



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

File Ref. : EK91220001

RSPO PUBLIC SUMMARY REPORT

CLIENT : SYARIKAT KRETAM MILL SDN BHD CERTIFICATION UNIT

PARENT COMPANY : KRETAM HOLDINGS BERHAD

RSPO MEMBERSHIP No.: 1-0189-15-000-00

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	
SYARIKAT KRETAM MILL SDN BHD	Syarikat Kretam Mill	5°39' 25" N	117°50' 15" E	Off KM 45, Sandakan – Lahad Datu Highway, Sandakan, Sabah
	Bode Estate	5°38' 37" N	117°49' 54" E	
	Masang Estate (2 Divisions)	5°39' 47" N	117°51' 55" E	
	Bukit Sekong Estate (2 Divisions)	5°36' 12" N	117°54' 09" E	Batu 60, Jalan Sukau, Kinabatangan, Sandakan, Sabah
	Sapagaya Estate	5°34' 52" N	118°01' 06" E	KM 82 Jalan Lahad Datu / Sandakan, Kinabatangan, Sandakan, Sabah

MAP : See Attachment 1

AUDIT DATE : 28/03/2022-01/04/2022

DURATION : 26 auditor days

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

STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 15th June 2016 to 14th June 2021 (extended until 14th Aug 2022)

The following attachments form part of this report:

Non-conformity Report(s) ☐

List of additional site(s) ☐

Report by Audit Team Leader

Name : Rohazimi Mat Nawi

Signature :

Date : 18/7/2022 (PUBLIC SUMMARY)
01/7/2022 (FINAL REPORT)

Acknowledgement by Client's Representative

Name : Simoh Bin Kulipang

Signature :

Date : 18/07/2022

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit				
On-site audit date	:	28/03/2022-01/04/2022	No. of auditor days	: 26 AD
Audit team	:	TLA-Rohazimi Bin Mat Nawi A- Mohd Ab Raouf Asis, Dzulfikar Azmi, Mohd Zulfakar Kamaruzaman, Rozaimiee Ab Rahman, Mohd Nordin Abd Jalil		
No. of major NCR	:	2	Indicator:6.2.4 & 7.8.2	Closing date : 29/6/2022
No. of minor NCR	:	3	Indicator :7.3.3, 6.7.2 & 1.1.2	
Indicate the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
	:	/	/	/
	:	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	:	/	/	/
	:	Indigenous people	Contractor	Others (Please specify)
Supply base sampled	:	Bode Estate, Masang Estate, Sapagaya Estate, Bukit Sekong Estate		
Justification of audit planning	:	Total allocation of auditor days for Syarikat Kretam Mill CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Estate = 21 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title		
Name of peer reviewer	:	Harso Yuli Antena		
Report approved by	:	Kamini Sooriamoorthy	Approval date : 18/07/2022	

Annual Surveillance Audit 4				
On-site audit date	:	27-30 July 2020	No. of auditor days	: 18
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Rozaimiee Ab Rahman, Mohd Ab Raouf, Dzulfikar Azmi, Selvasingam T. Kandiah		
No. of major NCR	:	3	Indicator: 3.6.1, 3.8.7, 7.12.4	Closing date : 24/10/2020
No. of minor NCR	:	2	Indicator : 2.2.3, 6.5.3	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers org.	Settlers	Villagers / Local communities
	:	√	√	√
	:	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	:	√	√	√
	:	Indigenous people	Contractors	Others (Please specify)
Supply base sampled	:	Bode Estate, Masang Estate, Sapagaya Estate, Bukit Sekong Estate		
Changes since the last audit	:	None		
Justification of audit planning	:	Total allocation of auditor days for Syarikat Kretam Mill CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Estate = 14 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title		
Report approved by	:	Kamini Sooriamoorthy	Approval date : 30/10/2020	

SUMMARY OF INFORMATION

TABLE 1

	RA-2022	ASA 1-2023	ASA 2	ASA 3	ASA 4-2021
Projection Period	June 2021 – May 2022	March 2022 – Feb 2023			August 2020 – July 2021
Certified FFB Processed (MT)	191,955.00	202,558.00			199,340.00
Production of Certified CPO (MT)	42,230.10	42,535.403			41,861.40
Production of Certified PK (MT)	8,610.76	9,118.65			7,973.60
Certified Areas (Ha)	10,436.07	10,567.66			10,436.07
Planted Areas (Ha)	9,564.08	9,587.74			9,564.08
Production Areas (Ha)	9,121.50	8,809.94			9,045.83
HCV Areas / Conservation Areas (Ha)	250.00	250.00			250.00
REMARKS	Changes planted and certified areas to include missed area under Masang Estate. This been detected during this audit and raised as NCR RMN 02.				

TABLE 2

	PO	PK
Last years certified volume (MT)	**64,806.40	**13,843.60
Last years actual certified sold (MT)	40,622.24	12,723.75
Last years actual sold under other schemes (MT)	16,986.590	0.00
Last years sold conventional (MT)	0.00	0.00
New year certified volume (MT)	42,535.41	9,118.65

**CPO & PK volumes have been extended in Sept & Dec 2021, and in Apr 2022.

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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
Rohazimi Mat Nawi	Trainee Lead Auditor Environment, Safety, Metric Template	Hold B. Sc (Hons) Chemical Gas Engineering from Universiti Teknologi Malaysia. He has direct working experience in the Plantations Industry and a qualified RSPO P&C Auditor.
Mohd Ab Raouf Asis	Auditor Social,GAP	Holds a B. Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. He has experience in auditing since 2016, a qualified RSPO P&C, RSPO SC and MSPO lead auditor.
Dzulfiqar Azmi	Auditor Environment, GHG & TBP	Holds a B. Sc. in Agriculture from University Teknologi Mara (UiTM). He had more than 5 years of working experience in the oil palm operation and experience in auditing since 2017.
Mohd Zulfakar Kamaruzaman	Auditor Social – External, HCV	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C, MSPO and RSPO SC Lead Auditor.
Rozaimiee Ab Rahman	Lead Auditor RSPO SC/Auditor SC & Safety Mill	Holds a B.Sc. in Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, MSPO and RSPO SC Lead Auditor.
Mohd Nordin Abd Jalil	Auditor GAP	Holds a B. Sc. in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation. He is qualified auditor for RSPO P&C.

1.3 Audit methodology

The audit covered the 1 palm oil mill and 4 estates of its supply base. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The 4 supply base covered during the audit are Bode, Masang, Bukit Sekong and Sepagaya. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification.

Assessment and verification site visit been sampled during the audit are

- Chemical stores, Fertilizer store, Premix area, Scheduled waste store - Bode estate, Masang estate, Sapagaya estate, Bukit Sekong estate and Kretam Mill
- Field inspections - Block 00BA8 & Block 05BC1 (Bode Estate), Block 01MA5 & Block 04BG (Masang Estate), Block 10ND2, Block 09NC8 & Block 09NC9 (Sapagaya Estate), Block 00BA2 & Block 12CA5 (Bukit Sekong Estate)
- HCV - Masang Estate & Bode Estate.
- Riparian zones - Bode estate, Masang estate, Sapagaya estate, Bukit Sekong estate
- Water Treatment Plant - Bode estate, Masang estate, Sapagaya estate, Bukit Sekong estate
- Workshops - Bode estate, Masang estate, Sapagaya estate, Bukit Sekong estate and Kretam Mill
- Line sites - Bode estate, Masang estate, Sapagaya estate, Bukit Sekong estate and Kretam Mil
- Landfill - Bode estate, Masang estate, Sapagaya estate, Bukit Sekong estate
- Mill inspections - Loading ramp, sterilizer, press station, oil room, kernel plant, mill workshop, boiler, effluent treatment plant

Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit and full document review on all aspects of RSPO P&C's applicable

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 11/2/2022. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs).

In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below. More information on stakeholders contacted were provided in Attachment 7 of this report.

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	<ul style="list-style-type: none">a. Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between.b. All workers confirmed that they receive a minimum of RM1100 per month. They receive their salaries before 7th of every month.c. Some workers receive their wages in cash and some workers received their wages through bank in. they can withdraw at nearest town i.e., Bukit Garam or Checkpoint.d. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing.e. 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.f. Undocumented dependant is being legalised in stages with collaboration with the Indonesian consulate.g. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in

		<p>house repairs, if any, are usually due to the need to order repair parts.</p> <p>h. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer.</p> <p>i. For newly arrived foreign workers who do not understand Bahasa or English, translations are provided during briefings.</p> <p>Please refer to indicator 6.2.1 for name list of workers interviewed at all estates.</p>
	2) Settlers	Not applicable
	3) Villagers / Local communities (including women representatives, displaced communities)	Interviewed relevant stakeholders such as villager representatives from Kg Batu 8, Kampung Berjaya 1, Kampung Buang Sayang, Kampung Sri Tanjung, Kampung Rantau Abang. No issue.
	4) Suppliers	No issue raised. Payments are received in time.
	5) Contract workers (local / foreign / Orang Asli workers / male & female)	NA
	6) Local & national NGOs	NA
	7) Government agencies / Statutory bodies	<p><u>Suruhanjaya Tenaga</u> Sighted an evidence email from Kretam Mill to Suruhanjaya Tenaga on 29/03/2022 to provide all the evidence. Among of issues & evidence provided as per below: Borang H (Pengujian) – the CU already hired competent electrical contractor “ IPC Engineering Sdn Bhd” to do the test Sijil Ujian Geganti Perlindungan (Relay Calibration) – leakage relay calibration certificate has been conducted on 19/07/2020 by CYES Power Engineering Sdn Bhd. Results from the calibration indicated that all the equipments are in accordance with Electricity Regulation 1994. Sijil Ujian Suisbod daripada Pengilang (Switchboard Certificate) – switchboard certificate nameplate already send to ST , the serial no : PF161121-012. Salinan borang 49/SS – sighted an evidence form 49 as per company Act 1965 (section 141(6)) has been submitted to ST.</p> <p><u>BOMBA</u> Training for fire drill – collaborated with Jabatan Bomba dan Penyelamat on 14/09/2021. Sighted training programme established to include fire drill & emergency response plan training. Meeting on emergency response plan has been conducted on 13/09/2021, chaired by the Mill Engineer Mr John Chong Yee Hin.</p> <p><u>DOSH</u> To conduct OSHWA inspection at workplace – conducted on 08/03/2021 results: Gred A. The air compressor SOP for tire pump was established, i.e., “SOP safety & health – fixing tyre & rim, doc no: KHB/G/SOP-26/S&H-23, revision date 03/11/2016.</p>
	8) Independent growers / Smallholders	NA
	9) Indigenous people	NA
	10) Contractor	<p>Some of the contractors sampled: 1) Tai Ann and Lo Nyuk Kiong (contractor from Bukit Sekong Estate) 2) Syarikat Sri Manjung and Hasanuddin Company (contractor from Sepagaya Estate) 3) Juita Baru Sdn Bhd, K.K Fong Sdn Bhd, and Gordon Anchi Bersaudara (POM)</p> <p>From the interview with contractors, it can be confirmed that they understand on terms and conditions of the agreement between themselves and KHB. No complaints against the certification unit.</p> <ul style="list-style-type: none"> Fair dealings with the units in Kretam Mill CU. Payments are made within 1 months of invoice. For transporter contractor, the estate mandore and staff will verify the work the contractor has done before his invoice can be approved for payment.

		<ul style="list-style-type: none"> ▪ All contractors' workers had attended RSPO training, signed COBC commitment statement and safety briefing. The Company provides PPE. ▪ Suppliers of hardware and spare parts invoices were based on agreed quoted prices. ▪ Payment to contractors were made usually within 45 days of invoice. Renewal of contract is via tender system. ▪ Contractor and his workers knew about the minimum wages order requirement the workers make statutory contributions such as EPF, EIS and SOSCO. Workers details including names, pay slips, were presented for verification. ▪ All contractors also attended stakeholder meetings. ▪ Contractors must provide to the estate's copies of their worker details and payslips.
	11) Previous land owner (if any)	NA
	12) Others (please specify)	NA

1.5 Audit plan : Refer to Attachment 2

1.6 Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit. (For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate)

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

Syarikat Kretam Mill Sdn. Bhd. and the supply bases owned by Kretam Holdings Berhad (KHB) is located at Bode Estate, Sandakan, Sabah, Malaysia was newly transferred to SIRIM QAS on 21 May 2020. KHB is a plantation organization with operations in 3 regions namely Sandakan, Tawau and Lahad Datu, Sabah, Malaysia. There are 3 mills, one at each region and one refinery at Sandakan region. The supply bases of Kretam Mill consist of 4 owned estates namely Bode, Sapagaya, Bukit Sekong and Masang.

The palm oil mill operates with a processing capacity of 60 metric tonnes of fresh fruit bunches (FFB) per hour. The CU have ISCC certification beside of RSPO P&C and Supply Chain.

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

The FFB sourced from company owned estates that are certified and a small proportion from third party suppliers. Details of the FFB contribution from each source to the Syarikat Kretam Mill Sdn Bhd were as follow:

Table 1(a): Actual FFB production by the supply base for the last reporting period (August 2020 – July 2021)

CU own estates	FFB Production	
	Tons	Percentage (%)
Masang	52,046.70	30.20
Bode	44,776.99	25.98
Sapagaya	59,397.65	34.46
Bukit Sekong	12,979.10	7.53
Abedon S/B	3,150.88	1.83
Total	172,351.32	100.00

Table 1(b): Actual FFB production by the supply base for the last reporting period (Aug 2021 – Feb 2022)

CU own estates	FFB Production	
	Tons	Percentage (%)
Masang	30,998.07	25.86
Bode	36,730.28	30.64
Sapagaya	38,302.68	31.95
Bukit Sekong	9,659.06	8.06
Abedon S/B	2,624.10	2.19
Sime Darby Plantation SABAH S/B (Third Party)	1,552.94	1.30
Total	119,867.13	100.00

Table 2: Projected FFB production by supply base for the next reporting period (Mac 2022 – Feb 2023)

CU own estates	FFB Production	
	Tons	Percentage (%)
Masang	62,862	31.03
Bode	50,133	24.75
Sapagaya	69,316	34.22
Bukit Sekong	20,247	10.00
Total	202,558	100.00

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

RSPO Supply Chain Model: IP	Total (MT)
FFB Received	172,351.32
FFB Processed	171,533.11
CPO Production	35,615.193
PK Production	7,664.47
CPO delivered as RSPO certified	17,608.900
CPO delivered under other schemes (MT) - ISCC	16,986.590
PK delivered as RSPO certified	7,352.15
PK delivered under other schemes (MT)	0.00
PK delivered as non-RSPO certified	0.00
Credits traded thru Book & Claim	0.00

Table 3(b): Actual FFB received and CPO & PK dispatch by Mill for the last reporting period
(Aug 2021 – Feb 2022)

RSPO Supply Chain Model: IP	Total (MT)
FFB Received	119,867.13
FFB Processed	119,732.64
CPO Production	24,957.789
PK Production	5,401.32
CPO delivered as RSPO certified	23,013.340
CPO delivered under other schemes (MT) - ISCC	0.00
PK delivered as RSPO certified	5,371.60
PK delivered under other schemes (MT)	0.00
PK delivered as non-RSPO certified	0.00
Credits traded thru Book & Claim	0.00

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(Mac 2022 – Feb 2023)**

RSPO Supply Chain Model: IP	Total (MT)
FFB Received	202,558.00
FFB Processed	202,558.00
CPO Production	42,535.41
PK Production	9,118.65

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Bode Estate	2,803.42	3,472.41
Masang Estate	2,959.84	3,178.62
Bukit Sekong Estate	826.30	866.86
Sepagaya Estate	2,998.18	3,049.77
Total	9,587.74	10,567.66

Table 6 Planting profile for CU

Estate	Year of planting	Planting Cycle	Mature >3 years (Ha)	Immature < 3 years(Ha)	Planted area	% of planted area mature	% of planted area immature
Bode Estate	1997	1st	102.03	0.00	102.03	85.08	14.92
	1998	1st	127.72	0.00	127.72		
	2000	2nd	154.14	0.00	154.14		
	2001	2nd	196.47	0.00	196.47		
	2003	2nd	210.49	0.00	210.49		
	2004	2nd	249.04	0.00	249.04		
	2005	2nd	214.64	0.00	214.64		
	2006	2nd	246.34	0.00	246.34		
	2007	2nd	158.03	0.00	158.03		
	2008	2nd	90.90	0.00	90.90		
	2009	2nd	78.14	0.00	78.14		
	2012	2nd	89.35	0.00	89.35		
	2016	2nd	123.94	0.00	123.94		
	2017	2nd	101.63	0.00	101.63		
	2018	2nd	201.72	0.00	201.72		
	2019	2nd	40.46	0.00	40.46		
	2021	2nd	0.00	292.33	292.33		
	2022	2nd	0.00	126.05	126.05		
Sub. Total			2385.04	418.38	2803.42	85.08	14.92
Bukit Sekong Estate	2000	1st	59.60	0.00	59.60	100.00	0.00
	2012	2nd	185.70	0.00	185.70		
	2015	2nd	160.38	0.00	160.38		
	2016	2nd	224.86	0.00	224.86		
	2017	2nd	195.76	0.00	195.76		
Sub. Total			826.30	0.00	826.30	100.00	0.00


Masang Estate	2001	1st	55.06	0.00	55.06		
	2001	2nd	237.13	0.00	237.13		
	2002	1st	37.97	0.00	37.97		
	2004	1st	24.13	0.00	24.13		
	2004	2nd	213.68	0.00	213.68		
	2005	2nd	247.14	0.00	247.14		
	2007	2nd	215.63	0.00	215.63		
	2010	2nd	299.69	0.00	299.69		
	2011	2nd	384.70	0.00	384.70		
	2012	2nd	238.48	0.00	238.48		
	2013	2nd	324.68	0.00	324.68		
	2014	2nd	131.45	0.00	131.45		
	2015	2nd	80.55	0.00	80.55		
	2018	2nd	145.61	0.00	145.61		
	2019	2nd	130.46	0.00	130.46		
	2020	2nd	0.00	68.87	68.87		
	2021	2nd	0.00	24.14	24.14		
	2022	2nd	0.00	64.09	64.09		
	Sub. Total			2766.36	157.10		
Sapagaya Estate	2001	2nd	445.24	0.00	445.24		
	2003	2nd	135.71	0.00	135.71		
	2004	2nd	193.79	0.00	193.79		
	2005	2nd	232.01	0.00	232.01		
	2006	2nd	286.66	0.00	286.66		
	2007	2nd	288.2	0.00	288.2		
	2008	2nd	275.74	0.00	275.74		
	2009	2nd	294.25	0.00	294.25		
	2010	2nd	252.47	0.00	252.47		
	2011	2nd	197.99	0.00	197.99		
	2012	2nd	192.90	0.00	192.90		
	2022	3rd	0.00	203.22	203.22		
Sub. Total			2794.96	203.22	2998.18	93.22	6.78
Grand Total			8809.04	778.70	9587.74	91.88	8.12

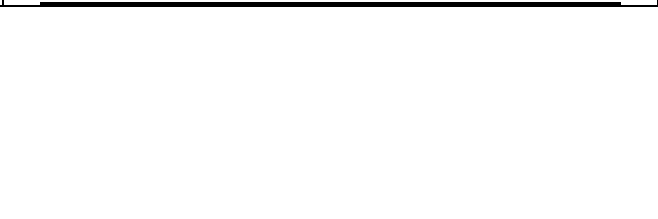
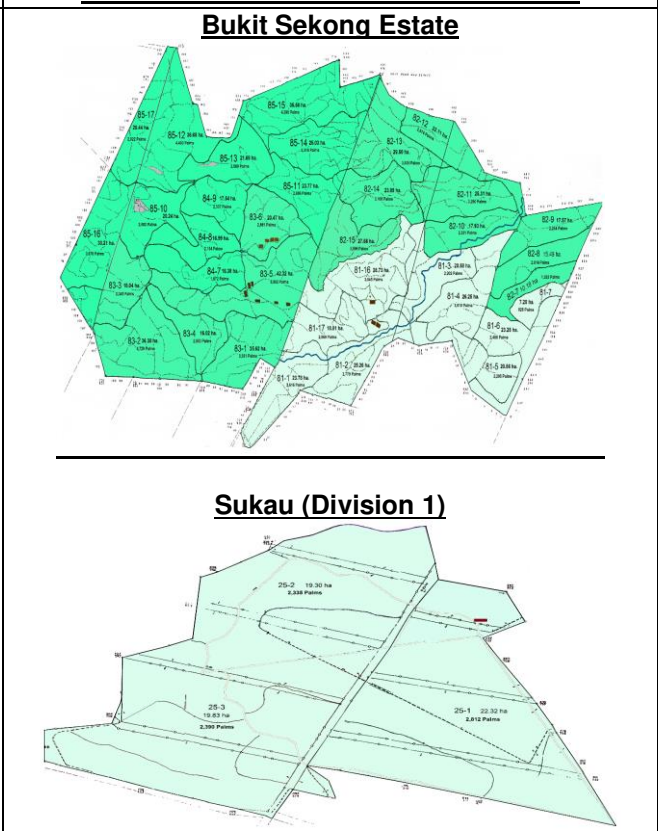
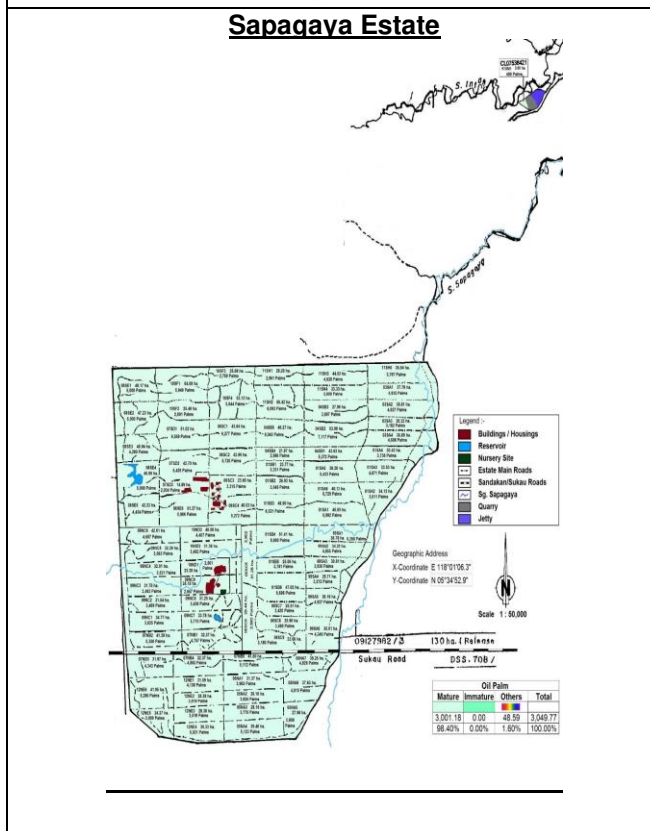
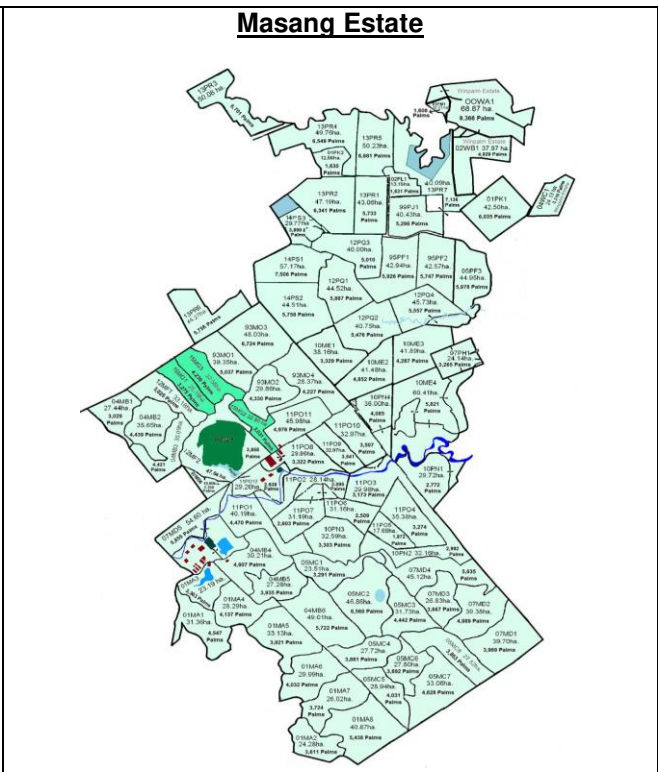
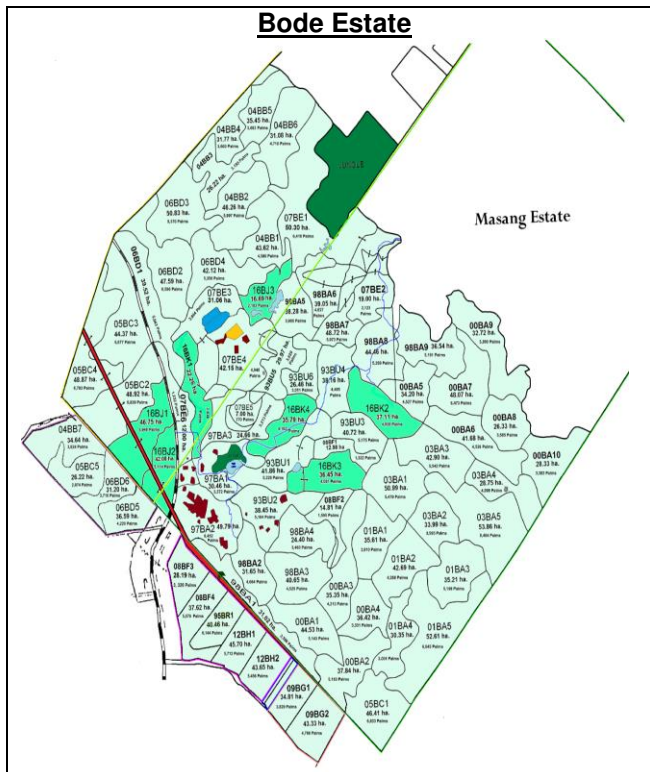
2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Sinoh Kulipang
Position	:	Sustainability and Research Manager
Address	:	Lot 6, Block 44, Leboh Tiga, 90000 Sandakan, Sabah.
Phone no.	:	019-8151925
Email	:	sinohkulipang@yahoo.com

3.0 AUDIT FINDINGS			
3.1 Changes to certified products in accordance to the production of the previous year Changes to certified areas and this been highlighted as per NCR RMN 2.			
3.2 Progress and changes in time bound plan (Refer to Attachment 6 for the time bound plan)			
i.	Have all the estates under the parent company been certified?	<input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No
If no, comments on the organization's compliance with the RSPO partial certification rules : Refer attachment 6			
ii.	Are there any changes to the organization's time bound plan?	<input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No
If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan? Refer attachment 6			
iii.	Are there associated smallholders (including scheme smallholders) in the CU	<input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No
If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?		<input type="checkbox"/>	Yes <input type="checkbox"/> No
If no, please state reasons			
iv.	Any new acquisition which has replaced primary forests or HCV areas	<input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No
3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.) -New contact person appointed.			
3.4	Status of previous non-conformities *	<input checked="" type="checkbox"/>	Closed <input type="checkbox"/> Not closed*
* If not closed, minor non conformity will be upgraded to major non conformity			
3.5. Complaint received from stakeholder (if any) No complaint received. Other communication as per table consultation.			
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 : 2	(DA 1 & DA 2)
Total no. of major NCR(s) (details refer to Attachment 3)		List : 3	(DA 3, RMN 1 & RMN 2)

4.2	For SC (Details checklist refer to Attachment 5) : <div style="display: flex; justify-content: space-between;"> <div>Total no. of minor NCR(s) (details refer to Attachment 3)</div> <div>List : -</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div>Total no. of major NCR(s) (details refer to Attachment 3)</div> <div>List :-</div> </div>
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 <div style="margin-bottom: 10px;"> <input type="checkbox"/> No NCR recorded. Recommended to continue certification. </div> <div style="margin-bottom: 10px;"> <input checked="" type="checkbox"/> Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit. <i>Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .</i> </div> <div style="margin-bottom: 10px;"> <input checked="" type="checkbox"/> 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. </div> <div style="margin-bottom: 10px;"> <input checked="" type="checkbox"/> Recommended to continue certification. </div> <div> <input type="checkbox"/> 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. <i>Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.</i> </div>
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.
<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 45%;"> Audit Team Leader : Rohazimi Mat Nawi <div style="border-top: 1px solid black; width: 100%; margin-top: 5px;"></div> <div style="text-align: center;">(Name)</div> </div> <div style="width: 20%; text-align: center;">  <div style="border-top: 1px solid black; width: 100%; margin-top: 5px;"></div> <div style="text-align: center;">(Signature)</div> </div> <div style="width: 30%; text-align: center;"> 29/6/2022 <div style="border-top: 1px solid black; width: 100%; margin-top: 5px;"></div> <div style="text-align: center;">(Date)</div> </div> </div>	



RSPO RECERTIFICATION AUDIT PLAN

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.

Date of assessment : 28th March 2022 - 01st April 2022

Site of assessment : Syarikat Kretam Mill
Bode Estate
Masang Estate
Bukit Sekong Estate
Sapagaya Estate

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

Assessment Team

Trainee Lead Assessor : Rohazimi Mat Nawi (RMN) – (Environment, Safety, Metric Template)
Auditor : Mohd Ab Raouf Asis (MAR) - (Social, GAP)
Dzulfiqar Azmi (DA) - (Environment, GHG & TBP)
Mohd Zulfakar Kamaruzaman (MZK) – (Social – External, HCV)
Rozaimiee Ab Rahman (RAR) (SC & Safety Mill)
Mohd Nordin Abd Jalil (MNAJ) (GAP)

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

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.

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.

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.

Working Language : English and Bahasa Malaysia

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. |

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

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

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

- a) Reporting time frames for economic data are:
 - i. Calendar year (January to December): January 2021 to December 2021, and
 - ii. 12-month period counting up to two months before audit month:
- 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).

Assessment Programme Details : As below

Time	Activities / areas to be visited			
9.00 am	Opening Meeting at Syarikat Kretam Mill <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. Logistic arrangement 			
9.15 am	To assign each audit team members – site and the P&C requirements			
	RMN Sekong Estate	DA Sepagaya Estate	MAR Sekong Estate	MZK Sepagaya Estate
	Coverage of assessment: P1, P2, P3, P4, P6, P7: <ul style="list-style-type: none"> Follow up from previous assessment findings. Laws and regulations Waste management including disposal site Aspects/impacts of mill management Controlled/open burning Pollution mitigating plans River system and Effluent Treatment/Discharge Management and disposal of waste including pesticides containers Training and skill development programs <p>Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc)</p>	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> Follow up from previous assessment findings. Laws and regulations Safety & Health practice – witness activities at site Hazard identification and Risk Management Chemical management Chemical/ fertilizer store, workshop Controlled/open burning Training and skill development programs Time bound plan and uncertified management units <p>Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.</p>	<ul style="list-style-type: none"> Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. Interview with Union/workers representatives Interview with gender committee, worker representative, contractors, supplier, etc Workers Issues & welfare Continuous improvement <p>Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.</p>	Coverage of assessment: P1, P5, P7, P6: <ul style="list-style-type: none"> Follow up from previous assessment findings Consultation with relevant government agencies Local communities and stakeholders Local sustainable development Support smallholder inclusion Complaints and grievances Mill Boundary, adjacent and neighbouring land use HCV/RTE and action plan Continuous improvement <p>Other area identified during the assessment</p>
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			

RSPO PUBLIC SUMMARY REPORT

Time	Activities / areas to be visited			
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Lokan Estate			
9.15 am	To assign each audit team members – site and the P&C requirements			
	RMN Sapagaya Estate (Morning)	DA Sekong Estate (Morning)	MAR Sepagaya Estate (Morning)	Zulfakar Sekong Estate
	Coverage of assessment: P1, P2, P3, P4, P6, P7: <ul style="list-style-type: none"> Follow up from previous assessment findings. Laws and regulations Waste management including disposal site Aspects/impacts of mill management Controlled/open burning Pollution mitigating plans River system and Effluent Treatment/Discharge Management and disposal of waste including pesticides containers Training and skill development programs <p>Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc)</p>	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> Follow up from previous assessment findings. Laws and regulations Safety & Health practice – witness activities at site Hazard identification and Risk Management Chemical management Chemical/ fertilizer store, workshop Controlled/open burning Training and skill development programs Time bound plan and uncertified management units <p>Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.</p>	<ul style="list-style-type: none"> Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. Interview with Union/workers representatives Interview with gender committee, worker representative, contractors, supplier, etc Workers Issues & welfare Continuous improvement <p>Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.</p>	Coverage of assessment: P1, P5, P7, P6: <ul style="list-style-type: none"> Follow up from previous assessment findings Laws and regulations Consultation with relevant government agencies Local communities and stakeholders Local sustainable development Support smallholder inclusion Complaints and grievances HCV/RTE and action plan Continuous improvement <p>Other area identified during the assessment</p>
12.30 pm	LUNCH BREAK & ZUHUR PRAYER			
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit			
9.00pm	Discussion LA and teams on potential NCRs			

RSPO PUBLIC SUMMARY REPORT

Time	Activities / areas to be visited					
8.00am – 1.00pm	To assign each audit team members – site and the P&C requirements					
	DA	RMN	MAR	RAR	MZK	MNAJ
	<u>Kretam Mill</u> <ul style="list-style-type: none"> ▪ Laws and regulations ▪ Witness activities at site ▪ Waste & chemical management ▪ Interview with workers, safety committee and contractors ▪ Facilities at workplace ▪ Occupational safety & health practice witness activities at site ▪ Time bound plan and uncertified management units ▪ GHG assessment 	<u>Masang</u> <ul style="list-style-type: none"> • Follow up from previous assessment findings. • Laws and regulations • Waste management including disposal site • Aspects/impacts of mill management • Controlled/open burning • Pollution mitigating plans • River system and Effluent Treatment/Discharge • Management and disposal of waste including pesticides containers • Training and skill development programs 	<u>Masang</u> <ul style="list-style-type: none"> ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Linesite inspection ▪ Complaints and grievances ▪ Consultation with relevant government agencies ▪ Training and skill development programs 	<u>Kretam Mill</u> Site visit and assessment on Supply Chain Implementation including the: <ul style="list-style-type: none"> ▪ Model used ▪ General Chain of Custody ▪ System Requirements ▪ for the supply chain ▪ Documented procedures ▪ Purchasing and goods in ▪ Outsourcing activity ▪ Sales and goods out ▪ Processing ▪ Records keeping ▪ Registration ▪ Training ▪ Claims 	<u>Kretam Mill</u> <ul style="list-style-type: none"> ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Land titles user rights ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Linesite inspection ▪ Complaints and grievances ▪ Consultation with relevant government agencies ▪ Training and skill development programs 	<u>Sepaqaya Estate</u> <ul style="list-style-type: none"> • Commitment to long-term economic and financial viability • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) • EFB mulching, POME application • Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement
1.00pm	LUNCH BREAK					
2.00pm	DA and STK will continue assessment at BODE Estate. MAR stay at Masang			MZK and RAR will continue assessment at Bukit Sekong Estate		
5.00pm	Audit team discussion / End of Day 3 audit					All

RSPO PUBLIC SUMMARY REPORT

Time	Activities / areas to be visited					
8.00am – 1.00pm	To assign each audit team members – site and the P&C requirements					
	DA	RMN	MAR	RAR	MZK	MNAJ
	Masang <ul style="list-style-type: none"> ▪ Laws and regulations ▪ Witness activities at site ▪ Waste & chemical management ▪ Interview with workers, safety committee and contractors ▪ Facilities at workplace ▪ Occupational safety & health practice witness activities at site ▪ Time bound plan and uncertified management units 	Bode <ul style="list-style-type: none"> • Follow up from previous assessment findings. • Laws and regulations • Waste management including disposal site • Aspects/impacts of mill management • Controlled/open burning • Pollution mitigating plans • River system and Effluent Treatment/Discharge • Management and disposal of waste including pesticides containers • Training and skill development programs 	Bode <ul style="list-style-type: none"> ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Linesite inspection ▪ Complaints and grievances ▪ Consultation with relevant government agencies ▪ Training and skill development programs 	Kretam Mill <ul style="list-style-type: none"> ▪ Laws and regulations ▪ Environmental management ▪ Witness activities at site ▪ Waste & chemical management ▪ Interview with workers, development programmes ▪ Continuous improvement 	Masang <ul style="list-style-type: none"> ▪ Inspection of protected sites with HCV attributes ▪ Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone ▪ HCV Assessment management plan & implementation ▪ Training and skill development programs ▪ Continuous improvement ▪ Land titles user rights 	Masang <ul style="list-style-type: none"> • Commitment to long-term economic and financial viability • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) • EFB mulching, POME application • Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement
1.00pm	LUNCH BREAK					
2.00pm	continue assessment unfinished areas					
5.00pm	Audit team discussion / End of Day 4 audit					

RSPO PUBLIC SUMMARY REPORT

Time	Activities / areas to be visited					
	To assign each audit team members – site and the P&C requirements					
	DA <u>Bode</u>	RMN <u>Bode</u>	MAR <u>Bode</u>	RAR <u>Bode</u>	MZK <u>Bode</u>	MNAJ <u>Bode</u>
8.00am – 1.00pm	<ul style="list-style-type: none"> ▪ Laws and regulations ▪ Witness activities at site ▪ Waste & chemical management ▪ Interview with workers, safety committee and contractors ▪ Facilities at workplace ▪ Occupational safety & health practice witness activities at site ▪ Time bound plan and uncertified management units 	<ul style="list-style-type: none"> • Follow up from previous assessment findings. • Laws and regulations • Waste management including disposal site • Aspects/impacts of mill management • Controlled/open burning • Pollution mitigating plans • River system and Effluent Treatment/Discharge Management and disposal of waste including pesticides containers • Training and skill development programs • Verify RSPO Metric Template 	<ul style="list-style-type: none"> ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Line site inspection ▪ Complaints and grievances ▪ Consultation with relevant government agencies ▪ Training and skill development programs 	<ul style="list-style-type: none"> ▪ Laws and regulations ▪ Witness activities at site ▪ Waste & chemical management ▪ Interview with workers, safety committee and contractors ▪ Facilities at workplace ▪ Occupational safety & health practice witness activities at site 	<ul style="list-style-type: none"> ▪ Inspection of protected sites with HCV attributes ▪ Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone ▪ HCV Assessment management plan & implementation ▪ Training and skill development programs ▪ Continuous improvement ▪ Land titles user rights 	<ul style="list-style-type: none"> • Commitment to long-term economic and financial viability • Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) • EFB mulching, POME application • Plantation on hilly/swampy area • IPM implementation, training and safe use of agro-chemicals. • New planting • Continuous improvement
12.15pm	LUNCH BREAK & FRIDAY PRAYER					
2.00pm	continue assessment unfinished areas and verify previous audit findings					
3.30pm	Audit team discussion					
5.00 pm	Closing meeting at CU / End of audit.					

RSPO PUBLIC SUMMARY REPORT

Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	Yes	The Syarikat Kretam Mill Sdn Bhd CU – Sandakan Region (KHB Sandakan Region CU) continued to implement the procedure for responding to any communication as outlined in their Estate/Mill Sustainability Department documents. The records of communication were identified and maintained in different files depending on the stakeholder. Among the records reviewed were correspondences with the authorities and employees. The CU continued to use internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Kretam Holdings Berhad website at http://www.kretam.com/ .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	No	Sighted the latest external stakeholders' communications for the CU was conducted independently. The CU carried out questionnaires' form methods due to COVID 19 Restriction via email, WhatsApp and by hand. Next tentative program for the mill and all estates to conduct the stakeholder consultation via face-to-face methodology or meetings in May 2022. The previous stakeholder consultation involved relevant stakeholders such as government authorities, CLC/school's representatives, contractors, local communities, internal stakeholders, neighboring plantations, and etc. were briefed on all the RSPO principles and criteria. Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the SIA and EIA plan. So far, no negative impacts were observed during the stakeholder's feedback or meeting. However, it was found that information on hectarage was not accurate, hence Minor NCR raised, i.e., NCR RMN 02.
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	Records of requests for information and responses are maintained. 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. Communication with the authority such as DOSH, DOE and Labour Department were maintained.

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Clause	Indicators	Comply Yes/No	Findings
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	The consultation and communication procedures were documented. External and internal communication procedures developed by Kretam Holdings Berhad for the estates and mill maintained to be followed and available at the audited sites. The document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estates 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 observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which were kept in the External Communication File.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	The list of stakeholders for Kretam Mill CU are maintained and made available during the audit. The stakeholders list at Kretam Mill CU are including the contractors, vendors, neighboring estates/smallholders, villagers and government agencies. Records of communications are documented and filed. Records also show actions taken in response to inputs from stakeholders, and that efforts are made to ensure understanding by affected parties. Sampled of stakeholders been verified thru stakeholder listing and the public consultation minutes such as DOSH, DOE, Suruhanjaya Tenaga and Borneo Samudera, as provided in the list. The stakeholder's list has been updated in Oct 2021.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Yes	Policy for ethical conduct is available via Code of Conduct & Human Rights Policy signed by Chief Executive Officer. Based on documentation review, observations during audit and interviews conducted, the ethical conduct policy is implemented in its sampled business operations and transactions. Contractors, suppliers and employees interviewed are aware of conflict of interest and the offence of accepting bribery and have been briefed on the same during stakeholder meetings and company policy briefings.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	There are at least two systems in place that monitor compliance and implementation of ethical conduct: <ul style="list-style-type: none"> a. Establishment of a Tender Committee to ensure transparency, independence and no conflict-of-interest situation. All tenders are reviewed, selected and approved by a Tender Committee based in HQ in Sandakan, Sabah. b. Internal audit and external audit done by selected departments to ensure compliance and implementation of overall ethical business practices.

RSPO PUBLIC SUMMARY REPORT

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	The organization had complied with applicable legal requirements
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	Yes	List of Related Laws, Regulation and Guidelines has been prepared by Sustainability Team and HR Team with updated date in Feb 2021. The Sustainability Team 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	In Syarikat Kretam Mill Sdn Bhd CU legal boundaries were clearly demarcated and visibly maintained. During the site review, physical markers were visibly maintained at Bukit Sekong & Sapagaya Estates and it was observed that there was no planting beyond these legal boundaries. The perimeter boundary of the estate was visibly maintained with wooden posts along the boundary, especially the ones that adjacent to other private estate. Legal boundaries of both Estates had been identified and marked with post painted red and white.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	Yes	The list of contracted parties is maintained by each unit in its respective stakeholder list. The lists contain name of contractors, designated contact persons, address, telephone / fax / email and type of contracted works done. The list of contracted parties maintained in stakeholders list which has been updated in Dec 2021.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	Yes	Each contract issued to suppliers and contractors contain a clause requiring compliance with legal requirements. Sighted during the audit were contracts between with crude palm oil and palm kernel transporters, namely, there is evidence that agreements with third parties contain clauses on meeting applicable requirements. Legal due diligence is carried out by the Contracts Department at KHB HQ in Sandakan. This include obtaining the contractors' registered company names and addresses, contact numbers, evidence of company registration, details of contractors' principal activities, authorised and paid-up capital, list of shareholders, board of directors, bank details, financial auditors, and current trading/business licences.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Yes	Sighted during this Recertification Audit, in <u>Clause 8: Labour</u> of the contract included the statement contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts also include a clause for children protection.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
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	Estate currently not acting as a collecting centre to the smallholder or small grower nearby. Only owned FFB as production.
	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	Estate currently not acting as a collecting centre to the smallholder or small grower nearby. Only owned FFB as production.

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	<p>Syarikat Kretam Mill Sdn Bhd CU has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as a guidance towards sustainable business for future planning. The components of the business plan are presented in a budget format comprising of the following.</p> <ol style="list-style-type: none"> Crop yielding area Yield statement oil palm Total upkeep & cultivation Labour statement/Allocation of wages/Labour benefit summary Summary of vehicle and running schedule/Job allocation for vehicles Summary of workshop running schedule Summary of general charges Summary cost/ha & cost/mt FFB CAPEX <p>The business plan and budget were available and kept in soft copy. The documents were categorised as confidential. Information in the documents were sighted and briefed by the Estates/Mill Managers. Generally, the estates and mill business plan were towards sustainable business and prepared in a 3 to 5-year horizon. The budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital</p>

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Clause	Indicators	Comply Yes/No	Findings
			expenditure, RSPO compliance etc. The budget included projections on yield per hectare, and total cost of production per mt and per hectare.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	Syarikat Kretam Mill Sdn Bhd Cu continued to maintain replanting programs. The replanting programs until FY 2028 were sighted. The programme was reviewed once a year and is incorporated in their annual financial budget.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	The organization had conducted management review meeting in Apr 2021, and minutes of meeting was reviewed. The meeting was chaired by General Manager Plantation and attended by estates manages, mill manager, safety officer, sustainability personnel and assistant managers. Among the management review agenda been discussed are: 1. Results of internal audits 2. Customer (internal/external) feedback 3. Process performance and product conformity 4. Status of preventive and corrective actions 5. Follow-up actions from management reviews 6. Changes that could affect the management system 7. Recommendations for improvement Management has transparently addressed the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	Yes	The continual improvement plan is developed in conjunction with the Social Management Plan. The plan is reviewed every 12 months or more often if significant changes in the Company's operations or in the operating environment occurs: Among the commitment to continuous improvement are: 1) To create more awareness on human rights 2) Improved budget for housing repair in order to facilitate good housing standard.
	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 metric template has been checked and verified during audit. Details and values were appropriate and the RSPO metric template was updated by the CU accordingly. The metric template will be submitted with the PT submission of this project.
3.3 Operating procedures are appropriately documented, consistently	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	Yes	The CU SOPs for each of the process had continued to be implemented. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. Generally, it was observed that activities being implemented involved safety and health, environmental, quality, employees, etc. In general, the practices in the CU had been carried out as per the Plantations / Mill standard operating manual and procedures (SOP - General) and SOP – Safety and

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Clause	Indicators	Comply Yes/No	Findings
implemented and monitored.			<p>health, SOP corrective action, handling incoming material / product, processing FFB, power and steam generation, quality and efficiency, handling of waste, chemical handling, preventive maintenance, handling CPO & PK, Handling incoming good (store), production planning working, safety & health, document handling responsibility, control of non-conforming materials / product procedure, supply chain certification manual, general chain of custody, RSPO supply chain module, internal audit procedure, RSPO it platform, outsource procedure, and identification & traceability. The documents include all aspects of the operation in the estates and mill, which is from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and dispatch of CPO, PK and PKO as well as security of the CU.</p> <p>For the estates, on top of the Head Research Environment Protection Department, sustainability department, technical guidelines such as the SOP – general & SOP – safety & health were also referred. Contents of the manual were disseminated to the workers through morning roll call and trainings. The manual was kept in the administration office for reference.</p> <p>Employment procedures for recruitment, selection, hiring, are documented and verified. For locals, the procedures are in SOP on Recruitment and Selection Procedure. The procedure details out the process of hiring (application form, screening, interview, requisition approval from HR Manager/Estate Manager, medical check-up and issuance of letter of offer).</p>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	Yes	<p>Syarikat Kretam Mill Sdn Bhd CU had in place the mechanism to check consistent implementation of procedures. Both had lists of SOPs and monitored good agricultural practices as per SOPs by on-site visits, inspections and discussions with relevant personnel and by conducting assessments and audits like Internal Audits, Agronomist visits and by RSPO Audits. Implementation is also monitored by Estate Manager and direct report to General Manager. The mechanism of ensuring consistent implementation was by:</p> <ul style="list-style-type: none"> i. Periodic reporting from estates ii. On site visits, inspections and discussions with relevant personnel iii. Assessments and audits like Internal Audits, SEM visits and by RSPO Audits iv. Consultation with RSPO team & management.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	<p>Records of monitoring and the actions taken by estates in Syarikat Kretam Mill Sdn Bhd Cu continued to be maintained. This was to ensure that the established procedures were consistently implemented.</p>
3.4 A comprehensive Social and Environmental	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	Yes	<p>No new planting. SEIA carried out as explained below.</p>

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Clause	Indicators	Comply Yes/No	Findings
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.	stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.		
	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>The SIA was conducted in Jun – Jul 2015. A total of 13 negative impacts were identified. The SIA was carried out covering for the Masang, Bode, Sapagaya, Bukit Sekong and Kretam Mill. Social management and monitoring plan has been updated with 36 positive feedback and 31 negative feedbacks. The reports had covered all workers and Staff. Records on stakeholder meetings in Dec 2021 were verified. Both meetings were attended by workers, staff, workers' representative, suppliers, contractors, and teachers. Within the CU, Kretam Mill Sdn Bhd CU mitigate negative impacts and promote positive ones by calling for meetings with their respective stakeholders. Meetings with the stakeholder included the workers, Gender Committee meetings, OSH meetings, JCC Meetings and external stakeholder's meetings. Based on minutes of the meetings, the issues raised were discussed and documented. These issues were subsequently incorporated into the Time Bound Social Plan to mitigate negative impacts and to promote positive impacts. Five (5) positive impacts and Five (5) negative impacts had been identified. Examples of positive issues raised identified included:</p> <ol style="list-style-type: none"> 1. Good Basic Amenities 2. Good Medical Services 3. Good Opportunity Job for Employees Children 4. Satisfied with the wages 5. Safety is maintained <p>Environmental aspect impact assessment (EAIA) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. For KHB Sandakan Region CU, latest environment aspect impact assessment was reviewed in Mar /2022 covering all activities. The main purposed of this assessment was to evaluate and analyse the operations impact on soil, water, and air associated with the organization activities. At the estates, field activities that includes fertilizing, spraying, transportation of FFB, garbage disposal, landfill management, clinical wastes, road maintenance, wildlife and land conservation activities. The mitigation measures were continued to be implemented to minimise the negative impacts. The EAIA 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 and internal stakeholders such as worker's representative, Govt. agencies, neighboring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders' communication.</p>

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Clause	Indicators	Comply Yes/No	Findings	
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	At Kretam Mill CU, the SIA Action or “Time Bound Social Plan” will be reviewed and updated once a year. For the review, meetings with their respective stakeholders will be conducted and the list of stakeholders included workers, the Gender Committee meetings, OSH meetings and external stakeholder’s meetings. Evidence such minutes of the Committee meetings, attendance lists etc. was made available during the audit. The environmental management and monitoring plans were developed based on the impact identified in the EAIA. The environmental management plan is reviewed and updated regularly in a participatory way. 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 management has periodically reviewed the implementation and effectiveness of the established program. So far, no issues related to environmental has been highlighted during stakeholders’ consultation.	
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement, and termination are documented and made available to the workers and their representatives where applicable.	Yes	Employment procedures for recruitment, selection, hiring, are documented. For locals, the procedures are in SOP on Recruitment and Selection Procedure. The procedure details out the process of hiring (application form, screening, interview, requisition approval from HR Manager/Estate Manager, medical check-up and issuance of letter of offer). This procedure was confirmed by a Mill Manager at the Kretam Mill CU verified through the worker’s personal file. For foreign worker, the employment procedures are provided in Recruitment of foreign worker Procedure. Employment procedures for retirement and termination are available in the local workers’ employment contracts and also there is SOP on that. Similarly, foreign workers’ contracts also contain provision for mutual termination. Retirement procedure is not applicable to foreign workers.	
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	Based on the sampling of the workers’ employment contracts and personal files, there is evidence that the employment procedures on recruitment, selection, hiring, promotion are implemented, and records maintained. No termination has been carried out, and so this could not be verified during the audit. Hiring process of submitting job application, interviews, medical check-ups, issuance of offer letters, and performance assessments were sighted for Malaysian workers. The same requirement as stipulated above applied for foreign workers too.	
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 organization had established Master list of Safety and Health Risk Assessment with latest updated in Mar 2022. Sighted that the identification of coverage of HIRADC on the activities included:	
			Harvesting	Pruning
			Pest and disease	Covid 19
			Rat Baiting	Replanting
			Manuring	Water sampling activities
			Nursery	FFB crop via bin system
			Water treatment	Road maintenance
			Chemical store	Workshop including tire pumping activities

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Clause	Indicators	Comply Yes/No	Findings
			HIRARC for the mill with latest review made on (has been reviewed in May 2020 to include pandemic covid 19 issues) and in Aug 2021 to include land irrigation maintenance & inspection. The significant and routine activities for mill and estates were adequately covered with details and reviewed during the audit.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	Yes	The organization had established control measure based on the OHS hierarchy. Sighted available full sets of Sops been available during the audit. The H&S plan is available and monitored.
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	A documented program that provided training for all staff and workers which took into account gender-specific needs, and which covered applicable aspects of the RSPO P&C was available on all estates and POM. A training need identification matrix has been established with target dates for the training identified.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	Yes	Records of training are maintained appropriately.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Yes	Training on Supply Chain requirements was carried out in Jan 2022 and Mar 2022 (for contractors). The training has been conducted by Engineer to maintenance engineer, assistant mill engineer, admin supervisor, shift supervisor, grader, laboratory assistant, and weighbridge operator. The intention on this training was to create awareness on understanding on supply chain requirement.

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	Yes	Kretam Mill sourced for their FFB only from estates under the same CU which involve, Bode Estate, Masang Estate, Sepagaya Estate, and Bukit Sekong Estate. There is a Diversion crop from other certification units Abedon Estate (certified by Intertek) and 1 from outsider which was also certified FFB from Sime Darby – Segaliud SOU (Certified by BSI) So the Mill is IP mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings										
	necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.												
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.	NA	<i>Not applicable since the mill was used Identity Preserved Model</i>										
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	Yes	<div>The previous estimated tonnage of CPO and PK products has been recorded in the RSPO IT platform, supply chain certificate and public summary audit report as accordingly. Refer to Table 4 of this report.</div> <div>Mill had registered through RSPO IT Platform with Member ID as per below:</div> <table><tr><td>License ID</td><td>CB109420 (Active)</td></tr><tr><td>Member Name</td><td>Syarikat Kretam Mill - Kretam Mill</td></tr><tr><td>RSPO Membership Number</td><td>1-0189-15-000-00 (KRETAM HOLDINGS BERHAD)</td></tr><tr><td>Member Category</td><td>Oil mill</td></tr><tr><td>Issued By</td><td>SIRIM QAS International Sdn. Bhd.</td></tr></table>	License ID	CB109420 (Active)	Member Name	Syarikat Kretam Mill - Kretam Mill	RSPO Membership Number	1-0189-15-000-00 (KRETAM HOLDINGS BERHAD)	Member Category	Oil mill	Issued By	SIRIM QAS International Sdn. Bhd.
License ID	CB109420 (Active)												
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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	Yes	As above.
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the 	Yes	<p>Kretam POM Organizational, management systems and the operational systems, documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.</p> <p>Sighted Kretam oil mill has updated and change the name of documented procedure named RSPO Supply Chain Certification Manual Revision 2. Among the documented requirements related to Mill Supply Chain definition, purchasing FFB, arrived of FFB, received of FFB processing of FFB, overproduction, product sales, dispatch product, record keeping</p> <p>Mill Manager have overall responsibility for and authority over the implementation of SCCS requirement and compliance with all applicable requirements. Mill engineer and sustainability executive -mill also assist the implementation of supply chain requirement. Sighted appointment letter to Mill engineer, sustainability executive, admin office, weighbridge clerks, supervisor, laboratory assistant, in Jan 2022.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>organisation's procedures for the implementation of this standard.</p> <p>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>		
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	Yes	<p>Procedure to conduct annual internal audit has established Under title 'internal Audit Procedure". The purpose of this procedure is to provide guidelines to conduct internal audit for RSPO SCCS & RSPO SCCS & another similar standard.</p> <p>Audit checklist also been established using RSPO Supply Chain Certification Standard to cover all the elements and indicator, sighted latest SCCS Internal Audit report has been carried out in Jan 2022 by the internal auditor. Coverage of audit sufficient & comprehensive to cater for the new standard.</p> <p>No nonconformity has been raised during the internal audit.</p> <p>Management review has been conducted in Feb 2022 and has covered input that could affect the management system and also include the output review on improvement in the effectiveness of the SCCS system and its process, customer feedback, process performance and product conformity, status preventive and corrective action, follow up action, changes on management system, recommendation, improvement on management system, and other resources needed.</p>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p>	Yes	<p>Made available and as reported in the body text.</p> <p>The incoming documents from estates were verified which found to be in line with Kretam POM's internal procedure as well as standard requirements. All the information is adequately presented and traceable.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.		
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:</p> <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number 	Yes	The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Sales and Marketing Department (HQ) on behalf of Kretam POM. Sample of deliveries document were sighted during the audit, and it was found all related information were adequate. Kretam POM's RSPO certificate number and product name together with model used were stated in the delivery documents.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	Yes	<p>a) There are 3 outsource company CPO and PK dated Aug 2020.</p> <p>b) There was a contract document between Kretam POM and the transporters. Access to the outsourcing contractor or operation if an audit was stated in the contract – index's no 7.1</p> <p>c) There were explicit procedures for the outsourced process i.e., outsourcing activities (CPO&PK) – SCCS.</p> <p>d) Inspection was carried out by Lab Supervisor or lab attendant as additional effort to ensure no contamination.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Yes	Syarikat Kretam Mill POM has outsource the transportation of certified CPO and certified PK. An agreement covering the outsources activity were sighted. During stakeholder meeting representatives from 3 contractors attended the meeting. It has been noted that the meeting highlighted the information on the implementation of RSPO standard. There is also addendum stated that the transporter shall comply with 'to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary'.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Yes	No new contractors used and will be used in the future for the processing or production of RSPO certified materials
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	Yes	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up to date.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Yes	All records related to RSPO SC were maintained minimum for 2 years. Sample CPO dispatch note since Jan 2019 until to date was available and well maintained.
	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	<p>Sales activities usually handled by Sales and Marketing Department Department (HQ) on behalf of Kretam POM. Personnel updated the RSPO IT platform system upon confirmed contract.</p> <p>Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).</p> <p>A randomly selected weighbridge tickets issued during August 2020 – February 2022 by SKPOM for delivery of RSPO-certified CPO &PK were verified and found to have indicated all the required information including the status of the products.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
			RSPO Records for Oil Mills had been updated on real time basis by relevant personnel and had included the receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK. Their LAK weighing system also being referred for real-time transaction details as well as daily/ monthly summary of their material movements (FFB, CPO, PK, others).
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)	NA	<i>Not applicable since mill used Identity Preserved Model</i>
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	Based on nature of their processing activities, Kretam POM's conversion factor shall be based on their oil extraction rate (OER) and kernel extraction rate (KER). These rates being monitored on daily basis as part of their process performance evaluation and consolidated at month end.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Yes	As above.
3.8.15	Processing For IP 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	Kretam POM shall only receive the RSPO certified FFB which are from Syarikat Kretam CU own estates – same CU. Monitoring records titled as “Daily quality and production report, has recorded the tonnage of certified FFB, CPO produced, Kernel produced, contract, delivered, diesel and water consumption, storage, and quality. It was confirmed that RSPO certified CSPO & CSPK product is from the certified sources. As for transport, dedicated tankers had been allocated by service provider to prevent cross contamination.
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	Kretam POM through usually handled by The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by Sales and Marketing Department (HQ) on behalf of Kretam POM. Personnel updated the RSPO IT platform system upon confirmed contract. The registration of transaction being carried out by Kretam Trading Department using the RSPO Member ID. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).
3.8.17	Claims - The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Kretam POM has not use RSPO corporate logo as well as trademark logo

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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	Kretam Mill CU has a Policy to protect human rights is contained in Code of Conduct & Human Rights Policy signed by the CEO, Datuk Freddy Lim Nyuk Sang. The policy frameworks provide for protection for HRD and Whistleblowers and states that no reprisals would be taken against whistleblowers and HRDs. Similarly, the Whistleblowing Policy also aims to protect whistleblowers from reprisals or victimisation. During audit interviews, there is between good understanding among all levels of workforce and local communities of what HRD is and the prohibition against retaliation towards HRDs
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	As observed during the audit, and in interviews held with local communities and workers, there is no evidence of instigation of violence, harassment or use of mercenaries or paramilitaries in any of the operations at Kretam Mill CU.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	The system used by the Syarikat Kretam Mill CU in resolving disputes exists in the procedure called "Procedure on Complaint & Grievances". This SOP is open to all stakeholders, internal workers, NGO's, Third party etc. The system was open to all aggrieved parties as evidenced by the existence. There is also procedure name 'Whistle blowing Policy' to ensuring anonymity of complainants, community spokespersons and whistleblowers and Code of Conduct & Human Right Policy" ensuring anonymity HRD. All complaints (workers and stakeholders) were to be recorded in the "Grievance/Complaint" forms. "House repair" book was also available for house repair requests. The books were accessible to all aggrieved parties, internal as well as external. An examination of the books showed that all the complaints were from internal stakeholders and related to house repairs. There were no complaints from external stakeholders.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Yes	Procedures are in place to ensure affected parties understand the Dispute and Resolution Procedures. Verbal explanation is given in an easy-to-understand language accompanied by pictorial explanations, and where relevant, flowcharts. If necessary, senior foreign workers who could speak and understand the Bahasa Malaysia act as translators to their other colleagues, especially the newly arrived ones.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed	Yes	Kretam Mill CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders as evidenced by inhouse training for internal stakeholders and stakeholders meeting for external.

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Clause	Indicators	Comply Yes/No	Findings
	timeframe and the outcome is available and communicated to relevant stakeholders.		
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Yes	The books were accessible to all aggrieved parties, internal as well as external. An examination of the books showed that all the complaints were from internal stakeholders and related to house repairs. There were no complaints from external stakeholders. At the same time, a review of the Kretam Holdings Berhad conflict resolution mechanism found it include an option for observers as well as the option of a third-party representation. Specifically, it does include the option for complainant access to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator
4.3 The unit of certification contributes to local sustainable dev. 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	Syarikat Kretam Mill CU is able to demonstrate that contributions to community development have been made based on consultation results with the local communities. Some of the contributions namely, villagers' access to free medical treatment at the estate clinic, and job opportunities. The POM has contributed Bus Running Expenses to workers for transport of workers, transport children to school, contributed paint to Masjid Al Falah, Kampung Rantau Abang Kinabatangan.
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	<p>It has been verified that Kretam Mill CU has bought the land of Bode Estate, Bode Division from Colony of North Borneo (Sabah Government) in March 1953, as Country Lease. There is Also 2 Division in Bode Estate namely Capakaya division which is legitimately owned by Syarikat Kretam Plantation Sdn Bhd but originally bought from Capakaya Sdn Bhd. All Land title has already change the owner to Syarikat Kretam Plantations Sdn Bhd in Aug 2005. The land titles were for planting either oil palm or agricultural crops for economic value.</p> <p>For Bukit Sekong Estate, the Land was owned by Brinchang Plantation, Brinchang Realty, Merjaya and Nunuyan which is previously bought from Sabah Land Development and bought by Abedon Sdn Bhd in 1997. After that Abedon Sdn Bhd has merged with Kretam Holdings Berhad in 2012 and the Estate has been managed by Kretam until now. Previous landowner of this Plantation is a villager who is originally from Kinabatangan villagers.</p> <p>For Sepagaya Estate, the Land was legitimately own and bought by Syarikat Kretam Plantations Sdn Bhd in 1980 from Sabah Government. It has been confirmed that Kretam has the right to use the land which is legitimately owned by their company.</p> <p>For Masang Estate, the Land was previously owned by several Company and Several villagers, which is previously bought from Sabah Government in 1980 - 1984 and bought by Syarikat Kretam in year 1988 - 1992. And the Estate has been managed by Kretam until now. Previous landowner of this Plantation are some villagers who are originally from Kinabatangan villagers and outsider. It was evident that Kretam has the right to use the land which is legitimately owned by their company.</p>

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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 checklist, it has been verified that the land is now legitimately owned by Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. 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.		
	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 recognized legal, customary or user rights are developed through	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. All the related documentation regarding the land acquisition was kept in Kretam Holdings Berhad HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and

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Clause	Indicators	Comply Yes/No	Findings
	participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).		neighboring estate. Hence, there was no map showing the legal, customary, or user right of other users since 1988-2005.
	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 Syarikat Kretam Mill Sdn Bhd CU
	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 Syarikat Kretam Mill Sdn Bhd CU
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	This requirement in this indicator does not apply to Syarikat Kretam Mill Sdn Bhd CU
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own	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 Syarikat Kretam Mill Sdn Bhd CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. All the related documentation regarding the land acquisition was kept in Kretam Holdings Berhad HQ Office, Sandakan 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
representative institutions.	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 Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. All the related documentation regarding the land acquisition was kept in Kretam Holdings Berhad HQ Office, Sandakan 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 Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. All the related documentation regarding the land acquisition was kept in Kretam Holdings Berhad HQ Office, Sandakan 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 legal, economic, environmental and social implications of the proposed operations on their lands.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. All the related documentation regarding the land acquisition was kept in Kretam Holdings Berhad HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and neighboring estate.

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Clause	Indicators	Comply Yes/No	Findings
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. All the related documentation regarding the land acquisition was kept in Kretam Holdings Berhad HQ Office, Sandakan 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 was no new lands acquired for plantation and mills after 15/11/2018 as verified during this Assessment at Syarikat Kretam Mill Sdn Bhd CU. The current operation area including mill and estates 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 Procedure in resolving land conflict'. The CU had also developed a SOP - Fair Compensation in order to handle any issues related with compensation. In accordance with the and SOP - Fair Compensation and Land Dispute, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Kretam Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. However, it has been noted that there was no negotiation concerning compensation for this CU during the reporting period.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Yes	In accordance with the "Procedure in resolving land conflict and SOP - Fair Compensation and Land Dispute, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	Yes	There were no scheme small holdings at Syarikat Kretam Mill Sdn Bhd CU. The Fresh Fruit Bunches are supplied from Kretam Holdings owned estates which are certified to RSPO.

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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	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Procedure in resolving land conflict'. The CU had also developed a SOP - Fair Compensation in order to handle any issues related with compensation. In accordance with the and SOP - Fair Compensation and Land Dispute, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Kretam Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Yes	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and 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	It has been verified that the land is now legitimately owned by Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. All the related documentation regarding the land acquisition was kept in Kretam Holdings Berhad HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and neighboring estate.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	Yes	It has been verified that the land is now legitimately owned by Syarikat Kretam Mill Sdn Bhd CU since 1988-2005. All the related documentation regarding the land acquisition was kept in Kretam Holdings Berhad HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and neighboring estate.

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Clause	Indicators	Comply Yes/No	Findings
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Yes	Land conflict is not present in the area of the unit of certification.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary 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.
	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 neighbouring communities where applicable).	Yes	There was no conflict or dispute over the land.

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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	Current and past prices paid for Fresh Fruit Bunches (FFB) was made available at Kretam Mill POM weighbridge. However, it was for collecting centre inside the mill separate ramp. This mill is IP mill. All FFB are from own estate, thus this indicator was not applicable.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	There is evidence that Kretam Mill POM regularly explains the FFB Pricing to Smallholder who sent to their collection centre. FFB Survey form has been send at FFB Supplier in July 2020 and Oct 2021 to all 18 FFB Supplier to collection centre. The FFB Supplier Survey form explains regarding Pricing Mechanism, Complaints and Grievance Procedure, MSPO certification, Assistance training, explain RSPO incentive and Supports smallholder by offering free training and consultation for RSPO, and calculation of pricing given to Smallholder.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	In Kretam Mill POM Collection Centre, Price for FFB are follow by MPOB Pricing, all price are calculate by the MPOB and the mill take the price and follow what MPOB guide, Interview with 18 Smallholder who sent FFB to Collection centre they are quite happy due to current price are rise and they think price at collection quite fair compare to outsider Mill and also other mill also far from them.
	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	There is no Evidence is available that all parties, including women and independent representative organizations 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 due to Fresh Fruit Bunches were supplied from Syarikat kretam Mill Sdn Bhd CU owned estates, which is Bode Estate, Masang Estate, Sapagaya Estate and Bukit Sekong Estate. So far, there was no third-party FFBs sent to the mill.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	Fresh Fruit Bunches were supplied from Syarikat Kretam Mill Sdn Bhd CU owned estates, which is Bode Estate, Masang Estate, Sapagaya Estate and Bukit Sekong Estate. So far, there was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	Interviews conducted with contractors and suppliers. Contractors' representatives had confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 15-30 days of invoice issuance.

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Clause	Indicators	Comply Yes/No	Findings
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis.	Yes	Weighing Equipment in Kretam CU has been calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn Bhd.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	Yes	Kretam Holdings Berhad supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. However, in Syarikat Kretam Mill Sdn Bhd CU, The FFB are from Syarikat Kretam Mill Sdn Bhd CU owned estates, which is Bode Estate, Masang Estate, Sapagaya Estate and Bukit Sekong Estate. There is no third-party FFB sent to the mill. Noted that Syarikat Kretam Mill Sdn Bhd CU has invited nearby smallholder to promote on RSPO certification collaboration with Wild Asia. Sighted the letter and training for surrounding Smallholder dated in Oct 2021. But some smallholders are willing to go for MSPO only.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Yes	A grievance mechanism which respects anonymity and protects complainants is in place at the Syarikat Kretam Mill Sdn Bhd CU as per the Procedure for External Communication, and as per SOP Complaints and Grievances. As at to date there is no complaint by stakeholders.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in 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	Kretam Holdings Berhad has 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.
	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	Kretam Holdings Berhad has 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. Noted that Syarikat Kretam Mill Sdn Bhd CU has invited nearby smallholder to promote on RSPO certification collaboration with Wild Asia. Sighted the letter and Training for surrounding Smallholder dated in Oct 2021. But some smallholders are willing to go for MSPO only.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	Noted that Syarikat Kretam Mill Sdn Bhd CU has invited nearby smallholder to promote on RSPO certification collaboration with Wild Asia. Sighted the letter and training for surrounding Smallholder dated in Oct 2021. But some smallholders are willing to go for MSPO only.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders	Yes	Not applicable to this CU.

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Clause	Indicators	Comply Yes/No	Findings
	on pesticide handling.		
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Kretam Holdings Berhad regularly reviews and publicly reports on the progress of the smallholder support programme.

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 policy of equal opportunities policy including identification of relevant/affected groups is promoted through the Kretam Holdings Berhad Group's "Code of Conduct & Human Right Policy" is available in two languages (Malay and English). The policy 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.
	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	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against. Interviews conducted with workers (male, female, local and migrant) as well as local communities also confirmed that this is so. There is also no evidence of payment of recruitment fees by migrant workers. Workers' pay slips were also sampled which showed that workers receive the same amount of daily rate of RM42.31 per day for the same work irrespective of gender, age or nationalities.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Yes	As stipulated in the contracts, Job Description and Yearly Salary Scale for workers and Staff the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs. For monthly paid employees, interviews are done by Estate Manager/Mill before a panel of interviewers who would objectively assess the candidate for suitability. Promotions are based on recommendations, Years of service and performance.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.	Yes	As of the date of the audit, there is no pregnant worker at Kretam Mill.

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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	The gender committees throughout the Kretam Mill CU are known as the Gender Committee. Membership comprises female employees and the employees' wives. Based on interviews of the committee members and review of meeting minutes, the Committees main activities are to provide awareness to its members on issues of concern. These relate to sexual harassment, domestic and other forms of abuse, children's health, immunization and education, as well as women's reproductive rights. Meetings are held annually.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	Comparisons were made of sampled employment contracts and payslips of Mill and Estate Workers (local and foreign). Evidence is available that sampled workers receive equal pay for equal work.
6.2 Pay and conditions for staff and workers and for contract workers always meet 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	Contracts for local and Indonesian foreign workers at the Kretam Mill POM Bode, Masang, Bukit Sekong and Sipigaya Estate were sampled and confirmed that all workers and the management signed a dated contract of employment. The terms and conditions of employment are contained in the employment contracts which include duration of employment, place of work, salary, working hours, medical benefits, annual leave, sick leave, termination of service, and other benefits provided (housing, employment cost, etc.). The contract was available in both languages (English and Bahasa Malaysia).
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	Yes	<p>The employment contract in Kretam Mill CU is in Bahasa Melayu and English for local and foreign workers. The CU has explained the pay slip to the workers. Employment contract of foreign worker clearly stated the working hours, employee provident fund (for local only), annual leave, medical benefits and sick leave, insurance scheme, retirement, and etc. There is also addendum name "Buku Panduan Pekerja (Syarat syarat dan terma terma am)" was provided to new workers and old workers at completion of briefing. There was also evidence that employees' non-statutory salary deductions (e.g. Tabung Haji, Amanah Saham Berhad, Takaful insurance, mosque fund) were deducted at the request of the employees and with the approval of the Labour Office as required under Section 113(4), Labour Ordinance (Sabah Bab 67). During interviewing the local workers and foreign, they were understood the content of their contract of employment and pay slip statement.</p> <p>The pay slip is the document that give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, month of pay, work description, (normal work, overtime pay, piece-rate work, public holiday pay, company contributions such as SOCSO, EIS, KSWP, deductions such as advance, average daily rate, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work. Sighted were employment contracts of the following workers and their pay slips.</p>

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Clause	Indicators	Comply Yes/No	Findings
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	Yes	Evidence is available at the Kretam Mill CU that regular working hours as determined by the Sabah Labour Ordinance and stipulated in employment contracts are being adhered to. Any work in excess of 8 hours is being compensated as overtime. Workers who have been certified ill are given paid medical leave, and this is the same for workers who have gone on maternity were given 2 months paid maternity leave as evidenced from the pay slips. Salary deductions are made for EPF, SOCSO, EIS (local workers) and there are no deductions for foreign workers except for travel documents.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	No	(Onsite) Based on interview and site visit to workers' quarters at KHB Sandakan Region CU, observed housing was found with inadequate of "structural safety and reasonable levels of decency, hygiene and comfort" – ILO Guidance on Workers' Housing Recommendation No. 115. Based on interview and site visit to workers' quarters at KHB Sandakan Region CU, observed that wooden houses at POM, Masang Estate and Bode Estate was not structural safety and reasonable levels of decency, hygiene and comfort i.e. drainage system not in good condition, no mosquito netting provided, sanitation facilities provided not meet minimum standard of hygiene and inadequate ventilation system. Besides that, bedding and bedframe materials not provided and no adequate furniture for each worker to secure his or her belongings to newly recruited worker. <i>As a result, Major NCR DA 01 2022 was issued.</i>
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	All units within Kretam Mill CU except Bukit Sekong Estate (nearest to Kinabatangan Town) have their own canteen/grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within the expiry dates. Workers interviewed informed that they purchase items from these stores, and are able to either pay in cash, or on credit. Additionally, for Bode, Masang and Sepagaya, monthly <i>tamu</i> (mobile local markets) are also available where workers are able to have access to a wider variety of food items.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in	Yes	Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,200 per month, or more. Kretam Mill CU also has carried out the calculation of prevailing wages and in-kind benefits as evidenced from prevailing wages calculation. The calculation took into account i.e housing, electricity, water, education, child care and healthcare. Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is reasonable and in line with RSPO Guidance on calculating prevailing wages.

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Clause	Indicators	Comply Yes/No	Findings
	<p>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>		
	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	Permanent and full-time employees are used to carry out core work such as harvesting, loose fruit collecting, sprayers and manurers.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably	Yes	Kretam Mill CU 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.

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Clause	Indicators	Comply Yes/No	Findings
bargain collectively. Where the right to freedom of assoc. and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free assoc. and bargaining for all such personnel.	implemented.		
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	Yes	There are no trade unions at Kretam Mill CU, but the Workers' Welfare and Social Committees have been established at every unit. The Committee comprise management and worker representatives. Evidence is available that management holds regular meetings with the Workers' Welfare and Social Committees. Meeting minutes between management representatives and workers' representatives were sighted during the audit.
	6.3.3 Management does not interfere with the formation or operation of registered unions / labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Yes	Evidence is available that workers' representatives that sit in the Joint Consultative Committee (JCC) have been independently and freely elected by the workers themselves. No evidence of any management interference was observed.
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	Kretam Mill CU subscribes to Kretam Holdings Berhad Group, Social Policy signed by Datuk Freddy Lim Nyuk Sang. The Policy states KHB Group ensure that NO child (a person under the age of 15 years) or young person (who has attained the age of 15 years but has not attained the age of 18 years) shall be, or be required or permitted to be, engaged in any employment other than those allowed by the laws. Schools should encourage and motivate children to attend school, parents to be advised and warned verbally on the spot not to allow children to assist them, and the child sent home or to an appropriate childcare facility.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	Yes	Based on documentation review (master checkroll, personal files containing copies of passport, KTP or Malaysian IC), interviews conducted and observations in the field, all employees were above the age of 18 when they commenced work at Kretam Mill CU. There also have a documented age screening verification procedure in the Recruitment and Selection procedure. Evidence is available that minimum age requirements are met. Documented age screening procedure is available from copies of passport and Malaysian NRIC, and copies of Indonesian workers' identity card known as KTP.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	Kretam Mill CU has a guidance document which defines young person as someone between 15 to 18 years of age and is only applicable for employment of local workers. The guidance document also lists out the types of work that can be considered for a young person to be employed. This includes house cleaning, weighbridge clerk, gardening, loose fruit picking (excluding loading), FFB checker, filling polybags, EFB mulching, creche ayah helper, sundry shop helper, and line sweeping. However, based on site review, there was no evidence of young persons employed in any estate in Kretam Mill CU.

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Clause	Indicators	Comply Yes/No	Findings
	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	Communication of Social Policy signed by Datuk Freddy Lim Nyuk Sang. The Policy states KHB Group ensure that NO child (a person under the age of 15 years) or young person (who has attained the age of 15 years but has not attained the age of 18 years) shall be, or be required or permitted to be, engaged in any employment other than those allowed by the laws was given to external stakeholders during stakeholder meetings, Policy briefings to workers, and during induction trainings for new workers.
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	The policy to prevent sexual and other forms of violence is contained in the Kretam Holdings Berhad Group's Social Policy. A specific policy on sexual harassment titled "Sexual Harassment Policy" has been established since 2015. This policy is implemented and communicated to all levels of workforce.
	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	To protect the reproductive rights of all, especially of women, Kretam Mill CU has established a policy titled "Social Policy". All workers had been briefed on this Policy which included protection of their reproductive rights - maternity leave, access to creche, access to safe workplace during pregnancy, etc., during training sessions. The Gender Committee meetings are used as an avenue to disseminate information to its members regarding reproductive rights.
	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	Gender Committee have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights and need of new mothers. Awareness on reproductive rights need of new mothers are also briefed during muster and Gender Committee meetings held at each Mill and Estates. There is also form titled 'Borang Penilaian Keperluan Ibu Baru' has been Established at CU, but currently there are no new Mother at POM. Based on interviews held with other female workers who had given birth before, their needs have been taken into account such as providing a private place for expressing milk and access to a fridge for storage, and permission granted enabling them to go home to breastfeed their babies.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Yes	The system used by the Syarikat Kretam Mill CU in resolving disputes exists in the procedure called "Procedure on Complaint & Grievances". This SOP is open to all stakeholders, internal workers, NGO's, Third party etc. The system was open to all aggrieved parties as evidenced by the existence. There is also procedure name 'Whistle blowing Policy', to ensure anonymity of complainants, community spokespersons and whistleblowers and Code of Conduct & Human Right Policy" ensuring anonymity HRD. All complaints (workers and stakeholders) were to be recorded in the "Grievance/Complaint" forms. "House repair" book was also available for house repair requests. The books were accessible to all aggrieved parties, internal as well as external. An examination of the books showed that all the complaints were from internal stakeholders and related to house repairs. There were no complaints from external stakeholders.

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Clause	Indicators	Comply Yes/No	Findings
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	<p>Based on interviews conducted with foreign workers, review of documents signed by workers agreeing to voluntarily keep their passports at the estate /mill office, as well as observations made, there is evidence that workers are given an option to either keep their own passports, or to keep them at the office. Those who chose to keep the passports at the office, keep them in locked pigeonholes with one key each kept by the worker, and one by the office. Workers have full access to their own passports and have given written confirmation of their agreement to keep their passports with the office.</p> <p>The estate and Mill do not charge their workers recruitment fee. As mentioned under Indicator 6.1.2 above, workers only pay for their Indonesian passport, Kad Tanda Penduduk (Indonesian ID card), visa, immigration processing fee, Malaysian work permit (PLKS). The balance is paid by the Company which include travel insurance, medical checkup, transportation fee, levy, etc. This breakdown in payment is agreed between the hiring Company and the recruitment agents. The Company is also responsible for worker levy, medical check-up, work pass, agency processing fees and insurance. The worker only pays fees related to passport renewal. This breakdown in payment is agreed between the hiring Company and the recruitment agents. Sighted were the recruitment agents signed between the Company and recruitment agency.</p> <p>There is no form of contract substitution. All foreign workers interviewed confirmed that while still in their home countries, they were briefed by the recruitment agents of the types of job they would be doing in Malaysia. There is no evidence of involuntary overtime and all overtime work is done on a mutual basis, as confirmed by Auxiliary Policemen, guards, and mill workers interviewed.</p>
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	<p>There is a Foreign Worker Policy signed by Chief Executive Director, Datuk Freddy Lim Nyuk Sang and the policy stated that the company committed to: Foreign workers should enter into employment voluntarily and freely, without the threat of a penalty, No Debt bondage, No Withholding of wages, No charging the workers for recruitment fees and, No discrimination. Additionally, there is a procedure established known as "Recruitment of Foreign Workers" that, spells out the recruitment process from:</p> <ul style="list-style-type: none"> Manpower planning – applying for quota, appointment of recruitment agent, sourcing of workers, workers interviews, satisfaction of employability criteria, shortlisting. Recruitment process – registration onto the approved Employee Master list and uploaded onto the Quarto system. Orientation – briefing on language, safety procedures, labour laws, culture practices, surrounding community, housing, medical, amenities, issuance of PPE. Commencement of work – no discrimination, no contract substitution practices, post-arrival orientation programme and provision of decent living conditions.

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Clause	Indicators	Comply Yes/No	Findings
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	The letter of appointment for the Managers signed by the Senior Manager was sighted. The Managers subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. All estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. Minutes of meetings held by the mill and estates were verified. At the meetings workers participated in the discussion mainly on housing and safety. All units adopted the agenda as released SQM.
	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.	No	Accident and emergency procedures were available in adherence to the Kretam Holdings Berhad Group, Safety and Health SOP. The accident cases were recorded, fire drills were conducted, and first aiders were trained by St John Ambulance Malaysia. However, sighted during site visit, the improvement by some individual estates required on the emergency shower and eye wash as been highlighted in Minor NCR RMN 01.
	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.	Yes	All Training and Briefing on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. During site visit at all estates and mill all PPE has been provided free of charge and was sighted all workers wearing appropriate PPE. Staff and workers such as the storekeepers, harvesters and sprayers were continuously trained and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Appropriate PPE were given to employees of estate and mill visited. All the PPE is provided free of charge to all workers at the place of work to cover all potentially hazardous operations. During site at spraying activities, manuring activities, harvesting activities and LF collection, they were seen to wearing PPE such as face masks respirators, goggles, rubber boots, nitrile gloves, apron and hard hat, to cover all potentially hazardous operations. Sanitation facilities for those applying pesticides was available near to chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area. Meanwhile, during site inspection estate and mill workshop, most of the moving part and rotating machinery were installed with machine guarding and properly covered. Noted also the set of oxygen and acetylene cylinders in the workshop available with "flash back arrestors".

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Clause	Indicators	Comply Yes/No	Findings
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	Yes	The Mill and Estates provide medical care and insurance coverage for all the workers. Local Workers and foreign workers – covered by SOCSO. Verified through ' <i>Jadual Caruman Bulanan</i> ' Borang 8A – and monthly payment has been verified. In addition, the estates and mill provide medical care to all workers using own Medical Assistant services. Cases requiring additional/serious treatment are referred to Hospital Kinabatangan which located near to certification unit.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Incident investigation all had been conducted and appropriate corrective action been implemented, and these been sighted been reviewed during safety meetings.

Principle 7: Protect, conserve and enhance ecosystems and the environment

Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	Yes	Syarikat Kretam Mill Sdn Bhd Cu had established and documented a common IPM plan which was reviewed yearly for the 4 Estates, Bode, Masang, Sapagaya and Bukit Sekong. The Integrated Pest Management had been implemented in Kretam Holding Berhad Group as part of compliance to the RSPO, ISCC & MSPO P&C requirements. The Kretam Holding Berhad group also has an Environment Policy and Sustainable Policy to advocate issues related to good agricultural practices and environment protections. Every plantation region had their IPM plan and addressed to the individual estates. The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Yes	There was no evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and as per the stakeholder consultation with relevant workers.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of gov authorities.	Yes	The Syarikat Kretam Mill Sdn Bhd Cu had 2 policies on Zero Buring a main policy and sub policy. As advocated, all 4 estates had practised Zero burning and there was no evidence on use of fire for any purpose inclusive of for pest control.

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Clause	Indicators	Comply Yes/No	Findings																																				
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	Yes	Justification of all pesticides used had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in Planting Manual and SOP. The Manual and SOP had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. All the Estates had maintained chemical registers and were updated periodically. The registers were updated in Mar-Apr2022.																																				
			<table><tr><td></td><td>Chemical name</td><td>Class</td><td></td><td>Chemical name</td><td>Class</td></tr><tr><td>1</td><td>Glyphosate isopropylamine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>II</td></tr><tr><td>2</td><td>Sodium chlorate</td><td>III</td><td>7</td><td>Triclopyr butoxy ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>Canyon 20G</td><td>IV</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Amine 2.4 D</td><td>II</td></tr><tr><td>5</td><td>Metsulfuron methy 20% w/w</td><td>III</td><td>10</td><td>Bayfolan</td><td>III</td></tr></table>		Chemical name	Class		Chemical name	Class	1	Glyphosate isopropylamine	III	6	Cypermethrin	II	2	Sodium chlorate	III	7	Triclopyr butoxy ester	III	3	Glufosinate ammonium	III	8	Canyon 20G	IV	4	Triclopyr butoxy	III	9	Amine 2.4 D	II	5	Metsulfuron methy 20% w/w	III	10	Bayfolan	III
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7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	Yes	The Syarikat Kretam Mill Sdn Bhd Cu continued to record areas where pesticides were used. a) Pesticides were used only when justified and as programmed. Records of pesticides used by area, quantity used, hectares applied, LD 50 and Ai/Ha were made available to auditors. b) Records were maintained in store issue chits, bin cards, program sheets, field cost books and progress reports.																																					
7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Yes	The Syarikat Kretam Mill Sdn Bhd CU continued to apply pesticides by proven methods that minimise risk and impacts. As part of the IPM plans, the quantity of pesticides required for various field conditions are documented and justified in Kretam Holding Berhad's Planting Manual in the chapters Weed Control & Selective Weeding and Calibration. The implementation in the field was consistent with the Planting Manual Sections and IPM Plan. In the implementation of the IPM plans the following practices were adopted by The Syarikat Kretam Mill Sdn Bhd CU.																																					
7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Yes	There was no evidence of prophylactic use of pesticides in Syarikat Kretam Mill Sdn Bhd CU except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practised for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOP. Syarikat Kretam Mill Sdn Bhd CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used are of Class II, III & IV. The use of paraquat had been banned in all estates in Syarikat Kretam Mill Sdn Bhd CU since 2017.																																					
7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or	Yes	During the audit, it was noted that Syarikat Kretam Mill Sdn Bhd CU had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Except for Amine and Cypermethin which were Class II																																					

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Clause	Indicators	Comply Yes/No	Findings
	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:		chemicals, all others were of Class III & IV. Paraquat had not be used since 2017 and was replaced by a systemic herbicide and glufosinate ammonium. All the 4 estates had maintained chemical registers for chemicals used and were updated in Apr 2022. The Chemical Registers had listed all Chemicals, Diesel, Petrol, Lubricants and Fertilisers.
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had not been used. Hence, the need for a judgement of the threat assessment does not apply on the Syarikat Kretam Mill Sdn Bhd CU.
	7.2.5b Why there is no other alternative which can be used.	Yes	As above.
	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 necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	Yes	Records showed that pesticides were handled, used and applied by trained persons and as per the MSDS/SDS of the pesticide, Kretam Holdings Berhad SOPs on Safety & Health, Sprayer and Rat Baiting. The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. The estates had a SOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. It was also observed that PPE was used by workers working in the fields. The estates had a SOP for handling of chemical/pesticide management. The employees involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers were trained in chemical handling training, and they understood the hazards of the chemicals and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to them through the SDS training. It was also noted that SDS are available at chemical and fertilizers during the audit. And, training on pesticides/chemical handling was carried out regularly by the CU.

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Clause	Indicators	Comply Yes/No	Findings
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	The storage of pesticides at Syarikat Kretam Mill Sdn Bhd CU was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorized personnel i.e. storekeeper. The stores in estate and mill were ventilated (equipped with exhaust fans).
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	Empty pesticide containers 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. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at Syarikat Kretam Mill Sdn Bhd CU not more than 180 days @ 20mt.
	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 all the visited estates. There was no evidence to show that any had been carried out.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	Specific annual medical surveillance for pesticide operators been conducted, all were fit to work. CHRA for Kretam POM has been conducted by competent assessor in Nov 2020, and all requirements were followed accordingly.
	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	In the CU, identification of pregnancy was done by the HA based on interview with their women workers on the last menstrual period dates. This interview was done during the 6-month interval medical check-up. Pregnancy test was carried on doubtful cases. Monthly medical check-up for women sprayer was also being carried out by VMO. There was no evidence that the work with pesticides was undertaken by pregnant or breast-feeding women. Records also showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product. No persons under 18 were involved.
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	In the sampled estate and mill, the waste management program and plan seen incorporated with environmental impact aspect assessments. The assessment seen effectively covers on matured maintenance, FFB collection, workshop, schedule waste / chemical / fertilizer store and etc. The waste disposed were seen only household and food waste and disposed via landfill. As for the line-site cleaning, it scheduled on weekly basis by Hospital Assistant.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is	Yes	In the waste management plan, the documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material e.g., EFB and POME. During

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Clause	Indicators	Comply Yes/No	Findings
	demonstrated.		site inspections, sighted disposal of empty pesticide containers was 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. Meanwhile, site inspection at SW Store, sighted all SW Management was handled according to procedure and regulation. It was found that scheduled waste generated at the mill stored not more than 180 days.
	7.3.3 The unit of certification does not use open fire for waste disposal.	No	The CU had 2 policies on Zero Burning a main and sub policy in place. However, during site inspection at worker quarters at Syarikat Kretam Mill, there was trace of fire burning on the ground and use open fire for waste disposal have been carried out. Therefore, Minor NCR DA 01 2022 was raised.
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	The Syarikat Kretam Mill Sdn Bhd CU continued to implement the good agriculture practices as per Planting Manual (July 2015) to ensure optimal and sustained yield and complied with recommendations for fertilizer application. All the Estates in Syarikat Kretam Mill Sdn Bhd CU continued to implement the good agriculture practices to maintain long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB application. Fertilizer application program was monitored using program sheets, bin cards, Field Cost book and Fertilizer Quality Assessment.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	Fertilizer application, which was of paramount importance for maintenance of soil fertility, were carried out based on the recommendation made by the agronomist from third party provider. Annual fertilizer recommendations were made based on annual foliar sampling. At the same time, soil sampling was carried out on an 8-year cycle basis were also made available during the inspection and the application of fertilizers had been carried out as recommended and scheduled. Noted from the records that the actual amount of fertilizers applied in 2021 were completed. For 2022, the application still in progress.
	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	Only Bode and Masang Estate continued to have a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and EFB applied. Records of application and maps were reviewed by the audit team. Both Bukit Sekong & Sapagaya Estates had a nutrient recycling strategy in place however, only palm fronds were stacked in the interrow to decompose. No Empty Fruit Bunches (EFB) and POME were applied in both estates.
	7.4.4 Records of fertiliser inputs are maintained.	Yes	The Syarikat Kretam Mill Sdn Bhd CU continued to monitor their fertilizer inputs as recommended by their agronomist from Boris Agriculture Services Sdn. Bhd. The records of the fertiliser inputs were maintained in the Fertilizer Application Record Books and the Bin Card. Records of application as per the appointed third-party recommendations.
7.5 Practices minimise and control erosion and	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes	Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the 4 estates were classified as follows and was last updated in May 2014.

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Clause	Indicators	Comply Yes/No	Findings																																								
degradation of soils.			<table><tr><th>Bode Estate</th><th>Masang Estate</th><th>Bukit Sekong Estate</th><th>Sapagaya Estate</th></tr><tr><td>Jempol</td><td>Jempol</td><td>Jeram</td><td>Lungmanis</td></tr><tr><td>Jeram</td><td>Jeram</td><td>Stom</td><td>Silabukan</td></tr><tr><td>Stom</td><td>Stom</td><td>Tanjong Lipat</td><td>Rumidi</td></tr><tr><td>Tanjung Lipat</td><td>Tanjung Lipat</td><td>Kumansi</td><td>Kretam</td></tr><tr><td>Kumansi</td><td>Kumansi</td><td>Talisai</td><td>Gomantong</td></tr><tr><td>Talisai</td><td>Talisai</td><td>Kuah</td><td>Lokan</td></tr><tr><td>Kuah</td><td>Tebok</td><td></td><td></td></tr><tr><td>Tebok</td><td>Briah</td><td></td><td></td></tr><tr><td></td><td>Selangor</td><td></td><td></td></tr></table> <p>There were no problematic soils (e.g. podzols and acid sulphate soils) on Syarikat Kretam Mill Sdn Bhd CU. The estates maintained the following maps and documents for proof of recognized legal rights. Documents were sighted and verified.</p>	Bode Estate	Masang Estate	Bukit Sekong Estate	Sapagaya Estate	Jempol	Jempol	Jeram	Lungmanis	Jeram	Jeram	Stom	Silabukan	Stom	Stom	Tanjong Lipat	Rumidi	Tanjung Lipat	Tanjung Lipat	Kumansi	Kretam	Kumansi	Kumansi	Talisai	Gomantong	Talisai	Talisai	Kuah	Lokan	Kuah	Tebok			Tebok	Briah				Selangor		
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	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in mature areas. The cover crop Mucuna bracteata had been planted along some slopes by management. Large areas with Nephrolepis biserrata in the inter rows were sighted during the visit.																																								
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	No new planting on steep terrain.																																								
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Yes	The Syarikat Kretam Mill Sdn Bhd CU continued to demonstrate the long-term suitability of land for palm oil cultivation and had conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain, As mentioned under indicator 7.5.1 soil maps and topography maps were made available. There were no peat soils, marginal soils and fragile soils on All Estates. The soil and topography of the estates were taken into account in plans and operations.																																								
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	Yes	Based on the soil maps provided and field visits there were no fragile and problem soils in all the estates.																																								
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	Soil survey and assessment report was conducted by the appointed third-party in Feb 2014. Topographic maps also were established during the soil survey assessment. The topographic information was provided and reviewed by the auditors.																																								

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Clause	Indicators	Comply Yes/No	Findings
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Yes	This is <i>not applicable</i> as there is no peat soil in all estates in the Syarikat Kretam Mill Sdn Bhd CU as supported by the soil maps of respective estates.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	Yes	This is <i>not applicable</i> as there is no peat soil in all estates in the Syarikat Kretam Mill Sdn Bhd CU as supported by the soil maps of respective estates.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	This is <i>not applicable</i> as there is no peat soil in all estates in the Syarikat Kretam Mill Sdn Bhd CU as supported by the soil maps of respective estates.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	This is <i>not applicable</i> as there is no peat soil in all estates in the Syarikat Kretam Mill Sdn Bhd CU as supported by the soil maps of respective estates.
	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	Yes	This is <i>not applicable</i> as there is no peat soil in all estates in the Syarikat Kretam Mill Sdn Bhd CU as supported by the soil maps of respective estates.

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	12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	Yes	This is not applicable as there is no peat soil in all estates in the Syarikat Kretam Mill Sdn Bhd CU as supported by the soil maps of respective estates.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	Yes	This is not applicable as there is no peat soil in all estates in the Syarikat Kretam Mill Sdn Bhd CU as supported by the soil maps of respective estates.
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, updated in Mar 2022, identified 3 major parts which are general water management, water quality management and emergency management. General Water Management covers mainly on the efficient water usage practices and ways to achieve it. Factors such as education, infrastructure and water using processes are being analysed to achieve the water management goal. Water quality management for various water using processes in the mill and for domestic use in the estate especially for drinking water. Water supply for mill and estates are mainly from flowing river/reservoir apart from rainwater. Emergency management is the discipline of dealing with and avoiding risks of water shortage. Water spillage during pre-mixing of chemicals, from washing of PPE and from triple rinsing was collected from in sumps and recycled for spraying. Water supplies are made to all housing areas and office complexes in the respective estates and POM as the sources are from the internal water pond and catchment. River water quality (upstream and downstream) is tested twice a year to ensure the water supply is in usable condition. Based on the result, water quality monitoring is generally within WHO and Class IIB of INWQS at all monitoring parameters.

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	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	Supplies are made to all housing areas and office complexes in the respective estates as the sources are from the internal water pond and catchment. Water sampling point selected from small river or water course. Based on the result, water quality monitoring is generally within Class IIB of INWQS at all monitoring points. For POM final discharges, samples were taken on monthly basis and sent to an accredited laboratory for analysis. The result was within the regulatory limit.
	7.8.1b Workers have adequate access to clean water.	Yes	The worker's quarters have adequate clean water supply by estate and mill management, the management also done the analysis to ensure water was safe for domestic use. Domestic water analysis results showed no adverse quality. Overall found during interview with workers that all operating units under CU have adequate access to clean water and the CU does not restrict access to clean water.
	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 mgmt. and rehabilitation of riparian reserves' (April 2017).	No	Water courses and wetlands was not protected, including maintaining and restoring appropriate riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). During site inspections at Masang Estate and Bode Estate, sighted the sign of chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to Sg. Bode. As a result, Major NCR DA 02 2022 was raised.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially BOD, is regularly monitored.	Yes	According to DOE's license, the disposal method of the final discharge is through land irrigation. The Biogas and ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. The result was within the limit.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to baseline renewable energy is in place, monitored and documented.	Yes	The CU showed evident that they are compiling the data by monthly basis and document it for further action to improve on their efficiency of using the renewable and non-renewable energy. Apart from use of grid electricity, palm fibre and shells were also used to generate electricity through biogas plant.
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.	Yes	<p>GHG emission has been identified in Energy Planning and has been reviewed by yearly basis, sighted latest revision in Jan 2022. For estate and mil operation GHG management plans as per below:</p> <ul style="list-style-type: none"> Fertilizer applications are based on programme to effectively and adequately apply the fertilizer. It will also prevent over application of fertilizer thus reduce the GHG emission To install ESP System – commissioning on expected in June 2022 Daily usage fiber and shell has been monitored <p>The CU had used RSPO Palm GHG version 4 Calculator as a tool to calculate the GHG emissions. For input FY 2021, the report sends via email to RSPO in Mar 2022 through the</p>

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designed to minimize GHG emissions.			Palm GHG calculator and publicly reported. The input data was verified, and the following were determined:																											
			<table><tr><th>Description</th><th>tCO₂e/tProduct</th><th>Production</th><th>t/yr</th></tr><tr><td>CPO</td><td>0.36</td><td>FFB Processed</td><td>182,756.39</td></tr><tr><td>PK</td><td>0.36</td><td>CPO Processed</td><td>37,070.33</td></tr></table>	Description	tCO ₂ e/tProduct	Production	t/yr	CPO	0.36	FFB Processed	182,756.39	PK	0.36	CPO Processed	37,070.33															
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			Palm Oil Mill Effluent (POME) Treatment																																
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Diverted to methane capture (flaring)		0%																																	
7.10.2 (C) Starting 2014, the carbon stock of the proposed dev area and major potential sources of emissions that may result directly from the dev. are estimated and a plan to minimize them prepared and implemented (guided by the RSPO GHG Assessment Proc for New Dev).	Yes	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at KHB Sandakan Region CU since Nov 2005. 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 minimize them implemented and monitored.	Yes	The Environmental Impact and Aspect Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N2O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. The CU also plan to reduce GHG by construct Biogas plant to capture Methane gas generated from the Effluent Treatment Plant to generate biogas engine to produce electricity for mill and domestic use.																																	
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	Yes	There was no land preparation in the CU by burning ever since KHB practice zero burning as per the policy dated in Jan 2016. It was observed that no fire had been used for land clearing in the FY 2020 and 2021 replants visited during time of audit. Palms had been felled, chipped, windrowed and left to decompose.																																
	7.11.2 The unit of certification establishes fire prevention and control measures for	Yes	The CU had established fire prevention and control measures for the areas under direct management estate and POM. In the mill their water hydrant and valid fire extinguishers at																																

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Clause	Indicators	Comply Yes/No	Findings
	the areas under its direct management.		the various operating stations. All estates visited had valid fire extinguishers at the office, employee quarters, chemical & fertiliser stores, diesel skid tank, etc.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	The CU also engaged with adjacent to stakeholders on fire prevention and control measures by inviting them to join training conducted during stakeholder meeting in 2019.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	Yes	Auditors has verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Syarikat Kretam Mill CU since Nov 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	Yes	The report "HCVF Assessment Two Parcels of Forest at Masang Estate, Kota Kinabatangan" is available. The study was conducted by HCVF External Assessor Dr Edwin J Bosi and His Team (Mr Isa Urani and Mr Justin Lanjang) the report was completed in October 2012. The finding from Assessment stated that 'There is no fauna of significance that is found in these parcels of forest. There is no ERT or Endangered, Rare and Threatened species within these forests. Since Parcel A and B is very close to each other there is not much difference in wildlife composition including the birds. Many species of bird are adapting to the oil palm plantation (OPP)' and 'The two parcels of forestland despite their small size qualify as HCVF on four criteria namely HCV 1.2, and 1.4, HCV 4.1 and HCV 5. There is also extended assessment conducted by internal Assessor Kretam namely 'Baseline Biodiversity Assessment and Planning for forest area, Unplanted Area, Water Catchment Area and Buffer Zones in KHB Plantation in Sandakan Region' dated May /July 2015 updated yearly and last review in October 2020. The study had covered all the High Conservation Value (HCV) within and adjacent to the Kretam Mill CU. The HCV assessment had identified the rare, threatened and endangered species (RTEs) for estate named Masang, Bode, Bukit Sekong and Sepagaya Estate including the management and action plan.
	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,	Yes	There was a presence of ERT species within HCV HCV 1.2, 1.4,4.1 and 5 in the CU. In managing the HCVs, the CU had a regular programme to educate its employees pertaining to the protection of the RTE as well as the protection of buffer zone and all protected areas. The CU has conducted a regular patrol of HCV areas, access and boundary of estates in its monitoring programme. Signage, such as "HCV attributes", "No Hunting", "No Fishing", "Buffer Zone" was erected on sites. No use of chemicals had been applied in the buffer zone

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Clause	Indicators	Comply Yes/No	Findings
	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).		as prohibited by the CU. In general, the action plan has been implemented accordingly as per detailed of action plan concerning HCV contained in the report section The action plan for these HCVs had been incorporated in the HCV report section '6.2.2 HCV Management and Monitoring Recommendations'. Sighted HCV integrated management plan has been developed in consultation with relevant stakeholder.
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	Yes	There were no local communities living nearby with Syarikat Kretam Mill CU. So, this indicator was not applicable with this CU.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Yes	A training programme for year 2022 was available at All estates. Awareness training like morning briefing has also been conducted. An appropriate disciplinary measure, was instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the	Yes	The implementation of HCV monitoring followed prescriptions in the "The HCV and RTE action plan was as in 'Monitoring Checklist of Biodiversity Area by Monthly'. The main approach taken included conservation of species and maintenance of connectivity between protected forest within, and surrounding Kretam Mill CU. Management included demarcation, education (awareness briefing) and constant monitoring. The status of HCV

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Clause	Indicators	Comply Yes/No	Findings
	management plan.		and RTE species that are affected by plantation or mill operations had also been documented in the report.
	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	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Syarikat Kretam Mill CU since Nov 2005.

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

Clause	Indicators		Comply Yes/No	Findings
5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	KHB Plantation already certified in July 2021 for all estates and mills. However, on October 2021, KHB Plantation has newly acquired property (Seraya Estate) @ 853.43 ha. KHB Plantation has deviated the TPB to 2024. The uncertified unit required 3 years' time frame to setup and prepared towards RSPO certification. KHB Plantations has sent the Time Bound Plan Revision template to the RSPO secretariat dated 31/03/2022 and still in the reviewing process. Refer attachment 6 TPB in the report.
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	The time bound plan set for one uncertified unit i.e. Seraya Estate, was appropriate and within the timeframe of three years for RSPO certification.
	(c)	Any revision to the time-bound plan or to the circumstances of the	Yes	CB has received and verified time bound plan for one uncertified unit as at March 2022. The time bound plan was revised and endorsed by the

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		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);		Sustainability Team. KHB Plantations has sent the Time Bound Plan Revision template to the RSPO secretariat dated 31/03/2022 and still in the reviewing process. Refer attachment 6 TPB in the report.
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	Yes	The details of the Time Bound Plan described as per attachment 6. KHB is progressively undergoing the RSPO Certification process towards 100%. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP. As of this audit and verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan.
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.13. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	For uncertified management unit, the HCV assessment has been carried out in Nov 2007 by Dr Edwin J Bosi from Fauna Consultant (wildlife management) and has been upgraded on Sept 2018 by Malaysian Environmental Consultants Sdn Bhd.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	Yes	There was no issue on land. Seraya Estate has a valid land title. Land title status has been described below: Government.Land title no: country lease CL096290363, CL095311078, CL095311256, CL095310464. Land status for purpose of cultivation of agricultural crop of economic value. Total land bank 853.43 ha.

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	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	Yes	Procedure was established to resolve any labour disputes i.e. Complaints & grievances procedure, document no: KHB-HR-P05. Sighted the grievance book (aduan perbaikan kerusakan rumah) established for workers to channel complaint related to housing complaint, etc.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	KHB complied with all the related legal requirement. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,	Yes	<p>Based on statement in (a) to (d) above, the CU has assessed the condition of their uncertified unit and has stated full commitment to comply with all relevant requirements as specified above.</p> <ul style="list-style-type: none"> ▪ Sighted the series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit as conducted and reported accordingly. The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. ▪ Evidence of audit attendance list, audit checklist & report were made available to auditor as the supporting evidence. ▪ Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting and no new development of area was observed. ▪ With this, it can be concluded that the positive assurance made was justified.
		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		<ul style="list-style-type: none"> • A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 		
		<ul style="list-style-type: none"> • Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 		
		<ul style="list-style-type: none"> • Desktop study e.g. web check on relevant complaints 		
		<ul style="list-style-type: none"> • If necessary, the audit team may decide on further stakeholder 		

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		consultation or field inspection, assessing the risk of any non-compliance with the requirements.		
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	Yes	As of this audit, KHB still on track and follow the requirement of uncertified requirement units, Further information can be obtained from KHB ACOP. The details of the Time Bound Plan described as per attachment 6. KHB is progressively undergoing the RSPO Certification process towards 100%. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	Yes	As of this audit, KHB still on track and follow the requirement of uncertified requirement units, Further information can be obtained from KHB ACOP. The details of the Time Bound Plan described as per attachment 6. KHB is progressively undergoing the RSPO Certification process towards 100%. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
5.6.6 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.		No additional indicators	Yes	It has been verified that KHB Sandakan Region CU has bought the land of Bode Estate, Bode Division from Colony Of North Borneo (Sabah Government) in 3 March 1953, as Country Lease. Interviews with Surrounding Villagers from Kg Batu 8, Kg Buang Sayang, Kg Berjaya 1, Kg Sri Tanjung confirmed that they do not have any issue on that. There is Also 2 Division in Bode Estate namely Capakaya division which is partly 281.93 ha from whole Bode Estate. The land in Capakaya Division is legitimately owned by Syarikat Kretam Plantation Sdn Bhd but originally bought from Capakaya Sdn Bhd. Auditor also sighted that all Land title has already change the owner to Syarikat Kretam Plantations Sdn Bhd on 9/8/2005. Another division Timberwood Division is partly 139.49 ha from whole Bode Estate, The land in Timberwood Division is legitimately owned by Syarikat Kretam Plantation Sdn Bhd but originally bought from Timberwood Sdn Bhd. Auditor also sighted that all Land title has already change the owner to Syarikat Kretam Plantations Sdn Bhd on 9/8/2005. The land titles were for planting either oil palm or agricultural crops for economic value.

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<p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>			<p>For Bukit Sekong Estate, the Land was owned by Brinchang Plantation, Brinchang Realty, Merjaya and Nunuyan which is previously bought from Sabah Land Development and bought by Abedon Sdn Bhd in 22/1/97. After that Abedon Sdn Bhd has merged with Kretam Holdings Berhad in 2012 and the Estate has been managed by Kretam until now. Interviews with surrounding area from Kg Batu 8, Kg Buang Sayang, Kg Berjaya 1, Kg Sri Tanjung confirmed that, there is no issue regarding Land title at Kretam. It has been confirmed that Kretam has the right to use the land which is legitimately owned by their company. There is Also 1 Division in Bukit Sekong Estate namely Sukau division which is partly 103.63 ha from whole Bukit Sekong Estate. The land in Sukau Division is legitimately owned by Abedon Sdn Bhd but originally bought from Nunuyan Plantation. Auditor also sighted that all Land title has already change the owner to Abedon Sdn Bhd on 27/9/2000. Previous landowner of this Plantation is a villager which is originally from Kinabatangan villagers. Auditor has make attempt to find the previous land owner through Sabah Land Department - Kinabatangan to get the previous land owner phone number, but couldn't get it as it was not traceable.</p> <p>For Sepagaya Estate, the Land was legitimately own and bought by Syarikat Kretam Plantations Sdn Bhd in 1980 from Sabah Government. Interviews with Villagers from Kg Batu 8, Kg Buang Sayang, Kg Berjaya 1, Kg Sri Tanjung confirmed that, there is no issue regarding Land title at Sapagaya Estate. It has been confirmed that Kretam has the right to use the land which is legitimately owned by their company.</p> <p>For Masang Estate, the Land was previously owned by several Company and Several villagers, which is previously bought from Sabah Government in 1980 - 1984 and bought by Syarikat Kretam in year 1988 - 1992. And the Estate has been managed by Kretam until now. Previous landowner of this Plantation are some villagers who are originally from Kinabatangan villagers and outsider. Auditor has made attempt to find the previous landowner through Sabah Land Department - Kinabatangan to get the previous land owner phone number, but couldn't get it as it was not traceable. However, the interviews with surrounding area from Kg Batu 8, Kg Buang Sayang, Kg Berjaya 1, Kg Sri Tanjung confirmed that, there is no issue regarding Land title at Kretam. It has been confirmed that Kretam has the right to use the land which is legitimately owned by their company.</p>
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ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
DA 01 6.2.4	Major	<p>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.</p> <p>Finding: Inadequate of "structural safety and reasonable levels of decency, hygiene and comfort" at housing – ILO Guidance on Workers' Housing Recommendation No. 115:</p> <p>Objective evidence:</p> <p>Based on interview and site visit to workers' quarters at KHB Sandakan Region CU, observed that:</p> <ol style="list-style-type: none"> 1. The perimeter drains at wooden houses are not kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water – found at POM, Masang Estate, Bode Estate 2. No replacement of housing window (Tingkap Nako) and mosquito netting due to broken/missing at several wooden houses – found at POM, Bukit Sekong Estate, Masang Estate and Bode Estate 3. Sanitation facilities provided not meet minimum standard of hygiene – mossy toilet condition and no pumping system to flushing – found at E13 wooden housing (POM) 4. No ceiling fan or portable fan provided – found at E13 wooden housing (POM) 5. Bedding and bedframe materials not provided – newly recruited workers (POM) 6. No adequate furniture for each worker to secure his or her belongings, such as a ventilated clothes locker which can be locked by the occupant to ensure privacy – newly recruited workers (POM) 	<p>Root cause:</p> <p>The old wooden housing at KHB Sandakan Region CU did not follow the ILO Guidance, instead the CU have been following the minimum standard of workers housing act. Unfortunately, the new RSPO indicator have changed the requirement to follow the ILO Guidelines on Workers' Housing Recommendation No.115. The CU lack of awareness and understanding on the ILO Guidance requirements.</p> <p>Corrective Action:</p> <p>The current KHB company policy or guidelines procedure will be revised/amended to include a statement of which basic amenities shall be provided to the workers as per ILO Guidance on Workers Housing Recommendation 115. The Long-term of five years planning for upgrading the facilities and amenities will be established.</p>	<p>Status:Closed</p> <p>Sighted the CU had rectify perimeter drain initiated at Masang Estate.</p> <p>Sighted the CU had initiated installed "Nako" and mosquito net program as per attachment.</p> <p>Sighted the CU had rectified flushing system for toilet.</p> <p>Basic amenities had been provided including fan, bed and wardrobe.</p> <p>Sighted draft for KHB company policy pending endorse by company Group CEO were evidence.</p>

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DA 02 7.8.2	Major	<p>Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>Finding: Water courses and wetlands was not protected, including maintaining and restoring appropriate riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>Objective evidence: During site inspections at Masang Estate (Division 2, Field Block 11PO2) and Bode Estate (Division 3, Field Block 06BD1), sighted sign of chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to Sg. Bode.</p>	<p>Root cause: The current practice of CU was only the buffer zone/riparian areas are painted/marked as per CU understanding. No marking is done to the oil palm trees near the artificial drainage to indicate "No spraying zone". Awareness training (compliance & spraying) provided is not sufficient and inadequate</p> <p>Corrective Action: Additional marking to the oil palm trees near the artificial drainage will be done as per RSPO requirements. Signage will also be installed at the artificial drainage area to convey information to the workers. The buffer zone/riparian SOP will be revised to include the protection and conservation at the artificial drainage area. Awareness training on spraying will be conducted.</p>	<p>Status: Closed Sighted revision of SOP Buffer Zone Rev 6 date 4/4/2022 and Weeding & Restriction procedure Rev 6 date 4/4/2022 updated. Additional signages at artificial drainage photo been sighted. Training records for no spraying at artificial drainage sighted as per attachment.</p>
DA 03 7.3.3	Minor	<p>The unit of certification does not use open fire for waste disposal.</p> <p>Finding: The unit of certification use open fire for waste disposal.</p> <p>Objective evidence: During site inspection at worker quarters at Syarikat Kretam Mill, sighted there is trace of fire burning on the ground and use open fire for waste disposal have been carried out.</p>	<p>Root cause: The basic root cause is lack of understanding of the company policy by the worker's dependents.</p> <p>Corrective Action: The POM identified workers including dependents will be given a training and awareness briefing on company's policies and environment protection procedures.</p>	<p>Status:Open Will be verify in next audit</p>
RMN 1 6.7.2	Minor	<p>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.</p> <p>Finding :Emergency shower and eye wash in good operation</p>	<p>Root cause: Emergency shower and eye wash facilities are available at B. Sekong and Masang Estate. Unfortunately, the conditions were unsatisfactory and the specification did not follow as per RSPO requirement because the facility was designed and made by own estates. The emergency facilities also located far from the pre-mixed and store</p>	<p>Status:Open Will be verify in next audit</p>

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		<p>condition.</p> <p>Objective evidence:</p> <p>Sighted at below estates, the emergency shower and eye wash was not in good conditions.</p> <p>1.Bukit Sekong Estate</p> <p>2.Masang Estate</p>	<p>area.</p> <p>Corrective Action:</p> <p>he estate management will upgrade all emergency shower and eye wash that did not meet the safety specification and to relocate the emergency shower facilities as per recommended by RSPO requirement.</p>	
RMN 2 1.1.2	Minor	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>Finding :The information provided was not accurate.</p> <p>Objective evidence:</p> <p>Discrepancy on certified hectarage at Masang Estate as per below</p>		<p>Status:Open</p> <p>Will be verify in next audit</p>
		Certified hectarage in previous certificate	Actual hectarage verified	
		3047.03 Hectare	3178.62 Hectare	
		.		

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ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
MAR 01 2020 (2.2.3)	Minor	<p>Finding: Contracts agreements does not contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>Objective evidence: Contract Agreement between Kretam Mill CU and Santi Kontraktor [agreement dated 9/5/2020] (Sepagaya Estate), Low Soew Weng [agreement dated 1st January 2019] (Masang Estate), Syarikat Abrar [general work order dated Jun 2020] (Bode Estate), KK Fong Sdn Bhd, Juwita Baru Sdn Bhd, Goldon Anchi Bersaudara (Kretam Mill) found no clauses on disallowing child, forced and trafficked labour, and clause for young workers protection (if employed).</p>	Top Management has decided Starting from 06/08/2020, all contract document produced by estates and mill will include the clauses on disallowing child, forced and trafficked labour, and clause for young workers protection (if employed). This includes yearly and monthly contracts.	<p>Based on records available, contracts were updated on 3/8/2020, and sighted that all contractor's contracts have been updated to include clauses on disallowing child, forced and trafficked labour, and clause for young worker's protection (if employed).</p> <p>Status: Closed</p>
DA 01 2020 (3.6.1)	Major	<p>Finding: Certain operations/activities has not been risk assessed to identify H&S issues.</p> <p>Objective evidence: Certain operations/activities has not been risk assessed in the HIRARC:</p> <ol style="list-style-type: none"> 1) Replanting activities 2) Water sampling activities 3) FFB Crop Evacuation via Bin System 	The management has conducted a risk assessment for these 3 activities been on 06/08/2020. And will remind the PIC of the Estate.	<p>The estates had conducted risk assessment on all its operation as well as determining their control measures annually. Last review was on 04/03/2021 related to COVID 19 activities. All work units that have been identified to have potential risks are documented and the sampled areas are as follows such as replanting, water sampling, FFB Crop Evacuation Via Bin System, Harvesting, Weeding, Manuring, Pruning, P&D, road maintenance, etc. have been carried out. Mitigation plans and control procedures such as PPE, Administrative Control and Trainings were documented accordingly.</p> <p>Status: Closed</p>

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RAR 01 2020 (3.8.7)	Major	Finding: The mill did not informed the CB about overproduction of certified volume. Objective evidence: <table><tr><td rowspan="2">Last year projected</td><td>CSPO</td><td>CSPK</td></tr><tr><td>41,217 mt</td><td>8,430.75mt</td></tr><tr><td rowspan="2">Actual</td><td>CSPO</td><td>CSPK</td></tr><tr><td>48,685.64mt</td><td>10.422.14mt</td></tr></table>	Last year projected	CSPO	CSPK	41,217 mt	8,430.75mt	Actual	CSPO	CSPK	48,685.64mt	10.422.14mt	Syarikat Kretam Mill POM has been apply volume extension of 11,000Mt for CPO and 2000Mt for PK on 29 of July 2020. In the future, Mill will immediately request for more CPO and CSPK volume if deemed necessary.	Based on verification of data through RSPO IT Platform and those recorded by Kretam POM, no overproduction occurred and record. Status: Closed
Last year projected	CSPO	CSPK												
	41,217 mt	8,430.75mt												
Actual	CSPO	CSPK												
	48,685.64mt	10.422.14mt												
MZK 01 2020 (7.12.4)	Major	Finding: HCV management plan have been not developed with participation of affected stakeholders Objective evidence: It was found that the HCV integrated management plan at Kretam Mill CU is not developed in consultation with relevant stakeholder, even though in the stakeholders meeting was held on 22/1/20 the stakeholder affected was invited.	All discussion and comments from stakeholder during past year Stakeholder Consultation will be included inside Baseline Biodiversity Assessment Document. This includes recommendation from NGOs such as Danau Girang and WWF. Refer to BASELINE BIODIVERSITY ASSESMENT AND PLANNING FOR FOREST AREA, UNPLANTED AREA, WATER CATCHMENT AREA AND BUFFER ZONES IN KHB PLANTATION IN SANDAKAN REGION i. Page 15 title Stakeholder Consultations ii. Page 52 and 53 title LONG TERM PLANNING FOR HCV FOREST AREA (YEAR 2018-2022). Date Complete:06/08/2020	Sighted HCV integrated management plan has been developed in consultation with relevant stakeholderAmong issues discussed with relevant affected stakeholder i.e. PERHILITAN, Danau Girang and WWF were related to illegal hunting, the effected stakeholder has no issues related to HCV action plan, and the plan was updated Latest on 2/1/22 (Sapagaya), 28/3/22 (Bukit Sekong), 28/3/22 (Masang) and 28/3/22 (Bode). Status: Closed										
MAR 02 2020 (6.5.3)	Minor	Finding: Management did not assess the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. Objective evidence: No evidence assessment of new mothers were found at Sapagaya Estate.	All the pregnant workers will be assessed on their needs by the estate management. Completed 06/08/2020	There is evidence assessment of new mothers were found at Sepagaya Estate. Status: Closed										

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ATTACHMENT 6 – Timebound Plan

Kretam Holdings Berhad Time-bound Plan for RSPO Certification, as of March 2022

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)
				Latitude	Longitude		
ABEDON OIL MILL SDN BHD	MALAYSIA	ABEDON OIL MILL SDN BHD	PO BOX 60402, LAHAD DATU, SABAH, 91113, MALAYSIA	5.312333° N	117.973889° E	13.8500	Certified
ABEDON OIL MILL SDN BHD	MALAYSIA	KOLOPIS ESTATE		5.298056° N	117.956667° E	2,489.86	Certified
ABEDON OIL MILL SDN BHD	MALAYSIA	TANAKI ESTATE		5.329972° N	117.938333° E	2,628.03	Certified
SILIMPOPON MILL	MALAYSIA	SILIMPOPON MILL	KM 128, TAWAU KALABAKAN HIGHWAY, MUKIM SG.SILIMPOPON, 91000 TAWAU, SABAH	N 4°019'31.9	E 117°28'38.2	38.0600	Certified
SILIMPOPON MILL	MALAYSIA	SILIMPOPON 1 ESTATE		N 4°019'44.76	E 117°27'32.88	3,934.8200	Certified
SILIMPOPON MILL	MALAYSIA	SILIMPOPON 2 ESTATE		N 4°19'44.76	E 117°27'32.88	4,155.1800	Certified
SYARIKAT KRETAM MILL	MALAYSIA	SYARIKAT KRETAM MILL	OFF KM 45 SANDAKAN-LAHAD DATU HIGHWAY, KINABATANGAN, SANDAKAN SABAH	N 050° 39' 25.8"	E 117°0 50' 15.1"	33.54	Certified

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SYARIKAT KRETAM MILL	MALAYSIA	BODE ESTATE	OFF KM 45 SANDAKAN-LAHAD DATU HIGHWAY, KINABATANGAN, SANDAKAN SABAH	N 050° 38' 37.3"	E 117°0 49' 54.0"	3,472.82	Certified
SYARIKAT KRETAM MILL	MALAYSIA	MASANG ESTATE	OFF KM 45 SANDAKAN-LAHAD DATU HIGHWAY, KINABATANGAN, SANDAKAN SABAH	N 050° 39' 47.3"	E 117°0 51' 55.8"	3,047.65	Certified
SYARIKAT KRETAM MILL	MALAYSIA	WINPALM ESTATE	OFF KM 45 SANDAKAN-LAHAD DATU HIGHWAY, KINABATANGAN, SANDAKAN SABAH	N 050° 43' 16.4"	E 117°0 53' 47.9"	130.97	Certified
SYARIKAT KRETAM MILL	MALAYSIA	SAPAGAYA ESTATE	KM82, JALAN LAHAD DATU / SANDAKAN, KINABATANGAN, SANDAKAN SABAH	N 050° 34' 52.9"	E 118°0 01' 06.3"	3,049.77	Certified
SYARIKAT KRETAM MILL	MALAYSIA	BUKIT SEKONG ESTATE	BATU 60, JALAN SUKAR, KINABATANGAN, SANDAKAN SABAH	N 050° 36' 12.8"	E 117°0 54' 09.8"	853.33	Certified
SYARIKAT KRETAM MILL	MALAYSIA	SUKAU ESTATE	KM136, JALAN SUKAU / SANDAKAN, KINABATANGAN, SANDAKAN SABAH	N 050° 32' 54.3"	E 118°0 15' 43.0"	103.63	Certified
SYARIKAT KRETAM MILL	MALAYSIA	SERAYA ESTATE	SERAYA ESTATE, MILE 50, LABUK ROAD, 90200 KINABATANGAN	5.644234° N	117.601625°E	853.43	Not Certified

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Attachment 7 – Stakeholder listings

<div> SYARIKAT KRETAM PLANTATIONS SDN. BHD. (Co. No. : 96429-U)</div> <div>Lot 6, Block 4A, Litchi Tiga, 90000 Sandakan, P.O. Box No. 1282, 90114 Sandakan, Sabah, Malaysia. Tel: 089-216999 (5 lines) Fax: 089-278111.</div>						
No	Stakeholder	Contact Person	Address	Tel/Fax/Email	Location	PIC
Category: Government						
1	1	Belai Polis Kinabatangan	Ketua Polis Daerah Kinabatangan	Ibu Pejabat Polis Daerah Kinabatangan Polis Diraja Malaysia W.D.T. No.17, 90200 Kinabatangan, Sabah	Tel: 089-561890 / 089-561559 / Email: kpd@kinabatangan.mil.gov.my	P & M MM/EMs/SAMs
2	2	Hospital Kinabatangan	Pengarah Hospital	Hospital Kinabatangan, W.D.T 200, Kinabatangan, 90020	Tel: 089-561857 / Email: pengarah.kinabatangan@moh.gov.my	P & M HREP/MM/EMs/SAMs
3	3	Jabatan Alam Sekitar Cawangan Sandakan, Kementerian Sumber Asli dan Alam Sekitar Malaysia	Ketua Cawangan	Tingkat 2, Wisma Saban, Megah Light Industrial Estate, Batu 7, Jalan Labuk, 90000 Sandakan.	Tel:089-674653 / Fax: 089-671384 / Email: alrudin@dce.gov.my	P & M HREP/MM/EMs/SAMs
4	4	Jabatan Bomba dan Penyelamat Kinabatangan	Ketua Jabatan	Jln Datuk Hj. Abdul Malek Chua, Pekan Kota Kinabatangan, 90200 Kinabatangan, Sabah.	Tel:089-562630 / Email: bcbmbkinabatangan@yahoo.com / bbp_kinabatangan@yahoo.com	P & M MM/EMs/SAMs
5	5	Jabatan Hidupan Liar Daerah Kinabatangan	Mr. Jimli Perjen	W.D.T. No. 169,90200 Kota Kinabatangan.	Tel: 089-561527 / 089-561581 / Fax:089-561523 / Email: jhkkth@yahoo.com	P & M HREP/MM/EMs/SAMs
6	6	Jabatan Keselamatan dan Kesihatan Pekerjaan Cawangan Sandakan	Ketua Cawangan	Tingkat 1, Wisma Saban, Batu 7, Jalan Labuk, W.D.T 71, Bangunan Rumah Persekutuan, 90500 Sandakan, Sabah	Tel:089-672059 / 089-672072	P & M HREP/MM/EMs/SAMs
7	7	Jabatan Perhutanan Daerah Kinabatangan	Ketua Jabatan	W.D.T 14,90200 Kota Kinabatangan	Tel: 089-561525 / 089-561276 / Fax: 089-561526	P & M HREP/MM/EMs/SAMs
8	8	Jabatan Perlindungan Alam Sekitar	En. Jomius Bin Joseph	Tingkat 4, Bangunan Urusetia Negeri, Batu 7, Jalan Labuk, Sandakan, Sabah.	Tel: 089-673530 / 089-672606 / Email: jps@sabah.gov.my	P&M HREP/EMs/SAMs
9	9	Jabatan Pertanian Daerah Kinabatangan	Pmk. Pegawai Pertanian (En. Awang Walit)	Jabatan Pertanian, W.D.T. No. 6, 90200 Kota Kinabatangan	Tel: 089-561139 / Fax: 089567834	P HREP/EMs/SAMs
10	10	Jabatan Tenaga Kerja	Ketua Cawangan	Pejabat Tenaga Kerja Kinabatangan	Tel: 089-561957 / 089-561627 / Email: jtkkkblgn@mohr.gov.my	P & M MM/EMs/SAMs
10	10	Jabatan Imigresen	Ketua Pejabat	Pejabat Imigresen Sandakan, No. 53, Wisma Persekutuan, 90450 Sandakan, Sabah	Tel: 089-66 8328 / Faks: 089-66 8858	P&M HHRS
11	11	Majlis Daerah Kinabatangan	En. Johanif Mualat	W.D.T No. 8, 90200 Kinabatangan	Tel: 089-560101 / 089-560102 / 087-748828 / Email: johanis.mualat@sabah.gov.my	M MM
12	12	MPOB - Sandakan Port Station	Mr. Adrien Tubong / Ms. Nor Aina Atika Binti Useh	Block C4, Lot 123 Tingkat 1, Bandar Labuk Jaya, 90000 Sandakan, Sabah	Tel: 089-224248/ 089-220843 / Fax:089-224245 / HP: 012-3687468 / 019-5875464 / Email: sandakan@mpob.gov.my	P & M HREP/MM/EMs/SAMs
13	13	Pejabat Daerah Kinabatangan	Pegawai Daerah	W.D.T No. 1, 90200 Kinabatangan.	Tel: 089-561811 / Email: kdnkpid@sabah.gov.my	P & M MM/EMs/SAMs
14	14	Pejabat Pendidikan Daerah Kinabatangan	En. Hertawan Bin Kanan	W.D.T 22, 90200 Kota Kinabatangan.	Tel: 089-561883 / 089-561881	P & M MM/EMs/SAMs
15	15	Regional Office Suruhanjaya Tenaga	En. Ir Amir Faisal Khamsah	Tingkat 3, Wisma Saban, KM12, Sandakan, Sabah.	Tel: 089-668695	M MM
16	16	SESB Kinabatangan	En. Baharuddin Alimuddin	Sabah Electricity Sdn. Bhd., W.D.T 11, 90200 Kota Kinabatangan, Sabah.	Tel: 089561902 / Email: baharuddin_alimuddin@sesb.com.my	P & M MM/EMs/SAMs
17	17	NIOSH Cawangan Sandakan	En. Muhamad Almansari Bin Albari	Institut Latihan Perindustrian Sandakan (ILP), Tingkat 1, Bahagian Pusat Sumber & Multimedia, Batu 5, Jalan Sibuga, 90000 Sandakan, Sabah.	Tel: 089-663761/089-663762	P & M HREP
Category: Villagers						
18	1	Kg. Batu 8	Mr. Hj. Jabli Bin Bari	Kg. Batu 8, Bukit Garam	HP: 0115-8083261	P & M MM/EM-Bode
19	2	Kg. Berjaya I	Mr. Amir Ali Md. Amir	Kg. Berjaya I	HP: 013-8550809	M MM
20	3	Kg. Berjaya II	Mr. Zakariah Bin Hj. Samsi	Kg. Berjaya II, Bukit Garam	HP: 019-8691455	M MM
21	4	Kg. Buang Sayang	Mr. Nordin Juri	Kg. Buang Sayang, Bukit Garam	HP: 012-5826469	P EM-Bode
22	5	Kg. Danau Ria	Mr. Merkin Gumpat	Kg. Danau Ria, Bukit Garam	HP: 014-8772497	M MM
23	6	Kg. Lot M	Mr. Moklar Bin Hj. Asmat / Mr. Obbatin Hasim	Kg. Rantau Abg Lot. M.	HP: 019-8712419 / 013-8768726	P EM-Bode
24	7	Kota Kinabatangan	Mr. Okar Bin Bunah	Pekan Kota Kinabatangan	HP: 019-8993449	P EM-Bode
25	8	Kg. Nusa Jaya	Mr. Norsani Jamri	Kg. Nusa Jaya, Bukit Garam	HP: 013-8784067	M MM
26	9	Kg. Sri Manis	Mr. Jaimin	Kg. Sri Manis, Bukit Garam	HP: 019-5369100	M MM
27	10	Kg. Sri Tanjung	Mr. Asnaji bin Sangi	Kg. Sri Tanjung, Bukit Garam	HP:019-8084659	M MM
28	11	Kg. Sungai Rotan	Mohamad Rizuan Moin	W.D.T 387, 90200 Kinabatangan	HP: 019-8224287 / 012-8711355	P EM-Bode

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Category : Internal Stakeholder							
29	1	Wakil Pekerja Lelaki (Sapagaya)	Mr. Usran Jaya	Batu 60, Jalan Sukau, Peti Surat 1292, 90714 Sandakan.	Tel: 089-676133	P	EM - Sapagaya
30	2	Wakil Pekerja Wanita (Sapagaya)	Mrs. Rosmini Binti Manaur	Batu 60, Jalan Sukau, Peti Surat 1292, 90714 Sandakan.	Tel: 089-676133	P	EM - Sapagaya
31	3	Wakil Pekerja Lelaki (Bode)	Mr. Andi Udarto	Syarikat Kretam Plantations Sdn Bhd, Bode Estate, P.O.Box 1292, 90714 Sandakan.	HP: 011-12574817	P	EM - Bode
32	4	Wakil Pekerja Wanita (Bode)	Mrs. Irma Irwan	Syarikat Kretam Plantations Sdn Bhd, Bode Estate, P.O.Box 1292, 90714 Sandakan.	HP: 017-8342501	P	EM - Bode
33	5	Wakil Pekerja Lelaki (Masang)	Mr. Bintang Hase	Syarikat Kretam Plantations Sdn Bhd, Masang Estate, P.O.Box 1292, 90714 Sandakan.	HP: 011-10088604	P	EM - Masang
34	6	Wakil Pekerja Wanita (Masang)	Mrs. Kamariah Binti Sudding	Syarikat Kretam Plantations Sdn Bhd, Masang Estate, P.O.Box 1292, 90714 Sandakan.	HP: 014-7290027	P	EM - Masang
35	7	Wakil Pekerja Lelaki (Bukit Sekong)	Mr. Fenselin Man	Bukit Sekong, Abedon Sdn Bhd, KM 82, Jalan Lahad Datu - Sandakan, 90200, Kota Kinabatangan, Sandakan.	HP: 011-16534182	P	SAM - Bukit Sekong
36	8	Wakil Pekerja Wanita (Bukit Sekong)	Mrs. Suniani Binti Marsuki	Bukit Sekong, Abedon Sdn Bhd, KM 82, Jalan Lahad Datu - Sandakan, 90200, Kota Kinabatangan, Sandakan.	HP: 017-8380170	P	SAM - Bukit Sekong
37	9	Syarikat Kretam Mill Sdn Bhd	Mr John Chong	Syarikat Kretam Mill Sdn Bhd, Kretam Mill, P.O.Box 1292, 90714 Sandakan.	Tel: 012-8011810 / HP: 0196723954	P	EM - Bode
38	10	Abedon Oil Mill	Mr. Chin Kuen Yaw@Kelvin	Peti surat 60402, 91113 Lahad Datu Sabah	Tel: 089-565148 Email: aomsb@yahoo.com	P&M	MM
Category : Supplier							
39	1	Agri - Horticultural Trading (Sandakan) Sdn. Bhd.	Mr. Lim Lip Tek	Block 3, Lot No.28, Jalan Satu, Peti Surat No. 592, 90708 Sandakan, Sabah	Tel: 089-215700 / 016-8183904	P	EMs(B)/SAMs
40	2	United Track Sdn Bhd.	Mr. Leo Lie	MDLD 3439, Lot 1, Tabanac Centre, Mile 1 1/2, P.O. Box 61813, Lahad Datu.	Tel: 089-862121 / 016-8106845 / Fax: 089-862332 / Email: utabco@yahoo.com	P	EMs(S)/SAMs
41	3	Millvest Sdn. Bhd.	Mr. Nickson Chan Jin Yun	Block A, Lot 4, Gr Floor, Taman Grandview, PPM 111 Elopura, 90000 Sandakan, Sabah.	Tel: 089-212977 / 089- 212975 / Fax: 089-271704 / Email: mlvest@streamyx.com	P & M	HREP/MM/EMs/SAMs
Category : Transporter							
42	1	Gordon Anchi Bersaudara	Mr. Sopi Bin Anshat	Lot SD 04, Taman Sejahtera Ujana Phase 05, Batu 07, Jalan Airport 90000, Sandakan, Sabah.	Tel: 089-860244 / 013-8852885	M	MM
43	2	Jutta Baru Sdn Bhd	Mr. Ho Yu Yee (Operation Manager)	PPM 110, Elopura 90000 Sandakan	Tel: (Operation) 089-531215, (Office) 089-866870 / 089-866872	M	MM
44	3	K.K Fong Sdn Bhd	K.K Fong (Director)	W.D.T. No. 161, 90009 Sandakan	HP: 019-8139788 / 019-8165220	M	MM
Category : School							
45	1	CLC PKBM - Bode Estate	Mr. Khair	P.O.Box 1292, 90714 Sandakan	HP: 013-8709813	P	EM - Bode
46	2	CLC Sapagaya	Mr. Tria Yudhistria	Batu 60, Jalan Sukau, Peti Surat 1292, 90714 Sandakan.	HP: 0195866322	P	SAM - Sapagaya
47	3	SK Ladang Bode	Megat Alias Binti Megat Muda (Guru Besar)	WYDT 241, 90009 Sandakan, Sabah	-	P & M	HREP/MM/EMs(B)/SAMs
48	4	SMK Bukit Garam	Headmaster	W.D.T No. 12, 90200 Kinabatangan	Tel: 089-581909	P & M	HREP/MM/EMs/SAMs
49	5	SK Sapagaya	Mr. Ahmad Bin Ali	Batu 60, Jalan Sukau, Peti Surat 1292, 90714 Sandakan.	HP: 014-8610255 / Email: xbs2233@moa.edu.my	P	EM - Sapagaya
Category : Contractor							
50	1	Hasanuddin Company / Santi Kontraktor	Mr. Hasanuddin Lanuel	Batu 60, Jalan Sukau, Peti Surat 1292, 90714 Sandakan.	HP: 019-8836059 / 0112-5323695	P	EMs(S)/SAMs
51	2	Kong Wui Keong	Mr. Micheal	Kong Wui Keong Sdn. Bhd, MDLD 6587, 2nd Floor, Lot 21, Block C, Airport Plaza, 91100 Lahad Datu, Sabah.	HP: 019-8838788	P	EM-Bode
52	3	Lo Enterprise	Mr. Lo Nyuk Voo	Lo Enterprise, BQ 4128, Mail Bag No.8, Jalan Labuk Lama, Batu 2 1/2, 90000 Sandakan.	HP: 019-8003325	P	EM-Masang
53	4	Lo Nyuk Kiong Contractor	Mr. Lo	Lot 19, Lorong 17, Taman Fajar Fasa 1, Batu 7, Jalan Lembangan Terbang, 80000 Sandakan	HP: 016-8370299 / 019-8074887 / Fax: 089-210625 / Email: kanyuna88@hotmail.com	P	EMs/SAMs(B,S)
54	5	Low Soew Weng Dev. Co.	Mr. Chan Peng Hua	MDLD 4389 Taman Tabanac, Mile 1 1/2, Segama Road, 91100 Lahad Datu	Tel: 089-862593 / 019-8833998	P	EMs(M)/SAMs
55	6	Syarikat ABRA	Mr. Abdul Razak / Mr. Behar	P.O.Box 1292, 90714 Sandakan	HP: 016-9862487 / 017-8964084	P	EMs(B)/SAMs -
56	7	Syarikat Sri Manjung	Mr. Goh	MDLD 3834, Taman Aman 3, Jalan Silam, 91100 Lahad Datu	HP: 013-8831984	P	EMs(M)/SAMs
57	8	Syarikat Willy Contractor	Mr. Poon Ka Ming	Lot 46, Block F, 1st Floor, Utama Place 1, Mile 6, North Road 90000 Sandakan	HP: 019-8139391 / 012-8111182	P	EMs(B)/SAMs
58	9	Tai Ann	Mr. Tai Ann	P.O.Box 60844, 91117 Lahad Datu Sabah.	HP: 019-8338191	P	SAMs-Bukit Sekong

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Category : NGO's							
59	1	Borneo Conservation Trust	Dr. Tsubouchi Toshinori / Dr Raymond Alfred	5th Floor, Block B, Wisma MUIS, 88100 Kota Kinabalu, Sabah	Tel & Fax: 088-254729 / HP: 013-8968889 / Email: easleco@gmail.com	P	HREP
60	2	Danau Girang Field Centre	Dr. Benoit Goossens	DGFC, c/o Sabah Wildlife Department, Wisma Muis, Block B, 5th Floor, 88100 Kota Kinabalu, Sabah, Malaysia (Field Location: Lot 6, Lower Kinabatangan Wildlife Sanctuary, Sabah)	Tel: 088-341527 / Fax: 088-341528 / Email: goossensbr@cardiff.ac.uk	P	HREP
61	3	Sabah Environmental Protection Association (SEPA)	Dr. Lanash Thanda & Ms. Julia Hwang	8AF13, 7th Floor, Kompleks Karamunsing, 88300, Kota Kinabalu, Sabah	Email: info@sepa.my / lanashth@gmail.com / julia_hwang@yahoo.com	P	HREP
62	4	WWF Malaysia - Sabah	Mr. Max Donysius	Suite 1-8-W11, 8th Floor, CPS Tower, Centre Point Complex No. 1, Jalan Centre Point, 88500 Kota Kinabalu, Sabah, Malaysia.	Tel: 088-248492 (ext.51) / Fax: 088-248697 / HP: 012-6267900 / Email: mdonysius@wwf.org.my	P	HREP/EMs/SAMs
63	5	East Malaysia Palm Oil Association (EMPA)	Ms. Chung Shook In (Secretary)	Lot 38-1F, Jalan Dataran BU 4, Bandar Utama, Mile 6, Labuk Road PPM 62 Elopura, 90000 Sandakan, Sabah, Malaysia.	Tel/Fax: 088-238316 Email: theempa1888@yahoo.com	M	MM
Category : Certification Bodies							
64	1	Intertek Certification International Sdn Bhd	En. Zul Hatri Abu Hassan	PT Intertek Utama Services, Beltway Office Park, Building A, 2nd Floor, JI Ampara Raya No.9-10 Jakarta 12550 Indonesia	Tel: 013-3373040	P&M	MM/EM
65	2	Rehpro Certification Sdn. Bhd.	En. Gusman Bin Rudin	Kwsp Building, Lot B5-2C, 5th Floor, Block B, 88598 Kota Kinabalu, Sabah	Tel: 088-222 320 Email: rehprogroupp@gmail.com	P&M	MM/EM
66	3	SIRIM QAS International Sdn. Bhd.	En. Dzuffiqar Azmi	FAF Section, Management System Certification Department No. 9F-1A, 9th Floor, Tower 2 @ PFCC, Jalan Puteri 3, Bandar Puteri Puchong, 47100 Puchong, Selangor	Tel: 03-55445056	P&M	MM/EM
67	4	TUV NORD (Malaysia) Sdn Bhd	En. Robert CY Cheong		Email: robert.cheong@tuv-nord.com	P&M	MM/EM
Category : Others							
68	1	Chemsain Konsultant Sdn. Bhd.	Miss. Wani	Lot 2 & 7, Lorong Suri, Off Lorong Buah Duku 1, Taman Perindustrian Suria, Jalan Kolombong, 84450 Kota Kinabalu, Sabah	Tel: 088-381278 / 389571 / Fax: 088-361280 / Email: consult.kk@chemsain.com / monitoring.kk@chemsain.com	P	HREP/EMs/SAMs
69	2	Sabah Veterinary Supplies	Dr. Edwin Bosi / Dr. Randolph Paza	Ground Floor, Lot 3, Block E, Lintas Jaya Uptownship, 88300, Penampang, Sabah	HP: 012-8890105 / 010-8816247 / Fax: 088-728991	P	HREP/EMs/SAMs
70	3	Boris Soon Agri-Services Sdn. Bhd.	Mr. Boris Soon Bin Foo	BORIS Agri - Services Sdn. Bhd. Lot No. E-358-2, 2nd Floor, Block E, Pavilion Bundusan, 88300 Kota Kinabalu Sabah, Malaysia	Tel / Fax: 088-738693 / HP: 019-8207820 / Email: boris330@gmail.com	P	HREP/EMs/SAMs
71	4	Klinik Mabello (Kinabatangan) Sdn. Bhd.	Dr. Fkni/Dr. Chan Heng Leong	Lot 6, Tingkat Bawah, Pusat R&R Kinabatangan, 90200 Kota Kinabatangan Sabah	Tel: 089-561368 Email: klinikmabello.drchan@gmail.com	P & M	HREP/MM/EMs/SAMs
72	5	Klinik Mansor	Dr. Ahmad Mansor Bin Osir	Klinik Mansor Sdn. Bhd., Block A1, Lot 7 & 8, Bandar Labuk Jaya, 90000 Sandakan, Sabah	Tel: 013-8814444 / 013-8834444 Email: mansordr@yahoo.com	P & M	HREP/MM/EMs/SAMs
73	6	Syarikat Victory Engineering	Mr. Denny Cheong	Lot 1, Block I, Gr. Fl., Bandar Ramai-Ramai, P.O. Box 607, 90707 Sandakan	Tel: 089-272684 / Fax: 089-272408 / Email: victoryeng78@yahoo.com	P & M	HREP/MM/EMs/SAMs
74	7	Agensi Pekerjaan Amat Mercu Sdn Bhd	Miss Tan	Amat Mercu Sdn Bhd P.P.M 132, Elopura 90000, Sandakan.	Tel: 089-275758 / Fax: 089-272059	P & M	HREP/EMs/SAMs
75	8	Kretam Mill Canten	Mrs. Bernarda Gebarten	Mile 44, Jalan Sandakan - Lahad Datu, Sandakan.	Tel: 019-8431775	P & M	MM
76	9	Embassy of the Republic of the Philippines	H.E. Charles C. Jose, Ambassador / Janice C. Sanchez - Rivera, Third Secretary & Consul	1, Jalan Changkat Kia Peng, Kuala Lumpur, 50450 Kuala Lumpur, Wilayah Persekutuan Kuala Lumpur	Tel: 03-21484233	P & M	HHRS
77	10	Consulate General of Republic of Indonesia Kota Kinabalu	Indonesian Consulate Officer	Lorong Kemajuan, Karamunsing, P.O. Box 11595, Kota Kinabalu, Sabah 88817, Malaysia	Tel: 088-218600	P & M	HHRS
78	11	DAB OH Sdn. Bhd.	Dr. Mohd Azizan Bin Abdul Aziz	2nd Floor, Lot 154, Block 15A, Prime Square, Mile 4 North Road, 90000 Sandakan, Sabah	Tel: 089-225 445 Email: dabohsb@yahoo.com	P & M	MM
79	12	Chem-Yields Co. Sdn. Bhd.	Mr. Yong Kai Wah	Lot 14, Kompleks Perindustrian Usahawan Seco, Lorong Sedco 5, Jalan Balai Bomba, Batu 3.5 Jalan Utara, 90000 Sandakan Sabah	Tel: 089-212388 Fax: 089-227389	M	MM
80	13	CT Engineering Services	Mr. Thien Fen Soon	Shop 8, Lot 4, Block 8, Lorong Buah Duku 3, Kolombong 88450 Kota Kinabalu Sabah	Tel: 088-433027 Email: ctengineeringsservices@yahoo.com	M	MM

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Category: Neighbours (other plantations)							
81	1	Jaya Masang Sdn Bhd	Mr. Liaw Chin Loi	Lot 2B Damai Plaza 3, Damai Luyang, Kota Kinabalu	HP: 019-8002665	P & M	MM/EM-Masang
82	2	Borhill Estate	Mr. Arbain Saleh	Borhill Estate Sdn. Bhd. Flat A2 2nd Floor, Gay Yap Building, Jalan Singapore, P.O. Box 2560, 90726 Sandakan.	Tel: 089-877812 / HP: 014-5510929	P	EM - Sapagaya
83	3	Borneo Global Sdn Bhd	Mr. Chen Shu Huei - Director	Lot 1, 2nd Floor, Block 7, Bandar Indah Mile 4, Labuk Road, Sandakan	HP: 013-8931918	P & M	MM/EM-Masang
84	4	Borneo Samudera (Annex)	Mr. Rizal / Mr. Agustine	Borneo Samudera Abas Gomantong, Batu 60 Jalan Sukau Kinabatangan.	HP: 019-8412268 / Tel: 089-677205	P	EM - Sapagaya
85	5	Central Agriculture Development Sdn Bhd.	Mr. Ahmad Bin Monta	2nd Floor, Block 12, Lot 8, Bandar Indah Mile 3, North Road Sandakan.	HP: 012-8112177 / 010-9833378	P & M	MM/EM-Masang
86	6	Chan Yuk Ping	Mr. Chan Yuk Ping	Blok 51, Lot B564 Taman Indah Jaya, St.4 Jalan Lintas, 90000 Sandakan Sebah.	HP: 013-8988886	M	MM
87	7	Genting Suan Lamba Estate / Genting Mubai Estate	Mr. Elan Govan A/K Mani Vellu	Genting Mubai Estate Kota Kinabatangan	Tel: 089-623233	P	SAM - Bukit Sekong
88	8	Harimaju Plantation Sdn Bhd / PK Lim	Mr. Lo Hon Kong / Mdm. Alice Tsen / Mr. Lo Ken Jun	Block M, Lot 16, 1st Floor, Bandar Sibuga Jaya, Mile 8, 90000 Sandakan	HP: 019-8836788 / 019-8136788 / 012-8961951	P & M	MM/EM-Masang
89	9	Helene Yap Sui Yin	Helene Yap Sui Yin	25 Oriental, Park 5, Lorong 11, Jalan Penampang, 88300 Kota Kinabalu, Sabah	HP: 019-8309420	M	MM
90	10	Hong Mau Estate	A/K Krishnan	Hong Mau Estate, Kota Kinabatangan Sabah East, Malaysia	HP: 016-7102504 / 016-7102503 / 016-7102509	P	SAM-Bukit Sekong
91	11	Jason Ng. Chor Yeew	Mr. Lim Boon Hin	No. 288 Jalan Pulau Carey, 42500 Teluk Panglima Garang, Selangor.	HP: 016-8142533	M	MM
92	12	Juta Maju Estate	Mr. Lai	Juta Maju Estate Kota Kinabatangan	HP: 013-8988986	P	EM-Bode/SAM-Bukit Sekong
93	13	Kam Cheong Plantation Sdn. Bhd.	Mr. Cheong Sung Yan	P.O. Box 66, 90701 Sandakan, Sabah	Tel: 089-212291 / Fax: 089-274706 Email: sungyancheong@yahoo.com	P	HREP
94	14	Kebun Persendirian	Mr. Jaffi Bin Baco	Kebun Persendirian Sukau	HP: 011-3195237	P	SAM - Bukit Sekong
95	15	Kesungguhan Sumur Sdn. Bhd. (Rantau Abang)	Mr. Chin Kok Lin	Mile 45, Jalan Sandakan - Lahad Datu, P.O. Box 3552, 90739, Sandakan, Sabah	HP: 013-8808360 / Fax: 089-220020 / Email: chinokoklin@gmail.com	P & M	EM-Bode/MM
96	16	Ladang Green / Borneo Samudera (Green)	Mr. Roger Jowit / Mr. Firdaus	Borneo Samudera Abas Gomantong, Batu 60 Jalan Sukau Kinabatangan.	HP: 019-8412268 / 012-8069077 / 016-8451951 / Tel: 089-677205	P	EM - Sapagaya
97	17	Landscape Reality Sdn. Bhd.	Mr. Aslansah Bin Jamile	Landscape Reality, Peti Surat 1519, 90716 Sandakan, Sabah	HP: 089-585095 / Email: landscap@hotmail.com	P	EM - Masang
98	18	Lekas Mewah Sdn Bhd	Mr. Peter Cheong Siew Leung	Peti Surat 1788, 90720, Sandakan, Sabah	HP: 019-3661088 / 016-3188801	P & M	MM/EM-Masang
99	19	Ling Piak Kee@Ling Piak Lee	Mr. Ling Piak Kee @ Lim	P.O. Box 60389, 91013 Tawau Sabah	HP: 019-8338088 / 016-8313309 / Fax: 089-223562 / Email: lingpiaklee@hotmail.com	M	MM/EM-Masang
100	20	Lo Ket Won	Mr. Lo Ket Won	Peti Surat 2416, 90727, Sandakan	HP: 019-8131375	M	MM
101	21	Lo Ho Min	Mr. Lo Ho Min / Mr. Chang Su Kong	Sg Terong Labuk, 90000 Sandakan, Sabah	HP: 019-8138766 / 019-8835568	P & M	MM/EM-Masang
102	22	Melanking Estate	Mr. Andi Mohd Irfan	Melanking Estate Kota Kinabatangan	HP: 019-5404075	P	SAM - Bukit Sekong
103	23	Merit Agenda Estate	Mr. Asman	Merit Agenda Kota Kinabatangan	HP: 019-3332315	P	SAM - Bukit Sekong
104	24	Metallik Sapphire	Mr. Ong	Metallik Sapphire Sukau	HP: 010-9335623	P	SAM - Bukit Sekong
105	25	Ngan Plantation	Mr. Ricky / Mr. Jiki B. A.	Ngan Yin Groundnut Factory, P.O Box 2449, 90727 Sandakan.	HP: 012-8419815	P	EM - Sapagaya
106	26	PB Plantation Sdn Bhd	Mr. K.L Lee / Mr. Looi Man Wai	Lot C 12, BDC, Batu 1 1/2 Jalan Utara, PPM 558 Elopura 90000 Sandakan, Sabah	HP: 019-8331712 / 019-8136947 Tel: 089-225620	P & M	MM
107	27	Pertanian Minat Harapan Sdn. Bhd.	Mr. Shim Vui Gel / Mr. Yap Fen Cham	P.O. Box 2305, 90726 Sandakan, Sabah	HP: 010-3681336 / 016-8268949 / Email: svigel@yahoo.com	P	EM - Masang
108	28	Profound Growth Sdn Bhd	Yap Hoo Bon	225, Jalan Sultan Abdul Samad, 42700 Benteng Selangor Darul Ehsan	HP: 013-2696925	P & M	MM
109	29	Profound Plantation Sdn. Bhd.	Yap Hoo Bon	No.29-2, Jalan 48A126, Taman Sri Rampai, 53300, Kuala Lumpur	HP: 019-2189153	P & M	MM/EM-Masang
110	30	Psitera Plantation Sdn Bhd	Mr. Panir Chellivum A/L Velatham	Center Point Commercial Center Phase 2, Jalan Kubu Miri, Sarawak	HP: 017-8066455	P & M	MM/EM-Masang
111	31	Sapih Saka	Sapih Saka	Kg. Gomantong Jaya, 90200 Kota Kinabatangan, Sabah	HP: 019-8334929	M	MM
112	32	SDK Harvest Sdn. Bhd.	Mr. Santhiran	2nd Floor, Plaza Pekelling, No.2 Jalan Tun Razak, 50400 Kuala Lumpur	Tel: 03-31220000 / HP: 016-8216711	P & M	MM/EM-Masang
113	33	Segar Usaha Estate	Mr. Baihaqi	Segar Usaha KLK Kota Kinabatangan	HP: 016-8126448	P	SAM - Bukit Sekong
114	34	Sinalang Estate Sdn. Bhd.	Mr. Eddy	Sinalang Estate Sdn. Bhd., P.O. Box 1378, 90716 Sandakan.	HP: 017-8973180 / Tel: 089272034	P	EM - Sapagaya
115	35	Solanak Estate	Mr. Edgar E.	Solanak Estate Kota Kinabatangan	HP: 014-8516340	P	SAM - Bukit Sekong

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116	36	Suara Baru Quarry	Mr. Jamaludin Hajar	Batu 60, Jalan Sukau, 90200 Kinabatangan.	HP: 012-8129831	P	EM - Sapagaya
117	37	THP Bukit Belian Sdn. Bhd.	Mr. Marlin Bin Soti	WDT No. 167, 90200 Kota Kinabatangan, Sabah.	Tel: 089-278030 / 089-278030 / 013-8674322	P	EM-Bode
118	38	Tong Sang Estate	Mr. Abbas / Mr. Wong	Tong Sang Plantation, P.O. Box 1292, 90307 Sandakan.	HP: 014-5667026 / 011-6281338 / Tel: 089-220043	P	SAM-Bukit Sekong/Sapagaya
119	39	Tradewinds (Ladang Batu Putih)	Tn. Hj. Samsuri Aniffuddin / Mr. Ayub Bin Jiha	WDT 125, 90200 Kota Kinabatangan, Sandakan	HP: 019-6339337 / Tel: 089-565111	P	EM - Sapagaya & Bukit Sekong
120	40	Unified Commerce Sdn Bhd	Mr. Wong Cheo Thung	Lot 1, 2nd Floor, Block 7, Bandar Indah, Mile 4, Labuk Road, 90000 Lahad Datu, Sabah.	HP: 014-6576938	P	EM - Masang
121	41	Sabco Plantations	Mr. David Wong	1st Floor Block T, Lot 7A, Bandar Ramai Ramai, 90000, Sandakan Sabah.	Tel: 089-222300	P	MM
122	42	Teropong Group	Mr. Eng Pau (Estate Manager)	Teropong Group Plantations Sdn Bhd, Mile 45 Jalan Sandakan-Lahad Datu, 90000, Sandakan.	HP: 013-2696925	P	EM-Bode
123	43	LCH Global Plantations Sdn Bhd	Mr. Amiruddin Bin Padi (Estate Manager)	LCH Global Plantations Sdn Bhd, Unit No.26 Sibuga Industrial Centre Jalan Lintas Sibuga Industrial Centre Mile 8, 90000, Sandakan.	HP: 018-5095291	P	EM-Bode
124	44	Fantasi Generasi	Mr. Bulan Bin Tibe	Fantasi Generasi	HP: 015-5677661	P	EM-Sapagaya
125	45	Syarikat Bukit Maju	Mr. Jaimon	Syarikat Bukit Maju, BQ No. 976, Mail Bag 8, 90000 Sandakan.	HP: 016-6336347	P	EM-Sapagaya
126	46	Ladang Tn. Bache	Mr. Simon	Jalan Sukau, Kinabatangan (Small holder)	HP: 019-9473691	P	EM-Sapagaya
127	47	Ladang Sepagaya	Mr. Daniel/Mr. Darwis	Borneo Samudera Ladang Sepagaya, Batu 60 Jalan Sukau Kinabatangan	HP: 016-6991304 / 016-5884949	P	EM-Sapagaya
128	48	Burhan Bin Masri	Mr. Burhan Bin Masri	Lot 124 Lorong Pertama Tiga Taman Pertama Batu 5 90000 Sandakan Sabah	HP: 0128205786	P	EM-Masang
129	49	Kesungguhan Sumur Sdn. Bhd.	Mr. Chin Kok Lin	Mile 45, Jalan Sandakan-Lahad Datu, P.O. Box 3552, 90739 Sandakan, Sabah	Tel : 013-6808360/Fax: 089-220020 Email : chinkoklin@gmail.com / plantation286@gmail.com	M	MM
130	50	Jaya Masang Sdn. Bhd.	Mr. Liaw Chin Loi	Lot 26, 2nd Floor, Block E, Damai Plaza 3, Damai Luyang Kota Kinabalu	Tel : 019-8002685	M	MM
131	51	Sime Darby Plantation (Sabah) Sdn.Bhd.	En.Abidin Hamid	Segelind Estate, Jalan Lemag-Lahad Datu, Batu 36 Sandakan Sabah	Tel:017-838 8628	M	MM

Remarks:- Replacement / additional phone numbers / Email Addresses / Contact Person

Glossary:

EM - ESTATE MANAGER

SAM - SENIOR ASSISTANT MANAGER

M - MILL

P - PLANTATION

HHRS - HEAD OF HUMAN RESOURCES & SUSTAINABILITY

EM - ESTATE MANAGER

MM - MILL MANAGER

PIC - PERSON IN CHARGE

HREP - HEAD OF RESEARCH, ENVIRONMENT AND PROTECTION

B (BODE), M (MASANG), S (SAPAGAYA) & B.S (B.SEKONG)

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