



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

File Ref. : EH04760002

RSPO PUBLIC SUMMARY REPORT

CLIENT : JEROCO PLANTATIONS SDN. BHD. – JEROCO PALM OIL MILL 2

PARENT COMPANY : HAP SENG PLANTATIONS HOLDINGS BERHAD

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

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Jeroco 2 Certification Unit	Jeroco POM 2	5°25'52.002" N	118°25'02.005" E	Off KM 50, Jalan Jeroco, 91109 Lahad Datu, Sabah, Malaysia.
	Kapis Estate	5°26'34.303" N	118°24'51.001" E	

MAP : See Attachment 1

AUDIT DATE : 17th – 20th January 2022

DURATION : 11 auditor days

TYPE OF AUDIT : Annual Surveillance Audit No. 3 Recertification Audit

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 27/09/2018 to 26/09/2023

The following attachments form part of this report:

Non-conformity Report(s)

List of additional site(s)

Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : **DZULFIQAR AZMI**

Name : **KEE KEON CHONG**

Signature :

Signature :

Date : **18th April 2022**

Date : **25.4.2022**

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SUMMARY OF AUDITS

Recertification Audit				
On-site audit date	:		No. of auditor days:	
Audit team	:			
No. of major NCR	:		Indicator:	Closing date:
No. of minor NCR	:		Indicator:	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
		Contract workers	NGOs	Govt. agency
		Indigenous people	Contractor	Others (Please specify)
Supply base sampled	:			
Changes since the last audit	:			
Justification of audit planning	:			
Name of peer reviewer	:			
Report approved by	:		Approval date:	

Annual Surveillance Audit 1				
On-site audit date	:	1 – 3 July 2019	No. of auditor days:	9 Auditor Days
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Amir Bahari, Mohd Norddin Abd Jalil		
No. of major NCR	:	1	5.13 (RSPO Supply Chain)	Closing date: 30/09/2019
No. of minor NCR	:	-	-	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers/ Local community
		√		NA
		Contract workers	NGOs	Govt. agency
				√
	Indigenous people	Contractor	Others (Please specify)	
		NA	√	
Supply base sampled	:	Kapis Estate		
Changes since the last audit	:	No changes		
Justification of audit planning	:	Total allocation of auditor days for Jeroco 2 CU were: Mill = 5 days (4 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Estate = 4 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Report approved by	:	Kamini A/P Sooriamorthy	Approval date :	7/10/2019

Annual Surveillance Audit 2				
On-site audit date	:	21 – 24 July 2020	No. of auditor days:	11 Auditor days
Audit team	:	Dzulfiqar Azmi (TLA) – Evaluated as Lead Auditor, Mohd Zulfakar Kamaruzaman - Evaluator, Selvasingam T Kandiah.		
No. of major NCR	:	1	Indicator: 7.12.4	Closing date: 12/10/2020
No. of minor NCR	:	2	Indicator: 2.2.3, 7.11.3	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
		√		NA
		Contract workers	NGOs	Govt. agency
				√

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	Indigenous people	Contractor	Others (Please specify)
	NA	√	
Supply base sampled :	Kapis Estate		
Changes since the last audit :	No changes		
Justification of audit planning :	Total allocation of auditor days for Jeroco 2 CU were: <ul style="list-style-type: none"> • Mill = 5 days (5 days for safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) • All estate = 6 days each for verification of safety and health, environment, good agriculture best practices, GHG verification. 		
Report approved by :	Kamini A/P Sooriamoorthy	Approval date: 15/10/2020	

Annual Surveillance Audit 3

On-site audit date :	02 – 03 August 2021 (Remote) 17 – 20 January 2022 (Onsite)	No. of auditor days:	11 auditor days
Audit team :	Dzulfiqar Azmi (LA) – Lead Auditor, Mohd Zulfakar Kamaruzaman, Mohd Norddin Abd Jalil		
No. of major NCR :	3	Indicator: 2.1.1, 7.8.2, 7.10.3	Closing date: 14/04/2022
No. of minor NCR :	1	Indicator: 7.3.2	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	√		NA
	Contract workers	NGOs	Govt. agency
			√
	Independent growers		
	Indigenous people	Contractor	Others (Please specify)
	NA	√	
Supply base sampled :	Kapis Estate		
Changes since the last audit :	No changes		
Justification of audit planning :	Total allocation of auditor days for Jeroco 2 CU were: <ul style="list-style-type: none"> • Remote Audit = 3 days for remote of documents reviews safety and health, environment, mill/estate best practices, GHG verification and for supply chain certification systems). • Onsite Audit = 8 days for verification onsite of implantations safety and health, environment, good agriculture best practices, GHG verification. 		
Name of peer reviewer :	NA		
Report approved by :	Kamini A/P Sooriamoorthy	Approval date: 18/04/2022	

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
*Projection Period / Reporting Period		July 2019 to June 2020	*July 2020 to June 2021	Jan 2022 to Dec 2022	
Certified FFB Processed (MT)		37,100.00	43,730.00	46,450.00	
Production of Certified CPO (MT)		7,645.00	9,008.00	9,429.00	
Production of Certified PK (MT)		1,781.00	2,099.00	2,230.00	
Certified Areas (Ha)		2,681.00	2,681.00	2,681.00	
Planted Areas (Ha)		2,342.00	2,342.00	2,342.00	
Production Areas (Ha)		2,082.00	2,342.00	2,342.00	
HCV Areas / Conservation Areas (Ha)		29.20	29.20	29.20	
REMARKS	*The actual period covered during this audit was between July 2020 to Dec 2021.				

TABLE 2

	PO	PK
**Last years certified volume (MT)	9,008.00	2,099.00
Last years actual certified sold (MT)	1,375.01	1,105.04
Last years actual sold under other schemes (MT)	999.73	0.00
Last years sold conventional (MT)	2,266.54	126.51
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	9,429.00	2,230.00

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1.0 AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally 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 & ISO 45001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Dzulfiqar Azmi	Lead Auditor / Social Internal & Environmental	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Mohd. Zulfakar Kamaruzaman	Auditor / Supply Chain, Social External & HCV	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor.
Mohd Nordin Abdul Jalil	Auditor / Good Agriculture Practice & Safety	Holds B.Sc. Agriculture (weed management) and had more than 35 years of working experience in plantation management covering rubber and oil palm.

1.3 Audit methodology

The audit covered the one palm oil mill and one of its supply base, i.e. the Kapis Estate. The audit included an 70 % balance on-site audit to the estate and mill and to verify the implementation of the requirement of the certification. The sampling conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. 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:

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Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ul style="list-style-type: none"> ▪ Foreign workers employed via recruitment agents confirmed that they did not pay any recruitment fees. ▪ All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. ▪ They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. ▪ They have been getting salaries above RM1,100 since January 2019. Salaries were paid before the 7th of every month. ▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. ▪ No discrimination between migrant workers and local workers, between male and female workers. ▪ Comfortable housing with water and electricity provided. ▪ Have access to affordable food from the canteen/sundry shops within the estate/mill premises. ▪ Entitled to free medical facilities at the estate clinic. ▪ Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. ▪ When they are at work, their children stay at the creche or the Community Learning Centre. The legalisation process of all the children has been done and some are still ongoing.
2) Settlers	<ul style="list-style-type: none"> ▪ Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> ▪ Not applicable
4) Suppliers	<ul style="list-style-type: none"> ▪ Suppliers confirmed that payments are received within one month of invoice. They are also aware of the complaint channel. There are no issues with the estates and mill. They receive invitations to attend stakeholder meetings but sometimes cannot attend.
5) Contract workers	<ul style="list-style-type: none"> ▪ No contract workers.
6) Local & national NGOs	<ul style="list-style-type: none"> ▪ No issues
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> ▪ No issues
8) Independent growers / Smallholders	<ul style="list-style-type: none"> ▪ Hap Seng give support to surrounding smallholders and growers by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification. Until to date surrounding smallholder who are RSPO certified is Spark Glory, Harus Abadi, and LKM Trading. Currently on progress for RSPO and MSPO certification is Lebijaya, Khoo Chin Hung, Bukit Kretam and LPC Plantation.
9) Indigenous people	<ul style="list-style-type: none"> ▪ Not applicable

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10) Contractor	<ul style="list-style-type: none"> ▪ Contractors confirmed that the contracts they have with the estates and mill are fair and transparent. The clauses on contract duration, amount and calculation of payments are clearly stated in their contracts. Payments are received within one month of invoice. There are no issues with the estates and mill. They receive invitations to attend stakeholder meetings but sometimes cannot attend.
11) Previous land owner (if any)	<ul style="list-style-type: none"> ▪ The right to use the land at the CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Kapis Estate the land was previous owned by Sabah Land Development and Jeroco Plantations Sdn Bhd has bought and developed the land in 1980. There were clear land ownership documents available for reviewed.
12) Others (please specify)	<ul style="list-style-type: none"> ▪ No issues

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

Jeroco Palm Oil Mill 2 certification unit (hereafter refer to JPOM2 CU) is one of the business unit under the Hap Seng Plantation Holdings Berhad (HSPHB). Located at Off 50 KM, Jalan Jeroco, Lahad Datu, Sabah, Malaysia, the CU consists of one mill (JPOM 2) and one supply base i.e. Kapis Estate.

The Jeroco Palm Oil Mill 2 has a processing capacity of 30 metric tonnes of fresh fruit bunches (FFB) per hour. The mill is also receiving and processing crops from smallholders and villagers nearby the estate.

JPOM 2 have ISCC/MeSTI/Halal/HACCP/MSPO certification beside of RSPO P&C and Supply Chain.

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

The FFB sourced from company owned estates that were certified. Details of the FFB contribution from each source to the JPOM 2 are shown in the following tables:

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

CU own estates& Certified FFB	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Kapis Estate	2,687.23	3.40	SIRIM QAS
Lokan Estate	1,854.44	2.35	SIRIM QAS
Lungmanis Estate	1,015.18	1.29	SIRIM QAS
First Raintree S/B	5,692.78	7.21	SIRIM QAS
Harus Abadi S/B	12,354.12	15.65	SIRIM QAS
LKM Trading / Chua Soon Lee S/B	120.49	0.15	SIRIM QAS

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Other Supply Bases (Non Certified)			
Tabin Estate	5,013.61	6.35	
Northbank Estate	3,582.31	4.54	
LPC Plantations S/B	1,356.08	1.72	
Khoo Chin Hung S/B	238.80	0.30	
Lim Engit Fun S/B	36.12	0.04	
Bukit Kretam S/B	36,355.95	46.04	
Sangi Enterprise S/B	2,194.34	2.78	
Lebijaya S/B	4,871.79	6.17	
Casem S/B	1,586.09	2.01	
Total	78,959.33	100.00	

**Table 2: Projected FFB production by supply base for the reporting period
(January 2022 to December 2022)**

FFB Supplier	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Kapis Estate	46,450.00	53.11	SIRIM QAS
Other Supply Bases (Certified Non-CU)			
First Raintree S/B	4,800.00	5.49	SIRIM QAS
Harus Abadi S/B	4,500.00	5.15	SIRIM QAS
Other Supply Bases (Non Certified)			
Bukit Kretam S/B	26,400.00	30.19	
Lebijaya S/B	4,300.00	4.92	
Sangi Enterprise S/B	500.00	0.57	
Casem S/B	500.00	0.57	
Total	87,450.00	100.00	

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

RSPO Supply Chain Model: MB	Total (MT)
FFB Received	78,959.33
FFB Processed	78,959.33
Certified FFB Processed	*23,724.24
Non-certified FFB Processed	55,235.09
Crude Palm Oil (CPO)	
Overall CPO Production	15,468.93
Certified CPO Production	*4,641.28
Certified CPO delivered as RSPO	1,375.01
Certified CPO delivered as non-RSPO	2,266.54
Certified CPO delivered under other sustainable schemes	999.73
Credits traded thru Book & Claim	0.00
Palm Kernel (PK)	
Overall PK Production	4,068.36
Certified PK Production	*1,231.55
Certified PK delivered as RSPO	1,105.04
Certified PK delivered as non-RSPO	126.51
Certified PK delivered under other sustainable schemes	0.00
Credits traded thru Book & Claim	0.00

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Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period (January 2022 to December 2022)

RSPO Supply Chain Model: MB	Total (MT)
FFB Received	87,450.00
FFB Processed	87,450.00
Certified FFB Processed (CU)	*46,450.00
Certified CPO Production (CU)	*9,429.00
Certified PK Production (CU)	*2,230.00

*The projection of CSPO & CSPK production has been based on 100% crop from its supply base i.e. Kapis Estate, processed by JPOM2. Crop diversion was not considered.

Table 5 Planted and certified area of the Jeroco 2 CU

Estate	Planted (ha)	Certified (ha)
Kapis Estate	2,342.00	2,681.00
Total	2,342.00	2,681.00

Table 6 Planting profile

Estate	Year of planting	Planting Cycle	Mature >3years (Ha)	Immature < 3 years (Ha)	Planted area	% of planted area mature	% of planted area immature
Kapis Estate	1996	1st	796.00	-	796.00	33.99	-
	1997	1st	373.00	-	373.00	15.93	-
	1998	1st	521.00	-	521.00	22.25	-
	2016	2nd	392.00	-	392.00	16.74	-
	2017	2nd	260.00	-	260.00	11.09	-
Total			2,342.00	-	2,342.00	100.00	-

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

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

3.0 AUDIT FINDINGS

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

No changes.

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

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

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

Hap Seng Plantations is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details provided in the Time Bound Plan described in Attachment 6.

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

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

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

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

If no, please state reasons Not applicable.

There is no associated smallholders supplying FFB to the CU.

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

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

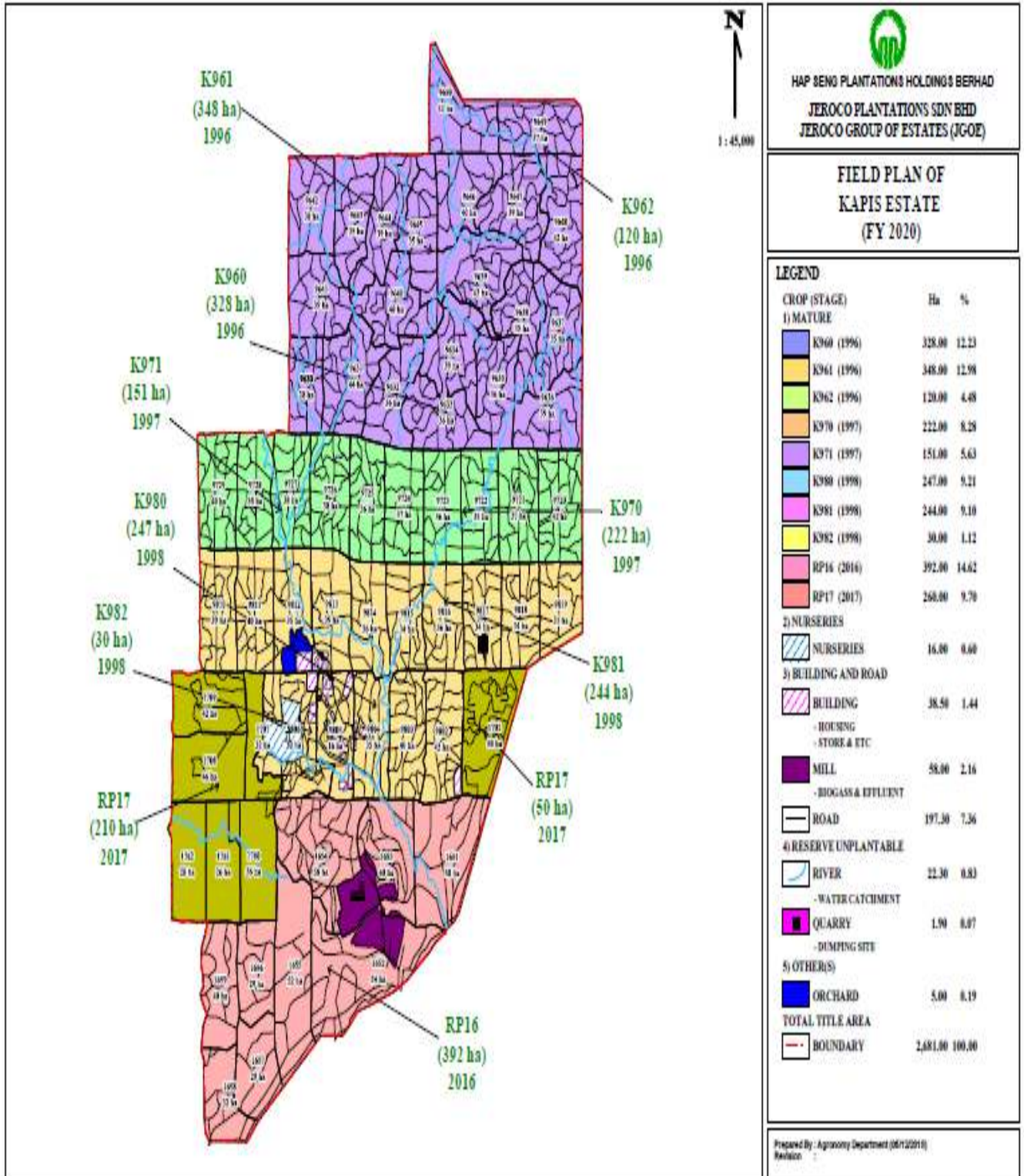
No other changes so far.

3.4 Status of previous non-conformities * Closed Not closed*
 * If not closed, minor non conformity will be upgraded to major non conformity

3.5. Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed.

Map of Kapis Estate within JPOM 2



**SURVEILLANCE 3
RSPO 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 : 17th to 20th January 2022

3. Site of assessment : Jeroco 2 Certification Unit:
i. Jeroco POM 2
ii. Kapis 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 (Social - Internal, Environmental, GHG, TPB)
Auditor : Mohd Zulfakar Kamaruzaman (SCCS, Social – External, HCV)
Mohd Norddin Abd Jalil (GAP, Safety)
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.

6. 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.

7. 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.

8. 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.

9. Working Language : English and Bahasa Malaysia

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10. 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.

11. 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

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

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).

- 13. Assessment program details: As below

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Day One: 17/01/2022 (Monday)

Time	Activities / areas to be visited	Auditee
9.00 am	Opening Meeting for Hap Seng Plantations Holdings Berhad – Jeroco 2 Certification Unit . Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.	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 Jeroco 2 POM	Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements	
	Dzul Jeroco 2 POM	
	<p>Coverage of assessment: P1, P2, P3, P4, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Effluent Treatment/Discharge ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union/workers representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues & welfare ▪ Facilities provided at line site (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc) ▪ Continuous improvement <p>Other area identified during the assessment.</p>	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER	
1.30 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 1 audit	

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Day Two: 18/01/2022 (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 Kapis Estate	Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements	
	Dzul Kapis Estate	
	<p>Coverage of assessment: P1, P2, P3, P4, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of estate management ▪ Production area (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.) ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc.) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Effluent Treatment/Discharge ▪ Buffer/Riparian Zones ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union/workers representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues & welfare ▪ Facilities provided at line site (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc) ▪ Continuous improvement <p>Other area identified during the assessment.</p>	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER	
1.30 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	

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Day Three: 19/01/2022 (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 Jeroco 2 POM			Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements			
	Dzul Jeroco 2 POM	Hj. Norddin Jeroco 2 POM	Zulfakar Jeroco 2 POM	
	<p>Coverage of assessment: P1, P2, P3, P4, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Effluent Treatment/Discharge ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union/workers representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues & welfare ▪ Continuous improvement <p>Other area identified during the assessment.</p>	<p>Coverage of assessment: P1, P2, P3, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Training and skill development programs ▪ Mill Best Practice ▪ Continuous improvement <p>Other area identified during the assessment</p>	<p>Site visit and assessment on Supply Chain Implementation including the:</p> <ul style="list-style-type: none"> ▪ Model used ▪ General Chain of Custody ▪ System Requirements for the supply chain ▪ Documented procedures ▪ Purchasing and goods in ▪ Outsourcing activity ▪ Sales and goods out ▪ Processing ▪ Records keeping ▪ Registration ▪ Training ▪ Claims <p>Coverage of assessment: P1, P5, P7, P6:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Mill Boundary, adjacent and neighbouring land use ▪ HCV/RTE and action plan ▪ Continuous improvement <p>Other area identified during the assessment</p>	

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12.30 pm	LUNCH BREAK & ZUHUR PRAYER
1.30 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

Day Four: 20/01/2022 (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 Kapis Estate			Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements			
	Dzul Kapis Estate	Hj. Norddin Kapis Estate	Zulfakar Kapis Estate	
	Coverage of assessment: P1, P2, P3, P4, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of estate management ▪ Pollution mitigating plans ▪ River system and Effluent Treatment/Discharge ▪ Buffer/Riparian Zones ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union/workers representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues & welfare 	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Production area (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc) ▪ Controlled/open burning ▪ Training and skill development programs ▪ Good Agriculture Practices ▪ Continuous improvement <p>Other area identified during the assessment</p>	Coverage of assessment: P1, P5, P7, P6: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Mill Boundary, adjacent and neighbouring land use ▪ HCV/RTE and action plan ▪ Continuous improvement <p>Other area identified during the assessment</p>	

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	<ul style="list-style-type: none"> ▪ Continuous improvement 		
	Other area identified during the assessment.		
12.30 pm	LUNCH BREAK & ZUHUR PRAYER		
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records		
3.00 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.		
3.30 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager		
4.00 pm	Closing meeting at the CU / End of audit		

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

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Jeroco 2 CU is committed to provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making by upon request. The procedure had involved internal and external consultation. The procedure provided a form to be filled up by any stakeholder who has the interest to request any information pertaining to Principle 1. Nonetheless, the method of requesting information was not limited by filling up the form alone. It was also described in the procedure that other means of request such as verbal or in writing, would also be entertained. The CU continued to use internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Hap Seng Plantations Holdings Berhad website at http://www.hapsengplantation.com
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The CU continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Hap Seng Plantations has revised their website, http://www.hapsengplantation.com to include all management documents relating to the unit's environmental, social and legal issues demonstrating commitment towards compliance to RSPO criteria via Hap Seng Plantation Sustainability Report.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The estate and mill maintain records of communication and consultation with external and internal parties. These includes communication with DOSH, Labour Department, Immigration Department, Department of Environment, suppliers and their own workers. Comments by DOSH and DOE on mill and estate operation were recorded in the respective DOSH and DOE inspection book. It was noted during this surveillance audit that there were no requests of information from the authority and stakeholders with regards to the agriculture practice, environment, and safety and health requirements.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by Hap Seng Plantations for the estate and mill maintained to be followed and available at the audited sites. Consultation and communications procedures for Jeroco 2 CU is documented in the Stakeholders Consultation Procedure. In the case of internal communications, records of meetings,

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Clause	Indicators	Comply Yes/No	Findings
	nominated representative.		briefings and memos were sighted. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. The CU has provided relevant information as requested by the relevant stakeholder during the annual group stakeholder meeting.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The stakeholder lists for Jeroco 2 CU were all available and sighted during the surveillance audit. The lists were updated in Jan 2021.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Jeroco 2 CU has documented policy to committing on integrity for all their staffs and workers by publishing <i>Anti-Bribery and Corruption Policy (ABC Policy)</i> . The CU has communicated the policy for new staffs and foreign workers during induction course. The ABC Policy applies via contract agreement under article (16) to all its suppliers, consultants, agents, contractor's/service providers who have direct dealings with the Group.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	The company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. The contractors and vendors signed on the ABC Policy where they complied with the COBC and other law and regulation. The overall ethical business practice was regularly monitored through the internal audit conducted by the HSP Sustainability Team and Consolidated Berhad (HQ Department).

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	Generally, it was evident that Jeroco 2 CU continue to comply with most of the applicable laws and regulations except for the following: <i>Occupational Safety and Health (Noise Exposure) Regulations 2019</i> The unit of certification did not comply with applicable legal requirements under Occupational Safety and Health (Noise Exposure) Regulations 2019 Section 4. Jeroco 2 CU yet to be carried out the Noise Risk Assessment (NRA) during the audit process. The CU only managed to award to Chemsain Konsultant Sdn. Bhd. to conduct the NRA. <i>Therefore, Major NCR DA 01 2022 was raised.</i>
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws	YES	Jeroco 2 CU had documented the List of Legal Register – Estates & Mills, covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. The Jeroco 2 CU had the mechanism for ensuring

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Clause	Indicators	Comply Yes/No	Findings
	and regulations.		all the applicable legal requirements were implemented. The mechanism is by the implementation of internal checking by its Assistant In-Charge through evaluation of compliance exercise against the legal register. The evaluation was carried out on at Kapis Estate and JPOM2.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	During the site review, the physical markers were visibly maintained at Kapis Estate. The perimeter boundary of the estate was visibly maintained with wooden posts along the boundary, especially the ones that adjacent to other private estate – IOI Group Plantation Berhad.
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	Each contract issued to suppliers and contractors contain a clause requiring compliance with legal requirements. The contracts contain a provision that the contractor shall comply with the provisions of the relevant Acts, regulations and by-laws. Legal due diligence is carried out by the Contracts Department at PCO. This include obtaining the contractors' registered company names and addresses, contact numbers, evidence of company registration, details of contractors' principle activities, authorised and paid-up capital, list of shareholders, board of directors, bank details, financial auditors, and current trading/business licences.
	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, including those for FFB supply were handled by Processing Department at PCO. Based on contract agreement reviewed, it includes addendum contained clause disallowing child, forced and trafficked labour and where young worker is employed are protected.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins. • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license 	YES	Jeroco 2 POM kept the records for the following for the directly source of FFB. The evidences were available in the 'Smallholder File'. There are 6 Smallholder and Smallgrower send their FFB at JPOM 2.

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Clause	Indicators	Comply Yes/No	Findings
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Currently in Jeroco 2 POM there is no practice of indirectly source of FFB. All FFB are received direct from the suppliers.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	The business plan for the mill is reflected in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilisation rate and CAPEX. The business or management plan for the estate was presented in the form of annual budget with 5 years projection (2021 – 2025). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Hap Seng Plantations maintains a replanting program up 2032. The replanting programme until FY 2027 were sighted for Kapis estate. The programme is reviewed once a year and is incorporated in their annual financial budget.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	The Management Review Meeting (MRM) was conducted after internal audit. The MRM was carried out together for Jeroco Group of Estates in June 2021. The MRM was attended by all the estates and POMs manager/GM and sustainability team. It was chaired by Sustainability Chairman. Management has transparently addressed continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental	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	Plans and impact assessments relating to social and environmental impacts maintained available. The Jeroco 2 CU have conducted social assessment titled 'Social Impact Assessment, Management Action Plans and Continuous Improvement Plans' and environmental assessment titled 'Environmental Impact Assessment Management Action Plans and Continuous Improvement Plans'. The SIA & EIA action plan was updated and each of the issues was identified for each of the operating unit.

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Clause	Indicators	Comply Yes/No	Findings
performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template. The auditor already verified and checked the data and figure given was tele with their database system.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	Both the mills and estates operations in the organization are guided by the Group Manuals and Standard Operating Procedure. The mill processing guidelines and standards are detailed via the Standard Operation Standard. Oil Palm Agriculture Policy (OPAP) is the manual used for the operations in the estate. The manual is maintained and updated accordingly. And, the Safe and Standard Operating Procedures is the Standard Operating Procedures used for the safety precautions for all operations in the estate and mill.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by Jeroco 2 CU are internal audits conducted by Sustainability Team.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Chief Executive Plantations, Senior General Manager (Estate), General Manager Processing (POM), Agronomy Department & Sustainability Team to 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	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There was no new planting in Jeroco 2 CU. Environmental Aspect and Impact (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations. Thus, this indicator 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	YES	For Jeroco 2 CU, the SIA and EIA reports separated. Environmental Impact Assessment (EIA), Management Action Plans and Continuous Improvement Plans which covers form upstream activities such as FFB reception until downstream processes was sighted during assessment i.e. specific impacts identified include biogas, smoke emissions, noise levels, POME and EFB management. Data were collected and analysed for compliance with relevant regulations and further actions needed were documented and implemented. For the estate, the assessment was to evaluate and analyse the

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Clause	Indicators	Comply Yes/No	Findings
regularly updated in ongoing operations.	affected stakeholders.		<p>operations impact on soil, water, and air associated with the organization activities. The EIA review process had included stakeholders' consultation with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done had involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighboring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting.</p> <p>The Social Impact Assessment (SIA), Management Action Plans and Continuous Improvement Plans Report for Jeroco 2 CU's estate and mill was prepared by the Agronomy Department (Sustainability Team). The SIA report presented the estates' and mill's background information, labour policies, grievance procedures (internal, external land owner issues), sexual harassment policies, facilities and amenities offered by the estate and POM, and the social impact assessment procedures and results. The report includes both positive and negative impact and its recommendation.</p>
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	<p>The social management action plans are being reviewed and updated on an annual basis at Jeroco CU. This takes into account inputs from external stakeholder meetings, JCC meeting, as well women committee meetings. Among the social issues for management and monitoring were COVID 19 issues, vaccine programme, replanting activities, school issues, canteen prices, making sure PPE replacement is always available, replacement of old workers' housing, and documentation and immunisation of foreign workers' children. The SIA review process had included stakeholders' consultation with regards to social issues. The reviews done had involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighbouring estates, local communities, suppliers and contractors.</p> <p>Significant environmental aspect and impact mitigation methods was implemented from EIA. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The EIA assessments had included the identification of aspects and impacts from resulting from the POM and Estate operations. A timetable with responsibilities for mitigation and monitoring was reviewed and updated as necessary. The CU had appointed specific person in charge (PIC) responsible for taking actions on each of the mitigation measures with specific time intervals.</p>
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	<p>Employment procedures which include recruitment, selection and hiring are contained in a document entitled Standard Operating Procedure – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (Local & Foreign). For matters related to termination of employment and retirement, these are contained in employment contracts. Clause C of the employment contract states that retirement age for workers is 60. These documents are available to workers and their representatives.</p>
	3.5.2 Employment procedures are implemented, and records	YES	<p>Employment procedures which include recruitment, selection and hiring are contained in a document entitled Standard Operating Procedure – Recruitment, Selection, Hiring, Termination, Retirement and</p>

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Clause	Indicators	Comply Yes/No	Findings
	are maintained.		Promotion of Workers (Local & Foreign). For matters related to termination of employment and retirement, these are contained in employment contracts. Clause C of the employment contract states that retirement age for workers is 60. These documents are available to workers and their representatives.
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 Occupational Safety and Health Policy was available. The policy had been communicated to all levels of the organization through briefings and also displayed prominently in <i>Bahasa Malaysia and English</i> on notice boards at mill and estate office and muster ground. All operations had been risk assessed to identify H&S issues. Mitigation plans and procedures were documented in the HIRARC document and implemented.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	Occupational health and safety (OHS) management plan for Jeroco 2 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 FY 2021 were acceptable. Safety executive was carried out safety requirements checking via Internal Audit. Other than that, the workplace inspection was done in monthly basis to ensure all H&S plan was done effectively.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	Formal training programmes for FY 2021 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Jeroco 2 CU. A training needs identification matrix has been established with target dates for the training to be conducted.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	The CU had trained their staff, workers and records of training were kept in the RSPO training file. It has been reviewed during the conduct of audit.
	3.7.3 Appropriate training is carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in June 2021 attended by personnel including PIC, Clerk, Assistant Engineer, Staff, Weighbridge Operator and Attendance list & photograph was seen.

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SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	<p>Identity Preserved Module</p> <p>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</p> <p>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.</p>	YES	Not applicable since this mill is Mass Balance.
3.8.2	<p>Mass balance Module</p> <p>A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base.</p>	YES	Jeroco 2 POM received certified FFB from own Estate Which is Kapis Estate and Uncertified FFB from Surrounding Smallgrower and Small holder which is 6 suppliers. Thus, Jeroco 2 POM has qualifies for the Mass Balance chain system and module. 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. Refer to Table 3-MB for the relevant production data.
3.8.3	<p>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.</p>	YES	Projection data available as in Table 4-MB of this report.
3.8.4	<p>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).</p>	YES	<p>The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information was:</p> <p>Name: Jeroco Plantations Sdn Bhd – Jeroco Palm Oil Mill 2</p> <p>Country: Malaysia.</p> <p>Member Category: Oil Mil</p> <p>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.</p>
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>	YES	Jeroco 2 POM had used their documented procedure title ' <i>Standard operating procedures for Supply Chain SOP/COC/001, issue 04.</i>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 		<p>The procedure is complete and up to date covering the implementation of all the elements of the supply chain model requirements including receiving and processing certified and non-certified FFBs. Since this is MB mill, there is no problem regarding noncertified FFB.</p> <p>The procedure was kept in file JPOM 2 Traceability File. Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in June 2021.</p> <p>The Assistant Engineer has the overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO JPOM2. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements</p>
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	YES	<p>As describe under para 8.4 SOP for Supply Chain issue no 4, JPOM2 refer to flow Chart Internal Audit System which is follow the RSPO Supply Chain Certification Standard Revision 2017 requirements.</p> <p>Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements.</p> <p>RSPO internal audit was conducted in May 2021 by the internal auditors 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 0 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	<p>Jeroco POM 2 had continued to receive certified FFB from own Estate Which is Kapis Estate. And Uncertified FFB from Surrounding Smallgrower and Small holder which is 6 suppliers. The validity of the certificate of the supplier has been checked accordingly. 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 "Supply Chain MB" 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"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number 	YES	<p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Hap Seng Plantation Shipping Department (HQ) on behalf of Jeroco 2 POM. Sample of deliveries document were sighted during the audit and it was found all related information were adequate. Jeroco 2 POM's RSPO certificate number and product name together with model used were stated in the delivery documents.</p>
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> (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. (ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 	YES	<p>Not Applicable since transportation and storage of certified finished products are handled internally using budge system. Should there be any additional transporter used in future to carry certified CPO/ PK, JPOM2 prepared Minor Job Contract for acknowledgement by hired service provider informing on the RSPO SCCS requirements.</p>
3.8.10	<p>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.</p>	YES	<p>Not Applicable since transportation and storage of certified finished products are handled internally using budge system. Should there be any additional transporter used in future to carry certified CPO/ PK, JPOM2 prepared Minor</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
			Job Contract for acknowledgement by hired service provider informing on the RSPO SCCS requirement.
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	Not Applicable since transportation and storage of certified finished products are handled internally using budge system. Should there be any additional transporter used in future to carry certified CPO/ PK, JPOM2 prepared Minor Job Contract for acknowledgement by hired service provider informing on the RSPO SCCS requirement.
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	The relevant record pertaining to RSPO SCCS within JPOM2 found to be updated accordingly and easily accessible during the audit. Relevant record pertaining to implementation of RSPO SCCS within JPOM2 retained for minimum 2 years as per statement on Chapter 1 of ' <i>Standard operating procedures for Supply Chain SOP/COC/001, issue 03.</i> ' JPOM2 also had established various reporting template to ensure that they will be able to track movement of their certified FFB as well as finished products (CPO & PK).
	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	
	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	
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)	YES	
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	YES	Jeroco POM2 process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	As above.
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	Not applicable.
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 Group Plantation Marketing subordinate. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in). JPOM2 through usually handled by procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Hap Seng Commodities Trading Department (HQ) on behalf of Jeroco 2 POM. The Personnel updated the RSPO IT platform system upon confirmed contract. The registration of transaction being carried out by Hap Seng Commodities Trading Department. based on contract summary (buyer weight being put in).
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork e.g. PK billing, CPO billing, JPOM2 weighbridge advice ticket and JPOM2 palm kernel/ CPO delivery note. JPOM2 adhered to the minimum requirement in term of the corporate communications rules as well as Annex 1 (RSPO trademark usage and guidance) of the RSPO Rules on Market Communications and Claims).

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Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is 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 was made available at Kapis estate and Jeroco 2 POM. There is also a new sustainable Agriculture Policy signed by the CEO contain the clause of prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staffs and workers during morning muster and training at JPOM in July & Aug 2021.
	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 estate and mill have developed procedures to handle grievances and disputes titled as 'Procedure for reporting complaints and grievances (Prosedur Melapor <i>Aduan dan Permasalahan</i>)' and 'Grievances Procedure – Appendix 1' for staffs and workers, Prosedur Aduan and also company has developed procedure named " Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)", to protect the complainants.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, 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 POM showed briefing the stakeholders meeting was held in June 2021 (Internal Stakeholder) and Apr 2021 (External Stakeholder). 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	YES	Jeroco 2 CU 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 was held in June 2021 (Internal Stakeholder) and Apr 2021 (External Stakeholder) at Jeroco 2 CU.

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Clause	Indicators	Comply Yes/No	Findings
	timeframe and the outcome is 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 Jeroco 2 CU in resolving disputes and grievances exists in the procedure called 'Prosedur Melapor <i>Aduan dan Permasalahan</i> ' and 'Grievances Procedure – Appendix 1' for staffs and workers. The Mill and Estates within SJBU 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 CU.
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	There was no local community lived nearby or within the CU plantation area. However, the CU has built a Humana at Kapis Estate for foreign worker's children. Sighted also the donation from Estate related to Humana.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	The right to use the land at the Jeroco 2 CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Kapis Estate the land was previous owned by Sabah Land Development and Jeroco Plantations Sdn Bhd has buy and develop the land in 01/01/1980. There were clear land ownership documents available for review. The original copies of the documents were kept in Plantation Central Office, Sg. Segama. Copies of land titles for all estate was also sighted at Kapis Estate office. The Kapis estate is under the jurisdiction of Kinabatangan District. Review of the documents confirmed the terms of the land title for all the estate cultivation of an agricultural crop of economic value have been complied.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Jeroco 2 CU since 1980. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all	YES	

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Clause	Indicators	Comply Yes/No	Findings
	affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.		
	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 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 Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 2 CU since 1 January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at the CU, it was confirmed through interviewed relevant stakeholder such as the IOI Plantation.
	4.4.5 (C) Evidence is available to	YES	There was no land encumbered by customary rights or dispute from any stakeholder at the CU, it

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Clause	Indicators	Comply Yes/No	Findings
	show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.		was confirmed through interviewed relevant stakeholder such as the IOI Plantation.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at the CU, it was confirmed through interviewed relevant stakeholder such as the IOI Plantation.
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 Jeroco 2 CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Jeroco 2 CU.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	As reported in 4.4.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations,	YES	As reported in 4.4.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

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Clause	Indicators	Comply Yes/No	Findings
	<p>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 ops.</p>		
	<p>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.</p>	<p align="center">YES</p>	<p>As reported in 4.4.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.</p>
	<p>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.</p>	<p align="center">YES</p>	<p>As reported in 4.4.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.</p>
	<p>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.</p>	<p align="center">YES</p>	<p>As reported in 4.4.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.</p>
	<p>4.5.7 New lands are not acquired for plantations and mills after 15 Nov 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p>	<p align="center">YES</p>	<p>As reported in 4.4.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.</p>

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Clause	Indicators	Comply Yes/No	Findings
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	Jeroco 2 CU have a standard procedure for identifying social related issues called “Land Dispute Compensation and Calculation Procedure” and “Procedure For Calculating & Distribution Fair Compensation”. The procedures defined details process of how compensation for any issues/disputes related to land, ownership and access to land, and ensures negotiations concerning compensation are dealt with. The procedure ensure that any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.
	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	“Land Dispute Compensation and Calculation Procedure” and “Procedure For Calculating & Distribution Fair Compensation” detailed out the procedures for calculating and distributing compensation in a participatory and fair manner. These procedures specify that it would take into account ethnic group, gender differences, etc. A flowchart to the same effect was also sighted. Interviews with the relevant stakeholders IOI Plantations confirmed that the mechanism for them to express their views are available, and the issues (if any) will be dealt in accordance with this standard requirement.
	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	The requirement of this indicator was not applicable as there is no scheme smallholding at Jeroco 2 CU.
	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	As mentioned in 4.6.2 above, there were no existing/known issues related to this indicator, hence it was not applied to Jeroco 2 CU.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	Jeroco 2 CU have a standard procedure for identifying social related issues called “Land Dispute Compensation and Calculation Procedure” and “Procedure For Calculating & Distribution Fair Compensation”. The procedures defined details process of how compensation for any issues/disputes related to land, ownership and access to land, and ensures negotiations concerning compensation are dealt with. The procedure ensures that any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

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Clause	Indicators	Comply Yes/No	Findings
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 neighboring estate
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	This requirement in this indicator was not applicable for Jeroco 2 CU.
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 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 checklists, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	As reported in 4.4.1 of this checklists, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current	YES	As reported in 4.4.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

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Clause	Indicators	Comply Yes/No	Findings
	operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant req.		
	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	As reported in 4.4.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

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	It was observed that the JPOM2 has displayed the current and past FFB prices from January 2021 until to date (Jan 2022) at their weighbridge station.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	Briefing conducted at Jeroco 2 POM in June 2021 during “Taklimat Pensijilan RSPO/MSPO/ISCC”. The “Taklimat Pensijilan RSPO/MSPO/ISCC” explains regarding the FFB Quality, FFB Grading, Calculation Payment by MPOB, Oil Extraction Rate (OER), and calculation of pricing given to Smallholder. The field day also conducted every month by mill to all the small holders.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	In Jeroco 2 POM Price for FFB are follow by MPOB Pricing, all price are calculate by the MPOB and the mill take the price and follow what MPOB guide, Hap Seng Management also give allowance to the Smallholder if they send FFB to mill base on tonnage.
	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 agreement between FFB outsider supplier with JPOM2, signed in July 2016. During interview with FFB Supplier above they stated that they are involved in decision-making processes and understand the contracts including involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable which is not applicable to them because they are operate by themselves. Hap Seng Management also support smallholder by give them consultation and guidance to certify surrounding smallholder under MSPO and RSPO without cost.

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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	Interviews were conducted with the transport suppliers. The contractors have been sending their FFB to JPOM2 more than 7 years. Their contracts are signed and it contains schedule of rates, conditions of contract, event of default, payment terms according to the volume, FFB price, OER price, Specifications FFB, Bonus for Sending FFB. Consultations with FFB Suppliers confirmed that they understand the salient points in the agreement, namely contract duration, rate of payment, their obligations under the contract, etc. They also confirmed that contract entered into are valid, fair and transparent as the terms of payment are being negotiated upon prior to signing.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	All contractor confirmed that payments were received within a reasonable timeframe which is 7-10 days after submission of invoice. And receipts contain specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Jeroco 2 POM has been calibrated in yearly basis using Metrology Corporation Malaysia Sdn Bhd last in Dec 2021.
	5.1.8 The unit of certification supports Independent Smallholders with cert., where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Hap Seng Management 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. However Surrounding smallholders and growers are against the idea of ICS they want to certify independently. Hap Seng give support to surrounding smallholders and growers by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification.
	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	There is a document namely 'Procedure for reporting complaints and grievances (Prosedur Melapor Aduan dan Permasalahan)' and 'Grievances Procedure – Appendix 1' for staffs and workers, Prosedur Aduan and also company has developed procedure named " Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)", to protect the complainants. The procedure contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.
5.2 The unit of certification supports improved livelihoods	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	YES	Hap Seng Management supports Independent Smallholders with certification, They also already consults with interested smallholders (irrespective of type) including women or other partners in their supply base and already assess their needs for support to improve their livelihoods and their interest in RSPO certification. However Surrounding

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Clause	Indicators	Comply Yes/No	Findings
of smallholders and their inclusion in sustainable palm oil value chains.	support to improve their livelihoods and their interest in RSPO certification.		smallholders and growers are against the idea of ICS they want to certify independently. Hap Seng give support to surrounding smallholders and growers by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification.
	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	Hap Seng Plantations already develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies. Hap Seng give support to surrounding smallholders and growers by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Hap Seng give support to surrounding smallholders and growers to promote legality of their FFB production by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	Hap Seng give support to surrounding smallholders and growers to certify under RSPO by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification. Sighted also training on Pesticide handlings has been given to surrounding Smallholder and Small grower in Jan, Mar, April July & Aug 2021.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Currently Hap Seng Plantations Management has created a system to trace their stakeholder around their estate. Hap Seng Plantations also regularly reviews and publicly reports on the progress of the smallholder support programme as per see in the Hap Seng Plantation Holdings Berhad 2019 ACOP report in the clause G.4.4.1. As of todate surrounding smallholder who are RSPO certified is Spark Glory, Harus Abadi, and LKM Trading.

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,	YES	The Equal Opportunity Policy is publicly available in the estates and POM. The policy statements emphasize on worker information, recruitment and selection, training, employee development, based on business needs, terms of service and records of service. It also states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. This

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Clause	Indicators	Comply Yes/No	Findings
	union membership, political affiliation or age.		policy is posted on notice boards in Bahasa Malaysia and English for the understanding of the public and workers.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Evidence is available that no employee has been discriminated against. This is evident from sampled employment contracts where all workers, (male, female, foreign, local) signed the same employment contract. Workers interviewed also confirmed that they face no form of discrimination. Foreign workers and local workers received similar pay rate, stay in the same house, and enjoy similar medical benefits as their local counterparts. Interviews also revealed that there is no discrimination on any bases in the estates/mill. However, due to government policies, education opportunities differ between local and foreign children. It also stated in the Equal Opportunity Policy. Workers' pay slips were also sampled which showed that workers receive the same amount of daily rate of RM42.31 per day for the same work irrespective of gender, age or nationalities. This breakdown in payment is agreed between the hiring Company and the recruitment agent, and the workers. Sighted were the recruitment agents signed between Hap Seng Plantations and employment agency for the recruitment of Indonesian workers. This is in consonance with the Company's SOP – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (local & Foreign). This document states that the Company shall bear travelling costs, accommodation, food and drink, during transit and application process for the worker which must be agreed earlier at a fixed rate with the recruiting agent. The Company is also responsible for worker levy, medical check-up, work pass, agency processing fees and insurance. The worker only pays fees related to passport renewal.
	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 <i>SOP – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (local & Foreign)</i> , the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs.
	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	There is no evidence that pregnancy tests are being conducted as a discriminatory measure. Pregnancy test is required to determine for Foreign Workers' Medical Examination (FOMEMA). Pregnancy test was done on her own free will.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	The gender committees throughout the Jeroco 2 CU are known as the 'Persatuan Wanita'. Membership comprises female employees and the employees' wives. Based on interviews of the committee members and review of meeting minutes, the Committees main activities are to provide awareness to its members on issues of concern. These relate to sexual harassment, domestic and other forms of abuse, children's health, creche hygiene, no sick children at the creche, childrens' immunization and education, as well as

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Clause	Indicators	Comply Yes/No	Findings
	6.1.6 There is evidence of equal pay for the same work scope.	YES	<p>women's reproductive rights, maternity benefits and leave entitlement. Meetings are generally held once a year.</p> <p>The Hap Seng Plantations Equal Opportunity Policy is publicly available at the offices of the Kapis Estate and Jeroco 2 POM. This policy states Hap Seng Plantations 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 general workers from local and general workers from Indonesia. Evidence is available that sampled workers receive equal pay for equal work.</p>
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English/BM) and explained to them in language they understand.	YES	Documentation of pay are available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Briefing on relevant provisions on the Sabah Labor Ordinance on their rights under the employment contract such as public holidays, paid annual leave, paid maternity leave, final repatriation costs to be paid by employer, and termination of contract.
	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	<p>Details of payment and conditions of employment are contained in employment agreements. These cover working hours, deductions, overtime, medical, maternity leave, annual leaves, dismissal, period of notice, etc. There is also evidence that the contracts agreement is prepared in a language understood by workers. For example, contracts with Indonesian workers were prepared in Bahasa Malaysia for Indonesia workers. In addition, their terms of contracts were also explained to them upon arrival at the estates/mill. During interviews of workers (both local and foreigners) at the Jeroco 2 CU, comprising sprayers/manurers and harvesters, general workers and Mill workers, they generally understand the contents of the employment agreements. Audit team has sampled contracts of employment workers at Jeroco 2 CU as per evidences in the indicator 6.2.1. Based on the above, Jeroco 2 CU has demonstrated that employment contracts signed with workers are in compliance with the Sabah Labour Ordinance.</p> <p>The pay slip contains the following information: employee name, employee number, month of pay, work description, (normal work, overtime pay, piece-rate work, public holiday pays, company contributions such as SOCSO, deductions such as advance and electricity, average daily rate, total income for the month, total deductions, net pay.</p>
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for	YES	(Onsite) There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Sabah Labor Ordinance. This was verified from the mill/estate workers' employment contracts, punch cards, checkroll book and interviews with the workers themselves. They are also entitled to at least 30 minutes' rest after 5

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Clause	Indicators	Comply Yes/No	Findings
	dismissal, period of notice and other legal labour requirements.		hours of work.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	Evidence is available that the Jeroco 2 CU provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free. Each house has between 2 to 3 rooms and accommodate between 2 to 5 workers. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises. Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall. There is evidence that housing inspection are being carried out once a week based on housing inspection records. Records of housing inspections was sighted and available. Water and electricity are also provided. Free medical treatment above is provided also to all workers and their dependents. The upkeep (sanitation) for JPOM2 and Kapis Estate worker quarters visited were observed in good maintained. No water clogging at all. The Jeroco 2 CU provided with treated water by water treatment plant and water sampling test was carried out 2 times annually for drinking water for human consumption.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Jeroco 2 CU was able to demonstrate that efforts are taken to improve workers' access to adequate, sufficient and affordable food. Jeroco 2 CU have their own canteen/grocery store which sells items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within the expiry dates. Prices of certain basic items are monitored regularly by the management.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2020. Jeroco 2 CU had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid. 		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All 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.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	The Policy on Freedom of Association and Right to Collective Bargaining is available in bilingual (Malay and English). The policy is posted at the Jeroco 2 POM and Kapis Estate notice board and information wall. Interviews with workers they are aware of their workers’ representatives.

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Clause	Indicators	Comply Yes/No	Findings
Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.2 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	There are no trade unions at Jeroco 2 CU, but the workers' welfare and social committees have been established at every unit. The committee comprise management and worker representatives. Evidence is available that management holds regular meetings with the workers' welfare and social committees.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Evidence is available that all worker representatives were freely appointed by the workers as confirmed by the workers' representatives themselves as confirmed by an upkeep/harvesting mandore from Kapis Estate and grades operator, weighbridge operator from Jeroco 2 POM.
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	Jeroco 2 CU subscribes to Child Labour Policy under Sustainable Agriculture Policy. The Policy states that it would not tolerate the use of child or forced labour, nor exploitation of children in any of its global operations and facilities. Wilmar's Child. This SOP also details out the remediation action to be taken should a child is found working. This includes awareness trainings for all employees and contractors, schools should encourage and motivate children to attend school, parents to be advised and warned verbally on the spot not to allow children to assist them, and the child sent home or to an appropriate child care facility.
	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	Stakeholder interview and documentation verified on the Employee Master List confirmed that all the workers employed were above 18 years old. During site visit also confirmed that no child labour work in the Jeroco 2 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	Based on documents sighted, interviews and observations, there was no evidence that the Estates and the Mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' particulars and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to	YES	Communication demonstrated as per stakeholder interview and records of stakeholder meeting sighted. Latest external stakeholder meeting conducted at Jeroco 2 CU involved relevant stakeholders such as government authorities, school's representatives, contractors, internal workers and etc. were briefed on all the RSPO principles and criteria.

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Clause	Indicators	Comply Yes/No	Findings
	supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.		
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	Jeroco 2 POM and Kapis Estate have displayed policy on sexual harassment titled “ <i>Sexual Harassment, Violence and Abuse Policy</i> ” and “Flow Chart – Reporting Sexual Harassment (Worker)” at the office notice board. The guidelines emphasize that sexual harassment is a threat to basic human rights and offenders will be punished accordingly, including termination from work. The policy and procedure have been communicated to all the women and men workers during morning musters. The sexual policy and flowchart for handling social issues have been explained to all level of workforce during the Gender Committee meeting.
	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	During interview with female workers, they really understood their reproductive right and managed to expose their awareness. The policy and procedure also were briefed to all levels of the workforce via Morning Muster, JCC Meeting and Gender Committee.
	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, no new mothers at Jeroco 2 CU were available to verify the Indicator. However, based on interviews held with other female workers who had given birth before, their needs have been taken into account such as providing a private place for expressing milk and access to a fridge for storage, and permission granted enabling them to go home to breastfeed their babies.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	The estate and mill have developed a grievance mechanism, which respects anonymity and protects complainants accordingly. All the mechanism is implemented and communicated via Morning Muster, JCC Meeting and Gender Committee.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution 	YES	Collective evidence is available that all sampled workers have entered into employment voluntarily.

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 		
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	A special labour policy for employment of foreign workers has been addressed in the “Labour Policy for Foreign Workers”. 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. Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc.
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 Assistant Manager 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. The OSH committee organization chart for 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. OSH Committee meetings confirmed that among the agenda discussed, included the following: <ul style="list-style-type: none"> ▪ Passing of previous minutes and arising matters. ▪ Accident report (Monthly Data of Mill/Estate Safety Performance) ▪ Workplace inspection ▪ Safety report and programme ▪ COVID 19 issues / matters
	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	YES	Accident and emergency procedures are available in adherence to the HSPHB policy on ‘Emergency Response’ plan–updated January 2021 Kapis Estate and Jeroco 2 mill had procedures emergencies situation as listed below (para 2 & 3). ERP Teams & ER Procedures were formed for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The

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Clause	Indicators	Comply Yes/No	Findings
	<p>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.</p>		<p>important telephone contact numbers were also provided therein. Procedures guidelines were issued by Agronomy Dept and amended to tailor to the situation differences in the estates and mills.</p>
	<p>6.7.3 (C) Workers use appropriate PPE, which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>YES</p>	<p>All staff and workers such as the storekeepers, harvesters, sprayers/manurers and mill operators were continuously trained in safe working practices including SSOP for PPE related to their job function. Appropriate PPE were given to workers based on HIRARC and SSOP recommendations suitable for the job position or hazardous operation undertaken. Records of PPE issued and acknowledgement of receipt are maintained individually for all category of workers at mill and estates. Sighted common PPE issued included face masks respirators, goggles, safety shoes, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as work at height and in confined space. All workers were provided with appropriate PPE where the cost is covered by the management.</p>
	<p>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.</p>	<p>YES</p>	<p>Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4).</p>
	<p>6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>YES</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics via monthly accident key performance indicator (KPI) to Safety Executive. Sighted the Jeroco 2 CU has maintained and updated the LTA Summary by monthly basis. For accidents records 2021, Jeroco 2 CU submitted the JKKP 8 form to DOSH before 31/01/2022, via MyKKP system.</p>

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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	Jeroco 2 CU continued to implement their Integrated Pest Management (IPM). These include proper management of pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the OPAP No.10 – Pests and Diseases revised on 31 Oct 2019. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera subulata</i> & <i>Turnera ulmifolia</i> and for rhinoceros beetles is by using pheromone traps. Census for Rat damage, Genoderma and Nettle caterpillars was regularly carried out to obtain information about threshold level and action to be taken thereafter. The records of census were available for verification. Rat baiting campaigns were immediately carried out as the damage of crop by rats was found to be above threshold level of 2%. The estate sent a monthly report “Pest & Disease Report” to the Agronomy Department.
	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	Species referenced in the Global Invasive Species Database and CABI.org. was not used in managed areas of the Kapis Estate.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	HSPHB had a Zero Burning Policy in Sustainability Agricultural Policy under Environment & Biodiversity – signed by Mr. Au Yong Siew Fah, Chief Executive – Group Plantations. Kapis Estate had fully complied with it. There were no pest outbreaks to warrant the use of fire.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Jeroco 2 CU continued to use agrochemicals based on HSPHB Oil Palm Agriculture Policy (OPAP) covering topics such as nursery management, replanting, immature and mature upkeep where written justifications of all pesticides used had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease and the correct dosage of agrochemicals to be used. All chemicals usage was based on the “need to do basis” to enhance field operations. It was found that no Class 1 chemicals had been used. The procedures also covered the use of PPE when handling these chemicals. The estates continued to use pesticides as per the SOPs.
	7.2.2 (C) Records of pesticides use (including active ingredients)	YES	Jeroco 2 CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients

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Clause	Indicators	Comply Yes/No	Findings
	used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.		applied per ha. Pesticides are used only when justified and areas used were recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. The Kapis Estate had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	As part of the IPM plans, the quantity of pesticides required for various field conditions are documented and justified in HSPHB Oil Palm Agriculture Policy (OPAP) – covering topics such as nursery management, replanting, immature and mature upkeep.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of prophylactic use of pesticides except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practised for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOPs. Jeroco 2 CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register done in Dec 2021, it was noted that all pesticides used are of Class III & Class IV. The Class 1A chemical, Methamidophos (Enforce) in Kapis Estates was packed individually and kept in a locked separate room with proper ventilation.
	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	Jeroco 2 CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used. The Class 1A chemical, Methamidophos (Enforce) in Kapis Estate was packed individually and kept in a locked separate room with proper ventilation. From records and interviews with workers, staff and estate assistants, found that they were trained with all precautions taken and all legal requirements met. Signboards indicated 'AWAS Dilarang Masuk', block, dates of operation, type of operation and chemical used.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	As mentioned above in 7.2.5 of this checklist and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and no paraquat had been used. Hence, the need for a judgment of the threat assessment does not apply on the Jeroco 2 CU.
	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	YES	

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Clause	Indicators	Comply Yes/No	Findings
	other less hazardous alternative.		
	7.2.5d What is the process to limit the negative impacts of the application.	YES	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	<p>Jeroco 2 CU had records showing that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner.</p> <p>Pesticide applications were guided by HSPHB's OPAP manual, CHRA and by SDS supplied by the manufacturer. The CHRA for the Kapis Estate were reviewed in May 2019 by the Chemsain Konsultant Sdn Bhd.</p> <p>In the HSPHB's OPAP manual, the guidance was in Chapter 9 – Upkeep of Mature oil palm (for herbicide) and Chapter 10 (for insecticide/rodenticide). The Manual had included a chemical register list, which indicates the purpose of usage (intended target), hazards signage, trade and generic names. The SOP procedure also had written justifications.</p> <p>The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Training including refresher sessions were provided to the workers involved in such activities to ensure a continued understanding of chemicals / hazard. Records showed that pesticides were handled, used and applied by trained personnel and as per the SDS of the pesticide. The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat baits were trained. Random interviews conducted showed that they understood the hazards involved and the usage and handling of chemicals in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites such as chemical store, lubricant store and laboratory.</p>
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	<p>In Jeroco 2 CU, all pesticides were stored in accordance with the legal requirement, in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations as well as recommendation by manufacturer as per applicable MSDS. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e. storekeeper. The stores in the estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. The fertilizers were well stacked. The stores are equipped with showers, wash area and a PPE storage area. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available at the estates. The wastewater from the washing of empty chemical containers and PPE,</p>

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Clause	Indicators	Comply Yes/No	Findings
			and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities was continually implemented for empty pesticide containers. The activities were carried out at a concrete pond of 3 levels. Empty pesticide containers observed were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	The documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material e.g. EFB and POME. Scheduled wastes identified included used batteries (SW102), hydraulic oil (SW305), spent lubricant oil (SW306), used chemical containers/drums (SW409), fertilizers bag (SW410), chemical wastes (SW429) and laboratory wastes (SW430). Scheduled wastes were stored at centralized scheduled waste store in Jeroco Central workshop. Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. Scheduled wastes had been disposed of through a licensed contractor approved by DOE. Segregations of waste i.e. general and scheduled wastes was verified to be satisfactorily carried out in the Jeroco 2 CU. Proper storage areas were identified for the storage of the recycle waste at the estates and mill.
	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 information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying of pesticides is not a practice in Jeroco 2 CU. There was no evidence to show that such a method being used in the Kapis Estate. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	CHRA has been conducted by DOSH registered personnel, in May 2019 and from these assessment, it has been recommended by the assessor for the estate management to conduct medical surveillance on all pesticide operators, fertilizer applicators, workshop technician, water treatment chemical operator, drivers and storekeepers. All the recommended workers were sent to conduct medical surveillance and from the results, all workers fit to handle chemical.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding	YES	Pregnant and breast-feeding women are not allowed to work with pesticides and hazardous chemicals in Jeroco 2 CU. This instruction was tabulated in SOP No OSH USECH Regulation 2000, Medical Removal Protection No.28 3b. There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in the estates. Workers interviewed were aware that pregnant and breast-feeding women

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Clause	Indicators	Comply Yes/No	Findings
	women or other people that have medical restrictions and they are offered alternative equivalent work.		should not handle chemicals. During the monthly check-up by the MA, pregnancy status is remarked and if of any cases the worker will be withdrawn from spraying duties.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially 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. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution during routine operation. On the monitoring of water and effluent discharge, monthly and quarterly report for final discharge were submitted to DOE timely, as required by the written approval. Effluent quality monitoring was also done on a monthly basis, with samples taken at final discharge point and sent for analysis. Results of laboratory showed that the discharges were within permissible limits. In estate, domestic waste from the housing area is well managed and all domestic wastes are disposed at landfill sited in the estate area. Sighted the there is no practice of open fires within all estates. Monitoring is done weekly in both domestic waste collection areas and in landfill sites.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	NO	Standard Operating Procedure Scheduled Waste Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. Scheduled wastes had been disposed of through a licensed contractor approved by DOE. Each house was provided with dustbin. The wastes were removed weekly and disposed via landfill. However, proper disposal of waste material was not practiced according to procedures/plans and not fully understood by workers. During site inspections at JPOM 2 Housing Area Block D, sighted domestic waste (aerosol spray, plastic bag), digestive wastes (baby/kid pampers), 2T lubricant empty containers was disposed at the back of housing compound area. <i>Thus, Minor NCR DA 04 2022 was raised.</i>
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at Kapis Estate and Jeroco 2 POM, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Jeroco 2 CU have 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	Jeroco 2 CU continued to follow good agricultural practices contained in the SOPs to manage and improve soil fertility to a level that ensures optimal and sustained yield. This was through annual fertilizer applications and nutrient recycling. Generally, Kapis Estate has effectively followed the established procedures to maintain the soil fertility. Fertilizer application, which was of paramount importance for maintenance of soil fertility, was carried out based on the recommendation made by the agronomist from the Agronomy Department. Annual fertilizer recommendations were made based on annual foliar sampling carried out in Apr 2021. Soil sampling was carried out on a 5-year cycle basis last carried out in May 2021 by Agronomy Department. The recommendation by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil	YES	Periodic tissue and soil sampling were carried out in Jeroco 2 CU to monitor changes in the nutrient status of the palms. Annual foliar sampling for the nutrients N, P, K, Mg, Ca & B had been carried out in Apr 2021 and its results formed the basis for the fertilizers input recommendation to maintain and improve

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	fertility and plant health.		soil fertility. The soil analysis provided the indication of soil fertility and plant health and monitor the changes in the organic carbon and total nitrogen. Soil sampling was carried out on a 5-year cycle basis last carried out in May 2021 by Agronomy Department.																		
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of EFB, POME, palm residues and optimal use of inorganic fertilisers.	YES	Jeroco 2 CU had a nutrient recycling strategy in place. Palm fronds were stacked in the inter row to decompose and Empty Fruit Bunches (EFB) application were given to replants, immature fields and young mature areas. No compost and POME were applied in the estate.																		
	7.4.4 Records of fertiliser inputs are maintained.	YES	Jeroco 2 CU continued to monitor their fertilizer inputs as recommended by their agronomist , who visited the estates during the annual foliar sampling carried out on in Kapis Estate. Fertiliser application programs were monitored using records like reconciliation of fertiliser application schedule, program sheets, bin cards, field cost book and manuring audits through GAP Progress Report. Records of programs and applications of fertilisers were made available to auditors. From the review of the records, it was noted that the actual fertilizer application for 2021 was in line with the recommendation.																		
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	The soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Jeroco 2 CU. As per the Soil Maps, the soil series were as follows: <table border="1" data-bbox="936 790 1653 1082"> <thead> <tr> <th>Kapis Estate</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Kretam</td> <td>1185.38</td> <td>44.21</td> </tr> <tr> <td>Kinabatangan</td> <td>165.97</td> <td>6.19</td> </tr> <tr> <td>Lungmanis</td> <td>114.10</td> <td>4.26</td> </tr> <tr> <td>Rumidi</td> <td>205.71</td> <td>7.67</td> </tr> <tr> <td>Lokan</td> <td>1009.84</td> <td>37.67</td> </tr> </tbody> </table>	Kapis Estate	Ha	%	Kretam	1185.38	44.21	Kinabatangan	165.97	6.19	Lungmanis	114.10	4.26	Rumidi	205.71	7.67	Lokan	1009.84	37.67
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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	Jeroco 2 CU had a management strategy for planting on slopes and to minimise and control erosion and degradation of soils. The plantings on slopes were guided by its Oil Palm Agriculture Policy. The Agronomy Department guided by Land Survey Department to established slope map for all estates.																			
7.5.3 There is no new planting of	YES	Jeroco 2 CU had a management strategy for planting on slopes to minimise and control erosion and																			

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Clause	Indicators	Comply Yes/No	Findings
	oil palm on steep terrain.		degradation of soils. It was observed that there is no new planting of oil palm on steep terrain.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	Jeroco 2 CU had a management strategy for palm oil cultivation, taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Jeroco 2 CU.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	There were no marginal and fragile soils in the Jeroco 2 CU.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Jeroco 2 CU had a management strategy for palm oil cultivation, taking into account the soil surveys and topographic information in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information was provided and reviewed by the auditors.
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	This is <i>not applicable</i> as there is no peat soil in the entire Jeroco 2 CU as supported by the soil maps of Kapis Estate.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	This is <i>not applicable</i> as there is no peat soil in the entire Jeroco 2 CU as supported by the soil maps of Kapis Estate.

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Clause	Indicators	Comply Yes/No	Findings
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	This is <i>not applicable</i> as there is no peat soil in the entire Jeroco 2 CU as supported by the soil maps of Kapis Estate.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	This is <i>not applicable</i> as there is no peat soil in the entire Jeroco 2 CU as supported by the soil maps of Kapis Estate.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Proc, or other RSPO recognised methods, at least 5yrs 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 40yrs, or 2 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 (5yrs: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.	YES	This is <i>not applicable</i> as there is no peat soil in the entire Jeroco 2 CU as supported by the soil maps of Kapis Estate.

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Clause	Indicators	Comply Yes/No	Findings
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	This is <i>not applicable</i> as there is no peat soil in the entire Jeroco 2 CU as supported by the soil maps of Kapis Estate.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	YES	This is <i>not applicable</i> as there is no peat soil in the entire Jeroco 2 CU as supported by the soil maps of Kapis Estate.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	The water management plan is confined to only Jeroco Group of Estates engulfing the plans from nursery to fresh fruit processing. This report also includes the domestic water use with the after effect of water use to the surrounding environment. The plans cover the process of water abstraction, shortage, utilization in cultivation, chemical and natural treatments to utilize water at processing, domestic purposes and waste water management. All of these aspects are included with monitoring, mitigation (if required), implementation and prevention or minimize pollution of these plan.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. In order to ensure supply of clean drinking water to workers treated water sampling was carried out by monthly basis. Drinking water quality has been monitored by Hap Seng Plantations Central Laboratory. Results from analysis were showed all the parameters within the limits.

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Clause	Indicators	Comply Yes/No	Findings
	7.8.1b Workers have adequate access to clean water.	YES	As verified at Jeroco 2 CU facilities for workers and through interview with workers, all workers have obtained adequate access to treated clean water. Cleanliness of drinking water supplied to worker was ensure by carrying water analysis. Drinking water quality has been monitored by Hap Seng Plantations Central Laboratory by monthly basis. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.
	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).	NO	Riparian buffer zones areas were identified and marked. No activities in buffer zone area. Vetiver grass had been planted along the riverbanks and water catchments. However, water courses and wetlands were not protected, including maintaining and restoring appropriate riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). During site inspections at Kapis Estate, it was sighted that chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to Sg. Simpang Kanan. Based on circle & strip spraying programme 2021, last chemical spraying activities was carried out in Dec 2021 and Jan 2022. <i>As a result, Major NCR DA 02 2022 was issued.</i>
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	Effluent license renewal application for year 2021/2022 and letter from Department of Environmental. An Effluent Treatment Plant (ETP) is available at Jeroco 2 POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum mill capacity per hour is 30mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through land irrigation. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. Among the parameters required by the DOE to be monitored are bio-oxygen demand (BOD), suspended solid (SS), oil and grease (O&G), ammoniacal nitrogen (AN) total nitrogen (TN), pH and temperature. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory 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	The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Among the plan for improving fossil fuel are: <ul style="list-style-type: none"> ▪ Regular servicing of the generator set for smooth running of engine and prevent excessive emission of greenhouse gas ▪ Estate/mill has set up a schedule the usage of fuels and monitor it at 3 times per week basis Site visit to Jeroco 2 CU, showed evident that they are compiling the data by monthly basis and document it for further action to improve on their efficiency of using the renewable and non-renewable energy. Apart from use of grid electricity, palm fibre and shells were also used to generate electricity through biogas plant.
7.10 Plans to reduce	7.10.1 (C) GHG emissions are identified and assessed for the	YES	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 03/08/2021. The input data was verified, and the following were

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pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.		determined: <table border="1" data-bbox="927 347 1839 467"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>1.63</td> <td>FFB Processed</td> <td>56,895.74</td> </tr> <tr> <td>PK</td> <td>1.63</td> <td>CPO Processed</td> <td>11,206.76</td> </tr> </tbody> </table> <table border="1" data-bbox="927 491 1568 699"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted Area</td> <td>14,509.32</td> </tr> <tr> <td>OP Planted on Peat</td> <td>0.00</td> </tr> <tr> <td>Conservation (forested)</td> <td>0.00</td> </tr> <tr> <td>Conservation (non-forested)</td> <td>386.34</td> </tr> </tbody> </table> Milling extraction rate: <table border="1" data-bbox="927 751 1507 837"> <tbody> <tr> <td>OER</td> <td>19.70</td> </tr> <tr> <td>KER</td> <td>5.41</td> </tr> </tbody> </table> Mill Emission <table border="1" data-bbox="927 890 1727 1190"> <thead> <tr> <th colspan="3">Own Crop</th> </tr> <tr> <th>Emission source</th> <th>tCO₂e</th> <th>tCO₂e/tFFB</th> </tr> </thead> <tbody> <tr> <td>POME</td> <td>8631.73</td> <td>0.15</td> </tr> <tr> <td>Fuel consumption</td> <td>152.92</td> <td>0.00</td> </tr> <tr> <td>Grid electricity utilisation</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td colspan="3">Credits</td> </tr> <tr> <td>Export of excess electricity to housing & grid</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Sale of PKS</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Sale of EFB</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Total</td> <td>8784.65</td> <td>0.15</td> </tr> </tbody> </table> Plantation / field emission <table border="1" data-bbox="927 1241 1895 1375"> <thead> <tr> <th colspan="4">Own Crop</th> </tr> <tr> <th>Emission sources</th> <th>tCO₂e</th> <th>tCO₂e/ha</th> <th>tCO₂e/FFB</th> </tr> </thead> <tbody> <tr> <td>Land Conversion</td> <td>3894.03</td> <td>0.55</td> <td>0.57</td> </tr> <tr> <td>*CO₂ Emissions from Fertiliser</td> <td>140.16</td> <td>0.02</td> <td>0.02</td> </tr> <tr> <td>**N₂O Emissions from Fertiliser</td> <td>197.58</td> <td>0.03</td> <td>0.03</td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	Production	t/yr	CPO	1.63	FFB Processed	56,895.74	PK	1.63	CPO Processed	11,206.76	Land Use	Ha	OP Planted Area	14,509.32	OP Planted on Peat	0.00	Conservation (forested)	0.00	Conservation (non-forested)	386.34	OER	19.70	KER	5.41	Own Crop			Emission source	tCO ₂ e	tCO ₂ e/tFFB	POME	8631.73	0.15	Fuel consumption	152.92	0.00	Grid electricity utilisation	0.00	0.00	Credits			Export of excess electricity to housing & grid	0.00	0.00	Sale of PKS	0.00	0.00	Sale of EFB	0.00	0.00	Total	8784.65	0.15	Own Crop				Emission sources	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/FFB	Land Conversion	3894.03	0.55	0.57	*CO ₂ Emissions from Fertiliser	140.16	0.02	0.02	**N ₂ O Emissions from Fertiliser	197.58	0.03	0.03
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OP Planted Area	14,509.32																																																																														
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Conservation (forested)	0.00																																																																														
Conservation (non-forested)	386.34																																																																														
OER	19.70																																																																														
KER	5.41																																																																														
Own Crop																																																																															
Emission source	tCO ₂ e	tCO ₂ e/tFFB																																																																													
POME	8631.73	0.15																																																																													
Fuel consumption	152.92	0.00																																																																													
Grid electricity utilisation	0.00	0.00																																																																													
Credits																																																																															
Export of excess electricity to housing & grid	0.00	0.00																																																																													
Sale of PKS	0.00	0.00																																																																													
Sale of EFB	0.00	0.00																																																																													
Total	8784.65	0.15																																																																													
Own Crop																																																																															
Emission sources	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/FFB																																																																												
Land Conversion	3894.03	0.55	0.57																																																																												
*CO ₂ Emissions from Fertiliser	140.16	0.02	0.02																																																																												
**N ₂ O Emissions from Fertiliser	197.58	0.03	0.03																																																																												

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Clause	Indicators	Comply Yes/No	Findings																																		
			<table border="1"> <tr> <td>Fuel Consumption</td> <td>116.25</td> <td>0.02</td> <td>0.02</td> </tr> <tr> <td>Peat Oxidation</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td colspan="4">Sinks</td> </tr> <tr> <td>Crop Sequestration</td> <td>-3344.83</td> <td>-0.47</td> <td>-0.49</td> </tr> <tr> <td>Conservation Sequestration</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Total</td> <td>1103.19</td> <td>0.14</td> <td>0.15</td> </tr> </table> <p>Palm Oil Mill Effluent (POME) Treatment</p> <table border="1"> <tr> <td>Diverted to compost</td> <td>0%</td> </tr> <tr> <td>Diverted to anaerobic digestion</td> <td>100%</td> </tr> </table> <p>Diverted to Anaerobic Digestion</p> <table border="1"> <tr> <td>Diverted to anaerobic pond</td> <td>0%</td> </tr> <tr> <td>Diverted to methane capture (flaring)</td> <td>15%</td> </tr> <tr> <td>Diverted to methane capture (electricity generation)</td> <td>85%</td> </tr> </table>	Fuel Consumption	116.25	0.02	0.02	Peat Oxidation	0.00	0.00	0.00	Sinks				Crop Sequestration	-3344.83	-0.47	-0.49	Conservation Sequestration	0.00	0.00	0.00	Total	1103.19	0.14	0.15	Diverted to compost	0%	Diverted to anaerobic digestion	100%	Diverted to anaerobic pond	0%	Diverted to methane capture (flaring)	15%	Diverted to methane capture (electricity generation)	85%
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Diverted to methane capture (electricity generation)	85%																																				
	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	(Remote) Auditor has verified through checking the www.globalforestwatch.com , 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 Jeroco 2 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.	NO	The Environmental Impact Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. Jeroco 2 CU also plan to reduce GHG via Biogas plant at JPOM 1 to capture Methane gas generated from the Effluent Treatment Plant to generate biogas engine to produce electricity for mill and domestic use. Significant pollutants of chemical spillage i.e. Calcium Carbonate 9002 used for Kernel Plant Station was not identified and plans to reduce or minimise them. During site inspection at Kernel Plant Station, (Claybath Separator Operation), sighted chemical spillage (Calcium Carbonate) on the ground was wash out or clean by water and leaching to monsoon drain (to oil trap then to waterways). Besides that, spill kit was not presented/available during the audit process at the area. <i>Therefore, Major NCR DA 03 2022 was raised.</i>																																		

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Clause	Indicators	Comply Yes/No	Findings
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	Jeroco 2 CU complied to the strict Zero Burning Policy In Sustainability Agricultural Policy under Environment & Biodiversity. There was no evidence to show that fire had been used for preparing land for replanting in the 2017 replant visited in Kapis Estate during the audit. It was also observed that all palms were felled, shredded, windrowed and left to decompose in the 2020 replants in the neighbouring HSPHB Estates.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Jeroco 2 CU had established fire prevention and control measures for the areas under its direct management. Fire emergency procedures were available in adherence to the HSPHB policy on 'Emergency Response' plan—updated Jan 2020 Kapis Estate and Jeroco 2 mill. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by Agronomy Dept and amended to tailor to the situation differences in the estates and mills. In the mill, there were water hydrants and valid fire extinguishers at the various operating stations. Kapis Estate had valid fire extinguishers at the office, worker's quarters, chemical & fertiliser stores, diesel skid tank, etc.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	During external stakeholder meeting in Apr 2021 that was carried out at Jeroco 2 CU, all stakeholder including neighbour was briefed on fire prevention and control measures.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	No new land clearing since Nov 2015 available at Jeroco 2 CU, thus this Indicator was not Applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The report of "Potential High Conservation Value Area Assessment Report of Kapis Estate and Jeroco POM 2" was made available to the auditor. It was noted that the report was prepared by the Sustainable Unit of Hap Seng. The review assessment was carried out in May 2017. The report was updated in July 2020. Based on the assessment, there was no identified RTE at Kapis estate. Kapis Estate had identified a significant HVC4 which the estate has controlled and maintained the river buffer zone for Sg. Kretam Besar (Sg Simpang Kanan). The total HCV area is 29.20 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	YES	

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Clause	Indicators	Comply Yes/No	Findings
	2018, the current HCV assessment of those plantations remains valid.		
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or 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).	YES	<p>Kapis estate has established HCV action plan for Sg Kretam Besar (Sg Simpang Kanan) river titled 'Potential HCV areas Management Action Plans'. The estate planned to maintain the riparian reserve by:</p> <ul style="list-style-type: none"> • Prohibiting the cutting down of the tree at the area, • Prohibiting of manuring and spraying operation at the riparian reserve area • Workers are constantly informed not to encroach into the riparian reserve and disturb the area • Periodic visit to the riparian reserve to monitor any illegal activities <p>The plan was updated in July 2021 with consultation with stakeholder. Records of consultation with relevant stakeholders regarding the developed HCV management plan, includes the directly managed area and any relevant wider landscape level considerations (where these are identified) were sufficient to identify the HCV Issue.</p>
	7.12.5 Where rights of local communities have been	YES	There were no local communities living nearby with Jeroco 2 CU. So, this indicator was not applicable with this CU.

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Clause	Indicators	Comply Yes/No	Findings
	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.		
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	Jeroco 2 CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the Sg. Kretam Besar (sg Simpang Kanan). It was noted that CCTV was placed at strategic area surrounding the estate to control everything including any illegal activities. The CCTV is in operation 24hours. Training for HCV and rare, threatened or endangered (RTE) species has been conducted in Jan & Mar 2021.
	7.12.7 The status of HCVs, HCS forests after 15 Nov 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Jeroco 2 CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the Sg. Kretam Besar (sg Simpang Kanan). It was noted that CCTV was placed at strategic area surrounding the estate to control everything including any illegal activities. The CCTV is in operation 24hours.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Jeroco 2 CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not

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Clause	Indicators	Comply Yes/No	Findings
	2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.		apply.

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Clause	Indicators	Comply Yes/No	Findings	
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	HSP was committed towards getting the 100% RSPO certification. The target year for certification was revised to 2022 (as in ACOP 2020). Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). A meeting was held at RSPO office with RSPO Compensation Manager Ms Khing Su Li to discuss on the revise of Concept Note. HSP have response after the meeting by providing updated Concept Note and documents on 01/03/2021. Meanwhile, based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest S/B) there were no clearance of primary forest at Pelipikan Estate. However, there were land clearing made in May 2006, September 2010 and February 2011. Whereas clearing was made without HCV assessment. HSP received the reviewer's comment on the LUCA assessment and latest replied on 18/04/2021.
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	There were no changes to the current time bound plan. It was confirmed during audit with representative of HSPHB. Time bound plan was verified by CB.
	(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	YES	The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.

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		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);		
	(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. 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. As of this audit and Verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	Assessment of compliance to RSPO Partial Certification Requirements was conducted in Northbank and Tabin Estate on 08-09/03/2021 and for Pelipikan Estate on 07-08/10/2020. From the assessment, the status of the uncertified management unit was summarized as follows: <u>Northbank and Tabin Estate</u> a) HCV Assessment at Northbank and Tabin Estate has been conducted in year 2013 and completed the report on 20 November 2013. b) Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). A meeting was held at RSPO office with RSPO Compensation Manager Ms Khing Su Li to discuss on the revise of Concept Note. HSP have response after the meeting by providing revised Concept Note and documents on 11/01/2020. <u>Pelipikan Estate</u> a) Based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest Sdn. Bhd.) there were no clearance of primary forest at Pelipikan Estate. However, there were land clearing made on May 2006, September 2010 and February 2011. Whereas clearing was made without HCV assessment. received the reviewer's comment on the LUCA assessment and latest replied on 18/04/2021.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	YES	The latest internal assessment has been made to Northbank and Tabin Estate on 08-09/03/2021 and for Pelipikan Estate on 07-08/10/2020: <u>Northbank and Tabin Estate</u> Land conflict are still under court case. Please refer Hap Seng Plantations 2018 Annual Report – refer page 115 (b) <u>Pelipikan Estate</u> Land conflict was resolved with the affected and relevant parties. Please refer Hap Seng Plantations 2018 Annual Report – refer page 269 (c)

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	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	YES	The latest internal assessment has been made to Northbank and Tabin Estate on 08-09/03/2021 and for Pelipikan Estate on 07-08/10/2020: <u>Northbank and Tabin Estate</u> JCC meeting with stakeholder which include local communities was conducted on 29/06/2020. The result of the meeting had no significant negative impact by the local community. <u>Pelipikan Estate</u> There was no labour dispute reported during JCC with stakeholder meeting conducted on 13/03/2020. In overall, no negative impacts.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	The latest internal assessment has been made to Northbank and Tabin Estate on 08-09/03/2021 and for Pelipikan Estate on 07-08/10/2020, there was no issue on legal non-compliance for all uncertified unit.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,	YES	Based on the latest internal assessment carried out in Feb 2020, the progress of the certification was concluded as non-compliance against 4.5.4. (a-d) on new planting requirement, HCV, legal compliance and labour disputes for Tabin, Northbank and Pelipikan Estate. With regards to the land disputes, the action to address the issues were on-going. It was evident that in handling uncertified management unit has conducted the Joint Consultation Committee (JCC) meeting on 29/06/2020 (Northbank and Tabin Estate) and 13/03/2020 (Pelipikan Estate) to address unresolved issues. Actions in progress. Further information can be obtained from https://document.rspo.org/Hap_Seng_Plantations_Holdings_Bhd_ACOP2020.pdf
		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 	YES	As of this audit Hap Seng Plantations still on track and follow the requirement of uncertified requirement units, Further information can be obtained from https://document.rspo.org/Hap_Seng_Plantations_Holdings_Bhd_ACOP2020.pdf . 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.
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	YES	
	<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	YES		

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	(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
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	YES

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<p>5.6.6 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>	<p>No additional indicators</p>	<p>YES</p>	<p>Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Kapis Estate the land was previous owned by Sabah Land Development and Jeroco Plantations Sdn Bhd has buy and develop the land in 01/01/1980.</p> <p>As reported in 4.4..1 of this checklist, it has been verified that the land is now The audit team has also interviewed relevant stakeholder such as the IOI Plantation, Harus Abadi Sdn Bhd, First Raintree Sdn Bhd, Bukit Kretam Sdn Bhd, Casem Sdn Bhd, Sangi Enterprise Sdn Bhd, LKM Trading, Lebijaya Sdn Bhd. From the interviews, it can be concluded that there was no evidence of any land dispute at Jeroco 2 CU.</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
2.1.1	Major	<p>Finding: The unit of certification did not comply with applicable legal requirements under Occupational Safety and Health (Noise Exposure) Regulations 2019 Section 4. This regulation gazette on 01/03/2019 and come into operation on 01/06/2019.</p> <p>Objective evidence: Jeroco 2 CU has yet to conduct the Noise Risk Assessment (NRA) during the audit process. The CU only managed awarded the contract to Chemsain Konsultant Sdn. Bhd. to conduct the NRA. The contract details: Kapis Estate: Dated 11/01/2021, ref. no #A-14/8 (009/2021). JPOM 2: Dated 01/08/2020, contract no. JP0176.</p>	<p>Root cause: Noise risk Assessment not yet conducted due to prolong of Movement Restriction Order (MCO) of Covid-19 pandemic causing late submission of quotation by consultant/affect the appointment of consultant and then delay of performing of Noise Risk assessment by appointed consultant at 4 estate and mill.</p> <p>Corrective Action: Noise Risk Assessment will be conducted in March '22 as per confirmation of estate and mill's appointed consultant. Operating unit to find alternative consultant to perform the Noise Risk Assessment if the quotation participated consultant cannot submit the assessment proposal and to conduct the assessment within the agreed timeline, in order to ensure the Noise Risk Assessment conducted soonest possible.</p>	<p>Auditor had verified evidence attached letter on confirmation monitoring scheduled from Chemsain Konsultant Sdn. Bhd. dated 23/02/2022 to conduct Noise Risk Assessment on 14-16/03/2020 at Jeroco 2 CU.</p> <p>Status: Closed</p>
7.8.2	Major	<p>Finding: Water courses and wetlands was not protected, including maintaining and restoring appropriate riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>Objective evidence: During site inspections at Kapis Estate (Field Block 1760 and Block 1652), sighted chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to Sg. Simpang Kanan. Based on circle & strip spraying programme 2021, last chemical spraying activities was carried out on December 2021 and January 2022.</p>	<p>Root cause: Estate's Sprayer has lack of understanding on the chemical spraying prohibition to the area close to the water edge at the artificial drainage and waterways that directly channel to natural waterways.</p> <p>Corrective Action: Training to the workers (sprayers) was immediately conducted by estate to avoid spraying to the area close to the water edge of the artificial drainage and waterways that directly channel to natural waterways and lead to pollution. Sustainability Team to monitor (yearly basis) the efficiency of training conducted by estate on area to prohibit spraying i.e. riparian area and area close to the water edge at the artificial drainage and waterways that directly channel to natural waterways</p>	<p>Auditor had verified evidence attached training material i.e. training report, pictures of training and attendance list. The training on "<i>Latihan Penyemburan Racun di Kawasan Berdekatan Aliran Air</i>" was conducted on 29/01/2022 and trained by estate manager.</p> <p>Status: Closed</p>

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7.10.3	Major	<p>Finding: Significant pollutants of chemical spillage i.e. Calcium Carbonate 9002 used for Kernel Plant Station was not identified and plans to reduce or minimise them</p> <p>Objective evidence: During site inspection at Kernel Plant Station, (Claybath Seperator Operation), sighted chemical spillage (Calcium Carbonate) on the ground was wash out or clean by water and leaching to monsoon drain (to oil trap then to waterways). Besides that, spill kit was not presented/available during the audit process at the area.</p>	<p>Root cause: This issue happens due to lack of awareness of new workers on how to handle and clean off the chemical spillage in proper manner during operation, no bund at the Calcium Carbonate Chemical point and no Environmental Aspect Impact Assessment for the activity of Kernel Plant Station, (Claybath Seperator Operation).</p> <p>Corrective Action: Mill management has immediately conducted the training on handling the chemical spillage to the workers, construct the Calcium Carbonate Chemical point and carry-out Environmental Aspect Impact Assessment for the activity of Kernel Plant Station, (Claybath Seperator Operation) Sustainability Team to monitor the efficiency of training conducted by mill management on the SOP of handling the chemical spillage at yearly basis.</p>	<p>Auditor had verified evidence attached training material i.e. training report, pictures of training and attendance list. The training on “<i>Penerangan Tentang Tumpahan Kalsium Karbonat</i>” was conducted on 26/01/2022 trained by Mill Assistant. Besides that, sighted picture of bund has been installed at cium Carbonate Chemical point storage. Furthermore, observed activity of “<i>washing pollutants of chemical spillage</i>” has been identified in the Environmental Impact Assessment Management Action Plans and Continuous Improvement Plans dated 14/03/2022.</p> <p>Status: Closed</p>
7.3.2	Minor	<p>Finding: Proper disposal of waste material was not practiced according to procedures/plans and not fully understood by workers.</p> <p>Objective evidence: During site inspections at JPOM 2 Housing Area Block D, sighted domestic waste (aerosol spray, plastic bag), digestive wastes (baby/kid pampers), and 2T Lubricant empty container was dumped without segregation at the back of housing compound area. Even though dustbin have been provided.</p>	<p>Root cause: This issue happens due to the line sweeper did not clean the domestic/digestive/schedule waste thrown outside the housing compound.</p> <p>Corrective Action: The digestive/domestic/schedule waste at the back of housing compound area were immediately cleaned up by mill management. The line sweeper cleaning area will extend up to about 30 feet from housing compound boundary.</p>	<p>Corrective action plan accepted.</p> <p>Status: Open The effectiveness of the corrective action plan will be verified during next audit</p>

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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
2.2.3 DA 01 2020	Minor	Finding: Contract agreement does not contain clauses disallowing child, forced and trafficked labour. Objective evidence: During site visit at Jeroco 2 Certification Units, sighted that contract agreement between Kapis Estate and Sundry Shop was not include Clause disallowing child, forced and trafficked labour and where young worker is employed are protected.	HSPB Sustainability Team will carry out yearly cross checking to ensure the clauses of “disallowing child, forced and trafficked labor and where young worker is employed are protected” are included in the contract agreement whenever there is a new supplier/contractors.	All contracts, including those for FFB supply were handled by Processing Department at PCO. Based on contract agreement reviewed, sighted that contract agreement between Kapis Estate and Sundry Shop (Kedai Runcit Chin Chun Pau) has been included addendum dated 11/08/2020, ref. #SGMJ/FC/2020/0942, contain clause disallowing child, forced and trafficked labour and where young worker is employed are protected. Status: Closed
7.11.3 STK 01 2020	Minor	Finding: Adjacent stakeholders of Jeroco 2 CU were not engaged on fire prevention and control measures. Objective evidence: At time of audit there was no evidence to show that Jeroco CU 2 had engaged its adjacent stakeholders on fire prevention and control measures.	The estate management will include fire prevention and control measure in their agenda for future JCC stakeholder meeting.	During external stakeholder meeting dated 27/04/2021 that was carried out at Jeroco 2 CU, all stakeholder including neighbour was briefed on fire prevention and control measures. Status: Closed
7.12.4 MZK 01 2020	Major	Finding: HCV management plan have been not developed with participation of affected stakeholders Objective evidence: It was found that the HCV integrated management plan at Jeroco 2 CU is not developed in consultation with relevant stakeholder, even though in the stakeholders meeting was held on 04/07/2020 (Internal Stakeholder) and 29/04/2019 (External Stakeholder) the stakeholder affected was invited.	The 2020 HCV Management Plan has immediately included the clear record of the matter regarding “the developed HCV Management Plan includes the directly managed area and any relevant wider landscape level considerations (where these are identified)”. Estate will ensure the developed HCV management plan (includes the directly managed area and any relevant wider landscape level considerations (where these are rectified)) be added into the agenda of JCC Stakeholder meeting and include the details of the developed HCV management plan in the reports.	The plan was updated on July 2020. However, it was found that the HCV integrated management plan at Jeroco 2 CU is not developed in consultation with relevant stakeholder, even though in the stakeholders meeting was held on 4/7/20 (Internal Stakeholder) and 29/4/19 (External Stakeholder) the stakeholder affected was invited. Status: Closed

RSPO PUBLIC SUMMARY REPORT

ATTACHMENT 6 – Timebound Plan

HAP SENG PLANTATIONS HOLDINGS BERHAD TIME BOUND PLAN ON RSPO CERTIFICATION

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

Note:

1. It has been confirmed during the audit that Shalimar Estate and Batang Berjuntai, which located in Selangor is under Euro Asia Brand Holding Company (Euro Asia). Euro Asia who certified to MSPO, belongs to Hap Seng Properties Sdn Bhd (HS Properties). HS Properties is one of subsidiaries of Hap Seng Consolidated Bhd. (Hap Seng Consolidated.)
2. As of now, neither Hap Seng Consolidated nor HS Properties are registered as RSPO member.
3. There is no management control between HS Properties & Hap Seng Plantations Holdings Berhad (HS Plantations), (two different companies with two CEOs). But both companies are subsidiaries to Hap Seng Consolidated.
4. In terms of RSPO certification process, HS Plantations is registered as RSPO member. The above TBP is parked under HS Plantations.
5. Following the RSPO Membership Rules 2020, [Clause 5.2.6 (ii) a],
 - Hap Seng Consolidated is a parent company but not an RSPO member, but one of its related entities are holding RSPO membership i.e. HS Plantations.
 - Only HS Plantations is an RSPO member.
 - Hap Seng Consolidated is not involved in activities related to the palm oil supply chain.
 - Corporate Group Membership is not applicable to Hap Seng Consolidated.