p> <p><b>Status: Closed</b></p>
3.4.2 MAR 04 2020	Minor	<p><b>Finding :</b> Social management and monitoring plans have been developed without participation of affected stakeholders.</p> <p><b>Objective evidence :</b></p>	<p><b>Trong CU</b> The estate management will conduct stakeholder meeting to update the SIA Plan after the MCO is over i.e. December 2020</p>	<p>The stakeholder consultation with external stakeholders was held on 1/12/2020. The meetings were attended by contractors, government agencies, school representatives (SK Bukit Mertajam) and local community heads of Kg Padang Bola and Kg Pasir</p>



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		During documentation review at Batu Pekaka Estate, Bukit Mertajam Rubber Estate, Malaya Estate and Taiping Rubber Plantation, there was found that social management and monitoring plans have been developed without participation of affected stakeholders i.e contractor's workers		Putih. There was no consultation with internal stakeholders. During documentation review at Stothard Estate, Kuala Muda Estate and Bukit Mertajam Estate, there was found that social management and monitoring plans have been developed without participation of affected stakeholders i.e contractor's workers and local workers (Bukit Mertajam Estate).  <b>Status: Open (Upgraded to Major)</b>
2.1.1 MAR 05 2020	Major	<p><b>Finding:</b> Unit of certification did not comply with legal requirement i.e Employment Act 1955 section 19 (1), section 60 (3) (a) (ii) and section 60F (1) (b) (aa).</p> <p><b>Objective evidence:</b></p> <ol style="list-style-type: none"> <li>3. Based on interview and documentation review on Work Order, there was found that Batu Pekaka Estate did not pay the contractor workers (Nalvam Enterprise) not later than the seventh day after the last day of any wage period, which contravene with the Employment Act 1955 19 (1).</li> <li>4. Based on interview held with 4 workers and contractor, there was found that Batu Pekaka Estate did not pay two (2) days' wages at the ordinary rate pay for the contractor workers worked on rest day (pruning works) in the month of August 2020, which contravene with the Employment Act 1955 section 60 (3) (a) (ii).</li> <li>5. Based on interview held with 13 workers and contractor, there was found that Bukit Mertajam Rubber Estate did not pay two (2) days' wages at the ordinary rate pay for the contractor workers worked on rest day (harvesting works) in the month of</li> </ol>	The management has already issued a warning letter to the contractor regarding this matter and ask contractor to repay the workers back and which is already repay to the eligible workers. Estate management also will further look into this and make sure this issue won't happen again.	<p>During ASA 4, Unit of certification still did not comply with some legal requirement i.e Employment Act 1955 section 19 (1), section 60 (3) (a) (ii).</p> <ol style="list-style-type: none"> <li>1. Based on interview and documentation review on Work Order and payment voucher, there was found that Stothard Estate did not pay the contractor workers (Nalvam Enterprise) not later than the seventh day after the last day of any wage period, which contravene with the Employment Act 1955 19 (1).</li> <li>2. Based on interview held and documentation review with workers and contractor (Hoo Chee Kiong, Eng Eng Resources, Low Kuan Yew Sdn Bhd), there was found that Stothard, Kuala Muda and Bukit Mertajam Estate did not pay two (2) days' wages at the ordinary rate pay for the contractor workers worked on rest day (harvesting works) in the month of July 2021, Aug 2021 and Sep 2021 which contravene with the Employment Act 1955 section 60 (3) (a) (ii).</li> </ol> <p><b>Status: Open (Recurrence Major)</b></p>

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		<p>August 2020, which contravene with the Employment Act 1955 section 60 (3) (a) (ii).</p> <p>6. Based on interview and documentation review on payslip and daily attendance, there was found that Malaya Estate did not pay two (2) days' wages at the ordinary rate pay for the contractor workers worked on rest day dated 9, 16 and 23 for the month of August 2020 (3 workers) doing harvesting and lent labor work, which contravene with the Employment Act 1955 section 60 (3) (a) (ii).</p> <p>7. Based on interview held with workers, there was found that Malaya Estate and Taiping Rubber Plantations did not pay for sick leave for contractor workers for the month of August 2020, which contravene with the Employment Act 1955 section 60F (1) (b) (aa).</p>		
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### ATTACHMENT 6 – Timebound Plan

#### Boustead Plantations Berhad Time Bound Plan on RSPO Certification.

No	PMU	Loc	Main Assessment	Certification Status	Status	Updated Information for Partial Certification, Clause 4.5.3 RSPO Time-bound Plan & 4.5.4 Requirements for uncertified management units
1.	Sg. Jernih CU	Pahang	11 Sep 2011	Stage 2	Certification completed	nil
			11 Sep 2016	Re-certification	Recertification completed	nil
2.	Nak CU	Sabah	16 May 2015	Stage 2	Certification completed	nil
			May 2017	Include LTTS	Certification completed	nil
3.	Trong CU	Perak	20 July 2017	Stage 2	Certification completed	nil
4.	Segaria CU	Sabah	Dec 2017	Stage 2	Certification completed	nil
5.	Segamaha CU	Sabah	Oct 2018	Stage 2	Certification completed	nil
6.	Telok Sengat CU	Johor	August 2019	Stage 2	Certification completed	Nil
7.	Lepan Kabu Bekoh Eldred	Kelantan Johor Johor	2021	-	CB appointment process Deferred to 2021 (initially 2020) (Delayed due to Pandemic Covid-19)	Lepan Kabu Mill ceased operation in May 2018. In July 2019, LKE undergo MSPO Audit. Lepan Kabu, Bekoh, and Eldred (All estates without own mill-loose estates).
8.	Rimba Nilai (Sugut) CU	Sabah	2021	-	CB appointed Deferred to 2021 (initially 2020) (Delayed due to Pandemic Covid-19)	External audit that scheduled by BSI tentatively on 7th-11th November 2020 has been postponed until further notice due to restrictions entering Sabah state.
9.	Loagan Bunut CU	Sarawak	2023	-	Deferred to 2023 (initially 2022) To allow Pertama & Tawai BU first	The Loagan Bunut CU has been proposed for land acquisition and still in negotiation process. All decision is pending for the Board of Directors discretion and direction.
10.	Pertama CU	Sabah	2022	-	Deferred to 2022 (initially 2021) (Delayed due to Pandemic Covid-19)	New Acquisition in 2018 from Duta Plantations Berhad. As per RSPO Certification System Nov. 2020; new acquisitions shall be certified within a three-year timeframe.
11.	Kanowit CU	Sarawak	2023	-	Deferred to 2023 (initially 2022) To allow Pertama & Tawai BU first	The Kanowit CU has been proposed for disposal and still in negotiation process. All decision is pending for the Board of Directors discretion and direction.
12.	Tawai CU	Sabah	2022	-	To combine audit with Pertama BU in 2022 due to same area of location	New Acquisition in 2019 from Sit Seng & Sons Realty Sdn Bhd as per RSPO Certification System Nov. 2020; new acquisitions shall be certified within a three-year timeframe.