

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

File Ref. : EH04760003

RSPO PUBLIC SUMMARY REPORT

CLIENT : HAP SENG PLANTATIONS (RIVER ESTATES) SDN. BHD.

PARENT COMPANY : HAP SENG PLANTATIONS HOLDINGS BERHAD

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

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Tomanggong CU	Tomanggong POM	5°25' 38.3" N	118°39' 33.5" E	Off 80 KM, Jalan Jeroco, 91109 Lahad Datu, Sabah, Malaysia.
	Tomanggong Estate	5°24' 01.9" N	118°39' 51.7" E	
	Tagas Estate	5°21' 47.3" N	118°38' 14.2" E	
	Litang Estate	5°19' 31.6" N	118°34' 28.3" E	

MAP : See Attachment 1

AUDIT DATE: 25th to 28th October 2022

DURATION : 18 auditor days

TYPE OF AUDIT: ☒ Annual Surveillance Audit No. 03 ☐ Recertification Audit

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 09/01/2020-08/01/2025 (RSPO PC 00114)

The following attachments form part of this report:

Non-conformity Report(s) ☒ List of additional site(s) ☐

Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : DZULFIQAR AZMI

Name : KEE KEOH CHANG

Signature :

Signature :

Date : 3 / 02 / 2023

Date : 6.2.2023

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SUMMARY OF AUDITS

Recertification Audit				
On-site audit date	:	21 - 24 October 2019	No. of auditor days :	16 days
Audit team	:	Amir Bin Bahari, Rozaimie B Ab Rahman, Mohd Zulfakar B Kamaruzaman, Mohd Ab Raouf B Asis		
No. of major NCR	:	1	Indicator: 2.1.1	Closing date :30/12/2019
No. of minor NCR	:	nil	Indicator : -	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local community
		√		√
		Contract workers	NGOs	Govt. agency
				√
		Indigenous people	Contractors	Others (Please specify)
		NA	√	
Supply base sampled	:	Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate		
Changes since the last audit	:	No changes except for the changes in no. of employees and stakeholders.		
Justification of audit planning	:	Allocation 4-man days for each site units (estates) and as for POM 3-man days allocated for P&C auditing and 1 day for Supply Chain System. 4 auditors for 4 days.		
Name of peer reviewer	:	Prof. Emeritus Dr. Jalani Sukaimi		
Report approved by	:	Kamini Sooriamorthy	Approval date :	24/01/2020

Annual Surveillance Audit 1				
On-site audit date	:	12-16 April 2021 (13 a.d)	No. of auditor days :	18 Days
Remote audit date	:	16-18 November 2020 (5 a.d)		
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Selvasingam T. Kandiah, Dzulfikar Azmi, Rohazimi Mat Nawi (trainee auditor)		
No. of major NCR	:	2	Indicator: 3.8.9, 7.2.11	Closing date: 1/07/2021
No. of minor NCR	:	-	Indicator : -	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees / Workers orgs.	Settlers	Villagers / Local communities
		√		√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
				√
		Indigenous people	Contractor	Others (Please specify)
		NA	√	
Supply base sampled	:	Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate		
Changes since the last audit	:	No changes		
Justification of audit planning	:	Allocation of mandays during onsite: 3-man days for each site units (estates) and as for POM 4-man days allocated for P&C auditing and 1 day for Supply Chain System. 3 auditors for 4 days And, extra 1 days at POM for Supply Chain		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini Sooriamorthy	Approval date :	7/07/2021

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Annual Surveillance Audit 2				
On-site audit date	:	29 Nov – 4 Dec 2021	No. of auditor days :	18 Days
Audit team	:	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar Kamaruzaman, Selvasingam T. Kandiah.		
No. of major NCR	:	Nil	Indicator: N/A	Closing date: N/A
No. of minor NCR	:	2	Indicator : 3.3.2, 7.8.1	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees / Workers orgs.	Settlers	Villagers / Local communities
		√		√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
				√
		Indigenous people	Contractor	Others (Please specify)
		NA	√	
Supply base sampled	:	Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate		
Changes since the last audit	:	No changes		
Justification of audit planning	:	Allocation of mandays during onsite: 4.5-man days for each site units (estates) and as for POM 3.5-man days allocated for P&C auditing and 1 day for Supply Chain System. 3 auditors for 6 days.		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini Sooriamorthy	Approval date: 4/1/2022	

Annual Surveillance Audit 3				
On-site audit date	:	25 – 28 October 2022	No. of auditor days:	18 auditor days
Audit team	:	Dzulfiqar Azmi (LA), Mohd Ab Raouf Asis, Mohd Zulfakar Kamaruzaman, Mohd Razman Salim, Amir Bahari.		
No. of major NCR	:	1	Indicator: 3.3.2 (Upgraded)	Closing date: 24/01/2023
No. of minor NCR	:	1	Indicator: 3.3.3	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees / Workers organizations	Settlers	Villagers / Local communities
		√	NA	√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
		NA	NA	√
		Indigenous people	Contractor	Others (Please specify)
		NA	√	
Supply base sampled	:	Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate		
Changes since the last audit	:	No changes.		
Justification of audit planning	:	Allocation of mandays during onsite: 4.5-man days for each site units (estates) and as for POM 3.5-man days allocated for P&C auditing and 1 day for Supply Chain System. 3 auditors for 6 days.		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini Sooriamorthy	Approval date: 3/02/2023	

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SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Nov 2019-Oct 2020	*April 2021 – March 2022	**Dec 2021 – Nov 2022	***Oct 2022 – Sept 2023	
Certified FFB Processed (MT)	132,714.00	127,569.00	131,790.00	137,724.00	
Production of Certified CPO (MT)	28,511.73	27,412.00	29,464.00	30,936.00	
Production of Certified PK (MT)	5,730.23	5,620.00	6,272.00	6,615.00	
Certified Areas (Ha)	7,515.75	7,515.75	7,515.75	7,515.75	
Planted Areas (Ha)	6,900.70	6,900.70	6,900.70	6,900.70	
Production Areas (Ha)	6,166.40	6,106.20	5,703.20	6,317.70	
HCV /Conservation Areas (Ha)	125.64	125.64	125.64	125.64	
REMARKS	<p>*This was the projected period based on audit carried out in 2019. However, during the conduct of ASA 1 in April 2021, the actual reporting period has been extended to 17 months as the surveillance audit was delayed due to Covid-19 pandemic restrictions. The actual reporting period i.e. Nov 2019-March 2021 was reflecting the actual stocks and transactions carried out by the CU.</p> <p>**The ASA2 was carried out in back in track for the surveillance audit. The actual reporting period covered were between Apr 2021-Nov 2021. Hence, that is why the next projection period is from Dec 2021-Nov 2022.</p> <p>***The actual reporting period covered were between Oct. 2021-Sep. 2022 (12-months data). With that, the next projection period is from Oct. 2022-Sep. 2023.</p>				

TABLE 2

	PO	PK
**Last years certified volume (MT)	29,464.00	6,272.00
Last years actual certified sold (MT)	0.00	125.44
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	651.45	0.00
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	30,936.00	6,615.00

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Dzulfiqar Azmi	Lead Auditor / Environmental, Time Bound Plan, Metrics Template	Holds a B. Sc. in Agriculture from Mara Technological University (UiTM). He had more than 6 years of working experience in the oil palm operation. He was qualified in the auditing line with experienced in Sustainability, EMS, Supply Chain, MSPO and RSPO audit since 2018. He is a qualified RSPO and MSPO Lead Auditor since 2020.
Mohd Ab Raouf Asis	Auditor / Social (Internal)	Holds a B.Sc. (Hons) in Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates and 5 years auditing related to oil palm operations. He is a qualified RSPO and MSPO Lead Auditor.
Mohd Zulfakar Kamaruzaman	Auditor / Supply Chain, Social External & HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Mohd Razman Salim	Auditor / Safety	Possessed B.Sc. Forestry (Hons) from University Putra Malaysia with more than 6 years of working experience in the Forest Management, forest, HCVF and ecology.
Amir Bahari	Auditor / Good Agricultural Practices	Possessed B.Sc. (Hons) USM 1985 and Diploma Palm Oil Milling Technology/Management 1996 MPOB. Working experience of 34 years in the oil palm industry including in the mill and estates. A qualified RSPO P&C auditor with experience in ISO, EMS and RSPO/MSPO auditing.

1.3 Audit methodology

The audit covered Tomanggong POM and three of its supply bases, with 100% sampling. This is accordance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The 3 supply-bases covered during the audit are Tomanggong Estate, Tagas Estate and Litang Estate. The audit included an on-site audit to the estates, mill and local communities' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ul style="list-style-type: none"> a) All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. b) They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. c) They have been getting salaries above minimum salary. Salaries were paid before the 7th of every month. d) No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. e) No discrimination between migrant workers and local workers, between male and female workers. f) Comfortable housing with water and electricity provided. g) Have access to affordable food from the canteen/sundry shops within the estate/mill premises. h) Entitled to free medical facilities at the estate clinic. i) Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. j) They knew the types of work offered at the CU (mill & estates) when they were in their countries of origin. k) All migrant workers keep their own passports.
2) Settlers	Not available for this audit.
3) Villagers / Local communities (including women representatives, displaced communities)	There was no land dispute reported/recorded. Borders are with Kg Tidung, Kg Litang, Kg Dagat. Relationship were harmonious and cordial.

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4) Suppliers	Supplier of hardware since the establishment of the CU. Fair dealings with the units in Tomanggong CU. Payments are made within 1 months of invoice.
5) Contract workers	Not available for this audit.
6) Local & national NGOs	Relevant NGOs were HUMANA, WWF-Malaysia. No issues were raised / recorded. The existing relationship was harmonious and cordial.
7) Government agencies / Statutory bodies	The Government Agencies mainly related to statutory bodies e.g. MPOB, DOSH , DOE, NREB, JTK BOMBA, PDRM, Immigration Dept, Indonesian Consulate, Philippine Embassy. No issues were raised / recorded.
8) Independent growers / Smallholders	The neighbouring estates are IOI Plantations, LPC plantations, Spark Glory Sdn Bhd, Bukit Kretam Sdn Bhd). No issues were raised / recorded.
9) Indigenous people	Not applicable.
10) Contractor	Most of the work in the Tomanggong CU is managed within the Company resources. Delivery of FFB and CPO are handled through own fleet of trailers and lorries. Mainly contract works are awarded to Contractors on construction of houses, buildings and major mill maintenance especially on the annual shutdown. There were no issues raised / recorded. Signed contract was with the HSPB Head Office. Contract terms are clear and fair.
11) Previous land owner (if any)	Not available for this audit.
12) Others (please specify)	Food facilities are managed by HSPB. Each complex having separate club / food facilities. Provision shop available at the estates visited. No issues raised on the pricing and services.

1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Tomanggong Certification Unit (Tomanggong CU) is under the Hap Seng Plantations (River Estates) Sdn Bhd. which is a subsidiary of Hap Seng Plantations Holdings Bhd (HSPHB). The CU is located at Ladang Tomanggong Off 80 KM, Jalan Lahad Datu-Sandakan, Kinabatangan, Sabah, Malaysia.

The Tomanggong CU consists of Tomanggong Palm Oil Mill (TPOM) and five supply bases which 3 certified supply bases and 2 non-certified supply bases, namely the Tomanggong Estate, Litang Estate, Tagas Estate (certified), Tabin Estate and Northbank Estate (non-certified). A time bound plan had been established to include these two estates in the certification. The milling capacity of Tomanggong POM is 45 mt/hr.

Tomanggong CU have ISCC EU/MeSTI/Halal/HACCP/MSPO certification beside of RSPO P&C and Supply Chain.

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

The FFB is sourced from company owned estates of Tomanggong CU and independent suppliers, Northbank Estate and Tabin Estate which are still in the progress to be certified. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

**Table 1: Actual FFB production by the supply base for the reporting period
(October 2021 – September 2022)**

Supply bases	FFB Production	
	Tonnes	Percentage (%)
*Tomanggong Estate (Certified)	1,552.37	51.42
*Tagas Estate (Certified)	887.81	29.41
*Litang Estate (Certified)	578.57	19.17
Total Certified	3,018.75	100.00
NorthBank Estate (Non-Certified)	32,366.85	30.16
Tabin Estate (Non-Certified)	56,824.72	52.96
Outside Crop (detail List)		
LPC Plantations	14,737.87	13.73
Khoo Chin Hung	2,227.86	2.08
Lim Engit Fun	393.17	0.37
Korporasi Pembangunan Desa	369.67	0.34
Bukit Kretam Sdn. Bhd.	309.76	0.29
Lebihjaya Sdn. Bhd.	73.65	0.07
Total Non-certified	107,303.55	100.00
Overall Total FFB Production	110,322.30	

*Low certified FFB received in Tomanggong CU as the certified FFBs were diverted to IP-mill to fulfill demand for IP-stocks.

**Table 2: Projected FFB production by supply base for the reporting period
(October 2022 – September 2023)**

Supply bases	FFB Production	
	Tonnes	Percentage (%)
Tomanggong Estate (Certified)	38,668.00	28.08
Tagas Estate (Certified)	47,556.00	34.53
Litang Estate (Certified)	51,500.00	37.39
Total Certified	137,724.00	100.00
NorthBank Estate (Non-Certified)	45,872.00	31.62
Tabin Estate (Non-Certified)	74,050.00	51.03
Outside Crop (detail List)		
LPC Plantations	20,020.00	13.80
Khoo Chin Hung	4,114.00	2.84
Lim Engit Fun	730.00	0.50
Korporasi Pembangunan Desa	204.00	0.14
Chin Hock Vui	101.00	0.07
Total Non-certified	145,091.00	100.00
Overall Total FFB Production	282,815.00	

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**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(October 2021 – September 2022)**

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	110,322.30
FFB Processed	110,322.30
Certified FFB Processed	3,018.75
Non-certified FFB Processed	107,303.55
Crude Palm Oil (CPO)	
Overall CPO Production	23,229.87
Certified CPO Production	651.45
Certified CPO delivered as RSPO	0.00
Certified CPO delivered as non-RSPO	651.45
Certified CPO delivered under other sustainable schemes	0.00
Palm Kernel (PK)	
Overall PK Production	4,881.69
Certified PK Production	125.44
Certified PK delivered as RSPO	125.44
Certified PK delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	0.00
Credits traded through Books and Claim	0.00

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

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	282,815.00
FFB Processed	282,815.00
Certified FFB Processed	137,724.00
Certified CPO Production	30,936.00
Certified PK Production	6,615.00

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Tomanggong	2,407.00	2,654.80
Tagas	2,019.00	2,212.33
Litang	2,474.70	2,648.62
Total	6,900.70	7,515.75

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Table 6 Planting profile for Tomanggong CU

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature ≥3 years (Ha)</u>	<u>Immature ≤ 3 years(Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Tomanggong	1996	2nd	90.00	0.00	90.00		
	1997	2nd	101.00	0.00	101.00		
	1998	1st	401.50	0.00	401.50		
	2014	2nd	143.00	0.00	143.00		
	2015	2nd	393.20	0.00	393.20		
	2016	2nd	352.00	0.00	352.00		
	2017	2nd	343.30	0.00	343.30		
	2020	3rd	0.00	180.00	180.00		
	2021	3rd	0.00	403.00	403.00		
Total Tomanggong Estate			1,824.00	583.00	2,407.00	75.78	24.22
Tagas	1994	1st	189.0	0.00	189.0		
	1997	2nd	185.0	0.00	185.0		
	2000	2nd	668.0	0.00	668.0		
	2001	2nd	414.0	0.00	414.0		
	2004	2nd	234.5	0.00	234.5		
	2006	2nd	328.5	0.00	328.5		
Total Tagas Estate			2,019.00	0.00	2,019.00	100.00	0.00
Litang	1994	1s	397.9	0.00	397.9		
	1997	1s	321.5	0.00	321.5		
	2011	2nd	236.0	0.00	236.0		
	2012	2nd	719.5	0.00	719.5		
	2015	2nd	146.3	0.00	146.3		
	2017	2nd	39.0	0.00	39.0		
	2019	2nd	614.5	0.00	614.5		
Total Litang Estate			2,474.70	0.00	2,474.70	100.00	0.00
Total			6,317.70	583.00	6,900.70	91.55	8.45

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Kee Keow Chong
Position	:	General Manager – Agronomy
Address	:	Hap Seng Plantations (River Estates) Sdn. Bhd. Batu 2, Jalan Kastam Baru, 91119 Lahad Datu, Sabah, Malaysia.
Phone no.	:	089-278183 / 0195532412
Fax no.	:	089 278168 / 089 278186
Email	:	keekc@hapseng.com

3.0 AUDIT FINDINGS

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

No changes so far.

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

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

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

Internal Assessment dated in 25/04/2017 was conducted based on RSPO Partial Certification Requirements. No significant non-compliance was observed by the organization. It has been noted that Hap Seng Plantation was progressively undergoing the RSPO Certification process towards 100% RSPO certification of their estates/mills. HCV Assessment at Northbank and Tabin Estate has been conducted in year 2013, completed the report on 20/11/2013. Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). The required LUCA data was submitted and has passed by the compensation panel. The company has already provided the Concept Note for review by RSPO. Assessment of compliance to RSPO Partial Certification Requirements was conducted in Northbank Estate and Tabin Estate on 01-04/08/2022 and for Pelipikan Estate on 22-23/11/2021.

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

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

N/A

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

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

If no, please state reasons There is no associated smallholder supplying FFB to the CU.

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

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

No changes.

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3.4 Status of previous non-conformities *



Closed



Not closed*

* **Therefore, minor nonconformity will be upgraded to major nonconformity under indicator 3.3.2.**

3.5. Complaint received from stakeholder (if any)

No complaints from stakeholders were recorded nor received.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s)
(details refer to Attachment 3) List : 1 3.3.3

Total no. of major NCR(s)
(details refer to Attachment 3) List : 1 3.3.2 (Upgraded)

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

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

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

5.0 AUDIT CONCLUSION

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

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6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

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

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

☒

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

☒

Recommended to continue certification.

☐

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

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

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

Audit Team Leader :

DZULFIQAR AZMI

(Name)

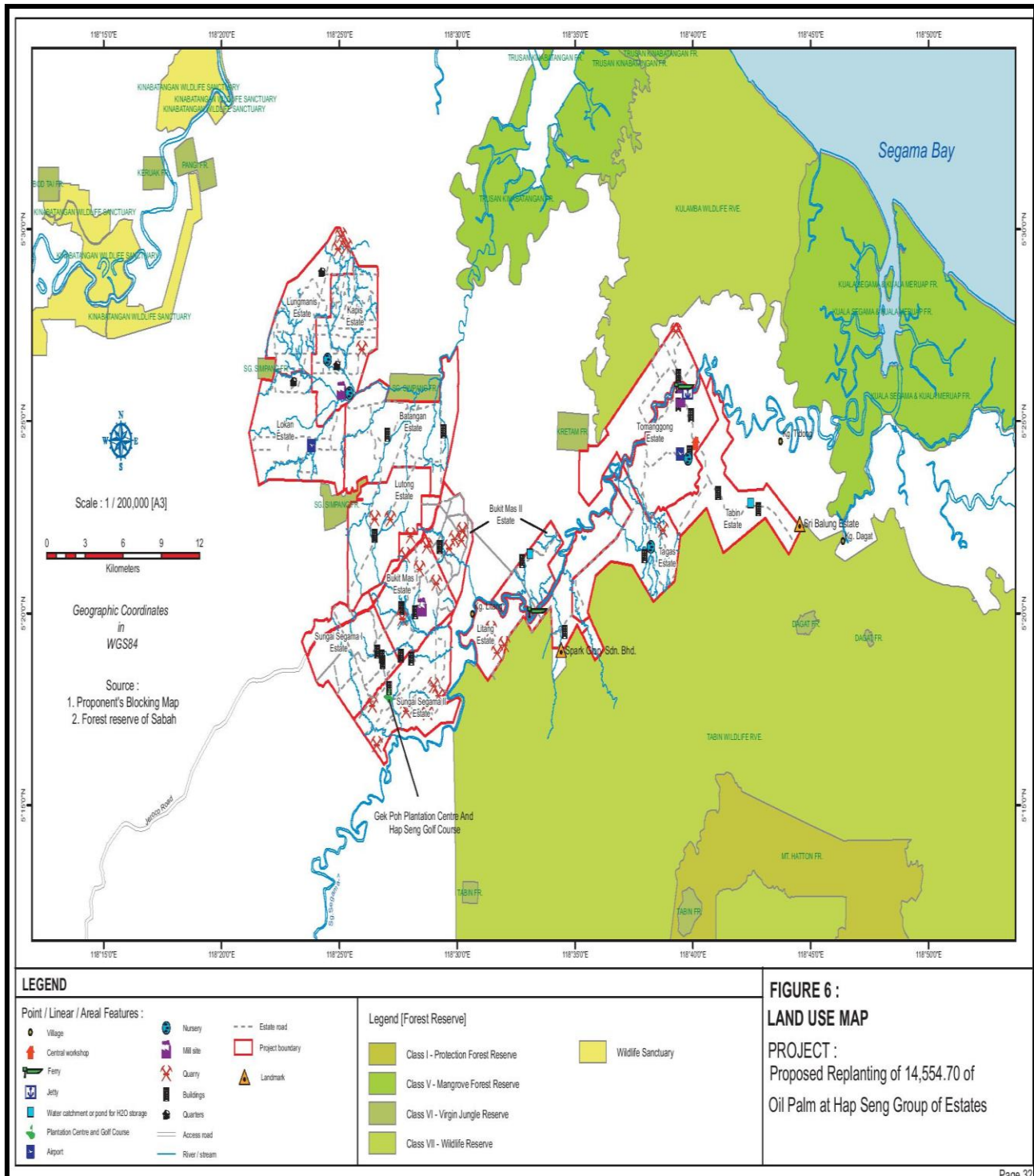


(Signature)

24/01/2023

(Date)

Map of Tomanggong CU under Hap Seng Group of Estates



RSPO PUBLIC SUMMARY

Attachment 2 – Audit Plan

RSPO SURVEILLANCE AUDIT PROGRAMMED

Day One: 25/10/2022 (Tuesday)

Time	Activities / areas to be visited			Auditee
9.00 am	Opening Meeting for HSP – Tomanggong CU . Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.			All CU
9.20 am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative.			Management Representative
9.30 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Tomanggong POM			Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements			
	Zulfakar Tomanggong POM	Roouf Tomanggong POM	Dzul Tomanggong POM	
	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 	Coverage of assessment: P1, P2, P3, P4, P6: <ul style="list-style-type: none"> i. Follow up from previous assessment findings. ii. Laws and regulations iii. Facilities inspections (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc. iv. Production area inspections – interview with workers at production area (work station, FFB loading ramp, effluent pond, biogas & etc.) v. Training and skill development programs vi. Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. vii. Interview with Union/workers representatives viii. Interview with gender committee, worker representative, contractors, supplier, etc ix. Workers Issues & welfare x. Continuous improvement <p>Other area identified during the assessment.</p>	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> I. Follow up from previous assessment findings. II. Laws and regulations III. Facilities inspection (water treatment plant, clinic, stores, workshop, landfill area & etc. IV. Production area field inspections (work station, FFB loading ramp, effluent pond, biogas & etc.) V. Safety & Health practice – witness activities at site VI. Hazard identification and Risk Management VII. Chemical management VIII. Waste management including disposal site IX. Aspects/impacts of estate management X. Pollution mitigating plans XI. Management and disposal of waste including pesticides containers XII. River system and Effluent Treatment/Discharge XIII. Buffer/Riparian Zones XIV. Controlled/open burning XV. Mill Best Practices XVI. Training and skill development programs 	

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	Coverage of assessment: P1, P2, P3, P4, P5: <ul style="list-style-type: none"> i. Follow up from previous assessment findings. ii. Laws and regulations iii. Interview with external stakeholders i.e. local communities, NGO, smallholders, etc. iv. Site Inspections at Mill/Estate Boundary, adjacent and neighbouring land use & HCV area v. Training and skill development programs vi. Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. vii. Consultation with relevant government agencies viii. Local communities and stakeholders ix. Local sustainable development x. Support smallholder inclusion xi. Complaints and grievances xii. External stakeholders issues & welfare xiii. HCV/RTE and action plan xiv. Continuous improvement <p>Other area identified during the assessment.</p>		XVII. Continuous improvement Other area identified during the assessment.
12.30 pm	LUNCH BREAK & ZUHUR PRAYER		
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records		
5.00 pm	Audit team discussion / Interim closing / End of Day 1 audit		
9.00pm	Discussion LA and teams on potential NCRs		

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Day Two: 26/10/2022 (Wednesday)

Time	Activities / areas to be visited					Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Tomanggong Estate					Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements					
	Zulfakar Tomanggong Estate Coverage of assessment: P1, P2, P3, P4, P5, P7: I. Follow up from previous assessment findings. II. Interview with external stakeholders i.e. local communities, Gov. agencies, NGO, smallholders, etc. III. Site Inspections at Mill/Estate Boundary, adjacent and neighbouring land use & HCV area IV. Training and skill development programs V. Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. VI. Local sustainable development & Support smallholder inclusion VII. External stakeholders issues/welfare & Complaints and grievances VIII. HCV/RTE and action plan IX. Continuous improvement	Raouf Tomanggong Estate Coverage of assessment: P1, P2, P3, P4, P6: I. Follow up from previous assessment findings. II. Facilities inspections (i.e. worker quarters, surau, community centre, School/CLC, Humana/Crèche, provision shop & etc. III. Production area inspections – interview with workers at production area (harvesting, spraying, manuring, OP nursery, replanting area & etc.) IV. Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. V. Interview with Union/workers representatives, gender committee, contractors, supplier, etc VI. Workers Issues & welfare VII. Continuous improvement	Dzul Tomanggong Estate Coverage of assessment: P1, P2, P3, P6, P7: I. Follow up from previous assessment findings. II. Facilities inspection (WTP, clinic, stores, workshop, landfill area & etc. III. Chemical management IV. Controlled/open burning V. Aspects/impacts of estate management VI. River system and Effluent Treatment/Discharge VII. Buffer/Riparian Zones VIII. Pollution mitigating plans IX. Management and disposal of waste including pesticides containers X. Training and skill development programs XI. Continuous improvement Other area identified during the assessment.	Razman Tomanggong Estate Coverage of assessment: P1, P2, P3, P6, P7: I. Follow up from previous assessment findings. II. Safety & Health practice – witness activities at site (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.) III. Hazard & Chemical identification and Risk Management IV. Training and skill development programs V. Continuous improvement Other area identified during the assessment.	Hj. Amir Tomanggong Estate Coverage of assessment: P1, P2, P3, P6, P7: I. Follow up from previous assessment findings. II. Safety & Health practice – witness activities at site (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.) III. Business Management Plan IV. Good Agricultural Practices V. Controlled/open burning VI. Training and skill development programs VII. Continuous improvement Other area identified during the assessment.	

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	Other area identified during the assessment.	Other area identified during the assessment.			
12.30 pm	LUNCH BREAK & ZUHUR PRAYER				
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records				
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit				
9.00pm	Discussion LA and teams on potential NCRs				

Day Three: 27/10/2022 (Thursday)

Time	Activities / areas to be visited					Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Tagas Estate					Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements					
	Zulfakar Tagas Estate Coverage of assessment: P1, P2, P3, P4, P5, P7: I. Follow up from previous assessment findings. II. Interview with external stakeholders i.e. local communities, Gov. agencies, NGO, smallholders, etc. III. Site Inspections at Mill/Estate Boundary, adjacent and neighbouring land use & HCV area IV. Training and skill development programs V. Discussion with relevant management (CSR,	Raouf Tagas Estate Coverage of assessment: P1, P2, P3, P4, P6: I. Follow up from previous assessment findings. II. Facilities inspections (i.e. worker quarters, surau, community center, School/CLC, Humana/Crèche, provision shop & etc. III. Production area inspections – interview with workers at production area (harvesting, spraying, manuring, OP nursery, replanting area & etc.) IV. Discussion with relevant	Dzul Tagas Estate Coverage of assessment: P1, P2, P3, P6, P7: I. Follow up from previous assessment findings. II. Facilities inspection (WTP, clinic, stores, workshop, landfill area & etc. III. Chemical management IV. Controlled/open burning V. Aspects/impacts of estate management VI. River system and Effluent Treatment/Discharge VII. Buffer/Riparian Zones VIII. Pollution mitigating plans IX. Management and disposal of waste including	Razman Tagas Estate Coverage of assessment: P1, P2, P3, P6, P7: I. Follow up from previous assessment findings. II. Safety & Health practice – witness activities at site (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.) III. Hazard & Chemical identification and Risk Management IV. Training and skill development programs V. Continuous improvement	Hj. Amir Tagas Estate Coverage of assessment: P1, P2, P3, P6, P7: I. Follow up from previous assessment findings. II. Safety & Health practice – witness activities at site (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.) III. Business Management Plan IV. Good Agricultural Practices V. Controlled/open burning VI. Training and skill development programs VII. Continuous improvement	

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	community affairs) and view documentation such as SIA, assessment and management plans. VI. Local sustainable development & Support smallholder inclusion VII. External stakeholders issues/welfare & Complaints and grievances VIII. HCV/RTE and action plan IX. Continuous improvement Other area identified during the assessment.	management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. V. Interview with Union/workers representatives, gender committee, contractors, supplier, etc VI. Workers Issues & welfare VII. Continuous improvement Other area identified during the assessment.	pesticides containers X. Training and skill development programs XI. Continuous improvement Other area identified during the assessment.	Other area identified during the assessment.	Other area identified during the assessment.
12.30 pm	LUNCH BREAK & ZUHUR PRAYER				
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records				
5.00 pm	Audit team discussion / Interim closing / End of Day 3 audit				
9.00pm	Discussion LA and teams on potential NCRs				

Day Four: 28/10/2022 (Friday)

Time	Activities / areas to be visited					Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Litang Estate					Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements					
	Zulfakar Litang Estate	Raouf Litang Estate	Dzul Litang Estate	Razman Litang Estate	Hj. Amir Litang Estate	
	Coverage of assessment: P1, P2, P3, P4, P5, P7: I. Follow up from previous assessment findings. II. Interview with external	Coverage of assessment: P1, P2, P3, P4, P6: I. Follow up from previous assessment findings. II. Facilities inspections (i.e.	Coverage of assessment: P1, P2, P3, P6, P7: I. Follow up from previous assessment findings. II. Facilities inspection (WTP,	Coverage of assessment: P1, P2, P3, P6, P7: I. Follow up from previous assessment findings. II. Safety & Health practice –	Coverage of assessment: P1, P2, P3, P6, P7: I. Follow up from previous assessment findings. II. Safety & Health practice –	

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	<p>stakeholders i.e. local communities, Gov. agencies, NGO, smallholders, etc.</p> <p>III. Site Inspections at Mill/Estate Boundary, adjacent and neighbouring land use & HCV area</p> <p>IV. Training and skill development programs</p> <p>V. Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</p> <p>VI. Local sustainable development & Support smallholder inclusion</p> <p>VII. External stakeholders issues/welfare & Complaints and grievances</p> <p>VIII. HCV/RTE and action plan</p> <p>IX. Continuous improvement</p> <p>Other area identified during the assessment.</p>	<p>worker quarters, surau, community center, School/CLC, Humana/Crèche, provision shop & etc.</p> <p>III. Production area inspections – interview with workers at production area (harvesting, spraying, manuring, OP nursery, replanting area & etc.)</p> <p>IV. Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.</p> <p>V. Interview with Union/workers representatives, gender committee, contractors, supplier, etc</p> <p>VI. Workers Issues & welfare</p> <p>VII. Continuous improvement</p> <p>Other area identified during the assessment.</p>	<p>clinic, stores, workshop, landfill area & etc.</p> <p>III. Chemical management</p> <p>IV. Controlled/open burning</p> <p>V. Aspects/impacts of estate management</p> <p>VI. River system and Effluent Treatment/Discharge</p> <p>VII. Buffer/Riparian Zones</p> <p>VIII. Pollution mitigating plans</p> <p>IX. Management and disposal of waste including pesticides containers</p> <p>X. Training and skill development programs</p> <p>XI. Continuous improvement</p> <p>Other area identified during the assessment.</p>	<p>witness activities at site (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.)</p> <p>III. Hazard & Chemical identification and Risk Management</p> <p>IV. Training and skill development programs</p> <p>V. Continuous improvement</p> <p>Other area identified during the assessment.</p>	<p>witness activities at site (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.)</p> <p>III. Business Management Plan</p> <p>IV. Good Agricultural Practices</p> <p>V. Controlled/open burning</p> <p>VI. Training and skill development programs</p> <p>VII. Continuous improvement</p> <p>Other area identified during the assessment.</p>
12.30 pm	LUNCH BREAK & FIRDAY PRAYER				
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records				
3.00 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager				
4.00 pm	Closing meeting at the CU / End of audit				

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

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Tomanggong CU is committed to provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making by upon request. There was procedure available on communication as evidenced in Tomanggong CU. The CU continued to use internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Hap Seng Plantations Holdings Berhad website at http://www.hapsengplantation.com
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The Tomanggong CU continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Hap Seng Plantations has revised their website, http://www.hapsengplantation.com to include all management documents relating to the unit's environmental, social and legal, presented in appropriate languages, issues demonstrating commitment towards compliance to RSPO criteria via Hap Seng Plantation Sustainability Report.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The estates and mill maintain records of communication and consultation with external and internal parties. These includes communication with DOSH, Labour Department, Immigration Department, Department of Environment, suppliers and their own workers. Comments by DOSH and DOE on mill and estates operation were recorded in the respective DOSH and DOE inspection book. It was noted during this surveillance audit that there were no requests of information from the authority and stakeholders with regards to the agriculture practice, environment, and safety and health requirements.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by Hap Seng Plantations for the estates and mill maintained to be followed and available at the audited sites. This document was sighted during the audit.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Stakeholder list FY 2022 was established in both mill and estates. Stakeholder such as internal stakeholder i.e., workers leader, women leader, ethnic leader and external stakeholders i.e., local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list. Nominated representative with contact number and address was sighted.

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Clause	Indicators	Comply Yes/No	Findings
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Tomanggong CU has documented policy to committing on integrity for all their staffs and workers by publishing <i>Anti-Bribery and Corruption Policy (ABC Policy)</i> . The CU has communicated the policy for new staffs and foreign/local workers during induction course, and via morning muster/briefing. The ABC Policy applied via contract agreement to all its suppliers, consultants, agents, contractor's/service providers who have direct dealings with the Group.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	The company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. The contractors and vendors signed on the ABC Policy where they complied with the COBC and other law and regulation.

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	It was evident that Tomanggong CU continue to comply with most of the applicable laws and regulations.
	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	Tomanggong CU had documented the List of Legal Register – Estates & Mills, covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. The Tomanggong CU had the mechanism for ensuring all the applicable legal requirements were implemented. The mechanism is by the implementation of internal checking by its Assistant In-Charge through evaluation of compliance exercise against the legal register. The evaluation was carried out on at Tomanggong CU.
	2.1.3 Legal or authorized boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorized boundaries.	YES	The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/Boundary stones along the legal boundaries between was visibly available.
2.2 All contractors providing operational	2.2.1 A list of contracted parties is maintained.	YES	List of contractor parties were maintained at Estates and Mill at the Tomanggong CU. These were all maintained and updated accordingly. The list contain details of the stakeholders, addresses and contact details.

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Clause	Indicators	Comply Yes/No	Findings
services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	Evidence of legal due diligence carried out include getting the contractor to sign Addendum where they undertake to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption. Additionally, contractors' background checks were also done as sighted at Tomanggong POM. Corporate background was also sought before a contract was signed.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All Minor Job Contract for acknowledgement by hired service contain clauses disallowing child, forced and trafficked labour as verified by audit team. There is no contractor involved except for except for Budge contractor, sterilizer repairing, electrical/Biogas contractor, all their works are done through Hap Seng owned Machinery and materials. For Budge contractor, Sighted the contract contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons.
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	The evidence of currently document is available in the 'Summary of Geo Location for FFB Supplier'. At present the mill only possessed the valid MPOB licenses for all the directly source FFB as verified by the auditor.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Currently in Tomanggong POM there is not indirectly source of FFB. All FFB are received direct from the suppliers.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	<p>All the estates possessed a minimum of 5 years business plans. The estates expenditure components comprised of the following among others;</p> <ul style="list-style-type: none"> i. Crop yielding area / Prime mature ii. upkeep, cultivation, harvesting & evacuation, iii. Welfare, RSP/MSPO compliance, etc. iv. Crop projection, cost of production, yield statistics and performance, age profile v. Mature and immature cost/ha and cost/mt FFB. vi. Management expenses / professional fees / building / compound vii. Water and power / security/labour mobilization. viii. CAPEX Building/plant machinery/office equipment/motor vehicle attachments ix. Water supply/Infrastructure. <p>The business plans are prepared by the respective Managers and verified by the General Managers for onward approval the Chief Executive - Group Plantations. There are no smallholder schemes managed by Tomanggong POM.</p>
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	<p>The replanting programs are documented in the “<i>Replanting Programme TGOE 2022-2027</i>”. The latest revision being in accordance with a memo issued by the General Manager of Agronomy. The revised replanting programme for the estate in the CU for the forthcoming five years are reviewed during audit.</p> <p>The progress of the replanting is monitored and recorded by individual units with monitoring from the Head Office Management with final approval made by Chief Executive Group Plantations. The replanting programme is reviewed at minimum 1x/yearly. Other reviews are subjective based on situational needs of the company. This is made by the Plantation Management Committee.</p>
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	<p>The Management Review was held in combination as a Group for the entire CU and complexes chaired by Senior General Manager - Group Plantations. The agenda discussed among others includes the following.</p> <ul style="list-style-type: none"> a) Results of internal audits b) Customer feedback c) Process performance and product conformity d) Status of preventive & corrective actions e) Accidents f) Environmental issues / Waste management g) Energy usage performance h) Follow up action from management review i) Changes that could affect the management system

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Clause	Indicators	Comply Yes/No	Findings
			j) Recommendation for improvement Minutes of meeting were sighted and verified. No major issues were highlighted during the meeting.
3.2 The CU regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	Plans and impact assessments relating to social and environmental impacts maintained available. The Tomanggong CU have conducted social assessment titled 'Social Impact Assessment, Management Action Plans and Continuous Improvement Plans' and environmental assessment titled 'Environmental Impact Assessment Management Action Plans and Continuous Improvement Plans'. The SIA & EIA action plan was updated and each of the issues was identified for each of the operating unit.
	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	RSPO metric template version 2.1 is used for the reporting of Tomanggong certification unit's metrics (economic, social and environment). Based on verification with input data, no discrepancies of data reported in the metrics for the period under review for all the operating units.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	Tomanggong CU Estates continued to use the established manuals and SOP separately, are in place. The SOP are dated and approved by the management. The latest copies of the SOP were available on-site and there were also available in Bahasa Malaysia. Copies of SOP were distributed and posted at site of operation in Bahasa Malaysia to ensure easier understanding by the workers.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	NO	The estates had an established mechanism to perform checking to ensure consistent implementation of procedures. The monitoring of the SOP implementation was closely made by all levels of the supervisory personnel with records maintained and checked. However, mechanism to check consistent implementation of procedures was not fully in place again during this surveillance 3 audit. <i>As a result, previous Minor NCR was open and upgraded to Major NCR MAR 01/2022.</i> The objective evidence is based on interview session and documentation review, it was found that, the workers of the sundry shop i.e., Kedai Tomanggong Utama did not have the payslip, agreement and passport with them. There is no mechanism to check the implementation of procedures for the Tomanggong CU management on the compliances of the vendor management such as sundry shop.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	NO	The implementation of SOPs are monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance. However, during inspection of Water Treatment Plant in Tagas Estate and Litang Estate, and records review, there were several non-compliances found on the unsafe condition of the walkway platform and ineffectiveness of the H&S monitoring to address health and safety risks to people. <i>Thus, Minor NCR MRS01/2022 was raised against the indicator.</i>
3.4 A comprehensive	3.4.1 (C) In new plantings or operations including mills, an independent SEIA,	YES	There was no new planting in Tomanggong CU. Environmental Aspect and Impact (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities

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Clause	Indicators	Comply Yes/No	Findings
Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.		associated to estate and mill operations. Thus, this indicator not applicable.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	<p>For Tomanggong CU, the SIA and EIA reports separated. Environmental Impact Assessment (EIA), Management Action Plans and Continuous Improvement Plans which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Last reviewed in Sept 2022 by Agronomy Department (Sustainability Team). Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the most significant environmental receptors are the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge to land application. For all estates, the assessment was to evaluate and analyse the operations impact on soil, water, and air associated with the organization activities. The EIA review process had included stakeholders' consultation with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done had involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighboring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting.</p> <p>Social Impact Assessment done through several stakeholder consultation, i.e., contractor, supplier, government agencies, NGO, all local villagers at HSPHB, consultants, worker's representatives and estates gender committee. Tomanggong CU maintained its documented SIA titled "Social Impact Assessment, Management Action Plans and Continuous Improvement Plans", with the latest update in Aug 2021. The assessment had covered operation aspects of plantation and mill. Among the social aspect covered, include employment opportunity, amenities and facilities, PPE and medical for employees, etc. The progress of plans noted reviewed annually. The review conducted with relevant stakeholders through Joint Consultative Committee (JCC) Meeting. The SIA was done with the participation of the affected parties as evidenced from the report reviewed. The stakeholders consulted were Tomanggong's relevant stakeholders who included its own workers, government agencies such as MPOA, Immigration Department, Lahad Datu Police Department, Wildlife Department, and Sabah Forestry Department. Also present were neighbouring estates.</p> <p>Management plan on Social Impact Assessment was developed with issues reported during meetings, stakeholder's meetings and gender committee's meetings. The management plan has included the key findings of housing condition / living improvement and feedbacks from stakeholders. The plan has incorporated the action plan, status,</p>

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Clause	Indicators	Comply Yes/No	Findings
			person in charge and the completion date. So far, no negative impacts were observed during the stakeholder's feedback or meeting.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	<p>Significant environmental aspect and impact and social mitigation methods was implemented from EIA. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The EIA assessments had included the identification of aspects and impacts from resulting from the POM and Estates operations. A timetable with responsibilities for mitigation and monitoring was reviewed and updated as necessary. The CU had appointed specific person in charge (PIC) responsible for taking actions on each of the mitigation measures with specific time intervals.</p> <p>Auditor has verified the latest groups stakeholder's consultation meeting in Apr 2021 via online meeting. The meetings have been conducted with participation of affected parties such as relevant parties such as MPOA, DOE, DOSH, EPD-Sandakan, IPD Lahad Datu, Kedai Ah Lok, MK Nexus, Suruhanjaya Tenaga. FFB suppliers, contractors, mill's part suppliers, neighboring estate, Humana, SK Jeroco, Sabah Forestry Department, PDRM, Wildlife Department and Immigration Department and worker's representative. Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the SIA plan. So far, no negative impact issues related to social have been highlighted during stakeholders meeting.</p>
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	Standard Operating Procedure (SOP) – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (Local and Foreign). For matters related to termination of employment and retirement, these are contained in employment contracts. Clause C of the employment contract states that retirement age for workers is 60. These documents are available to workers and their representatives. Retirement procedure is not applicable to foreign workers. And, management stressed on no recruitment cost should be paid by worker.
	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. Records are also maintained in each worker's individual file. Hiring process begins with newspaper advertisement, employee referrals, review of candidate's resume, job application, shortlisting, reference checks, interview, medical check-up and issuance of offer letter. Promotion would be recommended based on evaluation of behavior, performance appraisal and current work results. No termination had occurred so this element of the procedure could not be verified during the audit.
3.6 An occupational health and safety (H&S) plan is	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	The mill/estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following; Change in work process,

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Clause	Indicators	Comply Yes/No	Findings
documented, effectively communicated and implemented.			Revision/changes in legislative requirement, Occurrence of accidents. HIRARC for Tomanggong CU also has been reviewed by yearly basis. The policy had been communicated to all levels of the organization through briefings and also displayed prominently in <i>Bahasa Malaysia and English</i> on notice boards at mill and estate office and muster ground. All operations had been risk assessed to identify H&S issues. Mitigation plans and procedures were documented in the HIRARC document and implemented.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	Occupational health and safety (OHS) management plan for all Mill and 3 Estates had been established and the implementation is monitored. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc.
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 formal training program which covers all aspects of RSPO P&C was available for year 2022. The Program was established based on training needs identification. Regular assessments of the effectiveness training continued conducted by the CU management. Training plan for 2022 had been established with target month/dates for the training identified. The training program reviewed during audit.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Training with briefing on the estate operations were provided for workers. This is aimed to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees is conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. Records are maintained appropriately. Records were sighted and verified.
	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 has been conducted in Apr 2022 by Senior Assistant, to the Mill Assistant, maintenance engineer, assistant mill engineer, admin supervisor, shift supervisor, grader, laboratory assistant, and weighbridge operator.

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SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Not applicable since this mill is Mass Balance.
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	YES	Tomanggong POM received certified FFB from own Estates which are Tagas, Tomanggong, Litang Estate and Uncertified FFB from Tabin and Northbank Estate and as well as Surrounding Smallgrower and Small holders. Thus, Tomanggong POM has qualifies for the Mass Balance chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. Amount of sales as in Table 3 of this report.
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	Amount of Projection as reported in Table 4 of this report.
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	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Hap Seng Plantations (River Estates) Sdn Bhd Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.
3.8.5	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	YES	Tomanggong POM had used their documented procedure title ' <i>Standard operating procedures for Supply Chain SOP/COC/001</i> '. The procedure described the following:

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> - Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. - Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). - Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard. - The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 		<ul style="list-style-type: none"> - Chapter 1: CSFFB, CSPO & CSPK traceability system – chain of custody - Chapter 2: Harvesting and Loading of Fresh Fruit Bunch - Chapter 3: Delivery and Reception of CSFFB, In- house and Non-In-house FFB - Chapter 4: Dispatch of CSPO and CSPK from the mill to refinery/ bulk transit installation/ buyer's vessel - Chapter 5: Monitoring of CSPO and CSPK sales - Appendix 1: Weighbridge Tickets and Delivery Notes RSPO (& ISCC) Stamping Procedure <p>The procedure is complete and up to date covering the implementation of all the elements of the supply chain model requirements including receiving and processing certified and non-certified FFBs. Since this is MB mill, there is no problem regarding non-certified FFB. Senior Mill Manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. Assisted by Sustainability Executive & relevant mill staff such as mill clerk, chief clerk, weighbridge clerk. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.</p>
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ol 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>TPOM refer to flow Chart Internal Audit System which is follow the RSPO Supply Chain Certification Standard Revision 2020 requirements. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2020 requirements.</p> <p>RSPO internal audit was conducted in Aug 2022 by appointed internal auditors. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>Management review meeting was conducted in annual basis.</p>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	YES	<p>TPOM continue to receive certified FFB from Tagas, Tomanggong, Litang Estate and Uncertified FFB from Tabin and Northbank Estate and as well as Surrounding Smallgrower and Small holders i.e., 6 suppliers. The validity of the certificate of the supplier has been checked accordingly. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.		records titled as “ <i>Mass Balance System for Tomanggong Palm Oil</i> ” has recorded the tonnage of certified FFB and its supplying estate. Verified through Tomanggong POM weighing system called ‘LAK System’ and random sample of weighbridge ticket from. There was no overproduction sighted within the audited period – reference: Projected & Actual FFB Processed template.
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; a) The name and address of the seller b) The leading or shipment/delivery date; c) The date on which the documents were issued; d) RSPO certificate number; e) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); f) The quantity of the products delivered; g) Any related transport documentation h) A unique identification number 	YES	Documented procedures related to purchasing and handling of certified finished products (CPO & PK) were sighted and found adequate. Sample of deliveries document were sighted during the audit and it was found all related information were adequate. Tomanggong POM's RSPO certificate number and product name together with model used were stated in the delivery documents.
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i. The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification. ii. The mill shall ensure the following: <ul style="list-style-type: none"> iii. The mill has legal ownership of all input material to be included in outsourced processes iv. 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. 	YES	<p>Not Applicable since transportation and storage of certified finished products are handled internally.</p> <p>There are 1 outsource company CPO oil Barges. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>v. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>vi. 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>		
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contractors specifically the transporter which involve in the physical handling of certified materials had been well maintained through the stakeholder listing.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	Not applicable - no new contractors appointed for the physical handling of RSPO certified oil palm products. Nonetheless, the PIC was aware of the need to inform CB on those new contractors prior to the conduct of audit.
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	TPOM found to have maintained an accurate, complete, up-to-date and accessible records and reports pertaining to their traceability/ supply chain system implementation. Relevant traceability/ supply chain related records were maintained for minimum period of 3 years.
	The retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	Not applicable as TPOM is certified under Mass Balance Module.
	<p>For Mass Balance Module, the mill:</p> <ul style="list-style-type: none"> 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. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.) 	YES	TPOM has handled the certified materials in which had been well maintained in their certified material accounting template namely Mass Balance System for Tomanggong Palm Oil Mill, as per Table 3 of this report. Tomanggong POM had continued to keep record and balances of all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table ' <i>Mass Balance System for Tomanggong Palm Oil Mill</i> '. The Mass Balance System for Tomanggong Palm Oil Mill indicated both positive balances for the certified CPO and palm kernel.
3.8.13	<p>Extraction rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine</p>	YES	Based on nature of their process activity, TPOM conversion factors are based on their Oil Extraction Rate (OER) & Kernel Extraction Rate (KER). The OER & KER being updated on daily basis, and later consolidated at month-end. This is part of their performance monitoring tool and being recorded in the Daily/Monthly

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	and set their own extraction rates based upon past experience, documented and applied it consistently.		Production Report (Physical Movement).
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	Not applicable as TPOM is certified under Mass Balance Module.
3.8.16	Registration of Transactions 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. 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	TPOM is one of the main supply chain actors being involved in the FFB milling activity. Dedicated personnel had been assigned to carry out the transactions (announcement) on the IT Platform within the stipulated time frame (ideally not exceeding 3 months after contract completion or within duration as agreed between mill/buyer). Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket.
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork e.g PK billing, CPO billing, TPOM weighbridge advice ticket and TPOM palm kernel/ CPO delivery note. TPOM apply RSPO trademark with license no. 1-0098-11-100-00. The trademark being displayed on mill and estate entrance signboard. TPOM complied with the minimum requirement in term of the corporate communications rules as well as Annex 1 (RSPO trademark usage and guidance) of the RSPO Rules on Market Communications and Claims).

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Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	Human Rights policy available. There is also a new sustainable Agriculture Policy signed by the CEO contains the clause of prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staffs and workers during morning muster and training.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	There was no evidence that the CU instigate violence or use any form of harassment.
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 Tomanggong CU in resolving disputes and grievances exists in the procedure called Procedures for reporting complaints and grievances (<i>aduan dan permasalahan</i>) for stakeholders Ref#: HSPSB P1 1120 (b). The Mill and Estates within Tomanggong CU has its own Internal Complaint Book and External Communication Book. The Internal Complaint Books are for employees to lodge complaint pertaining to their houses. The external book is for external issues. It was reviewed and found no complaints against the Tomanggong CU. When ensuring anonymity of complainants and whistleblowers, an additional whistle-blower chart " <i>Mekanisme Melindungi Pengadu Terhadap Tatacara Tidak Wajar</i> " and Human Right Defender available.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Found the system was understood by the affected parties. The procedure for complaint/ grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting. Sighted document for POM showed briefing the stakeholders meeting was held accordingly. For foreign workers, the procedure was explained during initial report for duty with assistance of translators.

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Clause	Indicators	Comply Yes/No	Findings
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	Tomanggong CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders during the conduct of the stakeholders meeting.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The system used by the Tomanggong CU in resolving disputes and grievances exists in the procedure called 'Prosedur Melapor Aduan dan Permasalahan' and 'Grievances Procedure – Appendix 1' for staffs and workers, Prosedur Aduan. Noted that the Grievance procedure has already include an ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.
4.3 The CU contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	There is evidence that contributions to community development was provided based on consultations. There is a donation and providing service for free of charge to the surrounding schools, Mosque and Government agencies. The most important thing is 80% of the staff and non-clerical staff are from surrounding villagers which is the main Contributions to community development.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	The right to use the land at <i>Tomanggong CU</i> can be demonstrated and not disputed by any party. Assessor sighted that there were clear land ownership documents which is Hap Seng Plantations acquire/buy the land from Sabah State Government in 1895 -1969. Land titles were available in documents. The original copies were kept in Plantation Central Office, Sg. Segama. Copies of land titles for all estates were sighted. All the estates were under the jurisdiction of Kinabatangan District. Document review shows it was confirmed the terms of the land title for all the estates cultivation of an agricultural crop of economic value have been complied.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklist. it has been verified that the land is now legitimately owned by Tomanggong CU since 1895 -1969 The audit team had confirmed that there were no land issues related to previous owners. This clause was not applicable.

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Clause	Indicators	Comply Yes/No	Findings
	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	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Tomanggong CU since 1895 -1969 The audit team had confirmed that there were no land issues related to previous owners. This clause was not applicable.
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by Tomanggong CU The audit team had confirmed that there were no land issues related to previous owners.

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Clause	Indicators	Comply Yes/No	Findings
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at the CU. As reported in 4.4.1 of this checklist. it has been verified that the land is now legitimately owned by Tomanggong CU since 1895 -1969 The audit team had confirmed that there were no land issues related to previous owners. This clause was not applicable.
	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	
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for Tomanggong CU and land title, there was no new plantings established on local peoples' land. It has been verified that the land is legitimately owned by Tomanggong CU. The audit team had confirmed that there were no land issues related to previous owners, hence this indicator was not applicable.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	

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Clause	Indicators	Comply Yes/No	Findings
	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	YES	As reported in 4.4.1 of this checklist, Tomanggong CU has been developed since 1895 -1969, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. This indicator was not applicable.
	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	
	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	
	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	YES	

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Clause	Indicators	Comply Yes/No	Findings
	title to the operator.		
	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	As reported in 4.4.1 of this checklist, Tomanggong CU has been developed since 1895 -1969, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. NO new land.
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	Tomanggong CU have a standard procedure for identifying social related issues called "Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation". The procedures defined details process of how compensation for any issues/disputes related to land, ownership and access to land, and ensures negotiations concerning compensation are dealt with. The procedure ensures that any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	"Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation" detailed out the procedures for calculating and distributing compensation in a participatory and fair manner. These procedures specify that it would take into account ethnic group, gender differences, etc. A flowchart to the same effect was also sighted. The stakeholders confirmed that the mechanism for them to express their views are available, and the issues (if any) will be dealt in accordance with this standard requirement. However, the stakeholders have confirmed that there was no existing/known dispute that causing the need for any negotiation resulting in compensation process etc. either in the mill or the estate.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	The requirement of this indicator was not applicable as there is no scheme smallholding at Tomanggong CU.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	As mentioned in 4.6.2 above, there were no existing/known issues related to this indicator, hence it was not applied to Tomanggong CU.

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Clause	Indicators	Comply Yes/No	Findings
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	Tomanggong CU have a standard procedure for identifying social related issues called "Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation". The procedures defined details process of how compensation for any issues/disputes related to land, ownership and access to land, and ensures negotiations concerning compensation are dealt with. The procedure ensures that any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.
	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	No new planting. 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	No new planting and the land belonged to the CU. Evidence required under this clause was not available.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Tomanggong CU since 1895 -1969. All the related documentation regarding the land acquisition was kept in PCO and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired	YES	Land conflict is not present in the area of the unit of certification.

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Clause	Indicators	Comply Yes/No	Findings
	plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.		
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs.	YES	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	YES	There was no conflict or dispute over the land.

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	Based on pictorial displayed at TPOM, it was verified that the current and past prices for FFB (year 2021, year 2022 Jan – Sept 2022) is being displayed at the notice board near the Tomanggong POM weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	In Tomanggong POM, the price for FFB follows the MPOB Pricing. Hap Seng Management also give allowance to the Smallholder if they send FFB to their mill base on tonnage.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	In Tomanggong POM, the price for FFB follows the MPOB Pricing. Hap Seng Management also give allowance to the Smallholder if they send FFB to their mill base on tonnage.
	5.1.4 (C) Evidence is available that all parties, including women and independent	YES	There is an agreement between FFB outsider suppliers with TPOM. During interview with FFB Supplier above they stated that they are involved in decision-making processes and

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Clause	Indicators	Comply Yes/No	Findings
	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.		understand the contracts including involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable which is not applicable to them because they are operate by themselves. Hap Seng Management also support smallholder by give them consultation and guidance to certify surrounding smallholder under MSPO and RSPO without cost.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	The contractors have been sending their FFB to TPOM more than 6 years. Their contracts are signed when necessary, and it contains schedule of rates, conditions of contract, event of default, payment terms according to the volume, FFB price, OER price, Specifications FFB, Bonus for Sending FFB. Consultations with FFB Suppliers confirmed that they understand the salient points in the agreement, namely contract duration, rate of payment, their obligations under the contract, etc. They also confirmed that contract entered into are valid, fair and transparent as the terms of payment are being negotiated upon prior to signing. Contract with suppliers were drafted in the English language, which is understood by the suppliers, as verified during interviews.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	All contractor confirmed that payments were received within a reasonable timeframe which is 7-10 days after submission of invoice. And receipts contain specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Tomanggong POM has been calibrated in yearly basis using 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	Hap Seng Management supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. However Surrounding smallholders and growers are against the idea of ICS they want to certify independently. Hap Seng give support to surrounding smallholders and growers by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	There is a document namely 'Procedure for reporting complaints and grievances (Prosedur Melapor Aduan dan Permasalahan)' and 'Grievances Procedure – Appendix 1' for staffs and workers and Prosedur Aduan. The company has also developed procedure named "Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)", to

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Clause	Indicators	Comply Yes/No	Findings
			protect the complainants. The procedure contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.
5.2 The unit of certification supports improved livelihoods 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	Hap Seng Management supports Independent Smallholders with certification, they also already consult with interested smallholders (irrespective of type) including women or other partners in their supply base and already assess their needs for support to improve their livelihoods and their interest in RSPO certification. However Surrounding smallholders and growers are against the idea of ICS they want to certify independently. Hap Seng give support to surrounding smallholders and growers by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	Hap Seng give support to surrounding smallholders and growers by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Hap Seng give support to surrounding smallholders and growers to promote legality of their FFB production by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	Hap Seng give support to surrounding smallholders and growers to certify under RSPO by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification. Sighted also training on Pesticide handlings has been given to surrounding Smallholder and Small growers. Until to date, several surrounding smallholders are RSPO certified with the CU assistance.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Currently Hap Seng Plantations Management has created a system to trace their stakeholder around their estate. Hap Seng Plantations also regularly reviews and publicly reports on the progress of the smallholder support programme as per see in the Hap Seng Plantation Holdings Berhad 2019 ACOP report in the clause G.4.4.1. As of todote surrounding smallholder who are RSPO certified is Spark Glory, Harus Abadi, and LKM Trading.

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Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	The Equal Opportunity Policy is publicly available in the estates and POM. The policy statements emphasize on worker information, recruitment and selection, training, employee development, based on business needs, terms of service and records of service. It also states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. This policy is posted on notice boards in Bahasa Malaysia and English for the understanding of the public and workers.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Evidence is available that no employee has been discriminated against. This is evident from sampled employment contracts where all workers, (male, female, foreign, local) signed the same employment contract. Workers interviewed also confirmed that they face no form of discrimination. Foreign workers and local workers received similar pay rate, stay in the same house, and enjoy similar medical benefits as their local counterparts. Interviews also revealed that there is no discrimination on any bases in the estates/mill. However, due to government policies, education opportunities differ between local and foreign children.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	As stipulated in the <i>SOP – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (local & Foreign)</i> the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	As of the date of the audit, there is no pregnant worker at Tomanggong CU. As confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test was done on her own free will. During interview it was confirmed that if they require contact with chemicals, they will allocate to other light works. There is no evidence that pregnancy tests are being conducted as a discriminatory measure. Pregnancy test is required to determine for Foreign Workers' Medical Examination (FOMEMA). Pregnancy test was done on her own free will.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and	YES	The gender committees throughout the Tomanggong CU are known as the 'Persatuan Wanita'. Membership comprises of 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. Meetings are generally held once a year. It was

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Clause	Indicators	Comply Yes/No	Findings
	improvements for women.		noted that the committee had discussed the following matters: training on women's rights; counselling for women affected by violence; child care facilities to be provided by the growers and millers; women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks; and women to be given specific break times to enable effective breastfeeding.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	The Hap Seng Plantations Equal Opportunity Policy is publicly available at the offices of the Tomanggong CU. This policy states Hap Seng Plantations Policy on equal opportunity in all aspects of its employment including recruitment, training and promotion. The Policy identifies under-represented groups where they are encouraged to apply for training and employment opportunities with the Company, and that where possible, special training will be provided for such groups to prepare them to compete on equal terms for jobs and promotion.
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	Pay and conditions are documented and made available during the surveillance audit. These are contained in the workers' payslips and employment contracts. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during interview with management. Pay slips for Mill and Estate field workers show breakdown for all work done such as allowances received, deductions, no. of days worked and for the Mill, any overtime hours performed. It was also verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages (Amendment) Order 2020 (from January 2020 onwards) and the Sabah Labour Ordinance. Documentation of pay are available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Briefing on relevant provisions on the Sabah Labor Ordinance on their rights under the employment contract such as public holidays, paid annual leave, paid maternity leave, final repatriation costs to be paid by employer, and termination of contract.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	Details of payment and conditions of employment are contained in employment agreements. These cover working hours, deductions, overtime, medical, maternity leave, annual leaves, dismissal, period of notice, etc. There is also evidence that the contracts agreement is prepared in a language understood by workers. For example, contracts with Indonesian workers were prepared in Bahasa Malaysia for both Indonesia and Philippines workers. In addition, their terms of contracts were also explained to them upon arrival at the estates/mill. During interviews of workers (both local and foreigners) at the Tomanggong, Tagas and Litang Estate and Tomanggong POM comprising sprayers/manurers and harvesters, general workers and Mill workers, they generally understand the contents of the employment agreements. Audit team has sampled contracts of employment workers at Tomanggong CU as per evidences in the indicator 6.2.1. Based on the above, Tomanggong CU has demonstrated that employment contracts signed with workers are in compliance with the Sabah Labour Ordinance.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime,	YES	There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Sabah Labor Ordinance. This was verified from the mill/estate workers' employment contracts, punch cards, checkroll book and interviews with the workers themselves.

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Clause	Indicators	Comply Yes/No	Findings												
	sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		They are also entitled to at least 30 minutes' rest after 5 hours of work.												
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	Evidence is available that the Tomanggong CU provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free. Each house has between 2 to 3 rooms and accommodate between 2 to 5 workers. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises. Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall. There is evidence that housing inspection are being carried out once a week based on housing inspection records. Records of housing inspections was sighted and available. Mill and estates done the weekly inspection as required. Checklist of the inspection has been verified. Water and electricity are also provided, and the bills are shared among occupants and deducted from their wages. Free medical treatment above is provided also to all workers and their dependents. The upkeep (sanitation) for all estates linesite visited were observed in good maintained. The estates in Tomanggong CU provided with treated water by water treatment plant and water sampling test was carried out 2 times annually for drinking water for human consumption. Clinic currently sharing with Tomanggong POM, Tomanggong Estate, Tagas Estate and Litang Estate.												
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Tomanggong CU was able to demonstrate that efforts are taken to improve workers' access to adequate, sufficient and affordable food. Tomanggong CU have their own canteen/grocery store which sells items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within the expiry dates. Prices of certain basic items are monitored regularly by the management.												
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased	YES	<p>All sampled workers receive at least minimum wages based on Minimum Wages Order Amendment 2022. Tomanggong CU had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The breakdown of the prevailing wages calculation as follows: Tomanggong POM:</p> <table><tr><th></th><th>Foreign Worker (RM)</th><th>Local Worker (RM)</th></tr><tr><td>Total cost of in-kind benefits per worker</td><td>818.53</td><td>818.53</td></tr><tr><td>Average monthly take-home salary per worker</td><td>1,500.00</td><td>1,500.00</td></tr><tr><td>Total prevailing wage</td><td>2,318.53</td><td>2,318.53</td></tr></table>		Foreign Worker (RM)	Local Worker (RM)	Total cost of in-kind benefits per worker	818.53	818.53	Average monthly take-home salary per worker	1,500.00	1,500.00	Total prevailing wage	2,318.53	2,318.53
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Total prevailing wage	2,318.53	2,318.53													

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Clause	Indicators	Comply Yes/No	Findings																																				
	<p>implementation process will be in place, including the following:</p> <p>x. An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</p> <p>xi. There is annual progress on the implementation of living wages</p> <p>xii. 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.</p> <p>xiii. 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> <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>		<p>Tomanggong Estate:</p> <table><tr><td></td><td>Foreign Worker (RM)</td><td>Local Worker (RM)</td></tr><tr><td>Total cost of in-kind benefits per worker</td><td>1,620.36</td><td>1,271.97</td></tr><tr><td>Average monthly take-home salary per worker</td><td>2,162.81</td><td>1,718.00</td></tr><tr><td>Total prevailing wage</td><td>3,783.16</td><td>2,989.97</td></tr></table> <p>Tagas Estate:</p> <table><tr><td></td><td>Foreign Worker (RM)</td><td>Local Worker (RM)</td></tr><tr><td>Total cost of in-kind benefits per worker</td><td>1,347.29</td><td>1,200.91</td></tr><tr><td>Average monthly take-home salary per worker</td><td>2,167.97</td><td>1,903.37</td></tr><tr><td>Total prevailing wage</td><td>3,515.26</td><td>3,104.28</td></tr></table> <p>Litang Estate:</p> <table><tr><td></td><td>Foreign Worker (RM)</td><td>Local Worker (RM)</td></tr><tr><td>Total cost of in-kind benefits per worker</td><td>1291.68</td><td>1281.62</td></tr><tr><td>Average monthly take-home salary per worker</td><td>1482.81</td><td>1492.57</td></tr><tr><td>Total prevailing wage</td><td>2774.50</td><td>2774.20</td></tr></table> <p>The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.</p>		Foreign Worker (RM)	Local Worker (RM)	Total cost of in-kind benefits per worker	1,620.36	1,271.97	Average monthly take-home salary per worker	2,162.81	1,718.00	Total prevailing wage	3,783.16	2,989.97		Foreign Worker (RM)	Local Worker (RM)	Total cost of in-kind benefits per worker	1,347.29	1,200.91	Average monthly take-home salary per worker	2,167.97	1,903.37	Total prevailing wage	3,515.26	3,104.28		Foreign Worker (RM)	Local Worker (RM)	Total cost of in-kind benefits per worker	1291.68	1281.62	Average monthly take-home salary per worker	1482.81	1492.57	Total prevailing wage	2774.50	2774.20
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	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesian. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.																																				

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Clause	Indicators	Comply Yes/No	Findings
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	Tomanggong Group 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. Additionally, the Company was also committed under its own Sustainable Agriculture Policy, with paragraph on "Respect and Recognize the Rights of All Workers (Child Labor, Forced and Bonded Labor, OSH, Employment Contract, Freedom of Associations and Right to Collective Bargaining, equal employment opportunities, minimum income standard, working hours, record keeping, access to education, whistle-blowing, business integrity, grievance redress procedure)". The languages used in both Policies were English and Bahasa Malaysia. This was appropriate for workers as most were Malaysians and Indonesians whose main language was Bahasa Melayu.
	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 Tomanggong 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.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Evidence is available that all worker representatives were freely appointed by the workers as confirmed by the workers' representatives themselves.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The policy on non-employment of children is contained in Sustainable Agriculture Policy, which contains a paragraph on "Respect and Recognize the Rights of All Workers (Child Labor, Forced and Bonded Labor, OSH, Employment Contract, Freedom of Associations and Right to Collective Bargaining, equal employment opportunities, minimum income standard, working hours, record keeping, access to education, whistle-blowing, business integrity, grievance redress procedure)". There was no evidence that the estates and the mill employ anyone below the age of 18 years. The youngest workers in the Estate and mill are 20 and 19 years old. This was verified by examining the master lists of workers. Interviews with workers and staffs, as well as observations made during field visits show that those employed are 18 years and above. Tomanggong CU subscribes to Child Labour Policy under Sustainable Agriculture Policy. The Policy states that it would not tolerate the use of child or forced labour, nor exploitation of children in any of its global operations and facilities. This SOP also details out the remediation action to be taken should a child is found working. This includes awareness trainings for all employees and contractors,

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Clause	Indicators	Comply Yes/No	Findings
			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	There was no evidence that the estates and mill employed anyone below the age of 18 years. Auditor also has verified contractor workers in the estate and mill. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers, passport and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed. Internal external details workers age screening verification and procedure Stakeholder interview and documentation verified on the Employee Master List confirmed that all the workers employed were above 18 years old. During site visit also confirmed that no child labour work in the Tomanggong CU. There also have a documented age screening verification procedure.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Based on documents sighted, interviews and observations, there was no evidence that the Estates and the Mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' particulars and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	Communication demonstrated as per stakeholder interview and records of stakeholder meeting sighted. Latest external stakeholder meeting conducted at Tomanggong CU involved relevant stakeholders such as government authorities, school's representatives, contractors, internal workers and etc. were briefed on all the RSPO principles and criteria.
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	Tomanggong CU subscribes to the Company's Policy entitled Policy of Sexual Harassment, Violence & Abuse Policy. Additionally, the company also has a Guideline and Procedure Sexual Harassment issued which was prepared in Bahasa Malaysia and English. A copy each was distributed to all Gender Committee members. Each of the estates in Tomanggong CU had formed a Gender Committee which will be responsible for organizing relevant activities and programmes. The committees have met on quarterly basis to organize activities for the members, for example, briefings on the subject about what is sexual harassment, how to identify it, and reporting procedures.
	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	The Company also has a documented Reproductive Rights Policy signed by the Chief Executive – Group Plantations which specifies that the policy aims to improve the health and well-being of nursing mothers and new-born babies, to reduce sexually transmitted diseases, including HIV, and other reproductive related diseases, that the company respects the reproductive rights of women in accordance with national legislation. The Policy gives the employees the right to decide freely and responsibly of their planning to have children, and to make decisions concerning reproduction free of

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Clause	Indicators	Comply Yes/No	Findings
			discrimination, coercion and violence. During interview with female workers, they really understood their reproductive right and managed to expose their awareness. The policy and procedure also were briefed to all levels of the workforce via Morning Muster, JCC Meeting and Gender Committee.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	Management has maintained the records of pregnancy and birth for Tagas and Litang estate. Reviewed during the audit.
	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 company has a Guideline and Procedure Sexual Harassment which was prepared in Bahasa Malaysia and English, and a copy each was distributed to all Gender Committee members. This document contains guarantees of protection against acts of sexual harassment and violence, definitions and complaints procedures. The Company also has a documented SOP for making complaints regarding sexual harassment and violence and abuse. The document is entitled Guidelines/Procedure in <i>Lodging Complaints – Sexual Harassment, Violence and Abuse</i> . The estate and mill have developed a grievance mechanism, which respects anonymity and protects complainants is established under the guideline above and other document such as Stakeholder Consultation Procedure, Grievance Procedure (Internal & External), Request for Information Procedure, and Procedure Whistleblower. All the mechanism is implemented and communicated via Morning Muster, JCC Meeting and Gender Committee.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty to the workers for termination of employment Debt bondage Withholding of wages 	YES	All workers in the Tomanggong CU have entered into employment voluntarily, it was verified during the interview with local and Indonesian workers. The workers had been informed that they will work in Oil Palm Sector before applying this job. Foreign workers also are freely to take back their passport after filling these forms. All the passport is stored in the safe locker in manager office with name of worker, passport number. Workers also confirmed there is no involuntary overtime as they will work for overtime if management ask to. They also understand their contract which is if they want to resign, prior to 8 weeks of notice, they will not have debt of bondage. Collective evidence is available that all sampled workers have entered into employment voluntarily.

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Clause	Indicators	Comply Yes/No	Findings
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	The Company has a documented Labour Policy for temporary or migrant Workers signed by the Chief Executive – Group Plantations which states a commitment to non-discrimination, no contract substitution, post arrival orientation program (which includes briefing on language, safety, labour laws, cultural practices, etc) and provision of decent living conditions for foreign workers. The policy was posted on the main estate notice board. This policy mentioned that all employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival programme will be conducted once arrived for three months. The CU maintained its specific procedure / flowchart for employment of foreign workers titled 'Sourcing Process for Foreign Workers'. The procedure has been implemented for any employment related with foreign workers.
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	Tomanggong CU had identified persons responsible for Health & Safety and appointment letters were made available to auditors. 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.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	Accident and emergency procedures are available in adherence to the HSPHB policy as verified in the 'Emergency Response Plan' updated for year 2022. Procedures were formed for all the above identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Emergency Response Team members were given training in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training.
	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	YES	All staff and workers, storekeepers, harvesters and sprayers/manurers, were continuously trained in safe working practices including SOP for the use of PPE related to their job function. Random interviews conducted confirmed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Appropriate PPE were given free of charge to employees of estate and mill visited. Sighted PPE issuance to all workers have been recorded in the "PPE Personal Record".

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Clause	Indicators	Comply Yes/No	Findings
	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.		Records for issuance on PPE for all 3 estates and mill were sighted and verified. Sanitation facilities for those applying pesticides was available near to chemical store areas. On completion of spraying activities, the workers would remove their 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".
	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 CU continued to provide medical facilities. For all 3 Estates, Tomanggong, Tagas & Litang, a centralized clinic was provided by the management at Tomanggong Estate. The more serious cases are referred to <i>Hospital Lahad Datu</i> which is about 64km from the complex. Both Local & Foreign Workers were being covered by SOCSO.
	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. Cases if any are reviewed during safety meetings. Accident statistics was reviewed during Health and Safety committee meeting & through OSH committee investigations. It was evident in the minutes of the meeting. Where required submissions of JKPP 6, & 8 to DOSH were complied with under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly.

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	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	The IPM Plan for the estates has been established and documented in OPAP Chapter 10 - Pest and Diseases. a) Potential pests, thresholds for each pests that calls for chemical treatment, chemical and biological techniques to control pests, minimization of pesticide use and review of plans are illustrated in the IPM plan. Census of pests are made on a monthly basis and the Pests and Diseases Report (Early Warning System) indicates the result of the census. b) Pest management includes of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera subulata</i> . Rhinoceros beetles are managed by using pheromone traps.

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Clause	Indicators	Comply Yes/No	Findings
(IPM) techniques.			<p>c) Main pests in the estates are rats. Other pests such as bagworms, nettle caterpillars, rhinoceros beetles and Ganoderma are occasionally encountered. Currently chemical treatment is only applied for rats. Rat baiting campaigns are immediately made when the damage of crop by rats is above threshold level 2 %. Beneficial plants are planted in all estates according to the plan.</p> <p>d) The SOP to implement IPM and monitor its effectiveness is contained in OPAP 10 titled Pests and Diseases Management.</p> <p>e) Records are available Pests & Diseases Report (Early Warning System, Rat Infestation Report, Rat Infestation Status Report</p> <p>f) There are no signs of fire used for pest control and this was verified during the field visits and interviews with the employees.</p>
	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	The company personnel are aware of the Global Invasive Species List and CABI.org. There are no invasive species listed in the Global Invasive Species list that are used for pest control in any of the estates. Though no invasive species are used, monitoring of IPM is carried out on a regular basis by the Agronomy team to ensure that no invasive species spreads in the estates.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	The SOP for pest control is stipulated in OPAP 10 titled Pests and Diseases Management. Fire is not used in any circumstances. The Zero Burning Policy is clearly stated on the Sustainable Agriculture Policy. Hence no fire is used for pest control or any purpose whatsoever.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	<p>Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in</p> <ul style="list-style-type: none"> a) Estates HSPHB's Oil Palm Agricultural Policy (OPAP) Manual, b) Safe & Standard Operating Procedure / Accounting/Administrative Procedure (AAP) manual. c) OPAP 10 titled Pests and Diseases Management. d) The Oil Palm Agriculture Policy (OPAP), maintained in place for estate operation such <ul style="list-style-type: none"> i. as land clearing / field upkeep / pest and disease, ii. FFB harvesting and evacuation / soil conservation and terracing, iii. road construction & maintenance, iv. planting density & planting technique, palm replacement during immaturity & supplying, v. Fertilizer application, palm thinning and replanting. vi. Chemical justification and usage/dosage/target weeds <p>The Manual had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. The Estates had maintained chemical registers and were</p>

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Clause	Indicators	Comply Yes/No	Findings																																				
			<p>updated periodically. The registers were updated accordingly. The chemical used in the estates among others as listed below;</p> <table><tr><th></th><th>Chemical name</th><th>Class</th><th></th><th>Chemical name</th><th>Class</th></tr><tr><td>1</td><td>Glyphosate iso p/amine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Methamidophos</td><td>IA</td><td>7</td><td>Tric butoxy ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>2,4-D Amine</td><td>II</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Brodifacoum</td><td>IV</td></tr><tr><td>5</td><td>Metsulfuron methy 20%</td><td>III</td><td>10</td><td>Inaziflam 45.46%</td><td>III</td></tr></table> <p>The class 1A chemical, Methamidophos (Enforce) in the estates was packed individually and kept in a locked separate room with proper ventilation. The chemical was used for a bagworm outbreak in 2013. Chemical (300L) being kept in event of fresh outbreak in the estates. Regulatory requirement for the purchase in 2013 was sighted and complied. The justification of agrochemicals use is available in the Oil Palm circulars, SOP, and Manuals to justify the usage of certain chemical for respective treatment. The justification is also described in the agronomist report.</p>		Chemical name	Class		Chemical name	Class	1	Glyphosate iso p/amine	III	6	Cypermethrin	III	2	Methamidophos	IA	7	Tric butoxy ester	III	3	Glufosinate ammonium	III	8	2,4-D Amine	II	4	Triclopyr butoxy	III	9	Brodifacoum	IV	5	Metsulfuron methy 20%	III	10	Inaziflam 45.46%	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	<p>The estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.</p> <p>a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified.</p> <p>b) All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class III & class IV pesticides.</p> <p>c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.</p> <p>Variation of chemical usage are attributed to sizes of immature areas, rainfall pattern and the regeneration growth of weeds in different type of soil series. Explanatory notes for the usage variation was provided in the assessment.</p>																																				
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	<p>All the estates continued to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the HSPHB Oil Palm Agriculture Policy (OPAP)</p> <p>As part of the IPM plans, management of all estates had established nectariferous beneficial plants (<i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> and <i>Turnera subulata</i>) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. During the visit it was observed a number of beneficial plants had been planted and all 3 estates had plants ready for planting in the nurseries. Pheromone traps to trap Rhinoceros Beetles were sighted in all replants and immature in all the 3 estates.</p>																																				
	7.2.4 There is no prophylactic	YES	<p>There is no prophylactic use of pesticides. The quantity of agrochemicals required for various field</p>																																				

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	use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.		conditions are documented and justified in HSP SOP for estates operations. a) The 3 estates 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. b) From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraquat had been banned in all estates since 2007.																																				
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	The estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. a) The review of the chemical register concluded that all pesticides used were of class III & class IV. The use of paraquat had been prohibited in all HSP estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) The class 1A chemical, Methamidophos (Enforce) in all Estates was packed individually and kept in a locked separate room with proper ventilation. The chemical was used for a bagworm outbreak in 2013. Chemical being kept in event of fresh outbreak in the estates. Regulatory requirement for the purchase in 2013 was sighted and complied. d) Sighted from records and interviews with workers, staff and estate assistants, concluded that training was held with all precautions being taken and all legal requirements met.																																				
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	<div>The chemical kept in the estates stores among others as listed below;</div> <table><tr><th></th><th>Chemical name</th><th>Class</th><th></th><th>Chemical name</th><th>Class</th></tr><tr><td>1</td><td>Glyphosate iso p/amine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Methamidophos</td><td>IA</td><td>7</td><td>Tric butoxy ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>2,4-D Amine</td><td>II</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Brodifacoum</td><td>IV</td></tr><tr><td>5</td><td>Metsulfuron methy 20%</td><td>III</td><td>10</td><td>Bayfolan</td><td>III</td></tr></table>		Chemical name	Class		Chemical name	Class	1	Glyphosate iso p/amine	III	6	Cypermethrin	III	2	Methamidophos	IA	7	Tric butoxy ester	III	3	Glufosinate ammonium	III	8	2,4-D Amine	II	4	Triclopyr butoxy	III	9	Brodifacoum	IV	5	Metsulfuron methy 20%	III	10	Bayfolan	III
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	7.2.5b Why there is no other alternative which can be used.	YES																																					
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES																																					
	7.2.5d What is the process to limit the negative impacts of the application.	YES																																					
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES																																					
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance	YES	Records showed that pesticides were handled, used and applied by trained persons as per the MSDS and SSOPS of the pesticide. The staff 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 trade and generic names of the chemicals were made known to the workers through the MSDS training. It was sighted all the relevant document such as:																																				

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	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.		<ul style="list-style-type: none"> a) Records of purchase, storage and use were maintained. b) All store buildings were well secured and equipped with exhaust fans. c) Only authorized personnel are assigned to handle the chemicals. d) All the chemicals were segregated in storage accordingly.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The storage of pesticides at Tomanggong 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. Class 1 and Class II chemicals were stored in locked cupboards inside the locked stores. The stores in estates and mill were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. During site visit at the chemical and fertilizer stores in the 3 Estates, Tomanggong, Tagas & Litang, relevant SDS had been well displayed. Adequate safety signage has been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was reused for chemical mixing. This was to avoid any contamination of chemicals to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	On all 3 Estates Empty pesticide containers were triple rinsed, punctured and stored in the scheduled waste stores before being 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 mgmt. and disposal. Records showed that the empty pesticide containers were disposed by a DOE licensed contractor.
	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 info is provided to affected local communities at least 48 hours prior to applic. of aerial spraying.	YES	Aerial spraying was not practiced by all the estates. There was no evidence to show that aerial spraying was carried out on all 3 estates in Tomanggong CU. This was also confirmed by interviewed staff and workers.

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Clause	Indicators	Comply Yes/No	Findings
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, had been demonstrated on Tomanggong CU. Records showed that medical surveillance had been carried out for employees handling chemical by competent OHD of Chong Clinic, Tawau. All employees examined were found fit.
	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	On all 3 Estates there was no evidence to show that work with pesticides had been offered to persons under the age of 18, pregnant or breastfeeding women or other people who had medical restrictions, at time of visit. Spraying activity was observed in field T14E on Temanggong Estate, and field SR04A on Tagas Estate and in Field L12C on Litang Estate. An interview conducted it was verified that there were no persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions carrying spraying. The Estate had complied with Section 3 c "cause or permit a female worker who is pregnant or lactating to use or handle highly pesticides", Regulation 'Prohibition' of the Pesticide Act (Highly Toxic Pesticide) Regulation 1996. HSPHB also had a policy of recruiting workers 18 years old and above.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Waste management plan is developed based on the environmental impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill and recyclable wastes were sent to recycle centres. Based on site inspection at workers quarters, centralised workshop, scheduled wastes store, landfill, etc., sighted all wastes was disposed according to the waste management plan.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Tomanggong CU is implemented the proper disposal of waste material according to procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. Scheduled wastes had been disposed of through a licensed contractor approved by DOE i.e. Lagenda Bumimas Sdn. Bhd. Each house was provided with dustbin. The wastes were removed weekly and disposed via landfill. Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean condition. Wastes were properly disposed as mentioned in Indicator 7.3.1.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at Tomanggong CU, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Tomanggong CU have been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	All the 3 estates adopted an established manuals and standard operating procedures among others as guided by its HSPHB's OPAP manual. These SOP are implemented and monitored. The monitoring of daily implementation of SOP by estate workers is done by the field conductors, Estate Assistant Managers and Estate Manager. Periodic visits by the agronomists serve as an additional monitoring to ensure that the SOP have been well implemented and correctly monitored by the estate management. The fertilizer application SOP was latest revised in Oct 2014. Therein elaborating details on the nursery,

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Clause	Indicators	Comply Yes/No	Findings																										
that ensures optimal and sustained yield.			immature, mature palm manuring type of fertilizers. Application of fertilizer timing and placement were also described. Other information includes sub-soil manuring, fertilizer sampling, and stacking of fertilizer in estate store. Rainfall data, yield trends, level of nutrients in the palm fronds, level of nutrients in the soil, total fertilizer application for each type of organic and inorganic fertilizers are monitored on a monthly basis. There is continuity in the data obtained and utilized for analysis.																										
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	The 3 estates-maintained records of foliar and soil analysis in respective office. These records are compiled and issued from the Agronomy Dept. a) Foliar sampling is conducted on an annual basis and the soil sampling is made in a 5 year cycle for a particular field. Foliar analysis for the estates were completed in the following period and reports respectively. b) Soil analysis for the entire CU was made in phases on a 20% basis of an estate to complete a 5-year cycle to monitor changes in nutrient status pH, Org C, Total N, Total P, Avail P, exch K, exch Ca & exch Mg. There was no obvious change of soil chemical properties as compared to previous years where estates are required to maintain the current agronomic practices recommended. c) Results of the foliar and soil analysis are taken into account by the agronomists. Correlation of the results of the results of analysis and the recommended fertilizer inputs were noted.																										
	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	There is a nutrient recycling programme in place. Empty Fruit Bunch (EFB) and Belt Press Solids (BPS) produced by the mill are applied in the field. The strategy includes EFB mulching and application of BPS in the fields in the estates. Records of application are duly retained by each estate. EFB is applied at rate of 35-70 mt/ha subject to Agronomist recommendations. Immature area at rate of 25 mt/ha. BPS is applied at dosage of 15 kg /palm.																										
	7.4.4 Records of fertiliser inputs are maintained.	YES	Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2021/22 was in line with the program. The following fertilizers were applied in the 3 estates subject to the recommendation by the Agronomist. <table><tr><td></td><td>Fertiizer</td><td>Kg/palm</td></tr><tr><td>1</td><td>A chloride</td><td>1.50-1.75</td></tr><tr><td>2</td><td>MOP</td><td>1.50-2.25</td></tr><tr><td>3</td><td>HGFB</td><td>0.10</td></tr><tr><td>4</td><td>Kieserite</td><td>1.00-1.50</td></tr><tr><td>5</td><td>Borate</td><td>0.10</td></tr><tr><td>6</td><td>A Sulphate</td><td>1.50-2.00</td></tr><tr><td>7</td><td>R Phosphate</td><td>1.50</td></tr><tr><td>8</td><td>NK Mixture</td><td>3.00-4.00</td></tr></table>		Fertiizer	Kg/palm	1	A chloride	1.50-1.75	2	MOP	1.50-2.25	3	HGFB	0.10	4	Kieserite	1.00-1.50	5	Borate	0.10	6	A Sulphate	1.50-2.00	7	R Phosphate	1.50	8	NK Mixture
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RSPO PUBLIC SUMMARY

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7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	<p>All the 3 estates had soil maps detailing their soil profile including marginal and fragile soils. The slope maps identify steep areas within the estates. Figures are in % otherwise stated.</p> <table><tr><td></td><td>Soil type</td><td>Tagas</td><td>Tomanggong</td><td>Litang</td></tr><tr><td>1</td><td>Dagat</td><td>27.64</td><td>11.49</td><td>0.30</td></tr><tr><td>2</td><td>Gumpal</td><td>3.36</td><td>29.29</td><td>-</td></tr><tr><td>3</td><td>Kinabatangan</td><td>38.47</td><td>24.48</td><td>63.06</td></tr><tr><td>4</td><td>Kretam</td><td>21.30</td><td>-</td><td>24.80</td></tr><tr><td>5</td><td>Lungmanis</td><td>5.72</td><td>-</td><td>-</td></tr><tr><td>6</td><td>Rumidi</td><td>0.41</td><td>-</td><td>2.62</td></tr><tr><td>7</td><td>Tuaran</td><td>3.10</td><td>9.08</td><td>9.22</td></tr><tr><td>8</td><td>Brantian</td><td>-</td><td>25.66</td><td>-</td></tr><tr><td></td><td>Total</td><td>100.00</td><td>100.00</td><td>100.00</td></tr></table> <p>The topography details are as follows. Figures in ha otherwise stated.</p> <table><tr><td></td><td>Topography</td><td>Tomanggong</td><td>Litang</td><td>Tagas</td></tr><tr><td>1</td><td>0-5</td><td>2391.76</td><td>2581.30</td><td>2153.84</td></tr><tr><td>2</td><td>6-10</td><td>166.56</td><td>64.91</td><td>52.87</td></tr><tr><td>3</td><td>11-15</td><td>76.17</td><td>3.00</td><td>3.99</td></tr><tr><td>4</td><td>16-25</td><td>18.28</td><td>0</td><td>1.00</td></tr><tr><td>5</td><td>>25</td><td>2.03</td><td>0</td><td>0</td></tr><tr><td></td><td>total</td><td>2654.80</td><td>2649.20</td><td>2211.70</td></tr></table>					Soil type	Tagas	Tomanggong	Litang	1	Dagat	27.64	11.49	0.30	2	Gumpal	3.36	29.29	-	3	Kinabatangan	38.47	24.48	63.06	4	Kretam	21.30	-	24.80	5	Lungmanis	5.72	-	-	6	Rumidi	0.41	-	2.62	7	Tuaran	3.10	9.08	9.22	8	Brantian	-	25.66	-		Total	100.00	100.00	100.00		Topography	Tomanggong	Litang	Tagas	1	0-5	2391.76	2581.30	2153.84	2	6-10	166.56	64.91	52.87	3	11-15	76.17	3.00	3.99	4	16-25	18.28	0	1.00	5	>25	2.03	0	0		total	2654.80	2649.20	2211.70
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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	There is no replanting on steep terrains. This was verified during the field visits. 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 some mature areas. The cover crop <i>mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit.																																																																																								
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	This compliance being addressed in the “ <i>Slope and River Protection</i> ” signed by the CEO stating the following among others;																																																																																								

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Clause	Indicators	Comply Yes/No	Findings
			"Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".
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	This is not applicable to all the 3 estates as there is no new plantings made. Soil maps are taken into account in plans and operations of estates to ensure long term suitability of land for palm oil cultivation. Maps are used to identify areas that are inappropriate for planting such as slope maps to indicate steep terrain.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	There were no marginal and fragile soils in the estates.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Construction of drainage is evident at planted areas where water needs to be drained out especially at the terraces at the undulating areas and along the estate roads. Soil analysis and slope mapping have been used to guide the planning of drainage systems. Information obtained from soil analysis and slope mapping is taken into consideration when roads and infrastructure need to be developed. However, as all the estates in this unit of certification has been long established, there is rarely any new additional roads and drainage been developed. There are also no signs of soil erosion, and this was verified during the field visits.
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 not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.
	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	YES	This is not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.

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	RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	This is not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period,	YES	

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	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 series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.
	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	
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	<p>The water management plan is confined to only Tomanggong CU engulfing the plans from nursery to fresh fruit processing. This report also includes the domestic water use with the after effect of water use to the surrounding environment. The plans cover the process of water abstraction, shortage, utilization in cultivation, chemical and natural treatments to utilize water at processing, domestic purposes and wastewater management. All of these aspects are included with monitoring, mitigation (if required), implementation and prevention or minimize pollution of these plan.</p> <p>Identified physical system in management of TGOE:</p> <ul style="list-style-type: none"> ▪ Treated water quality standard ▪ Baseline data for water quality and frequency quality standard ▪ Contingency plans during dry season

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			<ul style="list-style-type: none"> Flow meter monitoring at TPOM. <p>The continued availability of water sources and to avoid negative impacts on other users in the catchment has been conclude in the Environmental Compliance Report (ECR). ECR was conducted by third party via four monthly environmental monitoring. Among the parameter monitored for water quality monitoring such as pH value, temperature, dissolved oxygen, BOD, COD, suspended solids, ammoniacal nitrogen, nitrate, total phosphorus, TTC, TFC and glyphosate. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.</p>
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. In order to ensure supply of clean drinking water to workers treated water sampling was carried out by monthly basis. Drinking water quality has been monitored by Hap Seng Plantations Central Laboratory. Results from analysis were showed all the parameters within the limits. Sampling Point: Raw Water, Buffer Tank and Staff/Workers House Pipe. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.
	7.8.1b Workers have adequate access to clean water.	YES	<p>As verified at Tomanggong CU facilities for workers and through interview with sampled workers, they have obtained adequate access to treated clean water. Cleanliness of drinking water supplied to worker was ensured by carrying water analysis. Drinking water quality has been monitored by Hap Seng Plantations Central Laboratory by monthly basis. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.</p> <p>Among action plan due to water quality off spec parameter such as turbidity, total coliform and fecal coliform:</p> <ul style="list-style-type: none"> To conduct checking on the filter tank and buffer tank when off spec To conduct inspection on the chemical dosage application of coagulant agent (PAC) To review/update the dosage WTP's chemicals application based on JAR Test Analysis To conduct immediate correction treatment To ensure correct dosage of chlorine has been applied for water treatment To ensure water is cooked prior to consumption (drinking etc.) with refresher briefing to water consumer at monthly basis
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	During site inspection at the estates, sighted water courses and wetlands was 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).
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of	YES	Effluent license renewal application for year 2022/2023 and letter from Department of Environmental was sighted. An Effluent Treatment Plant (ETP) is available at Tomanggong POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum

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	mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		mill capacity per hour is 60mt ffb/hr. According to DOE’s license, the disposal method of the final discharge is through land irrigation. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. Among the parameters required by the DOE to be monitored are bio-oxygen demand (BOD), suspended solid (SS), oil and grease (O&G), ammoniacal nitrogen (AN) total nitrogen (TN), pH and temperature. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory limit such as BOD discharged to land irrigation was not more than 20 mg/l.												
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.												
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<p>The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Among the plan for improving fossil fuel are:</p> <p>Regular servicing of the generator set for smooth running of engine and prevent excessive emission of greenhouse gas, Estate/mill has set up a schedule the usage of fuels and monitor it at 3 times per week basis.</p> <p>Site visit to Tomanggong 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.</p>												
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>Main sources of GHG emission identified were methane (CH₄) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO₂, SO_x and NO_x from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities. The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator V4 and submitted to RSPO on 25/10/2022. Based on verification of various records such as store issuance records and M3 system database, all of the data was found to be accurate.</p> <table><tr><th>Description</th><th>tCO₂e/tProduct</th></tr><tr><td>CPO</td><td>1.29</td></tr><tr><td>PK</td><td>1.29</td></tr></table> <table><tr><th>Production</th><th>t/yr</th></tr><tr><td>FFB Processed</td><td>123,861.55</td></tr><tr><td>CPO Processed</td><td>26249.75</td></tr></table>	Description	tCO ₂ e/tProduct	CPO	1.29	PK	1.29	Production	t/yr	FFB Processed	123,861.55	CPO Processed	26249.75
Description	tCO ₂ e/tProduct														
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Clause	Indicators	Comply Yes/No	Findings			
			Land Use	Ha		
			OP Planted on Mineral Soil	11803.91		
			OP Planted on Peat Soil	0.00		
			Total oil palm planted area	11803.91		
			Conservation (forested)	0.00		
			Conservation (non-forested)	125.64		
			Milling extraction rate:			
			OER	21.19		
			KER	4.25		
			Mill Emission			
			Emission source	tCO2e	tCO2e/tFFB	
			POME	24278.96	0.20	
			Fuel consumption	1463.22	0.01	
			Grid electricity utilisation	0.00	0.00	
			Credits			
			Export of excess electricity to housing & grid			
			Sale of PKS	0.00	0.00	
			Sale of EFB	0.00	0.00	
			Total	25742.18	0.21	
			Plantation / field emission			
				Own		
			Emission sources	tCO2e	tCO2e/ha	tCO2e/FFB
			Land Conversion	54998.58	4.66	0.53
			CO2 Emissions from Fertiliser	2319.37	0.20	0.02
			N2O Emissions from Peat	0.00	0.00	0.00
			N2O Emissions from Fertiliser	4070.36	0.34	0.04
			Fuel Consumption	2500.45	0.21	0.02
Peat Oxidation	0.00	0.00	0.00			
Sinks						
Crop Sequestration	-51999.61	-4.41	-0.50			
Conservation Sequestration	0.00	0.00	0.00			

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Clause	Indicators	Comply Yes/No	Findings							
			<table><tr><td>Total</td><td>11889.16</td><td>1.01</td><td>0.11</td></tr></table>				Total	11889.16	1.01	0.11
			Total	11889.16	1.01	0.11				
			Palm Oil Mill Effluent (POME) Treatment							
			Diverted to compost		0%					
			Diverted to anaerobic digestion		100%					
			Diverted to Anaerobic Digestion							
			Diverted to anaerobic pond		100%					
			Diverted to methane capture (flaring)		0%					
			Diverted to methane capture (electricity generation)		0%					
			7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Tomanggong CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.					
7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	Based on the assessment of all polluting activities as of the Environment Impact Assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate. Based on the stack sampling report by independent consultant, the mill complied with the regulated limit. Currently, TPOM in progress implementing Electrostatic Precipitators (ESP) System. An ESP is highly efficient device as it removes 99% of particulate matter present in the exhaust from a thermal power plant.								
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	Guided by HSP OPAP, preparation of replanting using fire is not allowed. Based on site visit at replanting fields of the sampled estates, there was no trace of burning observed. Palm trunks were chipped and windrowed.							
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Hotspot monitoring managed by Sustainability Team (Fire Hotspot Monitoring Team) – if any fire detected, inform estate. HSPB monthly Hotspot Monitoring system has been in place via www.globalforestwatch.com using NASA satellite data. The system monitors any possible occurrence of fire within or nearby the concession areas throughout TGOE operation globally. At the estates level, there							

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Clause	Indicators	Comply Yes/No	Findings
			are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	The above-mentioned fire prevention and control measures were communicated to the stakeholders through either stakeholder consultation or distribution of feedback forms sent through mail. Records of email sent, and acknowledgment returns from the stakeholders were maintained and made available for verification.
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 Tomanggong CU since Nov 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The report of " <i>Potential High Conservation Value Area Assessment Report of Tomanggong Group of Estates and Tomanggong Palm Oil Mill</i> " is available and prepared by the Sustainability Executive. The report was updated in Sept 2022 had covered all the High Conservation Value (HCV) within and adjacent to the CU. The HCV assessment had identified on the rare, threatened and endangered species (RTEs) for estate named <i>Tomanggong, Litang, Tagas, Tabin and North Bank</i> , including the management and action plan. In general, Tomanggong CU had identified 6 potential HCV in the whole estates. Total HCV areas were declared as 125.64 Ha. 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 Tomanggong CU since Nov 2005.
	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	YES	

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Clause	Indicators	Comply Yes/No	Findings
	Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring reqs. The integrated mgmt. plan is reviewed at least once every 5 yrs. The integrated mgmt. plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations.	YES	The SOU has established and reviewed the action plan and monitoring programme for HCVs area after consultation with relevant stakeholders. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action. There were no major changes to the integrated management plan, except awareness training, continuous monitoring for HCVs area.
	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 Tomanggong CU only surrounding with Hap Seng Own Estate. So, this indicator was not applicable with this CU.

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Clause	Indicators	Comply Yes/No	Findings
	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	The following program has been established in relation to the HCV/RTE protection during the year 2022. A training programme for year 2022 was available. An awareness training like morning briefing has been conducted by Assistant Manager from Tomanggong, Tagas and Litang Estate to all workers. 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, and also Policy and Procedure has been developed for disciplinary measures titled 'Disciplinary Measures Against Any Activities Involved with Rare Threatened & Endangered Species (RTE) / <i>Tindakan Terhadap Sebarang Aktiviti Melibatkan Haiwan Terancam (RTE)</i> '.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Tomanggong CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the HCV Area. It was noted that CCTV was placed at strategic area surrounding the estate to control everything including any illegal activities. The CCTV is in operation 24hours. Latest monitoring for HCV area, Sg. Segama river and Boundary with Tabin Wildlife reserve has been conducted by Tomanggong estate and the monitoring activities was recorded in the HCV & RTE Monthly Checklist January - October 2022.
	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 Tomanggong CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

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

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		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.		process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP. As of this audit and Verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 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	<p>Assessment of compliance to RSPO Partial Certification Requirements was conducted in Northbank Estate and Tabin Estate on 01-04/08/2022 and for Pelipikan Estate on 22-23/11/2021. From the assessment, the status of the uncertified management unit was summarized as follows:</p> <p><u>Northbank and Tabin Estate</u></p> <ul style="list-style-type: none"> ▪ HCV Assessment at Northbank and Tabin Estate has been conducted in year 2013 and completed the report on 20 November 2013. ▪ Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). Discussion was made between RSPO Secretariat (Mrs. Siti Joanni) and HSP representative Mr. Kee Keow Chong and Mr. Kelven Saihing Binson to resolve the Concept Note via Zoom Online on 11/04/2022. Mrs. Siti Joanni provided the slide on the alignment and discussion for your notes and perusal on 13/04/2022. ▪ HSP is in progress to review the Concept Note as per alignment and discussion provided by RSPO dated 22/05/2022. <p><u>Pelipikan Estate</u></p> <ul style="list-style-type: none"> ▪ Based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest Sdn. Bhd.) there were no clearance of primary forest at Pelipikan Estate. However, there were land clearing made on May 2006, September 2010 and February 2011. Whereas clearing was made without HCV assessment received the reviewer's comment on the LUCA assessment and latest replied on 18/04/2021. ▪ HSP has submitted the clarification and amended processed of satellite imagery and classification of vegetation coefficient as per comment by RSPO Biodiversity Manager (Ms. Khing) on 05/10/2022. ▪ RSPO Specialist, Environment acknowledge receipt and RSPO GIS Team is in progress to review the submission dated 09/05/2022.

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	(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	<p>The latest internal assessment has been made to Northbank Estate and Tabin Estate on 01-04/08/2022 and for Pelipikan Estate on 22-23/11/2021:</p> <p><u>Northbank and Tabin Estate</u> Land conflict are still under court case. Please refer Hap Seng Plantations 2018 Annual Report – refer page 115 (b)</p> <p><u>Pelipikan Estate</u> Land conflict was resolved with the affected and relevant parties. Please refer Hap Seng Plantations 2018 Annual Report – refer page 269 (c)</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	Yes	<p><u>Northbank and Tabin Estate</u> JCC meeting with stakeholder which include local communities was conducted on 04/08/2022. The result of the meeting had no significant negative impact by the local community.</p> <p><u>Pelipikan Estate</u> There was no labour dispute reported during JCC with stakeholder meeting conducted on 17/02/2022. Overall, no negative impacts.</p>
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	The latest internal assessment has been made to Northbank Estate and Tabin Estate on 01-04/08/2022 and for Pelipikan Estate on 22-23/11/2021, there was no issue on legal non-compliance for all uncertified unit.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	Yes	<p>Based on the latest internal assessment carried out in August 2022 and November 2021, the progress of the certification was concluded as non-compliance against 4.5.4. (a-d) on new planting requirement, HCV, legal compliance and labour disputes for Tabin, Northbank and Pelipikan Estate. With regards to the land disputes, the action to address the issues were on-going.</p> <p>It was evident that in handling uncertified management unit has conducted the Joint Consultation Committee (JCC) meeting on 04/08/2022 (Northbank and Tabin Estate) and 17/02/2022 (Pelipikan Estate) to address unresolved issues. Actions in progress.</p>
		A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;	Yes	<p>Further information can be obtained from https://document.rspo.org/Hap_Seng_Plantations_Holdings_Bhd_ACOP2020.pdf</p>
		Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	Yes	As of this audit Hap Seng Plantations still on track and follow the requirement of uncertified requirement units, Further information can be obtained from
		Desktop study e.g. web check on	Yes	

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		relevant complaints		https://document.rspo.org/Hap_Seng_Plantations_Holdings_Bhd_ACOP2020.pdf . The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
		If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.	Yes	
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	Yes	
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	Yes	

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<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators	Yes	<p>It has been verified that Tomanggong Group of Estate (TGOE) owned the said lands as Country Lease land title (CL) from The Government of The State of Sabah. The land was not previously owned by any users and subject to customary rights of local communities and indigenous people. The Mechanism of verification is CB going through Interviewed with surrounding smallholder and government agencies, CB also keep track the records in table 1.4 Stakeholder Consultation above. During this audit, it was confirmed through interviewed relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, Harus Abadi Sdn Bhd and IOI Plantations. There was no land encumbered by customary rights or dispute from any stakeholder at the Tomanggong CU</p>
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ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.3.2 MAR 01 2022	Major (Upgraded)	<p>Finding: Mechanism to check consistent implementation of procedures was not fully in place.</p> <p>Objective evidence: During interview and documentation review, it was found that, the workers of the sundry shop i.e Kedai Tomanggong Utama did not have the payslip, agreement and passport with them. There is no mechanism to check the implementation of procedures for the Tomanggong CU management on the compliances of the vendor management such as sundry shop.</p>	<p>Root cause: The Certification Unit misunderstand that the payslip, contract employment/agreement and passport of the worker should be kept by sundry shop himself.</p> <p>Correction: The Certification Unit has immediately provided mechanism (Attachment 1a and 1b) to check the implementation of procedures for the Tomanggong CU management on the compliances of the vendor management such as sundry shop.</p> <p>Corrective action: The Sustainability Team will cross-check the Certification Unit implementation of procedures for the Tomanggong CU management on the compliances of the vendor management such as sundry shop at yearly basis.</p>	<p>Auditor had verified evidence attached of SOP regarding <i>Mechanism to Check Compliance of Vendor Management and Vendor Management Compliance Checklist/ Report</i> dated 30/12/2022. Both documents considered to be satisfactory to address the findings. The implementation will be verified during next surveillance audit.</p> <p>Status: Closed</p>
3.3.3 MRS 01 2022	Minor	<p>Finding: Records of monitoring and any actions taken was not fully maintained and available. Facilities of Clarifier Tank and Sand Filter Tank were not fully effectively risk assessed and monitored for health and safety issues.</p> <p>Objective evidence: During inspection of Water Treatment Plant in Tagas Estate and Litang Estate, and records review, there were several non-compliances found on the unsafe condition of the walkway platform and ineffectiveness of the H&S monitoring to address health and safety risks to people as listed below:</p> <p>1) At Tagas Estate and Litang Estate, walkway platform connecting from the Clarifier Tank and Sand Filter Tank as verified at Tagas and Litang estates only guarded with handrail and mid-rail.</p>	<p>Root cause: The Certification Unit not fully risk assess and monitor on health and safety issue at Clarifier and Sand filter Tank for the Walkway Platform due to misunderstanding, that Water Treatment Plant activity was not within the estate boundary, as it is not under estate operation. The equipment was installed to improve the life quality of employee.</p> <p>Correction: 1. The Certification Unit will perform Risk Assessment of Water Treatment Plant especially Clarifier/Sand Filter Tank walkway platform and include in the Water Treatment Plant HIRARC by installing toeboard/kickplate to reduce risk of falling during walking at the</p>	<p>Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.</p> <p>Status: Open</p>

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		<p>No toeboard/kickplate as protective barrier to provide protection for workers from exposing to the risk fall hazard during walking/working at the walkway platform. This condition will cause significant serious injury in case of accident.</p> <p>2) HIRARC form which was reviewed on 25 March 2022 at Tagas Estate and 3 February 2022 at Litang Estate has identified the hazard of working at height at the water treatment water tank. The existing risk control only covered on handrail for climbing of the WTP tank stairs. No identification of risk control for the walkway platform.</p> <p>3) The Water Treatment Plant or Water Treatment Tank and Sand Filter Tank yet to be listed in the workplace inspection form at Tagas Estate titled 'Borang Pengumpulan Maklumat Pemeriksaan Tempat Kerja' and at Litang Estate titled 'RSPO Checklist – Litang Estate'.</p> <p>4) Report on Water Treatment Plant for Tagas Estate - August 2022 dated 6 September 2022 was ticked ✓ 'G' in column 'Conditions' that interpreted as 'good condition' for both the Clarifier Tank and Sand Filter Tank. However, no status/description on the condition of the walkway platform.</p> <p>5) Since the condition of walkway platform was not identified during workplace inspection on 24 October 2022 at Tagas Estate and 20 September 2022 at Litang Estate, this issue will be missed to be brought up to the safety committee meeting for discussion and action.</p>	<p>walkway platform.</p> <p>2. The Certification Unit will discuss on the safety issue of the walkway platform in the next Litang Estate Safety Committee Meeting in order to rectify the issue as per mention above with the specified time frame of completion.</p> <p>Corrective action:</p> <p>1. Estate Management to do workplace inspection on quarterly basis to ensure all area/workstation at Water Treatment Plant especially Clarifier/Sand Filter Tank walkway platform has been risk assessed and to ensure all the risk controlled especially installation of the toebard/kickplate has been implemented.</p> <p>2. Safety committee of the estate management to inspect and monitor on quarterly basis on the safety condition of all workstation at the Water Treatment Plant and any issue raised during inspection will be discuss during Quarterly Safety Committee Meeting in order to rectify the issue.</p>	
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ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
3.3.2	Minor	<p>Finding: Item 3.1 Palm Circle & Item 3.2 Inter-row of HSPHB OPAP No.9-UpkeepMature Oil Palms were no complied with.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> 1. The palm circles in Field T14I on Tomanggong Estate and in Field L11A on Litang Estate were not sprayed clean. Observed weeds around 1 foot of the palm base in Tomanggong Estate. Observed weeds around 1 foot of the palm base and on the back half of the circle on Litang Estate. 2. Tagas Estate: the inter-rows Field SR04A was observed to be covered with the weed Caladium. 	<p>Management action plan:</p> <ol style="list-style-type: none"> 1. Timely conduct the spraying training to sprayer as per circle & path spraying training programme (existing sprayer at yearly while training to be immediately conducted to new sprayer). 2. Timely conduct the spraying training to sprayer as per Caladium spraying training programme (existing sprayer at yearly while training to be immediately conducted to new sprayer). 3. Estate Management shall monthly monitor the training standard to evaluate whether the sprayer fully understand the scope of training or not. 	<p>Site visits for all the 3 estates confirmed that the field condition (mainly on circle path) have been maintained satisfactorily. There was no delay program observed to facilitate FFB harvesting and LF collection. Field visit to the respective field for the overgrowth of Caladium weeds have been attended to Both Litang and Tagas used Garlon at rate of 200 ml/20L for the eradication focusing on circle and path. Blanket spraying are avoided for cost effective and chemical prophylactic usage.</p> <ul style="list-style-type: none"> ▪ Tomanggong Estate - Field no P14E / P14G / T14I ▪ Tagas Estate - Field no SR04A / SR 04B/SR04C. ▪ Litang Estate - Field L11A <p><i>Previous issue was verified and closed. However, mechanism to check consistent implementation of procedures was not fully in place again during this surveillance 3 audit. As a result, previous Minor NCR was open and upgraded to Major NCR MAR 01 2022.</i></p> <p>Status: Open (Upgraded to Major NCR)</p>
7.8.1	Minor	<p>Finding: Water management plan did not address on workers have adequate access to clean water.</p> <p>Objective evidence:</p> <p>Based on Water Management Plan at Tomanggong CU, the Plan did not addresses reading water off spec i.e. Total Coliform.</p> <p>Evidence Sighted:</p> <ul style="list-style-type: none"> ▪ Report Analysis for water drinking analysis for 6 Monthly interval at Tomanggong CU dated 21/6/21 showed the total coliform reading is >23 against non-Detected. ▪ Latest Report Analysis for water drinking analysis at Tomanggong POM and 	<p>Water management plan has been reviewed and updated immediately.</p> <p>For current practice's yearly review, the estate management will monitor the incidence of prolonged off-spec at monthly basis so that the water management plan can be immediately reviewed/updated to address the detected prolonged off spec reading.</p>	<p>Among action plan due to water quality off spec parameter such as turbidity, total coliform and fecal coliform:</p> <ul style="list-style-type: none"> ▪ To conduct checking on the filter tank and buffer tank when off spec ▪ To conduct inspection on the chemical dosage application of coagulant agent (PAC) ▪ To review/update the dosage WTP's chemicals application based on JAR Test Analysis ▪ To conduct immediate correction treatment ▪ To ensure correct dosage of chlorine has been applied for water treatment ▪ To ensure water is cooked prior to consumption (drinking etc.) with refresher briefing to water consumer at monthly basis

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		<p>Tomanggong Estate dated 22/11/21 showed the total coliform reading is 2.2 against non-Detected.</p> <ul style="list-style-type: none">▪ Latest Report Analysis for water drinking analysis at Litang Estate dated 22/11/21 showed the total coliform reading is 1.1 against non-Detected.		Status: Closed
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ATTACHMENT 6 – Timebound Plan

HAP SENG PLANTATIONS HOLDINGS BERHAD TIME BOUND PLAN ON RSPO CERTIFICATION

No.	CU	Location	Date of Certification	Valid until	CAB
1	Hap Seng Plantations (River Estates) Sdn Bhd - Sg Segama Group of Estate & Bukit Mas Palm Oil Mill	Lahad Datu	24/05/2017	23/05/2022	PT TUV Rheinland
2	Jeroco Plantations Sdn Bhd Jeroco Palm Oil Mill	Lahad Datu	27/09/2018	26/09/2023	SIRIM QAS
3	Jeroco Plantations Sdn Bhd Jeroco Palm Oil Mill 2	Lahad Datu	27/09/2018	26/09/2023	SIRIM QAS
4	Hap Seng Plantations (River Estates) Sdn Bhd - Tomanggong Group of Estates	Lahad Datu	09/01/2020	08/01/2025	SIRIM QAS
5	Kawa Estate and Hap Seng Estate, Hap Seng Plantations (Ladang Kawa) Sdn Bhd *combined with Sg Segama Group of Estate & Bukit Mas POM, w.e.f 2018	Tawau	24/05/2017	23/05/2022	PT TUV Rheinland
6	2.1.1	Kota Marudu	2022 (as per ACOP 2020)	Not Applicable	Not Applicable
7	Hap Seng Plantations (River Estates) Sdn Bhd – Tomanggong Group of Estates – North Bank Estate and Tabin Estate	Lahad Datu	2022 (as per ACOP 2020)	Not Applicable	Not Applicable

Note:

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