



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

File Ref. : EB28910001

RSPO PUBLIC SUMMARY REPORT

CLIENT : BUKIT KRETAM SDN. BHD.

PARENT COMPANY : BUKIT KRETAM SDN. BHD.

RSPO MEMBERSHIP No.: 1-0292-20-000-00

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	
Bukit Kretam Sdn. Bhd.		5.482115	118.593382	Batu 13, KM 56 Jalan Jeroco, 90200 Kota Kinabatangan, Sabah.

MAP : See Attachment 1

AUDIT DATE : 6th – 8th April 2022

DURATION : 9 auditor days

TYPE OF AUDIT : ☐ Annual Surveillance Audit No. ☐ Stage 2 Audit

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

SCOPE OF CERTIFICATION: Production of Sustainable Fresh Fruit Bunches

VALIDITY OF RSPO CERTIFICATE : Pending approval

The following attachments form part of this report:

Non-conformity Report(s) ☐

List of additional site(s) ☐

Report by Audit Team Leader

Name : **DZULFIQAR AZMI**

Signature :

Date : **19/7/2022 (PUBLIC SUMMARY)**
4/7/2022 (FINAL REPORT)

Acknowledgement by Client's Representative

Name : **Helmy Arizal Bin Hussin**

Signature :

Date : **19/07/2022 (Public Summary)**
11/07/2022 (Final Report)

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SUMMARY OF AUDITS

Stage 2 Audit				
On-site audit date	:	6th – 8th April 2022	No. of auditor days:	9 auditor days
Audit team	:	Dzulfiqar Azmi (LA), Mohd Ab Raouf Asis, Ismail Adnan.		
No. of major NCR	:	3	Indicator: 3.4.3, 6.2.3, 6.7.3	Closing date: 1/07/2022
No. of minor NCR	:	1	Indicator: 7.4.4	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
		X	NA	X
		Contract workers	NGOs	Govt. agency
		NA	NA	X
		Indigenous people	Contractor	Others (Please specify)
		NA	NA	
Supply base sampled	:	Bukit Kretam Sdn. Bhd.		
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: 19/07/2022	

Annual Surveillance Audit 1				
On-site audit date	:		No. of auditor days :	
Audit team	:			
No. of major NCR	:		Indicator:	Closing date :
No. of minor NCR	:		Indicator :	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees / Workers organizations	Settlers	Villagers / Local communities
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
		Indigenous people	Contractors	Others (Please specify)
Supply base sampled	:			
Changes since the last audit	:			
Justification of audit planning	:			
Report approved by	:		Approval date :	

Annual Surveillance Audit 2				
On-site audit date	:		No. of auditor days :	
Audit team	:			
No. of major NCR	:		Indicator:	Closing date :
No. of minor NCR	:		Indicator :	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees / Workers organizations	Settlers	Villagers / Local communities
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
		Indigenous people	Contractors	Others (Please specify)
Supply base sampled	:			
Changes since the last	:			

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audit	
Justification of audit planning :	
Report approved by :	Approval date :

Annual Surveillance Audit 3				
On-site audit date :		No. of auditor days :		
Audit team :				
No. of major NCR :		Indicator:	Closing date :	
No. of minor NCR :		Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	Indigenous people	Contractors	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				
Justification of audit planning :				
Report approved by :		Approval date :		

Annual Surveillance Audit 4				
On-site audit date :		No. of auditor days :		
Audit team :				
No. of major NCR :		Indicator:	Closing date :	
No. of minor NCR :		Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	Indigenous people	Contractors	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				
Justification of audit planning :				
Report approved by :		Approval date :		

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SUMMARY OF INFORMATION

	STAGE 2
Projection Period	April 2022 to March 2023
FFB Production (MT)	20,202.00
Certified volume CSPO (MT)	4,040.40
Certified volume CSPK (MT)	1,010.10
Certified Areas (Ha)	1,375.72
Planted Areas (Ha)	1,288.59
Production Areas (Ha)	1,288.59
HCV Areas (Ha)	6.20
Remarks	-

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1.0 AUDIT PROCESS

1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & ISO 45001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Dzulfiqar Azmi	Lead Auditor / Safety, Environmental & GAP	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 and a qualified RSPO Lead Auditor.
Ismail Adnan Abdul Malek	Auditor / Social External & HCV	Holds a Master of Forestry, University of British Columbia, Canada. He is a forester working at Pahang Forest Department and at an integrated timber complex in Pahang. Currently, he is a Senior Lecturer at the Forestry Faculty, Universiti Putra Malaysia and a Social Auditor for Forest Management System at Food, Agriculture and Forestry Section, SIRIM QAS International Sdn Bhd.
Mohd Ab Raouf Asis	Auditor / Social Internal	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 and qualified as RSPO as well as MSPO lead auditor.

1.3 Audit methodology

The audit conducted at Stage 2 audit to covers Bukit Kretam Sdn. Bhd. (BKSB). The standard sampling formula of $0.8\sqrt{y}$ does not applied at this certification unit. The sampling conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The audit included an on-site audit to the estate and workers houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 23rd February 2022. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). Further details were as provided in Attachment 5 of this report.

In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<ul style="list-style-type: none"> Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between. There was contravene with legal labour requirement for Minimum Wages Order Amendmend 2020 for several workers sampled in BKSB. NCR was raised and can be refer to indicator 6.2.3. Workers receive their wages in cheque, and they changed it with cash money at sundry shop in the estate. All workers satisfy with the cheque payment method due to the nearest town is Lahad Datu, far from the estate if they want to withdraw their money. Approximately 90-100 km. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. Documented foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer. For newly arrived foreign workers who do understand Bahasa or English, translations are provided during briefings.
2) Settlers	<ul style="list-style-type: none"> Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> Confirmed there is no land dispute between BKSB CU and neighbouring estates IOI Plantation (Unico 3 Estate) and Trusan Kinabatangan Forest Reserve). No social issues arising from local communities (Kg Sri Ganda). Occasionally, they are called to attend meetings by BKSB. The last one was held online on 22 December 2021. All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings. Kg Sri Ganda representative interviewed confirmed no user rights issues between BKSB and villagers. Estate operation has no negative impact on village livelihood.
4) Suppliers	<ul style="list-style-type: none"> BKSB usually buy chemicals, PPE and other estates tools directly from suppliers in Lahad Datu town themselves.

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	<ul style="list-style-type: none"> Fair dealings with suppliers and traders in Lahad Datu. Payments are made within 1 months of invoice. Representatives from suppliers (Syarikat Excel Service, Teck Guan Sdn Bhd, Agri Horticultural Trading (Lahad Datu) Sdn Bhd) confirmed fair dealings and prompt payments through invoices.
5) Contract workers	<ul style="list-style-type: none"> There is no contractor workers has been hired.
6) Local & national NGOs	<ul style="list-style-type: none"> 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 enforcement at BKSB (shared boundary with Trusan Kinabatangan Forest Reserve).
8) Independent growers / Smallholders	<ul style="list-style-type: none"> Not applicable
9) Indigenous people	<ul style="list-style-type: none"> Not applicable
10) Contractor	<ul style="list-style-type: none"> No contractor has been hired.
11) Previous land owner (if any)	<ul style="list-style-type: none"> The right to use the land at the CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified during the audit. At BKSB, the land was previously owned by a group of smallholders with a total of 17 lots. Verified copies of the land titles showed that the ownership of the Lots was transferred to BKSB on 9/9/1986.
12) Others (please specify)	<ul style="list-style-type: none"> Sustainability Team from Hap Seng Plantations have consulted with interested smallholders partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.

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

Founded on 9th November 1981 as S.K Low Sdn. Bhd. and later on changed its name to Bukit Kretam Sdn. Bhd. (BKSB) on 10th October 1985. The head quarter located at Lot 23, MDLD 0718, Jalan Bahagia 1, Taman Bahagia, 91100 Lahad Datu, Sabah. The company started their oil palm planting with Bukit Kretam 1st generation planting in year 1998 until completion in year 2006.

Bukit Kretam Estate located at Mukim Sg. Merah Mukim Kinabatangan comprises 17 land titles with total certified area of 1375.72 hectares. All areas located at Mukim Sungai Merah Kinabatangan which is accessible through government road via Jeroco Road. There area surrounding estates such as IOI Plantations (Unico 3 Estate), Yeoh Eng Chong (smallholder), Yeoh Eng Cheang Company Sdn. Bhd., Kulamba Wildlife (Forest Reserved) and Kg. Sri Ganda.

The management of BKSB was headed by Estate Manager (Mansor Hj. Salaman) and assisted by assistant manager (Kaharuddin Nordin).

All the Fresh Fruit Bunches (FFB) from BKSB were sent to Jeroco 2 POM/Unico Desa POM/Tomanggong POM. After certified, the FFB will sent to Bukit Mas POM.

The BKSB did not have other management system certification beside of MSPO P&C.

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

Table 1 Planted and certified area of the Bukit Kretam Sdn. Bhd.

Estate	Planted (ha)	Certified (ha)
Bukit Kretam	1,288.59	1,375.72
Total	1,288.59	1,375.72

Table 2 Planting profile

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature >3years (Ha)</u>	<u>Immature < 3 years (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Bukit Kretam	1998	1st	270.04	0.00	270.04		
	1999	1st	436.06	0.00	436.06		
	2001	1st	19.08	0.00	19.08		
	2004	1st	39.47	0.00	39.47		
	2005	1st	222.10	0.00	222.10		
	2006	1st	301.84	0.00	301.84		
Total			1,288.59	0.00	1,288.59	100.00	0.00

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2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Helmy Arizal Bin Hussin
Position	:	Asst Manager Internal Audit & RSPO
Address	:	Lot 23, MDLD 0718, Jalan Bahagia 1, Taman Bahagia, 91100, Lahad Datu, Sabah.
Phone no.	:	089-881322 013-4790556
Email	:	bksb2004@yahoo.com helmyarizal.hussin@yahoo.com.my

3.0 AUDIT FINDINGS

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

This Stage 2 Audit in 2019 is the initial audit performed at this Certification Unit.

3.2 Progress and changes in time bound plan

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

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

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

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

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

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

If no, please state reasons Not applicable.

There is no associated smallholders supplying FFB to the CU.

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

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

No other changes so far.

3.5. Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed.

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4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) (details refer to Attachment 3)	List : 1	7.4.4
Total no. of major NCR(s) (details refer to Attachment 3)	List : 3	3.4.3, 6.2.3, 6.7.3

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.

6.0 RECOMMENDATION

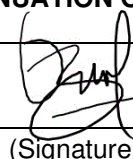
- ☐ No NCR recorded. Recommended to continue certification.
- ☒ Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.
Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs.
- ☒ Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.
- ☒ Recommended to continue certification.
- ☐ Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.
Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

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

Audit Team Leader :

DZULFIQAR AZMI

(Name)



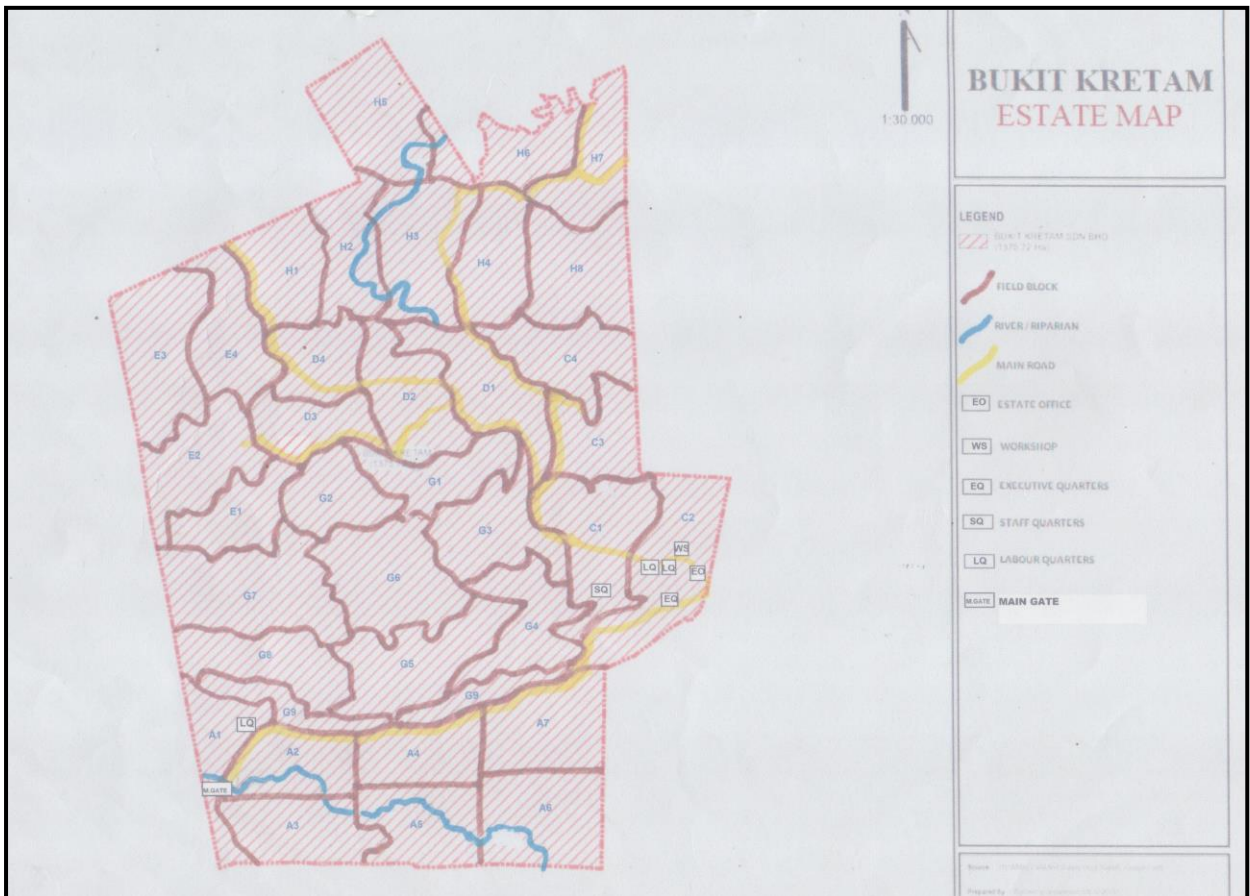
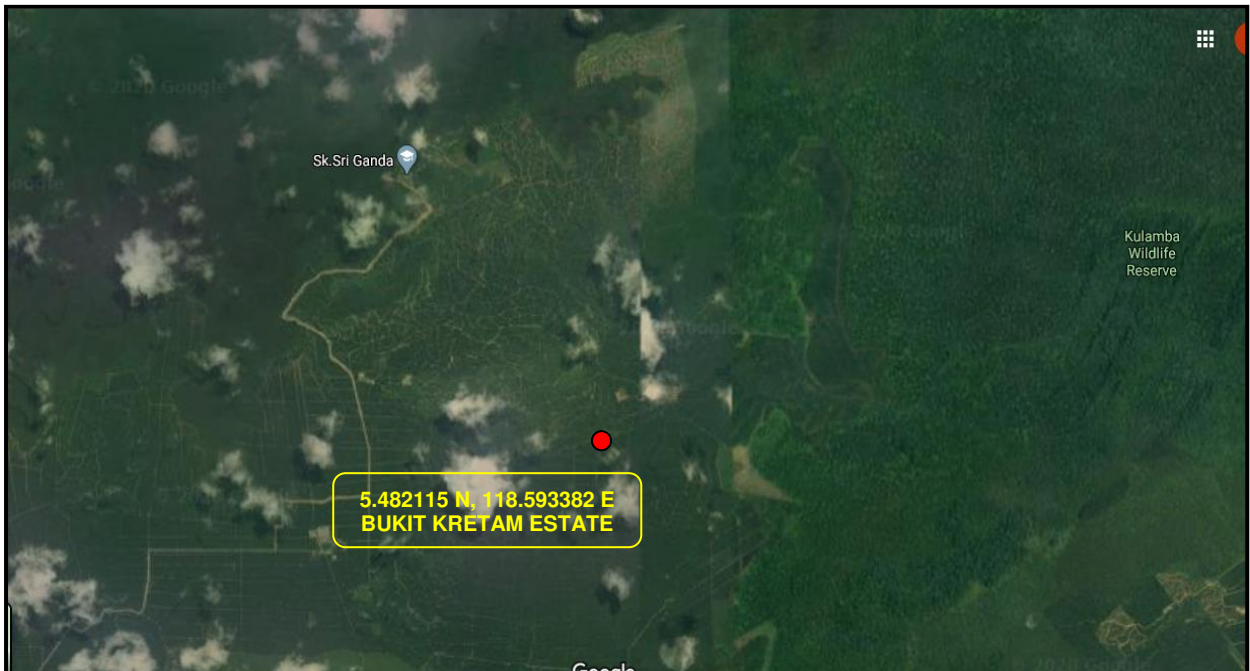
(Signature)

01/07/2022

(Date)

Attachment 1 - Map

Map of Bukit Kretam Sdn. Bhd.



Attachment 2 – Audit Plan

STAGE 2
RSPO AUDIT PLAN

1. **Objectives**

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the relevant certification standards.
- (ii) To verify the effective implementation of corrective actions arising from the findings of last audit.
- (iii) To make appropriate recommendations based on the audit findings.

2. **Date of assessment** : 6th to 8th April 2022

3. **Site of assessment** : Bukit Kretam Sdn. Bhd.

4. **Reference Standard:**

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

5. **Assessment Team**

Lead Auditor : Dzulfikar Azmi (Safety, Environmental, GAP)

Auditor : Mohd Ab Raouf Asis (Social – Internal)

Ismail Adnan (Social – External, HCV)

Observer : N.A.

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

6. **Audit Method**

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

7. **Audit Findings**

Audit findings shall be classified as major and/or minor. Major non conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 90 days, the certificate shall be terminated.

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

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

8. **Confidentiality Requirements**

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

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

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9. **Working Language** : English and Bahasa Malaysia
10. **Reporting**
- a) Language : English
 - b) Format : Verbal and written
 - c) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.
11. **Facilities Required**
- a. Room for discussion
 - b. Relevant document and record
 - c. Personnel protective equipment if required
 - d. Photocopy facilities
 - e. A guide for each group
12. **RSPO 2018 Principles and Criteria (P&C) Metrics Template**
 The RSPO 2018 Principles and Criteria (P&C) Metrics Template outlines a set of strategic outcome-based metrics relating directly to the RSPO P&C and is aligned with the RSPO Theory of Change. This Metrics Template comes into effect on 1 June 2021 and all audits against the 2018 P&C or the relevant National Interpretation conducted from 1 June 2021 onwards shall prepare and submit this Metrics Template for the audit team to review during audit.
 Please submit the Metrics Template to Lead Auditor according to this period:
- a) Reporting time frames for economic data are:
 - i. Calendar year (January to December): January 2021 to December 2021, and
 - ii. 12-month period counting up to one months before audit month: **Mar. 2021 to Feb. 2022**
 - b) Reporting time frames for demographic data:
 - i. For mill and estate workers: as of 31 December 2021
 - ii. For smallholders and outgrowers: January 2021 to December 2021
 - c) Reporting time frame for all other social and environmental data:
 - i. January 2021 to December 2021
- The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021. All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).
13. **Assessment program details:** As below

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Day 1: 06/04/2022 (Wednesday)

Time	Activities / areas to be visited			Auditee
9.00 am	Opening Meeting for Bukit Kretam Sdn. Bhd. Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.			All CU
9.20 am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative.			Management Representative
9.30 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at the estate.			Management Representative
9.35 am	To assign each audit team members – site and the P&C requirements			
	Dzul	Raouf	Ismail	
	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Waste management including disposal site ▪ Aspects/impacts of estate management ▪ Facilities at workplace inspection (water treatment plant, clinic, stores, workshop, landfill area & etc.) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ River system and Effluent Treatment/Discharge ▪ Buffer/Riparian Zones ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment.	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with external stakeholders i.e. local communities, contractors, supplier, government agencies, NGO, etc. ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Mill/Estate Boundary, adjacent and neighboring land use ▪ Production area field inspections (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.) ▪ Controlled/open burning ▪ Good Agriculture Practices ▪ Continuous improvement Other area identified during the assessment.	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Training and skill development programs ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union/workers representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues & welfare ▪ Complaints and grievances ▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc) ▪ HCV/RTE and action plan ▪ Continuous improvement Other area identified during the assessment.	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER			
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			

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5.00 pm	Audit team discussion / Interim closing / End of Day 1 audit
9.00pm	Discussion LA and teams on potential NCRs

Day 2: 07/04/2022 (Thursday)

Time	Activities / areas to be visited			Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at the estate.			Management Representative
9.10 am	To assign each audit team members – site and the P&C requirements			
	Dzul	Raouf	Ismail	
	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER			
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
5.00 pm	Audit team discussion / Interim closing / End of Day 1 audit			
9.00pm	Discussion LA and teams on potential NCRs			

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Day 3: 08/04/2022 (Friday)

Time	Activities / areas to be visited			Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at the estate.			Management Representative
9.10 am	To assign each audit team members – site and the P&C requirements			
	Dzul	Raouf	Ismail	
	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER			
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
3.00 pm	Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.			
3.30 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager			
4.00 pm	Closing meeting at the CU			
5.00 pm	End of audit			

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

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	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 Bukit Kretam Sdn. Bhd. (BKSB) 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 information 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. As of to date audit, there is no information had been requested.
	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 established and available at BKSB. External and internal communication procedures developed by BKSB were followed at the audited sites. Consultation and communications procedures for BKSB CU were documented in the <i>Stakeholders Consultation Procedure – Group Level & Estate Level</i> . This document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estate and mill followed the procedures and manuals developed by the company. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets displayed on notice boards at the office and the muster ground were also used as a means for internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which were kept in the office. The last stakeholders' meeting

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Clause	Indicators	Comply Yes/No	Findings
			was held online in Dec 2021 due to Covid 19's MCO restrictions.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The lists of stakeholders were prepared by both the CU and the company headquarters. The lists included schools, bus operators, traders, neighboring villages, smallholders etc. The list of stakeholders was updated in Dec 2021 to include Government Agencies, NGO's, Supplier/Contractors and all neighboring estates were also included in the lists.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Code of conduct and business ethics policy approved by Director in July 2018. BKSB through their policy committed to develop an organizational culture that will exhibit the highest standard of ethical conduct among through the following: <ol style="list-style-type: none"> 1. Prohibit any forms of corruption, bribery and fraudulent use of funds and/or resources. 2. Preserve books, records and accounts that accurately and fairly reflect the nature of the business transactions and providing accurate and proper disclosure of information in accordance with applicable laws and regulations. 3. Comply with all applicable laws, rules and regulations of the governments, regulatory authorities and public exchanges in jurisdictions within which company operates.
	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, BKSB also has a Vendor CODE of Conduct and Business Ethics which has been developed to outline the standards of behaviour required by BKSB 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 BKSB.

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	Bukit Kretam Sdn. Bhd. (BKSB) 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 Estate 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	BKSB has 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, last reviewed in Apr 2022. 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. Estate Manager with assisted from

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Clause	Indicators	Comply Yes/No	Findings
			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	The perimeter boundary of the estate was visibly maintained by erecting pegs along the boundary. During the site review, the physical markers were visibly maintained at Bukit Kretam Sdn Bhd, especially the ones that are adjacent to other private estate – Unico 3 and the Trusan Kinabatangan Forest Reserve.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties is maintained by BKSB in the stakeholder list. The list contains name of contractors, designated contact persons, address, telephone/fax/email and type of contracted works done.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	As of to date in BKSB being a small grower, there is no Contractors involved in all works. All work is done by themselves. Their foreign workers also were employed directly by the CU, not through Recruitment agencies as the workers applied for themselves. Thus, this indicator is not applicable
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	As BKSB is a small grower, there is no Contractors involved in all works. All work is done by themselves. Their foreign workers also were employed directly by the CU, not through Recruitment agencies as the workers applied for themselves. Thus, this indicator is not applicable.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> 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.

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Clause	Indicators	Comply Yes/No	Findings
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	There is no mill involve in this small grower certification. Thus, this indicator is not applicable.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	BKSB continued to achieve long term economic and financial viability through documented management plan projected to year 2026. A business plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2023 to 2026 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 each estate was made available during the audit, between 2023 to 2027.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	The Management Review Meeting (MRM) was conducted after internal audit (by Sustainability Teams from HSP) was done in Apr 2022, and attended by all the estates management and sustainability team from HSP. It was chaired by Estate Manager. Among the management review were discussed are: 1. Follow up actions from earlier MRM 2. Sustainability and adequacy of all SOPs 3. Sustainable Agriculture Policy 4. Results of internal audits 5. Changes In legal requirement of any compliance 6. Changes that could affect RSPO/MSPO/ISCC/SCCS management system 7. Complaint's/ Customer (internal/external) feedback 8. Accident & injury 9. Environmental quality 10. Waste management 11. Energy usage performance 12. Status of corrective actions

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Clause	Indicators	Comply Yes/No	Findings
			<p>13. Recommendations for improvement</p> <p>14. Improvement of the effectiveness</p> <p>15. Resources needed</p> <p>Management has transparently addressed continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO.</p>
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	Plans and impact assessments relating to social and environmental impacts maintained available. The BKSB have conducted social assessment titled 'Social Impact Assessment, Management Action Plans and Continuous Improvement Plans' and environmental assessment titled 'Environmental Impact Assessment Management Action Plans and Continuous Improvement Plans'. The SIA & EIA action plan was updated and each of the issues was identified for the estate.
	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 before the audit started. The auditor already verified and checked the data and figure given was true with their database system.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	<p>BKSB adopted the following documented manuals and documents as their standard operating procedures:</p> <ol style="list-style-type: none"> 1. Safe and Standard Operating Procedures (SSOP). 2. Agricultural Policy Oil Palm. <p>Agricultural Policy Oil Palm 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 July 2021. It was confirmed that all activities in the estates from seedlings in nursery to planting in the fields have been included in the Agricultural Policy Oil Palm. The document specifies the following sections such as harvesting, manuring, integrated pest management, and upkeep of mature oil palms. Safe and Standard Operating Procedures is the Standard Operating Procedures used for the safety precautions for all operations in the estate. Last reviewed was in Mar 2022.</p>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by BKSB are internal audits conducted by Hap Seng Plantations Sustainability Team. Internal audit covering MSPO & RSPO internal audit has conducted latest in Apr 2022. Results from the assessment internal audit recorded 3 Major NCR and 1 Minor NCR. BKSB 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	<p>On Estate, the estate manager and his subordinates were accountable to check on consistent implementation of procedures. The implementation of procedures was also carried out through:</p> <ul style="list-style-type: none"> • RSPO/MSPO internal audits by Hap Seng Plantations Sustainability Team, safety and health meetings

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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> • routine inspection (workplace inspection) by field staff. • Periodic reporting from estate • On site visits, inspections by estate manager • Assessments by RSPO Audits • Consultation with RSPO team & management. <p>Implementation of these procedures included:</p> <ul style="list-style-type: none"> • briefing on the SOPs and related documents. • workers were frequently reminded about it during the morning muster. • safe keeping in the administration office for reference. • relevant SOPs, sometimes an abridged version, were displayed at various workstations, e.g. at estate office notice board for easy reference. <p>The BKSB has managed and monitored foreign workers' status compliance against the RSPO requirements such as legality of the workers, appropriate license, employment contract, insurance and wages. Suppliers/Vendors compliance with BKSB 'Code of Conduct and Business Ethics Policy' was also monitored.</p>
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 methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There was no new planting in BKSB. Environmental Impact Assessment (EIA) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations. Thus, this indicator not applicable.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	<p>For BKSB, the SIA and EIA reports separated. Environmental Impact Assessment (EIA), Management Action Plans and Continuous Improvement Plans which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment and last reviewed on 30/01/2022. Identification and evaluation of environmental impact was done for all activities and processes related to the estate operation. The assessment was to evaluate and analyse the operations impact on soil, water, and air associated with the organization activities. The EIA review process had included stakeholders' consultation with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done had involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighboring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting.</p> <p>BKSB has established the Social Impact Assessment Management Action Plan and Continuous Improvement Plan which are available and sighted. The report which was developed in Jan 2021 was reviewed in Dec 2021. The Continual Improvement Plan which covered issues related to continued and improved relationship with both internal and external stakeholders is not included in the Environmental</p>

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Clause	Indicators	Comply Yes/No	Findings
			Management Plan for the estates. For implementation and monitoring, a staff had been appointed. The consultation with the relevant and affected stakeholders took place in Dec 2020 through virtual meeting and establishment of Social Action Plan. It was noted that the meeting was participated by various government agencies, local communities, NGOs, and neighboring estates. Evidence of participation of the stakeholders was available in signed attendance list as well as photographs showing evidence of the consultation that had took place. The minutes of the meeting of the consultation were also maintained.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	NO	<p>Significant environmental aspect and impact mitigation methods was implemented from EIA. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The EIA assessments had included the identification of aspects and impacts from resulting from the estate operations. A timetable with responsibilities for mitigation and monitoring was reviewed and updated as necessary. The BKSB had appointed specific person in charge (PIC) responsible for taking actions on each of the mitigation measures with specific time intervals.</p> <p>It has been found that the social and environmental management and monitoring plan is not reviewed and updated in a participatory way. Based on SIA, management action plans and continuous improvement plans dated February 2022, there was several issues do not update in the documents such as:</p> <ol style="list-style-type: none"> 1. Education facilities especially on primary school / HUMANA / CLC for Indonesians/Filipino childrens aged 7-16 years old in BKSB estate. 2. Health facilities i.e., Hospital Assistant / Medical Assistant in the estate. Currently estate used medical practitioner from Klinik Ung which is approximately 90-100km. 3. Updating the status of providing mosque/surau which was updated in July 2021. <p><i>Therefore, NCR was raised as MAR 01 2022.</i></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>BKSB 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 Estate Manager 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. Awareness towards the procedures was given to worker's representatives through briefings held for BKSB in Mar 2021.</p>
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	<p>Employment procedures are implemented, and records are maintained at BKSB. 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. Audit team has also verified all recruited workers from Indonesia and Philippines through personal file by employment no./ name of employee, employment contract, offer letter, passport consent form. etc. Review of the above employment records of</p>

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Clause	Indicators	Comply Yes/No	Findings
			BKSB employees proved that the employment procedures had been implemented, and records are maintained at BKSB.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	The Occupational Safety and Health Policy was established and signed by the Executive Director in July 2018. 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 Bahasa Malaysia and English on notice boards at estate office and muster ground. All operations had been risk assessed to identify H&S issues. Mitigation plans and procedures were documented in the HIRARC document and implemented. Based on the risk assessment done in accordance to DOSH Hazard Identification, Risk Assessment and Risk Control (HIRARC) Guidelines 2008. The BKSB has conducted assessment on health and safety issue in their operation and documented in the HIRARC register. The HIRARC register was reviewed at minimum once a year and during accident occur or change in the operation. For FY 2021, annual review was conducted on in Jan 2022 by Asst. Manager. No changes made since last reviewed.
	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 BKSB 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 2021/2022 were acceptable. The assessment enables further appropriate actions, based on evaluation on existing control measures and exposure for all chemicals by CHRA.
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	BKSB's Training Schedule for 2021 and Training Matrix for 2022 were sighted by the auditor. Dates of training for 2021 and 2022 were also presented. Formal training programs for 2021 and 2022 covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs. Trainings were either conducted internally by its own manager or by sustainability team from Hap Seng Plantation. Sexual Harassment
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.

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Clause	Indicators	Comply Yes/No	Findings
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Not applicable.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Not applicable. BKSB didn't have other mills or estates within its company.
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	YES	Not applicable. BKSB didn't have other mills or estates within its 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.	YES	Not applicable.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	YES	Not applicable.
3.8.5	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	YES	Not applicable.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>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. 		
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <p>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <ul style="list-style-type: none"> • Effectively implements and maintains the standard requirements within its organisation. • Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	YES	Not applicable.
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	Not applicable.
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> <p>a) The name and address of buyer;</p>	YES	Not applicable.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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		
3.8.9	Outsourcing Activities (i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification. (ii) The mill shall ensure the following: 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.	YES	Not applicable.
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	Not applicable.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	Not applicable.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Not applicable.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	Not applicable.
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)	YES	Not applicable.
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	YES	Not applicable.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	Not applicable.
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform	YES	Not applicable.
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Not applicable.

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Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	A Human Rights policy was made available at BKSB. There is also a Sustainable Agriculture Policy signed by the Managing Director containing the clause of prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staffs and workers during morning muster and training in Jan 2022. Auditor has verified through interview with workers and workers that they understood this policy. External stakeholders were also briefed on the BKSB's Human Rights and Equal Opportunity Policies during the meeting held in July 2021. Consultation with sampled contractors, suppliers and neighboring estate by the auditor confirmed the formers' understanding of BKSB's Human Rights Policy and prohibiting of retaliation against Human Rights Defenders.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As at time of audit, it was confirmed that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. No records of violence or use any form of harassment in BKSB's operations were found.
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	BKSB had developed Grievance Procedures for External stakeholders and Internal Stakeholders (Workers and Staff) respectively, to handle grievances and complaints. A procedure titled 'Procedure for reporting complaints and grievances (<i>Prosedur Melapor Aduan dan Permasalahan</i>)' was also available. A procedure named " <i>Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar</i> (Whistleblower)" dated in Nov 2020 to protect the complainants was also presented.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate	YES	Based on interview with stakeholders (contractors, suppliers, Government agency (Lahad Datu FD), neighboring village (Kg Sri Ganda), and Estate (Unico 3), it was found that 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 BKSB showed briefing during the stakeholders meeting was held on in July 2021 (Internal Stakeholder)

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Clause	Indicators	Comply Yes/No	Findings
	parties.		and Dec 2021 (External Stakeholder). For foreign workers, the procedure was explained during initial report for duty with assistance of translators.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	BKSB had developed Grievance Procedures for External stakeholders and Internal Stakeholders (Workers and Staff) respectively to handle grievances and complaints. A procedure titled 'Procedure for reporting complaints and grievances (<i>Prosedur Melapor Aduan dan Permasalahan</i>)' was also available. A procedure named " <i>Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar</i> (Whistleblower)" dated in Nov 2020 to protect the complainants was also presented.
	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 BKSB 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> . BKSB 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 any complaints against the CU. The Grievance Procedure had included the option for complainant/aggrieved party to access to independent legal and technical advice, 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 agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	There was only one (1) local community located nearby BKSB estate (Kg Sri Ganda). It was evident that the contributions were based on the results of consultation with the local community and other external stakeholders.
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 the audit. At BKSB, the land was previously owned by a group of smallholders with a total of 17 lots. Verified copies of the land titles showed that the ownership of the Lots was transferred to BKSB in 1986. There were clear land ownership documents available for review. The original copies of the documents were kept by BKSB main office. Copies of land titles for BKSB were available for verification. The BKSB estate is under the jurisdiction of Kinabatangan District. Review of the documents confirmed the terms and condition of the land is for cultivation of agricultural crop of economic value had been complied with.

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Clause	Indicators	Comply Yes/No	Findings
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklists, it has been verified that the land is now legitimately owned by BKSB since 9/9/1986. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or	YES	Maps of BKSB Estate i.e. legitimate land owned by BKSB titled 'Boundary Map of Bukit Kretam (BKSB)' was available and presented.

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Clause	Indicators	Comply Yes/No	Findings
	user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).		As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 9/9/1986. All the related documentation regarding the land acquisition was kept in BKSB main office, and the copy of the Land titles were in the estate were verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate as per interview with Head of Kg Sri Ganda, neighbouring estate (Unico 3) and Lahad Datu Forest Department, hence the evidence required under this clause was not available.
	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 BKSB.
	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 BKSB.
	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 BKSB.
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	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 BKSB 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 BKSB since 1986. The audit team had also 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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office 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
to express their views through their own representative institutions.	option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.		
	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 BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office 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 land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and neighboring estate.
	4.5.5 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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office 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
	legal, economic, environmental and social implications of the proposed operations on their lands.		
	4.5.6 Evidence is available that the communities 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 BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and neighboring estate.
	4.5.7 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, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the HQ BKSB. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. At the time of audit, there was no land and user rights issues at BKSB CU.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the ' <i>Prosedur Melapor Aduan dan Permasalahan - Pihak Berkepentingan Luaran dan 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 local community and External stakeholders.
	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 BKSB CU is considered as a Small Grower.

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Clause	Indicators	Comply Yes/No	Findings
	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	At the time of audit, there was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties at BKSB CU.
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	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management ". 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 BKSB HQ. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. At the time of audit, there was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties at BKSB CU.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighboring estate. The audit team has also interviewed relevant stakeholders such as the Head of Kg Sri Ganda, neighbouring estate (Unico 3) and Lahad Datu Forest Department. From the interviews, it can be concluded that there was no evidence of any land dispute at BKSB, hence the evidence required under this clause was not available. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.7.3 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 BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Based on the minutes of the Stakeholders meeting in Dec 2021 and interview with relevant stakeholders, it can be concluded that there was no evidence of any land dispute at BKSB, hence the evidence required under this clause was not available.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can	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	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office 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
demonstrate that they have legal, customary, or user rights.	time 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 as reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	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 Head of Kg Sri Ganda, neighbouring estate (Unico 3) and Lahad Datu Forest Department, From the interviews, it can be concluded that there was no evidence of any land dispute at BKSB, 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 Head of Kg Sri Ganda, neighbouring estate (Unico 3) and Lahad Datu Forest Department. From the interviews, it can be concluded that there was no evidence of any land dispute at BKSB.

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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.	YES	Not Applicable since this Assessment is for single unit certification and a small grower. No Mill is included. There are no smallholders as BKSB's stakeholder.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	Not Applicable since this Assessment is for single unit certification and a small grower. No Mill is included. There are no smallholders as BKSB's stakeholder.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	Not Applicable since this Assessment is for single unit certification and a small grower. No Mill is included. There are no smallholders as BKSB's stakeholder.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	YES	This Assessment is for single unit certification and a small grower. No Mill is included. There are no smallholders as BKSB's stakeholder.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	This Assessment is for Small Grower and no contractor was appointed since all work has been done internally due to money restrictions.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	This Assessment is for single unit certification and a small grower. No Mill is included.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	BKSB doesn't have Weighbridge, all weighing has been done by Outsider Mill.
	5.1.8 The unit of certification supports	YES	Not Applicable since this Assessment is for Small Grower. There are no smallholders as BKSB's stakeholder.

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

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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 BKSB established in Mar 2019, approved by Yeoh Yak Kheng, Executive Director of BKSB. It is one of the Policies relevant to social aspects verified by the auditor during the audit. The Social Policy statements at BKSB generally include aspects of worker information, recruitment and selection, training, employee development, terms of service and records of service. The policy has been communicated to all workers during morning muster and the policy is posted on notice boards in the estates office board. The equal opportunities policy (<i>Polisi Kesamarataan Hak</i>) states that the Company provide equal opportunity to all and does not practice discrimination based on race, caste, national, origin, disability, gender, sexual orientation, union membership, political affiliation, or age. There is no evidence of discrimination from feedback provided by employees interviewed. A functioning grievance mechanism is also in place.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	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 BKSB. Foreign workers also accorded the same living standards and accommodations as local workers. Interview with workers at BKSB CU also confirmed there was no discriminatory recruitment fees imposed on them by recruitment agent. They confirmed that they pay fee only for passport, visa, medical, and food, transportation from village and flight ticket. Workers also understood that they need to do all the above to go to Malaysia, and the agent has already explained to them regarding the work they should get in Malaysia which is in oil palm plantation
	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.	YES	There were no pregnant workers at the time of Audit. Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.

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Clause	Indicators	Comply Yes/No	Findings
	Alternative equivalent employment is offered for pregnant women.		
	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	A separate Gender Committee for male and female workers had been established at BKSB. They had been formed with appointed committee members and it was noted the formation of the committee is in line with BKSB CU implementation of the Gender Policy. The Gender Committee is responsible for organizing anything related to gender, covering among other things, policy awareness, grievances procedures, newly appointed committee, functions of the Gender Committee, male and female rights, sexual harassment and the activities for the year 2020 and 2021. The minutes of Gender Committee (male) and Gender Committee (female) meetings both dated in Jan 2022 were verified by auditor and found that gender committee was in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for genders at BKSB.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	The equal opportunities policy developed by BKSB states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Policy was displayed on notice boards in both Bahasa Malaysia and English. Interview with workers, the Manager of BKSB, local and foreign male and female workers, they agreed that male and female worker at BKSB receive equal pay for the same given work for example in the sprayer gang, being paid by piece rate. All workers receive daily payment as per Minimum Wages Order (Amendment) 2020.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	During the Audit, workers (local and foreigners) at the BKSB Comprising General Worker and harvesters were interviewed and their Employment Offer letters (in Bahasa Malaysia and English) were verified. Through the interview, the Auditor found that they understand the contents of the employment agreements, they know about how their salary rate and allowance and were satisfied with the payment made by management. Both employment contracts for local and foreign worker (Indonesian and Philippines) clearly stated the working hours, annual leave, medical benefits and sick leave, insurance scheme, retirement, and etc. Employment Contract and Payslips verified for the workers as listed in the people being interviewed during this audit.
	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	YES	Contracts and conditions of employment are contained in employment contracts signed between BKSB 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

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Clause	Indicators	Comply Yes/No	Findings
	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.		reflected in their pay slips which are issued to the workers during pay day. Conditions of pay are contained in the workers' respective employment contracts. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction. Payslip is the evidence of worker's remuneration. For the local workers, there is evidence in the payslip, the payment of statutory contributions such as EPF, SOCSO and Employment Insurance Scheme are being made in accordance with the relevant legal provisions. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO and non-statutory such as donation to mosque funds, Temple funds etc), net salary, annual leave and medical leave taken and others. Samples of payslips (Dec 2021 and Feb and Mac 2022) for the workers above were verified and found the workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order (Amendment) 2020 and Sabah Labor Ordinance.
	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.	NO	There was breach against legal labour requirement for Minimum Wages Order Amendmend 2020 for several workers sampled in BKSB. Minimum wages for several workers i.e., emp no 0889P (Jan 2022), 0759P (Jan 2021), 0207P (Jan 2021, July 2021, Dec 2021, Mac 2022), 0477P (Dec 2021, Jan 2022, Mac 2022) is not according to the Minimum Wages Order (Amendment 2020) which below RM 1,100 without justification from management. Therefore, NCR was raised as MAR 02 2022.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	BKSB has conducted housing inspection with records dated 13/3/2022 and 21/3/2022 were available. Assistant Manager cross-check the person in-charge's weekly housing inspection report on monthly basis. BKSB has provided adequate housing, water supplies, medical and welfare amenities. The houses were all in good conditions, and each house has between 2 – 3 bedrooms. The houses are generally well-maintained with not more than 6 persons live in each house. They are also furnished with the basic necessities such as cupboard, mattresses, pillows and cooking facilities. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner. BKSB workers are entitled to free medical facilities at the Hap Seng Estate clinic.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	There is 1 grocery shop available in the BKSB. Workers buy the food and groceries at the grocery shop in the estate. Sometimes also workers going to Lahad Datu or Kinabatangan for buy their food. They also have access to affordable food from close by Litang Estate canteen/sundry shops.

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	<p>6.2.6 A “DLW” is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>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:</p> <ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>	YES	Based on the suggested method(s) by RSPO guideline, an assessment of the Prevailing Wage was conducted for BKSB CU, and 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
	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 BKSB CU, permanent and full-time workers are used for core work such as Harvesting, Manuring and Spraying, there are no temporary workers and contractors at BKSB.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	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	BKSB 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. Employment contracts sighted do not contain any prohibitive clause from joining any trade unions. The policy included statements, among others, that the workers are allowed to join any registered organizations or associations. Foreign workers are not allowed to hold any positions in the organizations or associations. The workers who were consulted had confirmed that they were aware of their rights to join a union.
	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.
	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	BKSB 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 BKSB 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	" <i>Polisi Buruh Kanak-Kanak</i> ", is publicly available at BKSB CU. The policy statements emphasized on child under 18 years must not be employed to work in hazardous areas. This policy is posted on notice boards in the estate office. Audit team has verified employment card, copies of passports of Indonesian and Philippines workers, and 'Master List of Workers at BKSB' and no record of persons underage of eighteen was found at all visited estates.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the	YES	There is evidence that minimum age requirements are met at BKSB CU. 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

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Clause	Indicators	Comply Yes/No	Findings
	national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.		payslips of all workers at BKSB 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 BKSB 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	" <i>Polisi Buruh Kanak-Kanak</i> " dated 1 st September 2018 is publicly available at BKSB estates. There was no evidence that the estate had employed anyone below the age of 18 years. Communication of BKSB 's 'No child labour' policy was implemented to both workers and external stakeholders (including neighbouring estates, suppliers, local community) through workers training programmes and JCC meetings respectively.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	BKSB implements the 'Sexual Harassment, Violence and Abuse Policy' in the Company. The Policy text include "Company respects the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: • Eliminating Violence and Sexual Harassment: The Company seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. • Eradicating any form of Exploitation: The Company endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation". The policy was communicated through the Gender Committee meetings on meeting dated Jan 2021.
	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	Policy on reproductive rights disseminated is through periodic meeting reviewing violation of reproductive right policy during Gender Committee Meetings. The policy was displayed at the notice board outside the office. The policy was communicated through the Gender Committee meetings on meeting dated Jan 2021.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	During time of Audit, there were female workers at BKSB but no new mother, hence, assessing the needs of new mothers did not arise.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is	YES	BKSB has SOP for complaints and grievance namely, 'Procedure for reporting complaints and grievances "(Prosedur Melapor Aduan dan Permasalahan)" and "Carta Alir Mekanisma Aduan Dan Masalah (Pihak Berkepentingan Luaran Dan Dalam)" and also company has developed procedure named " <i>Mekanisme Melindungi Pengadu Terhadap</i>

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Clause	Indicators	Comply Yes/No	Findings
	established, implemented and communicated to all levels of the workforce.		<i>Tatacara Tidak Wajar (Whistleblower)</i> ”, to protect the complainants.
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 BKSB CU have entered employment voluntarily; it was verified during the interview with local, Indonesian and Philippines workers. The workers know they will work in Oil Palm Sector since from their country. BKSB had not withheld foreign worker's passport as verified during worker's interviews. Workers also confirmed there is no involuntary overtime as they will work for overtime if management ask to, they also understand their contract which is, if they resign from BKSB prior to 8 weeks of notice, they also don't have debt of bondage. At the same time, the foreign workers also confirmed the company pay the 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
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	“Polisi Untuk Pekerja Asing” stated that practices without discrimination and welfare of the employees. 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. 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	Estate Manager were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. Occupational Safety Health (OSH) Committee has been established together. The Manager subsequently assigned duties of ESH coordinator to the Assistant Manager for the down line implementation of ESH practices in the estate. All identified 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. OSH Committee meetings confirmed that among the agenda discussed, included of passing of previous minutes and arising matters, accident report (Monthly Data of Safety Performance), workplace inspection, safety report and programme and COVID 19 issues / matters.

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Clause	Indicators	Comply Yes/No	Findings
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	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 estate, 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 preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	NO	All staff and workers such as the storekeepers, harvesters, sprayers/manurers were continuously trained in safe working practices including SSOP for PPE related to their job function. Appropriate PPE were given to workers based on HIRARC and SSOP recommendations suitable for the job position or hazardous operation undertaken. However, the unit of certification was found ineffective in ensuring the working environment under its control is safe and without undue risk to health. Site inspection at Lot 30 A7, sighted 2 harvesters did not use appropriate personal protective equipment (PPE) i.e. safety helmet and cotton gloves (as per endorsement in HIRARC) to cover all potentially hazardous harvesting operations. Furthermore, emergency eyewash and shower were not provided at workshop area as per CHRA recommendation dated 04/07/2019. As a result, Major NCR DA 01 2022 was raised. Records of PPE issued, and acknowledgement of receipt are maintained individually for all category of workers at BKSB. Sighted common PPE issued included face masks respirators, goggles, safety shoes, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat. All workers were provided with appropriate PPE where the cost are bared by the management. Interviews conducted during the site visit at the estate showed understanding and approval from the workers that the management bares the cost of all PPEs and the workers are entitled to valid PPE, the importance of using required PPE at all times during work and proper storage and disposal methods of PPE.
	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	Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4).
	6.7.5 Occupational injuries are recorded	YES	Accident statistics were being maintained in a satisfactory manner and periodically

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Clause	Indicators	Comply Yes/No	Findings
	using Lost Time Accident (LTA) metrics.		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	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. Records of beneficial plants such as Cassia cobennensis, Tunera subulata and Antigonon Leptopus were available and showed to be extensively planted in the estate. The BKSB has also established a Beneficial Plant Garden where they have propagated and planted the beneficial plants extensively where pictures and records were available for verification. Evidence of program implementation can be demonstrated and available.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There were no species referenced in the Global Invasive Species database and CABI.org within the BKSB.
	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	No record of using fire as pest control in the BKSB, verification by interview and site verification.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of pesticides applied is available in the Agricultural Policy Oil Palm, Section 5.0: Weeding Management and Section 8.0: Pest and Diseases. The use of pesticide is specific to the targeted pest, weed and disease. Justification takes consideration to minimize effect on non-target species. Chemicals allowed use in estate is available dated in Mar 2022. BKSB Sustainable Agriculture Policy also states that: No use of paraquat policy is practiced. The use of other Class 1 Chemicals (such as metamidophos and monocrotophos) approved by the Pesticides Board and included in the MPOB list of approved Pesticide for use in oil palm plantations can only be carried out under strict

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Clause	Indicators	Comply Yes/No	Findings
the environment.			supervision and in absolutely necessary circumstances such as severe outbreak and critical pest infestation, and, with special method of application specified in the Highly Toxic Pesticides Regulation 1996 of the Pesticides Act 1974, after authorization has been received from relevant authorities.
	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	BKSB 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 dated in Mar 2022 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 BKSB 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. The due diligence refers to:	YES	Not applicable because BKSB 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.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	
	7.2.5b Why there is no other alternative which can be used.	YES	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	
	7.2.5d What is the process to limit the negative impacts of the application.	YES	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the	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,

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Clause	Indicators	Comply Yes/No	Findings
	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.		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	In BKSB, pesticides were stored in accordance with the legal requirement, in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations as well as recommendation by manufacturer as per applicable MSDS. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e. storekeeper. The stores in the estate were ventilated with no chemical smell during the inspection. All the chemicals were arranged/segregated according to the type. The fertilizers were well stacked. The stores are equipped with showers, wash area and a PPE storage area. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available at the estate. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. All information regarding the chemicals and its usage, hazards, trade and generic names were available in both English & in most cases, Bahasa Malaysia and understood by workers. The SDS for concerned pesticides used, were available in both English and in most cases, Bahasa Malaysia. Relevant information of the agrochemical used by estate workers, largely via morning muster and the use of Safety Pictorial poster, were conveyed and understood by all workers interviewed during the spraying activities and fertilizer application. It was also verified in the training records that training in chemical handling especially to the sprayers, had been conducted with the aim of disseminating the correct information and ensuring understanding regarding the usage and hazards of the agrochemicals.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes. Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing activities was continually implemented for empty pesticide containers. The activities were carried out at a concrete pond of 3 levels. Empty pesticide containers observed were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Records on usage and disposal were well recorded and documented. It

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Clause	Indicators	Comply Yes/No	Findings
			was found that scheduled waste generated at the mill stored not more than 180 days. Last disposal was made in Nov 2021.
	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 BKSB. 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	All workers involved with pesticides were sent for medical surveillance and from the result, 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	Pregnant and breast-feeding women are not allowed to work with pesticides and hazardous chemicals in BKSB. This instruction was tabulated in SSOP Chemical Spraying and OSH USECH Regulation 2000, Medical Removal Protection No.28 3b. There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in the estate. Workers interviewed were aware that pregnant and breast-feeding women should not handle chemicals. During the monthly check-up by the VMO, pregnancy status is remarked and if of any cases the worker will be withdrawn from spraying duties.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Waste management and disposal plan to avoid or reduce pollution had been documented. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution during routine operation. In estate, domestic waste from the housing area is well managed and all domestic wastes are disposed at landfill sited in the estate area. Sighted there is no practice of open fires within BKSB. Monitoring is done weekly in both domestic waste collection areas and in landfill sites.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Standard Operating Procedure Scheduled Waste Disposal has been established. The documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material. Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. Scheduled wastes had been disposed of through a DOE licensed contractor. Each house was provided with dustbin. The wastes were removed weekly and disposed via landfill.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at BKSB, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at BKSB have been disposed via landfill.

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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	<p>The BKSB continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <ul style="list-style-type: none"> i. Safe and Standard Operating Procedures (SSOP) ii. Agricultural Policy Oil Palm <p>BKSB operations were guided through the manuals and SOP. The procedures as documented in the Agricultural Policy Oil Palm were disseminated to the staff/workers through morning briefings and training. The documents included all operations in the estate from seedlings in nursery to planting of young palms and plantation upkeep. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment. BKSB 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. The process of the fertilizer application follows a flow chart Fertilizer application, which was of utmost importance for maintenance of soil commencing from an agronomist/PA 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.</p>
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	<p>Periodic tissue and soil sampling were carried out in the estate to monitor changes in nutrient status and its 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. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years' intervals. The soil sampling and leaf sampling, was done periodically, latest in 2021 by third-party lab.</p>
	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	<p>BKSB 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 was applied in FY 2020 and 2021.</p>
	7.4.4 Records of fertiliser inputs are maintained.	NO	<p>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. Review of the records revealed that the actual fertilizers applied in FY2021/2022 was in line with the program.</p>

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Clause	Indicators	Comply Yes/No	Findings
			However, there is no agronomic report or breakdown on fertilizer recommendations FY2022 i.e., fertilizer dosage, type of fertilizers, etc. based on foliar sampling result carried out in Apr 2021. Thus, Minor NCR DA 02 2022 was raised.
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	During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in BKSB. As per the Soil Maps, the soil series were Gumpal, Kinabatangan, Kretam, Rumidi and Weston.
	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 2025 based on replanting program provided. Based on slope map dated in Jan 2020 prepared by HSP Agronomy Department, there was no steep terrain (greater than 25°) in BKSB.
	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 BKSB. 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 BKSB. 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	There were no marginal and fragile soils in the BKSB.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	BKSB had a management strategy for palm oil cultivation, taking into account the soil surveys and topographic information in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information was provided and reviewed by the auditors.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands	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	Not applicable. Based on soil map dated Dec 2018, prepared by HSP Agronomy Department and site visit, there was no peat soil in the BKSB.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	YES	Not applicable. Based on soil map dated Dec 2018, prepared by HSP Agronomy Department and site visit, there was no peat soil in the BKSB.

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Clause	Indicators	Comply Yes/No	Findings
are managed responsibly.	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).		Not applicable. Based on soil map dated Dec 2018, prepared by HSP Agronomy Department and site visit, there was no peat soil in the BKSB.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.	YES	
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation	YES	

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Clause	Indicators	Comply Yes/No	Findings
	areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.		
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	The water management plan is confined to only BKSB engulfing the plans from nursery to fresh fruit processing. This report also includes the domestic water use with the after effect of water use to the surrounding environment. The plans cover the process of water abstraction, shortage, utilization in cultivation, chemical and natural treatments to utilize water at processing, domestic purposes and wastewater management. All of these aspects are included with monitoring, mitigation (if required), implementation and prevention or minimize pollution of these plan. Identified physical system in management of BKSB: <ul style="list-style-type: none"> ▪ Treated water quality standard ▪ Baseline data for water quality and frequency quality standard ▪ Contingency plans during dry season ▪ Flow meter monitoring
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the BKSB does not restrict access to clean water or contribute to pollution of water used by communities. The continued availability of water sources and to avoid negative impacts on other users in the catchment or rivers, the BKSB carried out water samplings from downstream to upstream. Based on the water sampling report, 4 water sampling point were selected from Sg. Pinang and Sg. Intan. The water quality been assessed by accredited laboratory. Based on the result dated in July 2021, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points. In order to ensure supply of clean drinking water to workers treated water sampling was carried out by yearly basis. Drinking water quality has been monitored by accredited laboratory.
	7.8.1b Workers have adequate access to clean water.	YES	As verified at BKSB facilities for workers and through interview with workers, all workers have obtained adequate access to treated clean water. Cleanliness of drinking water supplied to worker was ensured by carrying water analysis. Drinking water quality has been monitored by accredited laboratory by yearly basis. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.

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Clause	Indicators	Comply Yes/No	Findings																											
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	There are 2 riparian zones identified in the BKSB, there are Sg. Intan and Sg. Pinang. BKSB need to enhance the awareness to protected, including maintaining and restoring appropriate riparian and other buffer zones.																											
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	Not applicable.																											
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Not applicable.																											
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	Sighted "Fossil Fuel Management Plan" had been developed and reviewed in Jan 2022. The plan only focuses on diesel usage by FFB Transport and use of fertilizers. Sighted environmental impact and mitigation measure has been identified and documented accordingly. Consumption of diesel was monitored on monthly basis. Sighted the data from year 2018 to 2022 during the audit.																											
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	<div>The Bukit Kretam Sdn. Bhd. had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends via email to RSPO in Apr 2021. The input data FY2021 have been verified and checked. The input data as per below:</div> <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>1288.59</td></tr><tr><td>Oil Palm Planted On Peat</td><td>Ha</td><td>0.00</td></tr><tr><td>Total Oil Palm Planted Area</td><td>Ha</td><td>1288.59</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>6.20</td></tr><tr><td>FFB Supplied To This Mill</td><td>Mt</td><td>2022871.00</td></tr><tr><td>FFB Produced By This Estate/Pantation</td><td>Mt</td><td>2022871.00</td></tr><tr><td>FFB Production Per Hectarage</td><td>Mt/Ha</td><td>1569.83</td></tr></table>	Description	Unit	Value	Oil Palm Planted On Mineral Soil	Ha	1288.59	Oil Palm Planted On Peat	Ha	0.00	Total Oil Palm Planted Area	Ha	1288.59	Conservation Area (Forested)	Ha	0.00	Conservation Area (Non-Forested)	Ha	6.20	FFB Supplied To This Mill	Mt	2022871.00	FFB Produced By This Estate/Pantation	Mt	2022871.00	FFB Production Per Hectarage	Mt/Ha	1569.83
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Clause	Indicators	Comply Yes/No	Findings																																																							
			<table><tr><td colspan="5">Plantation / field emission</td></tr><tr><th>ription</th><th>Total emission (tCO2e)</th><th>tCO2e/ha</th><th>tCO2e/t FFB</th><th>Emission allocated to this mill (tCO2e)</th></tr><tr><td>Land Conversion</td><td>12726.92</td><td>9.88</td><td>0.01</td><td>12726.92</td></tr><tr><td>Crop Sequestration</td><td>-12063.44</td><td>-9.36</td><td>-0.01</td><td>-12063.44</td></tr><tr><td>*CO2 Emissions from Fertiliser</td><td>465013.31</td><td>360.87</td><td>0.23</td><td>465013.31</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>672129.90</td><td>521.60</td><td>0.33</td><td>672129.90</td></tr><tr><td>Fuel Consumption</td><td>1138.13</td><td>0.88</td><td>0.00</td><td>1138.13</td></tr><tr><td>Peat Oxidation</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Sequestration in Conservation area</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>TOTAL</td><td>1138944.82</td><td>883.87</td><td>0.56</td><td>1138944.82</td></tr></table> <p>*Includes transport and manufacture emissions from mineral fertilizers and emissions from urea *This only includes N2O emissions form mineral fertiliser application and peat soil. The N2O emissions from organic fertiliser application is not included here and can only be displayed in the final summary.</p>	Plantation / field emission					ription	Total emission (tCO2e)	tCO2e/ha	tCO2e/t FFB	Emission allocated to this mill (tCO2e)	Land Conversion	12726.92	9.88	0.01	12726.92	Crop Sequestration	-12063.44	-9.36	-0.01	-12063.44	*CO2 Emissions from Fertiliser	465013.31	360.87	0.23	465013.31	N2O Emissions from Peat	0.00	0.00	0.00	0.00	N2O Emissions from Fertiliser	672129.90	521.60	0.33	672129.90	Fuel Consumption	1138.13	0.88	0.00	1138.13	Peat Oxidation	0.00	0.00	0.00	0.00	Sequestration in Conservation area	0.00	0.00	0.00	0.00	TOTAL	1138944.82	883.87	0.56	1138944.82
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditors has verified through checking the 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 Bukit Kretam Sdn. Bhd. 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, N2O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place.																																																							
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	During site visit there was no new planting or replanting at BKSB.																																																							
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Estate has established fire prevention and control measures as per procedured SSOP "Pelan Tindakan Menghadapi Kebakaran" sighted a training has been conducted by estate manager to employees and mandore in Oct 2021.																																																							
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Engages with adjacent stakeholders on fire prevention has been conducted and briefed during external stakeholders' consultation meeting through online meeting conducted on Dec 2021.																																																							

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Clause	Indicators	Comply Yes/No	Findings
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	A historic Land Use Change Analysis (LUCA) analysis had been carried out for BKSB Estate with the report titled 'Land Use Change Analysis Review Report for Bukit Kretam Sdn Bhd' dated 19 January 2020 presented. LUCA is a requirement for BKSB Estate because new planting was carried out after November 2005. The LUCA concluded that the Final Compensation Liability was nil, and no compensation was to be penalised on BKSB. This was because BKSB had carried out the new planting prior to BKSB becoming a member of the RSPO (membership started on 20 February 2020). The initial RSPO membership was from February 2020 until Jan 2022 and renewal upon expiry.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The report of "HCV-HCSA Assessment Report of BKSB" was made available to the auditor. It was noted that the assessment was completed in Jan 2019. The latest review was in Jan 2022. The HCV-HCSA report was reviewed/amended using the HCS Approach Toolkit Module 1, 2, 3 & 4 Version 2.0. Noted that the results showed that there was no HCS forest has been identified in the estate. The assessment also found there was no identified RTE at Bukit Kretam Estate. Nevertheless, BKSB had identified the river buffer zone for Sg. Pinang and Sg Intan in the Estate as HVC 4 areas which are to be maintained and conserved (a total area of 6.20 ha). The Assessor had also verified that BKSB Estate was adjacent to Trusan Kinabatangan forest reserve and Kulamba Wildlife reserve. There was no new land clearing after 15 November 2018
	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>BKSB CU has established HCV action plan for BKSB titled "Management Action Plans and Continous Action Plan" dated Jan 2022. The estate planned to maintain the riparian reserve by:</p> <ul style="list-style-type: none"> • Prohibiting the cutting down of the tree at the area, • Prohibiting manuring and spraying operation at the riparian reserve area • Workers are constantly informed not to encroach into the riparian reserve and disturb the area • Periodic visit to the riparian reserve to monitor any illegal activities <p>And also to maintain or enhance measures adjacent with Trusan Kinabatangan FR and Kulamba Wildlife Reserve by:</p> <ul style="list-style-type: none"> • Prohibition workers entrance to this area • Signboard are erected at the boundary • Constantly briefed workers regarding RTE

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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> Prohibition of logging at the estate boundary Prohibition of illegal hunting
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	There were no local communities living in HCV areas within BKSB Estate. The only community located adjacent to BKSB estate is Kg Sri Ganda. Consultation with the Head of JKKK Kg Sri Ganda confirmed no land issues or FPIC between villagers and BKSB CU. Hence, this indicator was not applicable with this CU.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	<p>Bukit Kretam CU continued to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that prohibition signage was erected, that is,</p> <ul style="list-style-type: none"> No hunting, no fishing and no pesticide spraying within buffer area at Sg. Pinang and Sg Intan, and No hunting and no illegal activities at forest border with Trusan Kinabatangan Forest reserve.
	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	Bukit Kretam Sdn. Bhd. continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the Sg. Pinang and Sg Intan.
	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 since 15 November 2018.

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

Clause	Indicators		Comply Yes/No	Findings
5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	NA	Not applicable. BKSB didn't have other mills or estates within its 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.
	(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.
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	NA	Not applicable.
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 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.
	(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.

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	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	NA	Not applicable.
	(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.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	NA	Not applicable.
		<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; 	NA	
		<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.
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	NA	Not applicable.
		<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.
	(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.
5.6.6 The CB shall review whether oil	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	NA	Not applicable.
		No additional indicator.	YES	Not applicable.

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<p>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>				
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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
6.7.3 DA 01 2022	Major	<p>Finding: The unit of certification ineffective to ensure the working environment under its control is safe and without undue risk to health.</p> <p>Objective evidence: Site inspection at Lot 30 A7, sighted 2 harvesters did not use appropriate personal protective equipment (PPE) i.e. safety helmet and cotton gloves (as per endorsement in HIRARC) to cover all potentially hazardous harvesting operations. Furthermore, emergency eyewash and shower was not available at workshop area as per CHRA recommendation dated 04/07/2019.</p>	<p>Root cause:</p> <ol style="list-style-type: none"> Harvester lack of understanding on company SSOP. Lack of understanding regarding CHRA Report recommendation. <p>Correction:</p> <ol style="list-style-type: none"> SSOP Training for harvesters has been conducted on 18.04.2022. (refer to Attachment 01) To install emergency eyewash & shower at the workshop area as per CHRA recommendation. (refer to BKSB continuous improvement plan Attachment 02 - 5.5 Safety & Health) <p>Corrective action:</p> <ol style="list-style-type: none"> To evaluate the effectiveness of training conducted to ensure that the workers understand and comply company's SSOP. BKSB management shall review CHRA Report Recommendation. 	<p>Auditor has verified document attached of training records i.e. attendance list, pictorial of training, etc. The training regarding Safe Safety Operating Procedure (SSOP) for harvesting operation was conducted to all harvesters on 18/04/2022 and trained by estate manager.</p> <p>Emergency eyewash & shower has been installed at workshop area as per pictorial given. The major NC was closed effectively with sufficient evidence of implementation on 25/05/2022. Continuous implementation will be further verified in the next surveillance assessment.</p> <p>Status: Closed</p>
3.4.3 MAR 01 2022	Major	<p>Finding: Social and environmental management and monitoring plan is not reviewed and updated in a participatory way.</p> <p>Objective evidence: Based on SIA, management action plans and continuous improvement plans dated February 2022, there was several issues not update in the documents such as:</p> <ol style="list-style-type: none"> Education facilities especially on primary school / HUMANA / CLC for Indonesians/Filipino children's aged 7-16 years old in BKSB estate. Health facilities i.e. Hospital Assistant / Estate Dresser in the estate. Currently estate used medical practitioner from 	<p>Root cause: Issues for social improvement plan was not properly monitored by estate management.</p> <p>Correction: Social Impact Assessment Management Action Plans and Continuous Improvement Plans was updated 30/05/2022 to include 3 issues highlighted and in progress to rectified:</p> <ol style="list-style-type: none"> Company representative has engaged PPLD and Humana Society and in progress of evaluating best option available to improve the quality of education provided in the estate (refer to attachment 03). An Estate Dresser Gred 1 (Mr Samsuddin Samsurie) has been employed for estate clinic 	<p>Auditor has verified document attached of Social Impact Assessment Management Action Plans and Continuous Improvement Plans was updated 30/05/2022. All 3 issues emphasised was included and the progression to remedy the issues have been sighted. The major NC was closed effectively with sufficient evidence of implementation on 25/05/2022. Continuous implementation will be further verified in the next surveillance assessment.</p> <p>Status: Closed</p>

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		<p>Klinik Ung which is approximately 90-100km.</p> <p>3. Updating the status of providing mosque/surau which was updated on July 2021.</p>	<p>starting 10th May 2022</p> <p>c) A proposal has been submitted to the Board of directors on 10th April 2022 (please refer to attachment 04 & 05). Please refer to attachment 02 - BKSB CIP 5.6 Social & welfare</p> <p>Corrective action: BKSB shall monitor and take action on estate continuous improvement plan especially for social, safety & environment.</p>	
6.2.3 MAR 02 2022	Major	<p>Finding: There was contravene with legal labour requirement for Minimum Wages Order Amendment 2020 for several workers sampled in BKSB.</p> <p>Objective evidence: Minimum wages for several workers i.e. employee no 0889P (Jan 2022), 0759P (Jan 2021), 0207P (Jan 2021, July 2021, Dec 2021, Mac 2022), 0477P (Dec 2021, Jan 2022, Mac 2022) is not according to the Minimum Wages Order (Amendment 2020) which below RM 1,100 without justification from management.</p>	<p>Root cause: The workers does not comply with estate working hours and poor daily attendance.</p> <p>Correction: a) Refund/ top-up salary to workers that does not achieve minimum wages (refer attachment 06) b) Conducted briefing on 25th April 2022 to all workers regarding estate working hour/poor attendance and how it will affect their salary (refer attachment 07)</p> <p>Corrective action: To identify and counsel workers that does not comply with estate working hours/poor attendance and take disciplinary action if necessary.</p>	<p>Auditor has verified document attached of payment voucher dated 28/04/2022 and payment statement with total RM3231.97 to be paid to 4 workers as refund/ top-up salary to workers that does not achieve minimum wages. Sighted also briefing records dated 25/04/2022 during muster ground regarding working hours and turn out attendance to achieve minimum wages. The major NC was closed effectively with sufficient evidence of implementation on 25/05/2022. Continuous implementation will be further verified in the next surveillance assessment.</p> <p>Status: Closed</p>
7.4.4 DA 02 2022	Minor	<p>Finding: Records of fertiliser inputs was inadequate.</p> <p>Objective evidence: There is no agronomic report or breakdown on fertilizer recommendations FY2022 i.e. fertilizer dosage, type of fertilizers, etc. based on foliar sampling result dated 09/04/2021.</p>	<p>Root cause: Poor planning on estate fertilizer operation in terms of conducting sampling, fertilizer recommendation, ordering, purchasing, delivery & application.</p> <p>Correction: To obtain fertilizer recommendation for year 2023 after conducting 2022-year soil & foliar sampling.</p> <p>Corrective action: To ensure that the estate management understand the flow of fertilizer operation from A to Z to ensure fertilizer programme are executed efficiently.</p>	<p>Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.</p> <p>Status: Open</p>

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Attachment 5 – Stakeholder List

BUKIT KRETAM SDN BHD

List of Stakeholder

Last Updated as at 24.06.2021

Stakeholder Group (Neighbouring Estate, Villagers, Smallholders, Supplier, Contractor, Customer, NGO etc)						
No	Name	Address	Email	Telephone	Fax	Contact person
Government Department						
1	Malaysian Palm Oil Association	Malaysian Palm Oil Association (MPOA) - Sabah (No. Pendaftaran Pertubuhan 1045), 1st Floor, Lot 3, Block 6 Bandar Indah, Mile 4, Jalan Utara, 90000 Sandakan, Sabah, Malaysia.	mpoa.sabah@e.mail.com	089-225863	089-225864	Mr. Genga Pillai
2	Malaysian Palm Oil Board	Lembaga Minyak Sawit Malaysia (MPOB), Wisma Sawit, Lot 6, 556, Jalan Perbandaran, 47301 Kelana Jaya, Selangor Darul Ehsan.		03-78022851	03-7803223 / 03-78033533	Dr. Faizah Mohd Syariff
3	Department Of Environment (Kota Kinabalu)	Jabatan Alam Sekitar Sabah, Aras 4, Block A, Kompleks Pentadbiran Kerajaan Persekutuan Sabah, Jalan UMS-Sulaman, Likas, 88450 Kota Kinabalu, Sabah.		088-488171 / 088-488172	088-488177	Datin Hajah Hanili Binti Ghazali
4	Environmental Protection Department	Environment Protection Department, Wisma Budaya, 1-3 Floor, Tungku Abdul Rahman Road, Locked Bag 2078, 88999 Kota Kinabalu, Sabah, Malaysia.		088-238188	088-238120	Mr. Yabi Yangkat
5	Department Of Agriculture	Jabatan Pertanian Sabah, Aras 1,5,6 & 7, Wisma Pertanian, Jalan Tasik (Off Jalan Maktab Gaya), Beg Berkunci No.2050, 88632 Kota Kinabalu, Sabah.	doasabah@sabah.gov.my	088-283283 / 088-283282	088-239046	En. Idrus Bin Shafie
6	Immigration Department	Pejabat Imigresen Negeri Sabah, Aras 1-4, Block B, Kompleks Pentadbiran Kerajaan Persekutuan, Jalan UMS, 88300 Kota Kinabalu, Sabah.		088-488700	088-488800	Tuan Noor Alam Khan Bin A. Wahid Khan
7	Ibu Pejabat Polis Kontinjen Sabah	Ibu Pejabat Polis Kontinjen Sabah, Polis Di Raja Malaysia, Beg Berkunci No.2062, 88560 Kota Kinabalu, Sabah.	cpo.sabah@rmp.gov.my	088-253555	088-240475	DSP Mohammad Bin Taib (Bahagian Pentadbiran) - 0168036628
8	Labour Department Lahad Datu	Jabatan Tenaga Kerja, Peti Surat 60181, 91111, Lahad Datu.		089-881623	089-880623	Puan Asriyah Abdul Hafid
9	Suruhanjaya Tenaga	Pejabat Kawasan (Pantai Timur Negeri Sabah), Tingkat 3, Wisma Saban, KM 12, Jalan Labuk, WDT No.25, 90500 Sandakan, Sabah.		089-666694	089-660279	En. Mohd Yusrul Bin Yusof (Pegarah Suruhanjaya Tenaga, Kawasan Pantai Timur)
10	Department Of Safety and Health (Kota Kinabalu)	Jabatan Keselamatan dan Kesihatan Pekerjaan Sabah/W. Labuan (Kementerian Sumber Manusia), Tingkat 1, Sayap Kanan, Wisma Perkeso, No.11, Lorong Sempelang, P.O Box 60, 88858 Tanjung Aru, Kota Kinabalu, Sabah.	jkkpsb@mohr.gov.my	088-235855 / 088-230855 / 088-253576		Ir. Hamsain Bin Baniamin
11	Jabatan Keselamatan & Kesihatan Pekerjaan (JKKP) Sandakan	JKKP (Kementerian Sumber Manusia), Tingkat 1, Wisma Sabah, Batu 7, Jalan Labuk, WDT No.71, 90500 Sandakan.		089-672059 / 089-672072	089-562630	En. Mohd Zulfadly Bin Zainuddin
12	Jabatan Bomba dan Penyelamat Kinabatangan	Balai Bomba dan Penyelamat, Jalan Datuk Hj Abdul Malek Chua, Pekan Kota Kinabatangan, 90000 Kinabatangan, Sabah.		089-562630		
13	Lahad Datu Wildlife Department	No. 8125, Lot 1, Blok 10, Singga Point, Peti Surat 61224, 91121 Lahad Datu.		089-863736		
14	Lahad Datu Forestry Department	Ibu Pejabat Jabatan Perhutanan, Beg Berkunci 68, 900009 Sandakan, Sabah		089-242500		Datuk Sam Mannan
15	Jabatan Alam Sekitar	Tingkat 2, Wisma Sabah, Lot 1 & 2 Megah Light Industrial Estet, Bt 7, Jalan Labuk Sandakan		089-674653		En. Zulmie
16	Balai Polis Lahad Datu	Polis Diraja Malaysia, P/S 60133, Jalan Kastam Baru, 91100 Lahad Datu, Sabah		089-881255/ 089-882633		

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List of Stakeholder

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Stakeholder Group (Neighbouring Estate, Villagers, Smallholders, Supplier, Contractor, Customer, NGO etc)						
No	Name	Address	Email	Telephone	Fax	Contact person
17	Jabatan Buruh	Jabatan Tenaga Kerja, Peti Surat 60181, 91111 Lahad Datu		089-881623	089-880623	En. Rusdi Bin Bustami
18	Konsulat Republik Indonesia, Tawau	Batu 2 1/2 Jalan Sin Onn P.O.Box No 742, 91000 Tawau		089-772052	-	Pak Ridwan Bin Tahir
19	Philippine Embassy, Kuala Lumpur, Malaysia	No.1 Changkat Kia Peng, 50450, Kuala Lumpur, Malaysia		+(603) 2148 4233	-	Bernard Bonina Social Welfare Attache
NGO's Department						
20	World Wild Life Fund For Nature (WWF) Lahad Datu	WWF Lahad Datu Field Office, Forest Restoration, MDLD 6575, 1st Floor Lot 9, Block Airport Plaza, 91100 Lahad Datu, Sabah		089-886376	089-886378	MR Fredinand Lobinsiu
Villagers						
21	Kg. Sri Ganda, Kinabatangan	Kg. Sri Ganda, Kinabatangan, Sabah.		010-8835595		En. Kaidi - Ketua Kampung
22	Sekolah Kebangsaan Sri Ganda, Kinabatangan	WDT 22, 90200, Kota Kinabatangan, Sabah	xb2205@gmail.com	011-70332394		En. Ahmad Bin Normin - Guru Besar
Neighbouring Estate						
23	Unico 3 (IOI Plantations)	50km Jalan Jeroco, P.O. Box 6037, 91133, Lahad Datu, Sabah		016-8104869		Mr. Mohd Faizal Bin Yusoh
24	Hap Seng Plantations Holding Berhad	Locked Bag No.05, 91109 Lahad Datu, Sabah		089-278128 / 089-278138	089-278186 / 089278168	Daniel Lo, Tahir Salang
25	Yeoh Eng Cheang Co. Sdn Bhd	Lot 23, MDLD 0718, Jalan Bahagia 1, Taman Bahagia, 91100 Lahad Datu, Sabah.		089-887322		Pengurus Ladang
26	Yeoh Eng Chong Plantation Sdn Bhd	Lot 23, MDLD 0718, Jalan Bahagia 1, Taman Bahagia, 91100 Lahad Datu, Sabah.		089-887322		Pengurus Ladang
Contractor & Suppliers						
27	Kim Fung Contractor (Remarks :- Heavy Machinery Contractor)	MDLD 0653, Ming Huat Light Industrial Centre, Jalan Dam, 91100 Lahad Datu, Sabah.		019-8231171		Mr. Chin Kar Ven
28	Pemborong Bina Jaya Contractor (Remarks :- Heavy Machinery Contractor)	Sir Perdana, Phase 4, MDLD 7386, Lot 37, Jalan Silam, 91100 Lahad Datu, Sabah.		014-5553801 / 019-8712109		Mr. Chen Kon Sang
29	Woo Chee Ming (Remarks :- Estate Canteen)	No.31, Rays 2, Taman Public Villa, Lahad Datu, Sabah.		019-8338879		Mr. Woo Chee Ming
30	BEHN MEYER AGRICARE (M) SDN.BHD. (Remarks :- Fertilizer Supplier)	LOT 49, POIC LAHAD DATU, PHASE 2, KM 5.5, JALAN TENGAH NIPAH, 91110, LAHAD DATU, SABAH.		089-880334 / 089-884717 Mobile:- 019-8631336	089-863642	Mr. Eric
31	LOONGSYN SDN. BHD. (Remarks :- Fertilizer & Chemical Supplier)	MDLD 3294, FAJAR CENTRE, JALAN SEGAMA, 91100, LAHAD DATU, SABAH.		089-883655	089-884654	Mr. Paul / Ms. Lia
32	AGRI-HORTICULTURAL TRADING (LAHAD DATU) SDN BHD (Remarks :- Chemical Supplier)	MDLD 3331, TECK GUAN INDUSTRIES ESTATE, JALAN SEGAMA, P.O. BOX 60800, 91117, LAHAD DATU, SABAH.		089-884379	089-883298	Ms. Nanie
33	LAHAD DATU AGRO-CHEM (Remarks :- Chemical Supplier)	KM 1, JALAN SILAM, NO 69, TAMAN HING NAM, 91100, LAHAD DATU, SABAH.		089-884191 / 089-883879 Mobile :- 016-8269911	089-881426	Mr. Alan Yap
34	TECK GUAN SDN.BHD (Remarks :- Diesel Supplier)	MILE 1 1/2, JALAN SEGAMA, P.O. BOX 60036, 91110, LAHAD DATU, SABAH.		089-889955	089-888955	Mr. Thien / Mr. Lim
35	HAP SENG (OIL & TRANSPORT) SDN BHD (Remarks :- Diesel Supplier)	MDLD 2714, BATU 2 1/2, JALAN KASTAM BARU, P.O. BOX 61283, 91100, LAHAD DATU, SABAH.		089-884460	089-881343	Mdm. Lim

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No	Name	Address	Email	Telephone	Fax	Contact person
36	SYARIKAT EXCEL SERVICE (Remarks :- Petrol Supplier)	SHELL JALAN SEGAMA 1, P.O. BOX 61230		089-881789		
37	KLINIK MABELLO (PARIS) SDN. BHD. (Remarks :- Visiting Medical Officer)	LOT 4, PREMIS PERNIAGAAN, KAMPUNG PARIS 3, 90200, LAHAD DATU, SABAH		089-575077 / 013-5474776		Dr. Fikri
38	JEROCO Palm Oil Mill 2 (JPOM 2)	Locked Bag No.05, 91109 Lahad Datu, Sabah.		089-278128 / 089-278138	089-278186 / 089-278168	En. Jumansha A.
39	UNICO DESA Palm Oil Mill (UDOM)	UNICO DESA PLANTATION BERHAD (Unico Desa Mill) P.O. Box 60397, 91113, Lahad Datu, Sabah.	Udesaoilmill@gmail.com	016-8268896	-	En. Muslimin Sakka