



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

File Ref. : ES24120001

RSPO PUBLIC SUMMARY REPORT

CLIENT : HARUS ABADI SDN. BHD.

PARENT COMPANY : HARUS ABADI SDN. BHD.

RSPO MEMBERSHIP No.: 1-0280-19-000-00

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	
Harus Abadi Sdn. Bhd.	Harus Abadi Sdn. Bhd.	5° 26' 24" N	118° 32' 24" E	MDLD 9075, Bungalow Lot 1, I-Peak Business Centre, 91100 Lahad Datu, Sabah.

MAP : See Attachment 1

AUDIT DATE : 10-14 Jan 2022

DURATION : 10 auditor days

TYPE OF AUDIT : ☒ Annual Surveillance Audit No. 2 ☐ Recertification Audit

STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

SCOPE OF CERTIFICATION: Production of Sustainable Fresh Fruit Bunches

VALIDITY OF RSPO CERTIFICATE : 16/03/2020 – 15/03/2025

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 : **MOHD AB RAOUF BIN ASIS**

Name : **TEY YOU LAI**

Signature :

Signature :

Date :

11/04/2022

Date :

11/04/2022

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SUMMARY OF AUDITS

Stage 2 audit / Recertification audit				
On-site audit date :	01 – 04 October 2019		No. of auditor days:	10 auditor days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Rozaimiee Ab Rahman, Mahzan Munap			
No. of major NCR :	3	Indicator: 4.6.11, 6.5.2, 6.9.1		Closing date: 24/02/2020
No. of minor NCR :	1	Indicator: 6.5.3		
Indicate the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√	-	√	√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	-	-	-	-
	Indigenous people	Contractor	Others (Please specify)	
	NA	-	-	
Supply base sampled :	Harus Abadi and First Raintree (Division)			
Justification of audit planning :	During stage 2 audit, the audit team visited the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.			
Name of peer reviewer :	Prof. Emeritus Dr. Jalani Sukaimi			
Report approved by :	Kamini M. Sooriamoorthy		Approval date: 16/03/2020	

Annual Surveillance Audit 1				
On-site audit date :	21 – 23 April 2021		No. of auditor days:	10 auditor days
Audit team :	Dzulfiqar Azmi (LA), Mohd Ab Raouf Asis, Ismail Adnan, Mohd Zulfakar Kamaruzaman, Rohazimi Mat Nawi (TA).			
No. of major NCR :	2	Indicator: 7.10.1, 7.12.2		Closing date: 12/07/2021
No. of minor NCR :	1	Indicator: 3.3.2		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√	-	√	√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	-	-	-	-
	Indigenous people	Contractor	Others (Please specify)	
	NA	-	-	
Supply base sampled :	Harus Abadi and First Raintree (Division)			
Changes since the last audit :	No changes.			
Justification of audit planning :	During surveillance audit, the audit team visited the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.			
Name of peer reviewer :	NA			
Report approved by :	Kamini M. Sooriamoorthy		Approval date : 15/07/2021	

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Annual Surveillance Audit 2				
On-site audit date	: 10-14 Jan 2022	No. of auditor days	: 10	
Audit team	: Mohd Ab Raouf bin Asis (LA), Dzulfihar Azmi, Mohd Zulfakar Kamaruzaman			
No. of major NCR	: 1	Indicator: 7.8.2		Closing date: 8/04/2022
No. of minor NCR	: Nil	Indicator : Nil		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√			√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled	: Harus Abadi and First Raintree (Division)			
Changes since the last audit	: No changes			
Justification of audit planning	: During surveillance audit, the audit team visited the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.			
Name of peer reviewer	: NA			
Report approved by	: Kamini M. Sooriamoorthy		Approval date : 11/04/2022	

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**SUMMARY OF INFORMATION
TABLE 1**

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Oct 2019 to Sept 2020	April 2021 to March 2022	January 2022-December 2022		
Certified FFB Processed (MT)	10,310.00	10,636.00	10,050.00		
Production of Certified CPO (MT)	2,062.00	2,020.00	2,010.00		
Production of Certified PK (MT)	515.00	531.00	522.60		
Certified Areas (Ha)	566.89	566.89	566.89		
Planted Areas (Ha)	564.67	564.67	564.67		
Production Areas (Ha)	564.67	564.67	564.67		
HCV Areas / Conservation Areas (Ha)	0.0015	0.0015	0.0015		
REMARKS	Actual period for this reporting has covered between April to Dec 2021.				

TABLE 2

FFB last year certified volume (MT)	10,636.00	
FFB actual certified volume (MT) (April 21-December 21)	7,182.00	
Last licence year's actual sold volume of certified FFB (MT, if applicable)	7,182.00	
Last license year's actual sold volume through Book & Claim	-	
FFB new year certified volume (MT)	10,050.00	
	PO	PK
Last years certified volume (MT)	2,020.00	531.00
Last years actual certified sold (MT) (April 21-December 21)	1,436.00	373.46
Last years actual sold under other schemes (MT)	-	-
Last years sold conventional (MT)	-	-
New year certified volume (MT)	2,010.00	522.60

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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).

Qualification of audit team

1.2

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Ab Raouf Asis	Auditor / Safety, Environment, Metric Template	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He has been trained as RSPO as well as MSPO auditor.
Mohd. Zulfakar Kamaruzaman	Auditor / Social (External Stakeholder), GAP & 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.
Dzulfiqar Azmi	Lead Auditor / Social (Employees)	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 RSPO Lead Auditor since Oct. 2020.

1.3 Audit methodology

The audit covered the Harus Abadi Estate and First Raintree Division. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. However, in this audit, 100% supply base covered which are Harus Abadi and Forest Raintree. 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

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)	<ul style="list-style-type: none"> ▪ Interviewed workers constituted local and foreign, male and female, daily paid, monthly paid and piece rated at estate. They include Harus Abadi Plantation workers – 1 local and 15 foreign. ▪ All workers interviewed acknowledged they have signed employment agreements with the estates. The contents of agreement were understood, as these were prepared in English/Bahasa. The contents were explained to them in Bahasa by the management team. ▪ Pre-induction briefing on conditions and terms of employment was explained to them during first reporting of duty ▪ They are aware of their working hours (8 hours). They also acknowledged being paid overtime for any work in excess of 8 hours. There is no forced overtime. Harvesters were paid piece-rated and do not get overtime. They prefer to have their salaries calculated on piece-rate basis even after 8 hours of work as it allows them to be paid higher. Sprayers understood that they are paid daily rate. ▪ They have been getting salaries above RM1,100 since January 2019. Salaries are paid before the 7th of every month. ▪ Through worker's interview, they confirmed there are no abuse at work, and no sexual harassment. They understand what constitutes sexual harassment and the function of Gender Committee. ▪ There is no discrimination between migrant workers and local workers, between male and female workers. ▪ Workers are provided with comfortable housing with free water and electricity. Local workers choose to stay in their houses in the nearby villages. ▪ They have access to affordable food from close by Litang Estate canteen/sundry shops. Harus Abadi has made arrangement with Hap Seng Plantation Management to allow it workers have access at this canteen/sundry shops. Sometimes workers also buy the food and groceries from Bukit Mas Estate for First Raintree Division and IOI Unico Desa at Harus Abadi Main division. Sometimes also workers go to Lahad Datu to buy their food.
2) Settlers	Not applicable.
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> ▪ Confirmed there is no land dispute between HASB CU and neighbouring estates Hap Seng Plantation (Kapis Estate) Tabin Wildlife Forest Reserve. ▪ No social issues arising from estate workers. ▪ Occassionally are called to attend meetings by HASB. The last one was held virtually few months ago. ▪ All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings. ▪ Kg Litang representative interviewed confirmed no user rights issues between HASB and villagers. Estate operation has no negative impact on

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	village livelihood
4) Suppliers	<ul style="list-style-type: none"> ▪ Suppliers of crusher runs is from Hap Seng Plantation nearby. ▪ Being small, HASL usually buy chemicals, PPE and other estates tools directly from suppliers in Lahad Datu town themselves. ▪ Fair dealings with Hap Seng and traders in Lahad Datu. ▪ Payments are made within 1 months of invoice ▪ Representatives from suppliers: (Agromate (M) Sdn Bhd and Rising Star Properties Sdn. Bhd.) confirmed fair dealings and prompt payments through invoices.
5) Contract workers	Not applicable as none being used.
6) Local & national NGOs	Not applicable.
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> ▪ None at site as invitation letter sent out did not received any comments. See item 1.4 above. ▪ Phone interview with District Forest Officer of Lahad Datu confirmed no issues with boundary and RTE enforcement at HASB
8) Independent growers / Smallholders	Not applicable.
9) Indigenous people	Not applicable.
10) Contractor	Not applicable as none used.
11) Previous land owner (if any)	<p>For Harus Abadi the land was previous owned by Sabah Land Development and HASB has buy and develop the land in 20/09/1989.</p> <p>For First Rain Tree, the land was previous owned by company of several villagers which is the land has obtained from Sabah land development on the 21/03/1998 and 30/09/1997. The Company has sell their land to the First Rain Tree on 01/06/2000. There were clear land ownership documents available for review. The original copies of the documents were kept in Harus Abadi Central Office, Lahad Datu.</p>
12) Others (please specify)	Not applicable.

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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

Established in 1994 Harus Abadi Sdn. Bhd. (HASB) is a private company located in the district of Kinabatangan. The plantation started planting Oil Palm trees in year 2002. HASB is located about 87 km from Lahad Datu town, 66 km from Kampung Paris and can be accessed through the government road, estate road and ferry. All of its crop is sent to the Bukit Mas POM and Jeroco 2 POM (owned by Hap Seng). The estate is fully developed with 100% oil palm planting. It began planting oil palm in year 1994.

Harus Abadi Sdn. Bhd. did not hold any other management system certification except MSPO and RSPO. The sustainability schemes are certified under SIRIM QAS International Sdn. Bhd.

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

All crop is sent to the Bukit Mas POM and Jeroco 2 POM (owned by Hap Seng). The details of the FFB actual and projected contribution from each source to the mill are shown in the following tables:

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

Division	FFB Production	
	Tonnes	Percentage (%)
Harus Abadi	4,455.00	62.03
First Rain Tree	2,727.00	37.97
Total	7,182.00	100.00

Table 2: Projected FFB production by supply base for the next reporting period
(Jan 2022 to Dec 2022)

Division	FFB Production	
	Tonnes	Percentage (%)
Harus Abadi	6,756.00	67.20
First Rain Tree	3,294.00	32.80
Total	10,050.00	100.00

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

Details	Total (MT)
FFB Production	7,182.00
CPO Production @ 20%	1,436.40
PK Production @ 5.20%	373.46
Credits traded through Books and Claim	-

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

Details	Total (MT)
FFB Received	10,050.00
FFB Processed	10,050.00
CPO Production	2,010.00
PK Production	522.60

Table 5 Planted and certified area of the CU & Planting Profile

Division	Year of planting	Planting cycle	Mature / Immature	Planted area(ha)	Certified area (ha)	Percentage of planted area (%)
Harus Abadi (8 blocks)	1994	1	Mature	323.50	324.70	57.0
First Raintree (7 blocks)	1998	1	Mature	241.17	242.19	43.0
Total				564.67	566.89	

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Tey You Lai
Position	:	Assistant General Manager
Address	:	MDLD 9075, Bungalow Lot 1, Ipeak Business Centre, 91100, Lahad Datu, Sabah.
Phone no.	:	016-9288150
Fax no.	:	0899-6922
Email	:	harusabadi129081@yahoo.com.my

3.0 AUDIT FINDINGS

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

No changes

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

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

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

- 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?

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

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

If no, please state reasons _____

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

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

No changes

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

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

3.5. Complaint received from stakeholder (if any)

No complaint received from stakeholder

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) List : Nil
(details refer to Attachment 3)

Total no. of major NCR(s) List : 1 (7.8.2)
(details refer to Attachment 3)

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

Total no. of minor NCR(s) List : N/A
(details refer to Attachment 3)

Total no. of major NCR(s) List : N/A
(details refer to Attachment 3)

5.0 AUDIT CONCLUSION

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

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6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

☐

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

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

☒

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

☐

Recommended to continue certification.

☐

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

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

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

Audit Team Leader :

MOHD AB RAOUF BIN ASIS

(Name)



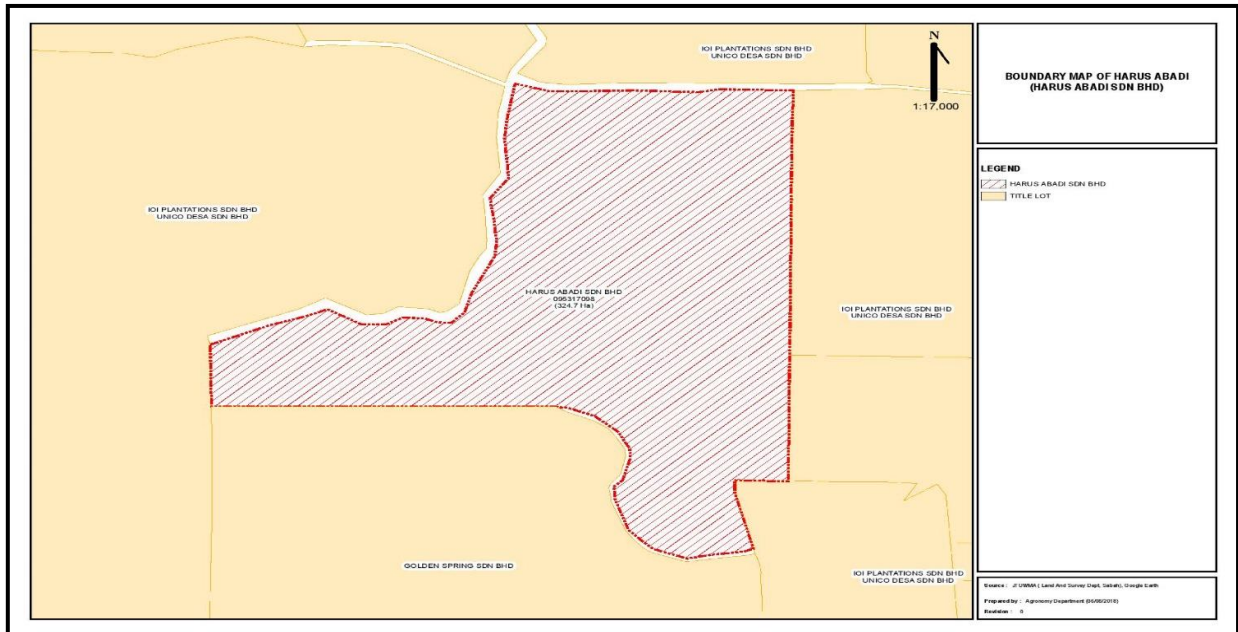
(Signature)

8/04/2022

(Date)

Attachment 1 - Map

Main Division



First Raintree Division



ASA 2 AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

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

2. **Date of assessment** : 10 Jan – 14 Jan 2022

3. **Site of assessment** : Harus Abadi Sdn Bhd

4. Reference Standard :

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

5. Assessment Team

- (i) Audit Team Leader : Mohd Ab Raouf bin Asis (**MAR**) – Safety, Environment, Metrics Template Auditor :
 - i) Mohd Zulfakar bin Kamaruzaman (**MZK**) - HCV, Social (External Stakeholder), GAP
 - ii) Dzulfikar bin Azmi (**DA**) – Social (Employee)

(ii) Witnessed : N/A

(iii) Technical expert : N/A

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

7. Audit Method

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

8. 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 two 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. For audits conducted during the transition period from 1 June to 31 July 2021, members are encouraged to use the updated version but are also allowed to use the previous version (version 1.0). All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).

9. 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.

10. 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.

11. Working Language : English and Bahasa Malaysia

12. 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. |

13. 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

14. Assessment Programme Details : As below

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Day 1: 10/1/2022 (Monday)

Time	Activities / areas to be visited			Auditee
9.00am	Opening Meeting – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.			
9.15am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative. Logistics discussion to the sites to be visited.			Management Representative
9.30 am	To assign each audit team members – site and the P&C requirements			
	Raouf (HASB)	Dzulfiqar (HASB)	Zulfakar (HASB)	Guide(s) for each auditor
	Site visit and assessment on implementation: <ul style="list-style-type: none"> Laws and regulations Environmental management – witness activities at site Waste & chemical management Interview with workers, safety committee and contractors Facilities at workplace Training and skill development programmes Continuous improvement 	Site visit and assessment on implementation incl. the <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Interview with employees, gender committee, worker representative, union representative, etc Linesite inspection Complaints and grievances 	Site visit and assessment on implementation: <ul style="list-style-type: none"> Land title Laws and regulations Plantation on hilly/swampy area 	
13.00pm	LUNCH BREAK			All
14.00pm	Continue assessment	Continue assessment	Only half day	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / Discussion on potential NCRs / End of Day 1 audit			All

Day 2: 11/1/2022 (Tuesday)

Time	Activities / areas to be visited			Auditee
9.00am	Overview of current activities at Supply base sites			Respective Scheme Manager
9.30am	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	Raouf (HASB)	Dzulfiqar (HASB)	Zulfakar (HASB)	Guide(s) for each auditor
	Site visit and assessment on implementation: <ul style="list-style-type: none"> Laws and regulations Facilities at workplace Occupational safety & health practice 	Site visit and assessment on implementation: <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, stakeholders. Interview with employees, gender 	Site visit and assessment on implementation: <ul style="list-style-type: none"> Interview with local communities, contractors, suppliers. IPM implementation, training and 	

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	<ul style="list-style-type: none"> – witness activities at site • Training and skill development programmes • Continuous improvement 	<ul style="list-style-type: none"> committee, worker representative, union representative, etc • Linesite inspection • Complaints and grievances 	<ul style="list-style-type: none"> safe use of agro-chemicals. • New planting • Witness activities at site • Good agricultural practices • Training and skill development programmes • Continuous improvement 	
13.00pm	LUNCH BREAK			All
14.00pm	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	Continue assessment at HASB	Continue assessment at HSAB	Continue assessment at HSAB	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / Discussion on potential NCRs / End of Day 2 audit			All

Day 3: 12/1/2022 (Wednesday)

Time	Activities / areas to be visited			Auditee
8.30am	Overview of current activities at Supply base sites			Respective Scheme Manager
9.00am	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	Raouf (HASB)	Dzulfiqar (HASB)	Zulfakar (HASB)	Guide(s) for each auditor
	Site visit and assessment on implementation: <ul style="list-style-type: none"> • Laws and regulations • Facilities at workplace • Occupational safety & health practice – witness activities at site • Training and skill development programmes • Continuous improvement 	Site visit and assessment on implementation: <ul style="list-style-type: none"> • Social aspects - SIA, management plan & implementation, workers' quarters. • Interview with employees, gender committee, worker representative, union representative, etc • Linesite inspection • Complaints and grievances • Training and skill development programmes 	Site visit and assessment on implementation: <ul style="list-style-type: none"> • Complaints and grievances on stakeholders • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • HCV Assessment management plan & implementation • Training and skill development programmes • Continuous improvement 	

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13.00pm	LUNCH BREAK	All
14.00pm	Continue assessment at HASB	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / Discussion on potential NCRs / End of Day 3 audit	All

Day 4: 13/1/2022 (Thursday)

Time	Activities / areas to be visited			Auditee
9.00am	Overview of current activities at Supply base sites			Respective Scheme Manager
9.00am	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	Raouf (HASB)	Dzulfiqar (HASB)	Zulfakar (HASB)	Guide(s) for each auditor
	Site visit and assessment on implementation: <ul style="list-style-type: none"> • Laws and regulations • Facilities at workplace • Occupational safety & health practice – witness activities at site • Training and skill development programmes • Continuous improvement 	Site visit and assessment on implementation: <ul style="list-style-type: none"> • Social aspects - SIA, management plan & implementation, workers' quarters. • Interview with employees, gender committee, worker representative, union representative, etc • Linesite inspection • Complaints and grievances • Training and skill development programmes 	Site visit and assessment on implementation: <ul style="list-style-type: none"> • Complaints and grievances on stakeholders • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • HCV Assessment management plan & implementation • Training and skill development programmes • Continuous improvement 	
13.00pm	LUNCH BREAK			All
14.00pm	Continue assessment at HASB			Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / Discussion on potential NCRs / End of Day 4 audit			All

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Day 5: 14/1/2022 (Friday)

Time	Activities / areas to be visited			Auditee
8.00am	Raouf (HASB)	Dzulfiqar (HASB)	Zulfakar (HASB)	
	Unfinished assessment area Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.			Guide(s) for each auditor
9.00am	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager Closing meeting at CU (CU to advised the venue for closing meeting) / End of audit			All

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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	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Public documents available in Harus Abadi Sdn. Bhd. (HASB) such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports and EIA. Management plans & continuous improvement plans and company policies also available publicly.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	Information requests and responses implemented based on Communication Procedure to handle communication for internal and external stakeholders. External Communication Form and Communication Record were used for records including authority visits books. During interview with internal and external stakeholders found that they were aware of the procedure consultation and communication related to their operation.
	1.1.3 (C) Records of requests for info and responses are maintained.	YES	The records of requests as mentioned in indicator 1.1.2, had been logged in the Communication Record were used for records including authority visits books.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by HASB maintained to be followed and available at the audited sites. Consultation and communications procedures for HASB is documented in the <i>Stakeholders Consultation Procedure – Group Level & Estate Level</i> . Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	List of stakeholders that may be relevant to the company's operation including local communities, local authorities and NGOs has been established and updated for year 2021 as verified at Harus Abadi. As mentioned earlier, consultation with the stakeholders during the establishment of Social Action Plan was conducted. The consultation with the relevant and affected stakeholders that was held in Dec 2021 for the Harus Abadi.
1.2 The unit of certification commits to ethical conduct in	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	HASB has documented policy to committing on integrity for all their staffs and workers by publishing <i>Code of Conduct And Business Ethics Policy</i> . The CU has communicated the policy for staffs and foreign workers during induction course.

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Clause	Indicators	Comply Yes/No	Findings
all business operations and transactions.	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	In addition, HASB also has a Vendor CODE of Conduct and Business Ethics which has been developed to outline the standards of behaviour required by HASB which includes expectation to uphold human rights. The COBC applies to all its suppliers, consultants, agents, contractor's/service providers who have direct dealings with the HASB.

Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	Harus Abadi Sdn. Bhd. (HASB) continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation was captured in a Legal Register and monitored by the Assistant General Manager.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	CU have identified and documented their legal register with written information on legal requirements applicable to their operation. The record titled " <i>List of legal register – Estate</i> ". The acts and its regulations were evaluated for compliance annually. A mechanism to ensure compliance to legal and other requirement has been documented in "Mechanism for Tracking Any Changes In The Law" under Standard Operation Manual distributed to all operating units. Assistant General Manager with assisted from Sustainability Team from Hap Seng Plantations will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.
	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 Harus Abadi Estate and First Rain Tree Division. The perimeter boundary of the estate was visibly maintained by erecting pegs along the boundary, especially the ones that adjacent to other private estate.
2.2 All contractors providing operational services and	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties is maintained by HASB in stakeholder list. The lists contain name of contractors, designated contact persons, address, telephone/fax/email and type of contracted works done. List of contracted parties was updated annually, based on any updated on the contracted parties.

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Clause	Indicators	Comply Yes/No	Findings
supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	As of to date in HASB, there is no Contractors/ contracts involved in all works due to this is small grower and All work is done by themselves. Their foreign workers also did not through Recruitment agencies, due to worker apply for themselves.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	As of to date in HASB, there is no Contractors/ contracts involved in all works due to this is small grower and All work is done by themselves. Their foreign workers also did not through Recruitment agencies, due to worker apply for themselves.
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	There is no mill involve in this small grower certification. Thus this indicator is not applicable.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	There is no mill involve in this small grower certification. Thus this indicator is not applicable.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an	3.1.1 (C) A business or management plan	YES	HASB continued to achieve long term economic and financial viability through documented management plan projected to year 2024.

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Clause	Indicators	Comply Yes/No	Findings
implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	(minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.		A business plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2022 to 2024 had been prepared for both estates and made available to the auditors.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Replanting program for both estates was made available. There will be replanting for Harus Abadi in 2023-2024, while no replanting program for the next 5 years for First Rain Tree Div.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	Management review conducted in Dec 2021 and the director of the company had joined the meeting. Among of the agenda was related to the sustainability issues, internal audit, complaints and follow up actions from earlier management review. Internal audit was done in Oct & Dec 2021 by Hap Seng representatives. The internal audit recorded 4 findings i.e 3 major and 1 minor.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	HASB has established the Social Impact Assessment Management Action Plan and Continuous Improvement Plan on latest reviewed in Dec 2021. Continual Improvement Plan covers issues related to continued and improved relationship with neighbouring Estates, Government agencies, Palm Oil Mills and both internal and external stakeholders (including suppliers, work force etc) in general. Person responsible for social issues (internal and external stakeholders) and monitoring them had been appointed. The findings from the Stakeholders consultation (Estate Level) dated in Jan 2018 and latest in Dec 2020 were detailed for action in the Social Impact Assessment Management Action Plan and Continuous Improvement Plan for HASB. Meanwhile, for environmental, the organization had established and maintained continuous improvement plans with latest review conducted in Nov 2020. Among the continuous improvement initiated were maintained best practices in operation and nonoperation as per identified in the Environmental Impact assessment. Sighted that all these improvement plans been implemented.
	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 together with palm trace renewal. This requirement refers to a small set of strategic outcome-based metrics, which are of value to growers, relates directly to the P&C, and aligns with the RSPO Theory of Change ¹ (ToC) and RSPO organizational Key Performance Indicators (KPIs).
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	HASB adopted the following documented manuals and documents as their standard operating procedures: 1. Safe and Standard Operating Procedures (SSOP) updated March 2021 2. Agricultural Manual updated May 2020 3. MPOB Guideline for smallholders Agricultural Manual and MPOB Guideline for smallholders is the manual used for the operations in the estate. The manual is maintained and updated accordingly. The latest update was carried out in May 2020. It was confirmed that all activities in the estates from

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Clause	Indicators	Comply Yes/No	Findings
			seedlings in nursery to planting in the fields have been included in the Manual. The document specifies the following sections such as harvesting, manuring, integrated pest management, and upkeep of mature oil palms.
	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 HASB are internal audits conducted by Hap Seng Plantations Sustainability Team. Internal audit covering MSPO & RSPO internal audit has conducted in Oct 2021. Results from the assessment internal audit recorded 2 Major NCR and 4 Minor NCR. HASB has taken necessary action to close out the NCR. Audit report was established and maintained.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	On Estates, the assistant general manager and his subordinates were accountable to check on consistent implementation of procedures. The implementation of procedures was also carried out through: <ul style="list-style-type: none"> • RSPO/MSPO internal audits by Hap Seng Plantations Sustainability Team, safety and health meetings • routine inspection (workplace inspection) by field staff. • Periodic reporting from estate • On site visits, inspections by assistant general manager • Assessments by RSPO Audits • Consultation with RSPO team & management.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	N/A	Not applicable
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	Social Impact Assessment (SIA) Report for HASB was verified. The SIA was done by Sustainability Teams of Hap Seng Plantations. Internal and external stakeholders were consulted during the assessment. The assessments were used methodology of interview workers, neighbouring estate/smallholders, Hap Seng Plantation representative and government agencies. The SIA Report also included the baseline for socio economic data of estate and the social profile, as well as their stakeholders. The report also contained the estate background information, labour policies, grievance procedures (internal and external), sexual harassment policies, facilities and amenities offered by the estates, and the social impact assessment procedures and results. The secondary data collection – document review/file checking also been made. The report includes both positive and negative impact and its recommendation.

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Clause	Indicators	Comply Yes/No	Findings
	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 SIA Management Action Plans and Continuous Improvement Plan of HASB are implemented and monitored ensuing their review and update once a year. Areas of concern/key findings were identified together with the action plan, person in charge and respective completion date. This takes into account inputs from internal and external stakeholder meetings, JCC meeting and complaint form. The SIA review process had included stakeholders' consultation with regards to social issues. The reviews done had involved respective AGM, field supervisors and Sustainability Team of HSP with external stakeholders such as from Govt. agencies, neighbouring estates, local communities, suppliers and contractors. Sighted the latest external stakeholders' consultations minutes meeting for Harus Abadi was conducted in Dec 2021 via online and carried out to external and internal stakeholders i.e. government agencies, CLC/school, villagers and private sectors (contractors and neighboring estates). Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the SIA action plan.</p> <p>Environmental aspects and impacts analysis was done by EIA Assessment Team Members and documented in Environmental Risk Assessment form, include recommendations to mitigate the negative effects and to promote the positive ones. Also included the Management plan is environmental policy and its objectives.</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>HASB has developed Employment procedures for recruitment, selection; hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. The Procedures signed by the Managing Director were as follows:</p> <ol style="list-style-type: none"> 1) Procedure for Hiring Workers 2) Procedure for Hiring Workers (Local and Foreign) <p>The recruitment process was clearly stated in the procedure where the recruitment was based on age, medical fitness etc. There is no discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. The employment procedures are made available to the workers and their representatives.</p>
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	<p>Employment procedures are implemented, and records are maintained at HASB. This was evidenced by sighted Workers Letter of Employment, "Workers Master List", Checkroll and Payslips of the workers sighted. SOCSO Registration list of workers was also verified.</p>
3.6 An occupational health and safety (H&S) plan is documented,	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	<p>The Occupational Safety and Health Policy was established and signed by the <i>Managing Director</i>. Therein the policy emphasized on the strict compliance with all laws /regulations of OSHA 1994 along with its relevant regulations. 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.</p>

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Clause	Indicators	Comply Yes/No	Findings
effectively communicated and implemented.	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that are conducted by HASB in each of the operations. It was sighted during the site visits and documents reviews that the sampled HIRARC were in place. Occupational health and safety (OHS) management plan for estate 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 2021 were acceptable.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	The assessment of training conducted by Training Need Analysis and been documented in Annual training plan for year 2021 had available covering safety, environment, company policies, induction, SSOP, legal and sexual harassment prevention etc.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	There was record of Safety and EIA Training Program for the year 2021.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	N/A	Not applicable because there are no personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at HASB.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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.		
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	N/A	Not applicable. HASB didn't have other mills or estates within the company.
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	N/A	Not applicable. HASB didn't have other mills or estates within the company.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. • Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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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 	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <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. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance. 	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	N/A	Not applicable. HASB didn't have other mills or estates within the company.
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.	N/A	Not applicable. HASB didn't have other mills or estates within the company.
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.	N/A	Not applicable. HASB didn't have other mills or estates within the company.
	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.	N/A	Not applicable. HASB didn't have other mills or estates within the company.
	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.	N/A	Not applicable. HASB didn't have other mills or estates within the company.
	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	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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.)		
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.	N/A	Not applicable. HASB didn't have other mills or estates within the company.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	N/A	
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.	N/A	Not applicable. HASB didn't have other mills or estates within the company.
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	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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		
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.	N/A	Not applicable. HASB didn't have other mills or estates within the company.

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 HASB. There is also a new sustainable Agriculture Policy signed by Managing Director contain the clause of prohibiting retaliation against Human Rights Defenders. This policy has been communicated to field supervisor and workers through training and morning muster ground. The policy in Bahasa Malaysia and English was seen displayed on notice board of the estate offices.
	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.

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Clause	Indicators	Comply Yes/No	Findings
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	HASB have developed procedures to handle grievances and disputes titled as '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.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Based on interview with stakeholders at HASB, Found the system was understood by the affected parties. The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting. Sighted document for HASB showed briefing the stakeholders meeting was held in March 2021 with Internal Stakeholder via JCC Meeting and Dec 2021 with External Stakeholder via Internal/External Stakeholders Consultation. For foreign workers, the procedure was explained during initial report for duty with assistance of translators.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	HASB 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 held as mentioned above.
	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 HASB in resolving disputes and grievances exists in the procedure called 'Prosedur Melapor Aduan dan Permasalahan' and 'Grievances Procedure – Appendix 1' for staffs and workers, <i>Stakeholders Consultation Procedure – Group Level & Estate Level</i> . The HASB 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 HASB. Sighted the new Procedure Title the Grievance procedure has already include an ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.
4.3 The unit of certification contributes to local sustainable development as	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 HASB area, only smallholder nearby estate and Harus Abadi has given Permissions to all small holder to use their road without charges.

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Clause	Indicators	Comply Yes/No	Findings
agreed by local communities.			
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	The right to use the land at the CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Harus Abadi Div. the land was previous owned by Sabah Land Development and HASB has buy and develop the land in 20/9/1989. For First Rain Tree Div., the land was previously owned by company of several villagers which obtained the land from Sabah Land Development on the 21/3/1998 and 30/9/1997. The Company sold their land to the First Rain Tree on 1/6/2000. There were clear land ownership documents available for review. The original copies of the documents were kept in the Central Office, Lahad Datu. Copies of land titles for all estate was also sighted at HASB Estate office. The HASB 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 Oil Palm has been complied. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholder such as the IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholders. From the interviews, it can be concluded that there was no evidence of any land dispute at HASB.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	

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Clause	Indicators	Comply Yes/No	Findings
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989. All the related documentation regarding the land acquisition was kept in HASB HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	This requirement in this indicator does not apply to HASB.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	This requirement in this indicator does not apply to HASB.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	This requirement in this indicator does not apply to HASB.

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Clause	Indicators	Comply Yes/No	Findings
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for HASB 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 HASB since 1989. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989. All the related documentation regarding the land acquisition was kept in HASB HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989. All the related documentation regarding the land acquisition was kept in HASB HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989. All the related documentation regarding the land acquisition was kept in HASB HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

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Clause	Indicators	Comply Yes/No	Findings
	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.		The audit team has also interviewed relevant stakeholders such as the IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholders. From the interviews, it can be concluded that there was no evidence of any land dispute at HASB, Hence the evidence required under this clause was not available.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989. All the related documentation regarding the land acquisition was kept in HASB HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989. All the related documentation regarding the land acquisition was kept in HASB HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including estate as per stated in the land title.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples,	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	In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the HQ Office HASB. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or	YES	In accordance with the ' <i>Prosedur Melapor Aduan dan Permasalahan - Pihak Berkepentingan Luaran dan Dalam</i> '/ SOP – Land Dispute Management, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at visited estate.

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Clause	Indicators	Comply Yes/No	Findings
local communities and other stakeholders to express their views through their own representative institutions.	otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.		
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	Not applicable since HASB is consider as Small Grower
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	In accordance with the SOP – Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the HASB HQ. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. From the interviews, it can be concluded that there was no evidence of any land dispute at HASB, hence the evidence required under this clause was not available.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989. All the related documentation regarding the land acquisition was kept in HASB HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.8 The right to use the land is demonstrated and is not legitimately contested by local	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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989. All the related documentation regarding the land acquisition was kept in HASB HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.

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Clause	Indicators	Comply Yes/No	Findings
people who can demonstrate that they have legal, customary, or user rights.	of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.		
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	Land conflict is not present in the area of the unit of certification. The audit team has also interviewed relevant stakeholders such as the IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder. From the interviews, it can be concluded that there was no evidence of any land dispute at HASB, Hence the evidence required under this clause was not available.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs.	YES	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. The audit team has also interviewed relevant stakeholders such as the IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder. From the interviews, it can be concluded that there was no evidence of any land dispute at HASB, Hence the evidence required under this clause was not available.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	YES	There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders such as the the IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder. From the interviews, it can be concluded that there was no evidence of any land dispute at HASB.

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Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	NA	Not Applicable since this Assessment is for Small Grower and This company are assisted by Hap Seng Plantations.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	NA	Not Applicable since this Assessment is for Small Grower and no contractor has appointed since all work has been done internally due to money restrictions.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	NA	Not Applicable since this Assessment is for Small Grower and no contractor has appointed since all work has been done internally due to money restrictions
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.
	5.1.8 The unit of certification supports Independent Smallholders with	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.

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Clause	Indicators	Comply Yes/No	Findings
	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.		
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	NA	Not Applicable since this Assessment is for Small Grower and no Mill has included.

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Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	A publicly available non-discrimination and equal opportunity policy is available and implemented at HASB. The Social Policy statements at HASB generally include aspects of worker information, recruitment and selection, training, employee development, terms of service and records of service. The policy has been communicated to all workers during morning muster and the policy is posted on notice boards in the estates office board.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Apart from the Social Policy which emphasized that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair. Review of pay checks, contracts of employment, and interviews of staff, local and foreign workers showed no discriminatory practices on the part of HASB. Foreign workers also accorded the same living standards and accommodations as local workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	Records of hiring were reviewed during the audit. It was noted that the hiring was based on the skills, capabilities, qualities and medical fitness. This was confirmed by the employees who were interviewed during the audit. Interview of candidates was done by Management Staff where an evaluation form is filled up to determine the suitability of the candidate.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	Currently, there were 1 female clerk at HASB. Feedback from interviewed, there are no pregnant worker at the time of audit. Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	With only 1 female worker, the estate managed to form a gender committee and communicated latest in Jan 2021 via meeting to raise awareness, identify and address issues of concern, as well as opportunities and improvements for male workers.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder's consultation, worker's interview,

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Clause	Indicators	Comply Yes/No	Findings
			complaint book and meeting with worker representative. Sighted the job description of each worker mention the same regardless of color, religion, race or caste.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	For the HASB documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthly pay slips and employment contracts were made available and reviewed. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction. Each pay slip included the name of employee, month of pay, income (basic, overtime, allowances) and deductions (if any). Interview with workers reveal that they understand the contents of the pay slips and seeks explanation from the office whenever they needed clarifications.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	Contracts and conditions of employment are contained in employment contracts signed between HASB management on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Indonesia or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. Details on monthly salary and deductions for every worker and staff are reflected in their pay slips which are issued to the workers during pay day. Conditions of pay are contained in the workers' respective employment contracts. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	YES	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, and reasons for dismissal, period of notice and other legal labour requirements in HASB Letter of Employment Offer to its workers. HASB has complied with legal requirements of Sabah Labour Ordinance on regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. The working hours as per regulation was for 8 hours and 0.5 hours break in the between the time. The time for break at the Estate is 1030-1100am. For overtime, it has been mutually agreed upon between the management and workers and met the legal requirements. Overtime will be offered when there is additional job and no discrimination observed. It has been verified during this audit that all the above conditions were being complied with. This was from verification on Checkroll, Payslips and Contract of Employment (Letter of Employment Offer).
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and	YES	HASB has provided adequate housing, water supplies, medical and welfare amenities. The houses were all in good conditions, and each house has between 2 – 3 bedrooms. The houses are generally well-maintained with not more than 6 persons live in each

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Clause	Indicators	Comply Yes/No	Findings
	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.		house. They are also furnished with the basic necessities such as cupboard, mattresses, pillows and cooking facilities. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner. Housing inspection was conducted weekly by the field supervisor and using the <i>"Residential & Utility Buildings Inspection Report"</i> . Any issues found during the inspection was remarked in the checklist and action will be taken accordingly. HASB workers are entitled to free medical facilities at the Hap Seng Estate clinic. HASB has made arrangement with Hap Seng Plantation Management to debit it for treatment received by its workers. However, drainage system design at worker quarters HASB need to be further enhanced on effectiveness to continuously flow.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	There is no grocery shop available in the HASB, however the management has initiative to collect the order from workers and buy from supermarket outside for food and everything. Sometimes workers also buy the food and groceries at nearby Plantation estate e.g. Hap Seng Litang Estate and Bukit Mas Estate for First Raintree Division and IOI Unico Desa at Harus Abadi Main division. Sometimes also workers going to Lahad Datu for buy their food. They also have access to affordable food from close by Litang Estate canteen/sundry shops.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: <ul style="list-style-type: none"> 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 	YES	Based on the suggested method(s) by RSPO guideline, an assessment of the Prevailing Wage was conducted for HASB. At the same time, the verification of the Salary slips for the workers confirmed that Minimum Wage Order (Amendment 2020) had been complied with.

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	At HASB, permanent and full-time workers are used for core work such as Harvesting, Manuring and Spraying, there are no temporary workers and contractors at HASB.
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	HASB subscribes to the documented policy on Freedom of Association and Right to Collective Bargaining. This Policy is available in dual language, i.e. Bahasa Malaysia and English and it recognizes and respects of employees to join trade union of their choice and to bargain collectively subject to the provisions of relevant national legislations.
Where the right to freedom of association and collective bargaining are	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	In practice, there was no trade union/workers’ union. However, the Company and workers’ representatives have formed a Joint Consultative Committee (JCC) – Estate Level comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers. Minutes of meetings with the JCC held in Mar 2021 are documented and sighted during the audit.

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Clause	Indicators	Comply Yes/No	Findings
restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	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	HASB 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 workers. However, in practice, there was no workers' union at HASB although the workers are allowed to join any registered organizations or associations they please. The Company and workers' representatives have formed a Joint Consultative Committee (JCC) comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	"Polisi Buruh Kanak-Kanak" is publicly available at the notice board. The policy statements emphasized on child under 18 years must not be employed to work in hazardous areas. This policy is posted on notice boards in the housing and estate office. Audit team has verified employment card, copies of passports of Indonesian workers, and List of Foreign Workers. No record of person's underage of eighteen at HASB.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	There is evidence that minimum age requirements are met at HASB. There was no evidence that the estates have employed anyone below the age of 18 years. This was verified by examining the Workers Master Lists, personal file, employment contracts and payslips of all workers at HASB where details of the workers' IC numbers and dates of birth are available.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that the HASB estates had employed anyone below the age of 18 years. This Indicator is not applicable.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	The management has communicated to the internal and external stakeholders regarding the no child labour policy and the negative effects of child labour, and promotes child protection to supervisors and emphasized that the risk of child labour to the stakeholders.
6.5 There is no harassment or abuse in the workplace, and reproductive rights	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	A policy on sexual harassment titled 'Polisi Gangguan Seksual, Keganasan dan Penderaan', was available. The policy was signed by the Managing Director. The policy is also written in Bahasa and displayed at the notice boards within the estate office. No evidence or acts that contradict this policy were observed. Based on excel databased provided to the auditor and interviewed with AGM, field supervisor and office clerk, there was only 9 employees (all males) in HASB.

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Clause	Indicators	Comply Yes/No	Findings
are protected.	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	HASB maintained its documented policy to protect reproductive rights of women, (i.e. <i>"Polisi Hak Reproduksi"</i>). Policy implementation is through periodic meeting reviewing violation of reproductive right policy during Gender Committee Meetings. The policies has been communicated to all workers during morning muster and the policy is posted on notice boards in the housing and estates office board.
	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	There is no female worker at HASB. Thus, this indicator not applicable.
	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	HASB has SOP for complaints and grievance namely, 'Procedure for reporting complaints and grievances (Prosedur Melapor Aduan dan Permasalahan)' and 'Carta alir mekanisme aduan dan masalah (pihak berkepentingan luaran dan dalaman)' and also company has developed procedure named "Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)", to protect the complainants. Grievance mechanism briefing to relevant stakeholders as evidenced by stakeholders meeting.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	YES	All workers in HASB CU have entered into employment voluntarily; it was verified during the interview 9 Indonesian male workers. The workers know they will work in Oil Palm Sector since from their country. HASB had not withheld foreign worker's passport as verified during worker's interviews. Workers also confirmed that there is no involuntary overtime as they will work for overtime if management ask to. They understand that in their contract, if they resign from HASB prior to 8 weeks of notice, they would not have debt of bondage. Foreign workers also confirmed they pay service fee and the others for passport, visa, medical, food, transportation from village and flight ticket. There was no contract substitution, debt bondage and withheld wages. Interview with workers confirmed they also understood that they need to do all the above to go to Malaysia, and the agent also already explained to them regarding the work they should get in Malaysia which is in oil palm plantation.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	A labour policy titled 'Labour Policy for Foreign Worker' for employment of foreign workers is available and has been addressed as one of Social policies at HASB. The policy mentioned that foreign employees will be treated fairly in terms of recruitment, terms and conditions of work; provide decent living and no contract substitution.

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Clause	Indicators	Comply Yes/No	Findings
			'Procedures for Hiring Workers (Local and Foreign) and 'Recruitment, Termination, Retirement and Promotion Procedure (Local and Foreign Workers)' were available. Document review and workers interviewed showed the procedure had been followed in worker recruitment exercise and had been implemented for any employment related with local and foreign workers.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	. Assistant General Manager were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. All identified OSH Committee were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. OSH Committee meetings were held once in three months. The Assistant General Manager is the chairman and the clerk is the secretary. 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 In addition to the OSH Committee meeting, another platform to raise any concerns about health, safety and welfare was at morning muster. Records of morning muster showed at least two to three times per week the mandore and/or field staff stressed on safety, health and safe work practice.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	Accident and Emergency procedure was available in the SSOP. Among of procedure of ERP Document, such as Accidents & Dangerous Occurrences Notification, Physical Injury, Chemical Spillage, Fire Outbreak, Control and Prevention of COVID 19 Infection. 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 important telephone contact numbers were also provided therein. Site inspection at harvesting operation, chemical & fertilizers store for the estates, noted on evidence that first aid kit is available at all works place with complete contents and no medication with expired date. The stock of first aid box is regularly check and refill when necessary, via outsider pharmacy. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Injury (LTI) board and monthly accident key performance indicator. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land	YES	All staff and workers such as the storekeepers, harvesters and sprayers/manurers were continuously trained in safe working practices including SSOP for PPE related to their job function and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Appropriate PPE were given free of charge to employees of estate and mill visited. Sighted PPE issuance to all workers have been recorded in the "PPE Personal Record".

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Clause	Indicators	Comply Yes/No	Findings
	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.		During field visit, at Harus Abadi and First Raintree harvesting operation, it was observed that all harvesters wearing the appropriate PPE according to HIRARC and SSOP.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	Local & Foreign workers are covered by SOCSO (Pertubuhan Keselamatan Sosial).
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Injury (LTI) board and monthly accident key performance indicator. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting. Form JKPP 8 for 2021 was submitted to DOSH timely in Jan 2022. Accident statistics were being maintained in a satisfactory manner and periodically reviewed.

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	HASB continued to implement Integrated Pest Management (IPM) in both division and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the "Code of Good Agricultural Practice For Oil Palm Estate and Smallholdings" from MPOB and SOP on Agricultural Practices Doc Ref No GAP MS 1784:2016 on harvesting, integrated pest management and upkeep of mature oil palms were also referred. Contents of the manual were disseminated to the workers through morning roll call and trainings. The manual was kept in the administration office for reference. 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>Antigonon leptopus</i> and <i>Turnera subulata</i> . In order to minimize use of pesticides the estates had planted beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org	YES	Species referenced in the Global Invasive Species Database and CABI.org. was not used in managed areas of the 2 divisions.

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Clause	Indicators	Comply Yes/No	Findings
	are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.		
	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	HASB continued to use the Harus Abadi Sdn Bhd's policy of no open burning. As advocated, the 2 estates practised Zero burning thus no use of fire for pest control. There was no replanting in both divisions, as replanting will be start in the year 2023 at HASB.
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	HASB continued to use agrochemicals based on its technical guidelines such as the "Code of Good Agricultural Practice For Oil Palm Estate and Smallholdings" from MPOB and SOP on Agricultural Practices Doc Ref No GAP MS 1784:2016 on harvesting, integrated pest management and upkeep of mature oil palms were also referred, where written justifications 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. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	HASB 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 per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, cost books. 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	Based on chemical register and site visit, no prophylactic use of pesticides used in both estates.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	Not applicable because HASB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	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.	YES	Not applicable because HASB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.

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Clause	Indicators	Comply Yes/No	Findings
	The due diligence refers to:		
	7.2.5a Judgment of the threat and verify why this is a major threat.	N/A	Not applicable because HASB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	7.2.5b Why there is no other alternative which can be used.	N/A	Not applicable because HASB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	N/A	Not applicable because HASB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	7.2.5d What is the process to limit the negative impacts of the application.	N/A	Not applicable because HASB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	N/A	Not applicable because HASB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	Records showed that pesticides were handled, used and applied by trained personnel and as per the MSDS 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 MSDS training. It was also noted that MSDS are available at all sites such as chemical store, lubricant store and laboratory.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The storage of pesticides at HASB was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorized personnel i.e. storekeeper. The stores in estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. During site visit chemical and fertilizer store, sighted relevant SDS were seen displayed. Adequate safety signage has been placed at both internal and external of the building. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The

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Clause	Indicators	Comply Yes/No	Findings												
			detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing.												
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Disposed in due course via a DOE licensed scheduled waste transporter and disposer.												
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying was not practiced by HASB. There was no evidence to show that aerial spraying was carried out.												
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. Several workers involved or handlings pesticides has been conducted the medical surveillance and send to Mabello Group of Clinic in Dec 2021. 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 women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	The HASB had stated they will have complied with pesticide act “No work with pesticides shall be undertaken by pregnant or breast-feeding women”. As per stated in the List of Legal register. There was also no evidence that work with pesticides was undertaken by pregnant or breast-feeding women.												
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Appendix 5 – List of waste generated at HASB estates as additional documents for EIA had been maintained. Among the waste and mitigation action been identified were: <table><tr><th>No</th><th>Type of waste</th><th>Mitigation measure</th></tr><tr><td>1</td><td>Domestic waste</td><td>Kept at landfill</td></tr><tr><td>2</td><td>Empty chemical container</td><td>Reuse / proper SW management</td></tr><tr><td>3</td><td>Lubricant/used oil engine</td><td>Proper SW management</td></tr></table>	No	Type of waste	Mitigation measure	1	Domestic waste	Kept at landfill	2	Empty chemical container	Reuse / proper SW management	3	Lubricant/used oil engine	Proper SW management
	No	Type of waste	Mitigation measure												
	1	Domestic waste	Kept at landfill												
2	Empty chemical container	Reuse / proper SW management													
3	Lubricant/used oil engine	Proper SW management													
7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Record of Scheduled waste handling was sighted. Harus Abadi has complete the registration on the notification of its SW in the E-swiss system.													
7.3.3 The unit of certification does not use open fire for waste disposal.	YES	No sign of open burning for waste disposal sighted. Domestic waste had been disposed at the landfill area and dispose in municipal.													

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Clause	Indicators	Comply Yes/No	Findings
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	HASB continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents i.e. manuring reference GAP MS1784:2016. The process of the fertilizer application follows a flow chart Fertilizer application, which was of upmost importance for maintenance of soil commencing from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire requirement in the field identified. The periodic tissue and soil sampling were carried out in the estates to monitor changes in nutrient status. The results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. The soil sampling analysis by Hap Seng Plantations (River Estates) Sdn Bhd was carried out in Dec 2021 to facilitate the 2021 fertilizer program.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	All 2 Estates had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field. No EFB application sighted and recorded.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	HASB continued to monitor their fertilizer inputs as recommended by the Agronomist, Hap Seng Plantations Holdings Berhad, who visited both estates during the annual foliar sampling carried out in Dec 2021. Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards and field cost book. Records of programs and applications of fertilisers were made available to auditors. Noted from the records that the actual amount of fertilisers applied in 2021 were completed in both First Raintree and Harus Abadi Estate. The main fertilizers recommended for Mature Oil Palms for 2021 were NK and NPK (Mixture) From the review of the records, it was noted that the actual fertilizer application for 2020 was in line with the recommendation.
	7.4.4 Records of fertiliser inputs are maintained.	YES	During the field visit and the soil map provided it was observed that no fragile or marginal soils found in First Raintree Sdn Bhd and Harus Abadi Sdn Bhd. In both estates the soil comprises of Kretam series.
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	No replanting until the year of 2023 based on replanting program provided. Based on slope map, there was no steep terrain (greater than 25°) in both estates.
	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	No replanting until the year of 2023 based on replanting program provided. Based on slope map, there was no steep terrain (greater than 25°) in both estates.

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Clause	Indicators	Comply Yes/No	Findings
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	Based on the audit findings, it was confirmed that there were no new planting or new development of areas at HASB. Hence, there was no need for soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation was required.
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	Based on the audit findings, it was confirmed that there were no new planting or new development of areas at HASB. Hence, there was no need for soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation was required.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Based on soil map and site visit, there was no peat soil in both estates.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Based on soil map and site visit, there was no peat soil in both estates.
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	Based on soil map and site visit, there was no peat soil in both estates.
	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	Based on soil map and site visit, there was no peat soil in both estates.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	Based on soil map and site visit, there was no peat soil in both estates.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	Based on soil map and site visit, there was no peat soil in both estates.

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Clause	Indicators	Comply Yes/No	Findings
	<p>7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>	YES	Based on soil map and site visit, there was no peat soil in both estates.
	<p>7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p>	YES	Based on soil map and site visit, there was no peat soil in both estates.
	<p>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</p>	YES	Based on soil map and site visit, there was no peat soil in both estates.

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Clause	Indicators	Comply Yes/No	Findings
	Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.		
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	HASB Water Management Plan has been reviewed and updated in Dec 2021. This plan is confined to only HASB, covering only the water used for daily operation. Among the water management plans are: <ol style="list-style-type: none"> 1) Soil Moisture Conservation Programmed 2) Buffer zone / riparian reserve of the streams 3) Water for domestic use 4) Contingency plan during drought season 5) Sewage and septic tank 6) Lubricant and fertilizer store 7) Rainfall records
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	There was no natural waterways or river passing through the Harus Abadi Main Division and First Raintree Division.
	7.8.1b Workers have adequate access to clean water.	YES	Water for domestic use is supplied from the rainwater for washing and shower. Proper filtration and treatment is yet to be installed. The company has provided a tank or jar for a worker to get treated water from Bukit Mas POM. Besides that, the estate also provided the mineral bottle as access to clean water with average 15 to 19 cotton per months for the workers.
	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	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). During site inspections at Harus Abadi Sdn Bhd (Field Block 2 and Block 3), sighted chemical spraying activities was carried out close to the Natural waterways that directly channel to Stream inside IOI Unico. observed also chemical spraying activities was carried out at the monsoon drain (Stream inside IOI Unico) at workers housing compound. Based on circle & strip spraying program 2021, last chemical spraying activities was carried out in Nov 2021. Therefore, major NCR, MZK 01 2022 was raised.
	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.	NA	Not applicable.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	NA	Not applicable.

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Clause	Indicators	Comply Yes/No	Findings																																																																			
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	<p>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:</p> <ul style="list-style-type: none">▪ Regular servicing of the generator set for smooth running of engine and prevent excessive emission of greenhouse gas▪ Drivers are required to inspect their vehicle on daily basis and recorded inside the vehicle inspection checklist. <p>Site visit to HASB, 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.</p>																																																																			
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>The data in the Palm GHG Version 4, was as follows:</p> <table><tr><th>Description</th><th>Unit</th><th>Value</th></tr><tr><td>Oil palm planted on mineral soil</td><td>Ha</td><td>564.67</td></tr><tr><td>Oil palm planted on peat</td><td>Ha</td><td>0</td></tr><tr><td>Total oil palm planted</td><td>Ha</td><td>564.67</td></tr><tr><td>Conservation area (Forested)</td><td>Ha</td><td>0.00</td></tr><tr><td>Conservation area (Non-forested)</td><td>Ha</td><td>0.015</td></tr><tr><td>FFB supplied to this mill</td><td>Mt</td><td>8908.00</td></tr><tr><td>FFB produced by this estate/plantation</td><td>Mt</td><td>8908.00</td></tr><tr><td>FFB production per hectarage</td><td>Mt/ha</td><td>15.77</td></tr></table> <table><tr><th>Description</th><th>Total emission (tCO2e)</th><th>tCO2e/ha</th><th>tCO2e/mt FFB</th><th>Emission allocated to this mill (tCO2e)</th></tr><tr><td>Land conversion</td><td>2382.24</td><td>4.22</td><td>0.27</td><td>2382.24</td></tr><tr><td>Crop sequestration</td><td>-2258.05</td><td>-4.00</td><td>-0.25</td><td>-2258.05</td></tr><tr><td>*CO2 emissions from fertilizer</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>N2O emissions from peat</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>N2O emissions from fertiliser</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Fuel consumption</td><td>223.62</td><td>0.40</td><td>0.03</td><td>223.62</td></tr><tr><td>Peat oxidation</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr></table>	Description	Unit	Value	Oil palm planted on mineral soil	Ha	564.67	Oil palm planted on peat	Ha	0	Total oil palm planted	Ha	564.67	Conservation area (Forested)	Ha	0.00	Conservation area (Non-forested)	Ha	0.015	FFB supplied to this mill	Mt	8908.00	FFB produced by this estate/plantation	Mt	8908.00	FFB production per hectarage	Mt/ha	15.77	Description	Total emission (tCO2e)	tCO2e/ha	tCO2e/mt FFB	Emission allocated to this mill (tCO2e)	Land conversion	2382.24	4.22	0.27	2382.24	Crop sequestration	-2258.05	-4.00	-0.25	-2258.05	*CO2 emissions from fertilizer	0.00	0.00	0.00	0.00	N2O emissions from peat	0.00	0.00	0.00	0.00	N2O emissions from fertiliser	0.00	0.00	0.00	0.00	Fuel consumption	223.62	0.40	0.03	223.62	Peat oxidation	0.00	0.00	0.00	0.00
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Clause	Indicators	Comply Yes/No	Findings				
			Sequestration in conservation area	0.00	0.00	0.00	0.00
			TOTAL	347.81	0.62	0.04	347.81
	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	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 HASB. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.				
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	The Environmental Impact 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. Plans to reduce or minimize them are in place.				
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	HASB complied to the strict Zero Burning Policy. There was no evidence to show that fire had been used for preparing land for replanting.				
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	HASB had established fire prevention and control measures for the areas under its direct management. Fire emergency procedures were available in adherence to the HASB policy on 'Emergency Response' plan—updated Jan 2021. The important telephone contact numbers were also provided therein. HASB 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	HASB had engaged its adjacent stakeholders on fire prevention and control measures with Hap Seng Plantations.				
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	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.	N/A	No new land clearing since Nov 2015 available at HASB, thus this Indicator was not Applicable.				
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as	YES	The report of "Potential High Conservation Value Area Assessment Report of Harus Abadi Sdn Bhd" was made available to the auditor. It was noted that the report was prepared by				

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Clause	Indicators	Comply Yes/No	Findings
managed area are identified and protected or enhanced.	follows:		the Sustainable Unit of Hap Seng. Based on the assessment, there was no identified RTE at Harus Abadi estate. Harus Abadi had identified a HCV 3 which the estate has conserve and maintained the Mud Volcano. Sighted also the new Report namely "HCV-HCSA Assessment Report of Harus Abadi Sdn Bhd" was made available to the auditor. It was noted that the report was prepared by the Sustainable Unit of Hap Seng. Based on the assessment, there was no identified RTE at Harus Abadi estate. Harus Abadi had identified a HCV 3 which the estate has conserve and maintained the Mud Volcano.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or 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>Identification and assessment of HCV habitats or protected areas is done prior the main assessment through. The report "Potential High Conservation Value Area Assessment Report of Harus Abadi" is available. The study was conducted by the Sustainable Unit of Hap Seng. The study had covered all the High Conservation Value (HCV) within and adjacent to the 2 Estate under Harus Abadi Sdn Bhd. Based on the assessment, there was no identified RTE at Harus Abadi. The Assessor had identified potential HCV 3 in the estate which is Mud Volcano i.e. 0.0015 Ha. Nevertheless, the assessor has outlined several recommendations for HCV management by estate among others as follows:</p> <ul style="list-style-type: none"> • Continue prohibiting workers from entering the area • Continue to prohibit indiscriminate spraying at the area • To put up signboard prohibiting entrance of workers to the area. The area must be properly marked or designated • For RTE continue prohibiting illegal Hunting • Continue to conduct yearly training to educate the workers on RTE species <p>HCV Management Plan 2021 updated on 24/12/2021 stated that to protect HCV 3</p>
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence	YES	There were no local communities living nearby with Harus Abadi. So, this indicator was not applicable with this CU.

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Clause	Indicators	Comply Yes/No	Findings
	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	HASB has develop action plan base on assessment by the Assessor, the plan name HCV Management Plan 2021 updated on 24/12/2021 stated that to protect HCV 3. Harus Abadi also is committed to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting were erected at border. Patrolling by mandore for Illegal hunting is also being implemented to control the illegal activities. HASB has conducted training on HCV and wildlife for the staffs and field workers on 13/7/21. The Company also has established a disciplinary measure titled 'Dilarang Memburu' dated January 19.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	HASB also is committed to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting were erected at border. Patrolling by mandora for Illegal hunting is also being implemented to control the illegal activities.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Not applicable since there is no new land clearing

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

Clause	Indicators		Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	NA	Not applicable. HASB didn't have other mills or estates within it company.
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	NA	Not applicable. HASB didn't have other mills or estates within it company.
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	NA	Not applicable. HASB didn't have other mills or estates within it company.
	(d)	Where there are isolated lapses in implementation of a time-bound	NA	Not applicable. HASB didn't have other mills or estates within it company.

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		plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.		
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 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;	NA	Not applicable. HASB didn't have other mills or estates within it company.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	NA	Not applicable. HASB didn't have other mills or estates within it company.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	NA	Not applicable. HASB didn't have other mills or estates within it company.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	NA	Not applicable. HASB didn't have other mills or estates within it company.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,	NA	Not applicable. HASB didn't have other mills or estates within it company.

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		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; 		
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	NA	Not applicable. HASB didn't have other mills or estates within it company.
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	NA	Not applicable. HASB didn't have other mills or estates within it company.
		<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. 	NA	Not applicable. HASB didn't have other mills or estates within it company.
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	NA	Not applicable. HASB didn't have other mills or estates within it company.
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above	NA	Not applicable. HASB didn't have other mills or estates within it company.

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		may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.		
<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators	YES	<p>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 Harus Abadi the land was previous owned by Sabah Land Development and Harus Abadi Sdn Bhd has buy and develop the land in Sept 1989.</p> <p>For First Rain Tree, the land was previous owned by company of several villagers which is the land has obtained from Sabah land development on 1997/1998. The Company has sold their land to the First Rain Tree in June 2000. There were clear land ownership documents available for review. The original copies of the documents were kept in Harus Abadi Central Office, Lahad Datu.</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
7.8.2	Major	<p>Requirement: 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).</p> <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 Harus Abadi Sdn Bhd (Field Block 2 and Block 3), sighted chemical spraying activities was carried out close to the Natural waterways that directly channel to Stream inside IOI Unico. observed also chemical spraying activities was carried out at the monsoon drain (Stream inside IOI Unico) at workers housing compound. Based on circle & strip spraying programme 2021, last chemical spraying activities was carried out in November 2021.</p>	<p>Root cause: The training held was not adequate to cover on the RSPO Manual on BMP BMPs for the management and rehabilitation of riparian reserves (April 2017).</p> <p>Correction: Management has taken immediate action by conducting awareness training with sprayer not to spray along artificial drainages as well as reminding sprayers not to spray along riparian and buffer zones. Training was conducted on 21th February 2022.</p> <p>Corrective action: The HASB management will continuous monitor on the spraying activities and to demarcate along the riparian reserves. For example to do marking on the palm tree along the riparian area.</p>	<p>Evidence of training was verified by the auditor. Content of training on prohibited spraying along the riparian reserves was verified.</p> <p>Status: CLOSED</p>

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ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor																								
3.3.2 DA 01 2021	Minor	Finding: Mechanism to check consistent implementation of procedures was not in place refer to SSOP for chemical spraying. Objective evidence: Sanitation facilities for those applying pesticides was not available at both divisions. Furthermore, emergency shower at chemical store at First Raintree Division was not functioning during the audit time.	Root cause: Harus Abadi Sdn Bhd (HASB) is lack of monitoring on the implementation of SSOP chemical spraying. Corrective Action: The HASB management to monthly cross-check with record the functionality of emergency shower and monitor the sanitation facility is available and suitable for the chemical handler.	Sanitation facilities has been provided at First Rain Tree Division for the workers handling pesticides. Therefore, previous NCR was satisfactorily closed.																								
7.10.1 (C) DA 02 2021	Major	Finding: Palm GHG calculator was not reported to RSPO. Objective evidence: During documents review, the Palm GHG data used was from Bukit Mas POM and its supplies based and the data for Harus Abadi Sdn. Bhd. was not accurate as per data i.e. FFB produced, diesel consumption, etc.	Root cause: The estate management did not aware that the GHG emissions data need to be reported under individual SGSB's GHG account since previous GHG data was only reported under POM CU GHG account. Corrective Action: Harus Abadi Sdn Bhd (HASB) has immediately registered the GHG account and submitted HASB's GHG emission data through RSPO Palm GHG calculator.	During audit in January 2022, auditor was unable to approved through Palm GHG Version 4. This was due to some error in the system. Email has been sent to the RSPO secretariat informed on the problem and RSPO secretariat acknowledged on the matter. However, auditor can log in and verify the data in the Palm GHG Version 4. The data was as follows: <table><tr><th>Description</th><th>Unit</th><th>Value</th></tr><tr><td>Oil palm planted on mineral soil</td><td>Ha</td><td>564.70</td></tr><tr><td>Oil palm planted on peat</td><td>Ha</td><td>0</td></tr><tr><td>Total oil palm planted</td><td>Ha</td><td>564.70</td></tr><tr><td>Conservation area (Forested)</td><td>Ha</td><td></td></tr><tr><td>Conservation area (Non-forested)</td><td>Ha</td><td></td></tr><tr><td>FFB supplied to this mill</td><td>Mt</td><td>8908.00</td></tr><tr><td>FFB produced by</td><td>Mt</td><td>8908.00</td></tr></table>	Description	Unit	Value	Oil palm planted on mineral soil	Ha	564.70	Oil palm planted on peat	Ha	0	Total oil palm planted	Ha	564.70	Conservation area (Forested)	Ha		Conservation area (Non-forested)	Ha		FFB supplied to this mill	Mt	8908.00	FFB produced by	Mt	8908.00
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Conservation area (Non-forested)	Ha																											
FFB supplied to this mill	Mt	8908.00																										
FFB produced by	Mt	8908.00																										

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				this estate/plantation		
				FFB production per hectare	Mt/ha	15.77
				Description	Total emission (tCO2e)	tCO2e/ha
				Land conversion	2382.24	4.22
				Crop sequestration	-2258.05	-4.00
				*CO2 emissions from fertilizer	0.00	0.00
				N2O emissions from peat	0.00	0.00
				N2O emissions from fertiliser	0.00	0.00
				Fuel consumption	223.62	0.40
7.12.2 (C) MZK 01 2021	Major	Finding: The HCV Assessment was not conducted as per Annex5 –Transition from HCV to HCV–HCS Assessment. Objective evidence:	Root cause: The estate management misunderstand on the new requirement of RSPO P&C MYNI 2019's Annex 5 and did not	tCO2e/mt FFB	0.03	0.04
				Emission allocated to this mill (tCO2e)	2382.24	0.00
				Peat oxidation	0.00	0.00
				Sequestration in conservation area	0.00	0.00
				TOTAL	347.81	0.62
				Therefore, previous NCR, DA 03 2021 was satisfactorily closed.		
				It was noted that the report was prepared by the Sustainable Unit of Hap Seng. The assessment was carried out on 24 December 2021 and next review on December 2022.		
				Based on the assessment, there was no identified RTE at Harus		

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		<p>The HCV Assessment was available; However, the Assessment was not carried out as per Annex5 –Transition from HCV to HCV–HCS Assessment.</p>	<p>aware that new combined HCV-HCS Assessment is needed to be conducted by the RSPO certified estate that with no land clearing/new planting (after 15th November 2018). Corrective Action: Harus Abadi Sdn Bhd (HASB) has immediately rectified it with new combined HCV-HCS Assessment.</p>	<p>Abadi estate. Harus Abadi had identified a HCV 3 which the estate has conserve and maintained the Mud Volcano. Therefore, previous Major NCR MZK 01 2021 has been successfully closed.</p>
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