



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

File Ref. : ES24120001

RSPO PUBLIC SUMMARY REPORT

CLIENT : HARUS ABADI SDN. BHD.
PARENT COMPANY : HARUS ABADI SDN. BHD.
RSPO MEMBERSHIP No.: 1-0280-19-000-00

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Harus Abadi Sdn. Bhd.	Harus Abadi Sdn. Bhd.	5° 26' 24" N	118° 32' 24" E	MDLD 9075, Bungalow Lot 1, I-Peak Business Centre, 91100 Lahad Datu, Sabah.

MAP : See Attachment 1

AUDIT DATE : 28th November to 1st December 2022 **DURATION :** 10 auditor days

TYPE OF AUDIT : Annual Surveillance Audit No. 3 Stage 2 Audit

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

SCOPE OF CERTIFICATION: Production of Sustainable Fresh Fruit Bunches Using the Identity Preserved Supply Chain Model

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

The following attachments form part of this report:

Non-conformity Report(s)

List of additional site(s)

Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : **DZULFIQAR AZMI**

Name : **TEY YOU LAI**

Signature :

Signature :

Date : **28 / 02 / 2023**

Date : **06/03/2023**

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SUMMARY OF AUDITS

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

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

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

Annual Surveillance Audit 3			
On-site audit date	: 28/11–01/12/2022	No. of auditor days:	10 auditor days
Audit team	: Dzulfiqar Azmi (LA), Rozaimée Ab. Rahman, Ismail Adnan		
No. of major NCR	: 1	Indicator: 3.6.2	Closing date: 25/02/2023
No. of minor NCR	: 1	Indicator: 6.3.3	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities
	√	N/A	N/A
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	N/A	N/A	N/A
	Indigenous people	Contractor	Others (Please specify)
N/A	N/A	N/A	Suppliers
Supply base sampled	: Harus Abadi and First Raintree (Division)		
Changes since the last audit	: No changes		
Justification of audit planning	: During surveillance audit, the audit team visited the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.		
Name of peer reviewer	: NA		
Report approved by	: Kamini M. Sooriamoorthy	Approval date :	28/02/2023

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Oct 2019 to Sept 2020	April 2021 to March 2022	January 2022 to December 2022	November 2022 to October 2023	
Certified FFB Processed (MT)	10,310.00	10,636.00	10,050.00	7,412.00	
Production of Certified CPO (MT)	2,062.00	2,020.00	2,010.00	1,482.40	
Production of Certified PK (MT)	515.00	531.00	522.60	385.42	
Certified Areas (Ha)	566.89	566.89	566.89	566.89	
Planted Areas (Ha)	564.67	564.67	564.67	564.67	
Production Areas (Ha)	564.67	564.67	564.67	564.67	
HCV Areas / Conservation Areas (Ha)	0.0015	0.0015	0.0015	0.0015	
REMARKS	Actual period for this reporting has covered between Nov. 2021 to Oct. 2022				

TABLE 2

FFB last year certified volume (MT)	10,050.00	
FFB actual certified volume (MT)	7,247.00	
Last licence year's actual sold volume of certified FFB (MT, if applicable)	7,247.00	
Last license year's actual sold volume through Book & Claim	0.00	
FFB new year certified volume (MT)	7,412.00	
	PO	PK
Last years certified volume (MT)	2,010.00	522.60
Last years actual certified sold (MT)	1,449.40	376.84
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	0.00	0.00
New year certified volume (MT)	1,482.40	385.42

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Dzulfiqar Azmi	Lead Auditor / Safety, Environmental & GAP	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 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 2019.
Rozaimiee Ab Rahman	Auditor / Social Internal & Safety	Holds a B.Sc. in Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C, MSPO and trainee lead for RSPO Supply Chain scheme.
Ismail Adnan Abdul Malek	Auditor / Social External & HCV	Holds a Master of Forestry, University of British Columbia, Canada. One year experience as Sub Assistant Conservator of Forest at the Pahang Forest Department and seven years spent as Forest Officer/Logging Superintendent at an integrated timber complex in Pahang. Currently, he is a Social Auditor for Forest Management System at Food, Agriculture and Forestry Section, SIRIM QAS International Sdn Bhd, since 2016.

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1.3 Audit methodology

The audit covered the Harus Abadi Estate and First Raintree Division. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. However, in this audit, 100% supply base covered which are Harus Abadi and Forest Raintree. The audit included an on-site audit to the estates and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by during the on-site audit. In general, there was no negative comments made against this Certification Unit. In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<ul style="list-style-type: none"> ▪ Interviewed 8 workers and 2 staff constituted local and foreign, male and female, daily paid, monthly paid and piece rated employees at HASB estate. ▪ All workers interviewed acknowledged they have signed employment agreements with the estates. The contents of agreement were understood, as these were prepared in English/Bahasa. The contents were explained to them in Bahasa by the management team. ▪ Pre-induction briefing on conditions and terms of employment was explained to them during first reporting of duty ▪ They are aware of their working hours (8 hours). They also acknowledged being paid overtime for any work in excess of 8 hours. There is no forced overtime. Harvesters were paid piece-rated and do not get overtime. They prefer to have their salaries calculated on piece-rate basis even after 8 hours of work as it allows them to be paid higher. Sprayers understood that they are paid daily rate. ▪ They have been getting salaries above RM1,500 since May 2022 Salaries are paid before the 7th of every month. ▪ Through worker's interview, they confirmed there are no abuse at work, and no sexual harassment. They understand what constitutes sexual harassment and the function of Gender Committee. ▪ There is no discrimination between migrant workers and local workers, between male and female workers. ▪ Workers are provided with comfortable housing with free water and electricity. Local workers choose to stay in their houses in the nearby villages. ▪ They have access to affordable food from close by Litang Estate canteen/sundry shops. Harus Abadi has made arrangement with Hap Seng Plantation Management to allow it workers have access at this canteen/sundry shops. Sometimes workers also buy the food and groceries from Bukit Mas Estate for First Raintree Division and IOI Unico Desa at Harus Abadi Main division. Sometimes also workers go to Lahad Datu to buy their food.
2) Settlers	Not applicable.
3) Villagers / Local communities (including	<ul style="list-style-type: none"> ▪ Confirmed there is no land dispute between HASB CU

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women representatives, displaced communities)	<p>and neighbouring estates Hap Seng Plantation (Kapis Estate) Tabin Wildlife Forest Reserve.</p> <ul style="list-style-type: none"> ▪ No social issues arising from estate workers. ▪ Occasionally are called to attend meetings by HASB. The last one was held virtually few months ago. ▪ All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings. ▪ Interviewed with representatives from JKKK Kampung Litang, neighbouring smallholder and Spark Glory Estate confirmed no user rights issues between HASB and villagers. Estate operation has no negative impact on village livelihood
4) Suppliers	<ul style="list-style-type: none"> ▪ Suppliers of crusher runs is from Hap Seng Plantation nearby. ▪ Being small, HASB usually buy chemicals, PPE and other estates tools directly from suppliers in Lahad Datu town themselves. ▪ Fair dealings with Hap Seng and traders in Lahad Datu. ▪ Payments are made within 1 months of invoice ▪ Representatives from suppliers - confirmed fair dealings and prompt payments through invoices.
5) Contract workers	Not applicable as none being used.
6) Local & national NGOs	Not applicable.
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> ▪ None at site as invitation letter sent out did not received any comments. See item 1.4 above. ▪ Phone interview with representative from District Forest Officer of Lahad Datu confirmed no issues with boundary and RTE enforcement at HASB.
8) Independent growers / Smallholders	Not applicable.
9) Indigenous people	Not applicable.
10) Contractor	Not applicable as none used.
11) Previous land owner (if any)	<p>For Harus Abadi the land was previous owned by Sabah Land Development and HASB has buy and develop the land in Sept 1989.</p> <p>For First Rain Tree, the land was previous owned by company of several villagers which is the land has obtained from Sabah land development in March 1998 and Sept 1997. The Company has sold their land to the First Rain Tree in June 2000. There were clear land ownership documents available for review. The original copies of the documents were kept in Harus Abadi Central Office, Lahad Datu.</p>
12) Others (please specify)	Not applicable.

1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

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

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

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

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

**Table 1: Actual FFB production by the supply base for the last reporting period
(November 2021 to October 2022)**

Division	FFB Production	
	Tonnes	Percentage (%)
Harus Abadi	3,828.00	52.90
First Rain Tree	3,419.00	47.10
Total	7,247.00	100.00

**Table 2: Projected FFB production by supply base for the next reporting period
(November 2022 to October 2023)**

Division	FFB Production	
	Tonnes	Percentage (%)
Harus Abadi	3,790.00	51.10
First Rain Tree	3,622.00	48.90
Total	7,412.00	100.00

**Table 3: Actual FFB received and CPO & PK dispatch by the estate for the last reporting period
(November 2021 to October 2022)**

Details	Total (MT)
FFB Production	7,247.00
CPO Production @ 20%	1,449.40
PK Production @ 5.20%	376.84
Credits traded through Books and Claim	0.00

**Table 4: Projected FFB received and CPO & PK dispatch by the estate for the next reporting period
(November 2022 to October 2023)**

Details	Total (MT)
FFB Production	7,412.00
CPO Production @ 20%	1,482.40
PK Production @ 5.20%	385.42
Credits traded through Books and Claim	0.00

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

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

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

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

3.0 AUDIT FINDINGS

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

No changes 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 :

Not applicable

- 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?

Not applicable

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

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

If no, please state reasons Not applicable.

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

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

No changes so far.

3.4 Status of previous non-conformities *

Closed

Not closed*

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

3.5. Complaint received from stakeholder (if any)

No negative feedback or comment was received during onsite audit.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) **List : 1 6.3.3 (ISMA 01 2022)**

Total no. of major NCR(s) **List : 1 3.6.2 (DA 01 2022)**

4.2 For SC (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s) List : NA

Total no. of major NCR(s) List : NA

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.
- 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



25/02/2023

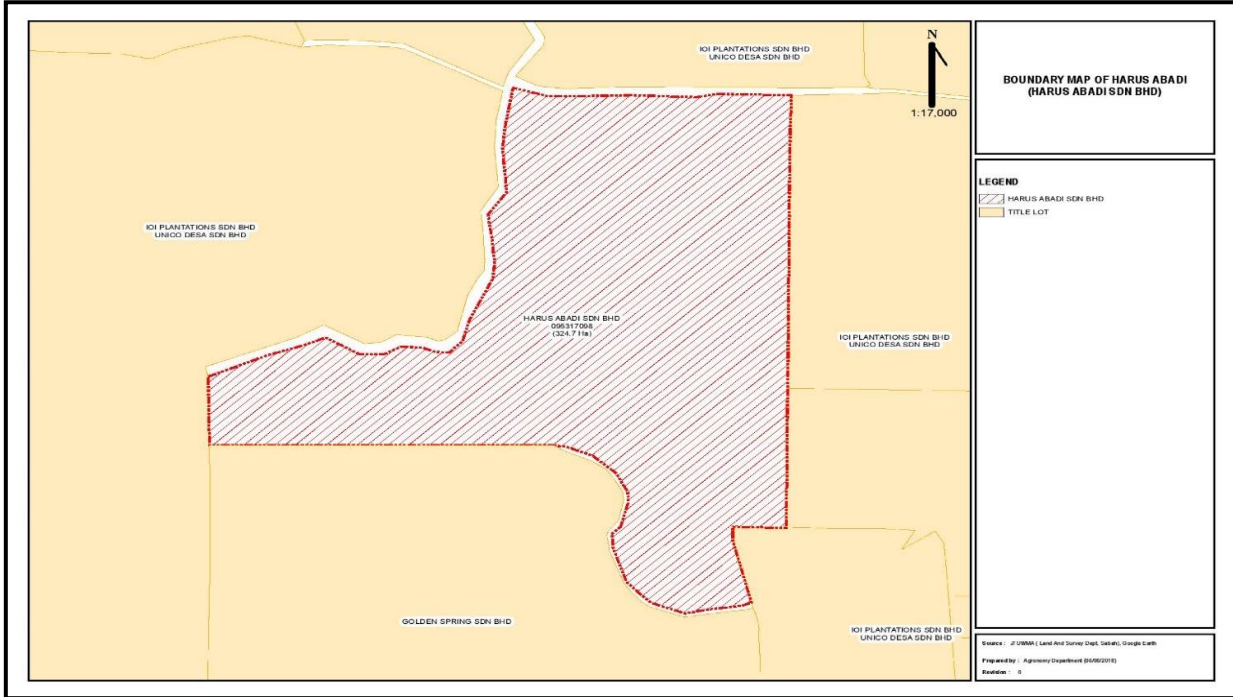
(Name)

(Signature)

(Date)

Map of Harus Abadi Sdn. Bhd.

Main Division



First Raintree Division



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Attachment 2 – Audit Plan

RSPO/MSPO SURVEILLANCE AUDIT PROGRAMME

Day One: 28/11/2022 (Monday)

Time	Activities / areas to be visited	Auditee
9.00 am	Opening Meeting for Harus Abadi Sdn. Bhd. Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.	All CU
9.20 am	Briefing on the organization background and implementation of RSPO/MSPO 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 Harus Abadi Sdn. Bhd.	Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements	
	Dzul Harus Abadi Sdn. Bhd.	
	<p>Coverage of assessment: P1, P2, P3, P4, P5, P6:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Facilities inspection (water treatment plant, clinic, stores, workshop, landfill area & etc. ▪ Production area field inspections (work station, FFB loading ramp, effluent pond, biogas & etc.) ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Waste management including disposal site ▪ Aspects/impacts of estate management ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ River system and Effluent Treatment/Discharge ▪ Buffer/Riparian Zones ▪ Controlled/open burning ▪ Mill Best Practices ▪ Training and skill development programs ▪ Continuous improvement <p>Other area identified during the assessment</p>	

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12.30 pm	LUNCH BREAK & ZUHUR PRAYER
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records
5.00 pm	Audit team discussion / Interim closing / End of Day 1 audit

Day Two: 29/11/2022 (Tuesday)

Time	Activities / areas to be visited			Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Harus Abadi Sdn. Bhd.			Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements			
	Dzul Harus Abadi Sdn. Bhd.	Rozaimée Harus Abadi Sdn. Bhd.	Ismail Harus Abadi Sdn. Bhd.	
	<p>Coverage of assessment: P1, P2, P3, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Facilities inspection (WTP, clinic, stores, workshop, landfill area & etc. ▪ Chemical management ▪ Controlled/open burning ▪ Aspects/impacts of estate management ▪ River system – Buffer/Riparian Zones ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Safety & Health practice – witness activities at site (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.) ▪ Hazard & Chemical identification and Risk Management ▪ Training and skill development programs ▪ Continuous improvement <p>Other area identified during the assessment.</p>	<p>Coverage of assessment: P1, P2, P3, P4, P5, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Interview with external stakeholders i.e. local communities, Gov. agencies, NGO, smallholders, etc. ▪ Business Management Plan ▪ Good Agricultural Practices ▪ Continuous improvement ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Local sustainable development & Support smallholder inclusion ▪ External stakeholders issues/welfare & Complaints and grievances ▪ Continuous improvement <p>Other area identified during the assessment.</p>	<p>Coverage of assessment: P1, P2, P3, P4, P6:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Facilities inspections (i.e. worker quarters, surau, community center, School/CLC, Humana/Crèche, provision shop & etc. ▪ Site Inspections at Estate Boundary, adjacent and neighbouring land use & HCV area ▪ Production area inspections – interview with workers at production area (harvesting, spraying, manuring, OP nursery, replanting area & etc.) ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union/workers representatives, gender committee, contractors, supplier, etc ▪ Workers Issues & welfare ▪ HCV/RTE and action plan ▪ Training and skill development programs ▪ Continuous improvement <p>Other area identified during the assessment.</p>	

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

Day Three: 30/11/2022 (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 Harus Abadi Sdn. Bhd.	Management Representative	
9.15 am	To assign each audit team members – site and the P&C requirements		
	Dzul Harus Abadi Sdn. Bhd.	Rozaimie Harus Abadi Sdn. Bhd.	Ismail Harus Abadi Sdn. Bhd.
	Coverage of assessment: P1, P2, P3, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P4, P5, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P4, P6: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records
12.30 pm	LUNCH BREAK & ZUHUR PRAYER		
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records		
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit		
9.00pm	Discussion LA and teams on potential NCRs		

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Day Four: 01/12/2022 (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 Harus Abadi Sdn. Bhd.			Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements			
	Dzul Harus Abadi Sdn. Bhd.	Rozaimie Harus Abadi Sdn. Bhd.	Ismail Harus Abadi Sdn. Bhd.	
	Coverage of assessment: P1, P2, P3, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P4, P5, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P4, P6: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER			
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
3.00 pm	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	Among the documents available for public review include the following policies on environment, equal opportunities, safety and health, sexual harassment, social and human rights, corruption prevention, child protection. Additionally, these documents are also available at the estate office for review. Other documents available for public review are documents related to OSH, social impact and improvement, consultation and communication procedure, details of complaints and grievances, negotiation procedures, records of contributions and donations to local communities, joint consultative committee and gender committee meeting minutes, estate map and boundary, licenses and permits, continuous improvement plan, public summary of certification assessment report, etc. The estate conducted stakeholder consultation in Nov 2022 involved relevant stakeholders such as neighboring estate or smallholders, supplier, POM, internal workers and sustainability team from Hap Seng Plantations were briefed on all the RSPO principles and criteria. Furthermore, stakeholders meeting for the big group with 2 years' interval has been conducted in Dec 2021 (external), the presented in detail the comments made by the various stakeholders on social impacts as well as the proposed mitigation plans by the Company. Each of the issue raised by the participant was addressed in the action plan. Figures of gender distribution within all workers categorised by management, administrative staff and workers (both permanent daily rated workers, piece rate workers) were made available at estate office with record.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	Information provided in both English and Bahasa Malaysia and accessible to all stakeholders in HASB upon request. The information was implemented based on Communication Procedure to handle communication for internal and external stakeholders. External Communication Form and Communication Record were used for records including authority visits books. During interview with internal and external stakeholders found that they were aware of the procedure consultation and communication related to their operation.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The records of requests as mentioned in indicator 1.1.2, had been logged in the Communication Record were used for records including authority visits books and maintained. As at todate audit, there is no information had been requested.

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Clause	Indicators	Comply Yes/No	Findings
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by HASB maintained to be followed and available at the audited sites. Consultation and communications procedures for HASB is documented in the <i>Stakeholders Consultation Procedure – Group Level & Estate Level</i> . This document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estate followed the procedures and manuals developed by the company. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which were kept in the External Communication File.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Stakeholder list updated as of Oct 2022 was established in the HASB. Stakeholder such as internal stakeholder i.e., workers leader, women leader, ethnic leader and external stakeholders i.e., neighbouring smallholders or estate plantations, local communities, government authorities, suppliers/consultant, vendor services provider and NGOs were included in the list. Nominated representative with contact number and address was sighted.
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	HASB has documented policy to committing on integrity for all their staffs and workers by publishing <i>Code of Conduct and Business Ethics Policy</i> . The estate has communicated the policy for staffs and foreign workers during induction course. Sighted latest company policies briefing was conducted in March 2022 for Harus Abadi and First Rain Tree Division.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	Internal audit was conducted in Oct 2022 conducted by Sustainability Team from HSPB is the one of the systems to monitor compliance and the implementation of the policy and overall ethical business practice. Besides, contract agreement also is the commitment to ethical conduct in all business operations and transactions which includes a declaration to eradicate all forms of exploitation, including but not limited to modern day slavery and human trafficking.

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Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	Harus Abadi Sdn. Bhd. (HASB) continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation was captured in a Legal Register and monitored by the Assistant General Manager.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	HASB had documented the List of Legal Register covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Documented procedure has been established and implemented. The estate was tracking any changes to applicable law and had the Assistant General Manager as the person responsible to monitor any changes to the law and to cascade those changes to the estate. Various sources were referred in obtaining information about the updates of legal requirements. This includes checking with the industrial association, attending seminar/conference, buying of the law books, government agencies websites, etc.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	During the site review, the physical markers were visibly maintained at Harus Abadi Estate and First Rain Tree Division. The perimeter boundary of the estate was visibly maintained by erecting pegs along the boundary, especially the ones that adjacent to other private estate.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties is maintained by HASB in stakeholder list. The lists contain name of contractors, designated contact persons, address, telephone/fax/email and type of contracted works done. List of contracted parties was updated annually, based on any updated on the contracted parties.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	As of to date in HASB, there is no contractors/ contracts involved in all works due to this is small grower and All work is done by themselves. Their foreign workers also did not through recruitment agencies, due to worker apply for themselves via walk in process.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers, the contracts include a clause for their protection.	YES	As of to date in HASB, there is no Contractors/ contracts involved in all works due to this is small grower and All work is done by themselves. Their foreign workers also did not through recruitment agencies, due to worker apply for themselves via walk in process.

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Clause	Indicators	Comply Yes/No	Findings
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder c) One or more supporting documents for claims d) Valid MPOB license	YES	There is no mill involve in this small grower certification. Thus, this indicator is not applicable.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	There is no mill involve in this small grower certification. Thus, this indicator is not applicable.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an 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	HASB continued to achieve long term economic and financial viability through documented management plan projected to year 2024. A business plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2022 to 2024 had been prepared for HASB and made available to the auditors.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Replanting program for both estates was made available during the conduct of audit. There will be replanting for Harus Abadi in 2023 & 2024, while no replanting program for the next 5 years for First Rain Tree Div.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	The Management Review Meeting (MRM) was conducted after internal audit (by Sustainability Teams) dated in Oct 2022. The MRM was attended by estate management including assistant general manager and sustainability team. It was chaired by HASB Director. Among the management review were discussed are: 1. Follow up actions from earlier MRM

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Clause	Indicators	Comply Yes/No	Findings
			2. Sustainability and adequacy of all SOPs 3. Sustainable Agriculture Policy 4. Results of internal audits 5. Changes In legal requirement of any compliance 6. Complaint's/ Customer (internal/external) feedback 7. Accident & injury 8. Environmental quality 9. Waste management 10. Energy usage performance 11. Status of corrective actions 12. Recommendations for improvement Management has transparently addressed continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	HASB has established the Social Impact Assessment Management Action Plan and Continuous Improvement Plan on latest reviewed in Nov 2022. Continual Improvement Plan covers issues related to continued and improved relationship with neighbouring estates, government agencies, Palm Oil Mills and both internal and external stakeholders (including suppliers, work force etc) in general. Person responsible for social issues (internal and external stakeholders) and monitoring them had been appointed. The findings from the Stakeholders consultation (Estate Level) dated in Nov 2022 were detailed for action in the Social Impact Assessment Management Action Plan and Continuous Improvement Plan for HASB. Meanwhile, for environmental, the organization had established and maintained continuous improvement plans with latest review was also conducted in Nov 2022. Among the continuous improvement initiated were maintained best practices in operation and nonoperation as per identified in the Environmental Impact assessment. Sighted that all these improvement plans been implemented.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template before the audit started. The auditor already verified and checked the data and figure given was tele with their database system. Apart from that, reporting time frame for this HASB was verified period for January 2022 to December 2022.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	HASB adopted the following documented manuals and documents as their standard operating procedures: 1. Safe and Standard Operating Procedures (SSOP) 2. Agricultural Manual 3. MPOB Guideline for smallholders Agricultural Manual and MPOB Guideline for smallholders is the manual used for the operations in the estate. The manual is maintained and updated accordingly. The latest update was carried out in May 2020. It was confirmed that all activities in the estates from seedlings in nursery to planting in

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Clause	Indicators	Comply Yes/No	Findings
			<p>the fields have been included in the Manual. The document specifies the following sections such as harvesting, manuring, integrated pest management, and upkeep of mature oil palms.</p> <p>Safe and Standard Operating Procedures is the Standard Operating Procedures used for the safety precautions for all operations in the estate. Last reviewed was in Nov 2021. The document stated the procedure and control measures, other than that PPE's that made compulsory during work commenced. It was also noted that relevant SOPs maintained displayed at various workstations for easy reference, for example, at the muster ground, chemical storage and diesel storage.</p>
	<p>3.3.2 A mechanism to check consistent implementation of procedures is in place.</p>	<p>YES</p>	<p>There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by HASB are internal audits conducted by Hap Seng Plantations Sustainability Team. Internal audit covering MSPO & RSPO internal audit has conducted in Oct 2022. Results from the assessment internal audit recorded 6 Major NCR and 0 Minor NCR. For nonconformity form, sighted the estate has submitted the root cause and corrective action for all NCRs raised using Section 2: NCR & Corrective Action Monitoring Table, and Section 3: Corrective action plan including completion date forms. Based on the identified root cause recorded in the internal audit report, the estate management have provided the corrections and corrective actions with satisfactory closed in order to prevent recurrence of nonconformity.</p>
	<p>3.3.3 Records of monitoring and any actions taken are maintained and available.</p>	<p>YES</p>	<p>The monitoring of the SOP implementation was closely made by all levels of the supervisory personnel to the top management with records maintained and checked. The records sighted were as follows;</p> <ul style="list-style-type: none"> • RSPO/MSPO internal audits by Hap Seng Plantations Sustainability Team, safety and health meetings • routine inspection (workplace inspection) by field staff. • Periodic reporting from estate • On site visits, inspections by assistant general manager • Assessments by RSPO Audits • Consultation with RSPO team & management. <p>Implementation of these procedures included:</p> <ul style="list-style-type: none"> • briefing on the SOPs and related documents. • workers were frequently reminded about it during the morning muster. • safe keeping in the administration office for reference. • relevant SOPs, sometimes an abridged version, were displayed at various workstations. <p>All the above records were kept for a minimum period of 12 months.</p> <p>The estate has managed and monitored foreign workers' status compliance against the RSPO requirements such as legality of the workers, appropriate license, employment contract, insurance and wages. Suppliers/Vendors compliance with HASB 'Code of Conduct and Business Ethics Policy was also monitored.</p>
<p>3.4 A comprehensive</p>	<p>3.4.1 (C) In new plantings or operations including mills, an</p>	<p>YES</p>	<p>There are no new plantings or new operations within HASB. Nevertheless, the estate has its own Environmental Aspect & Impact (EAI) and Social Impact Assessment (SIA) done which have been</p>

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Clause	Indicators	Comply Yes/No	Findings
<p>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.</p>	<p>independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>		<p>prepared internally by the Sustainability Department from Hap Seng Plantations. Details of the EIA and SIA are contained in Indicator 3.4.2 below. Thus, this indicator not applicable.</p>
	<p>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.</p>	<p>YES</p>	<p>HASB the SIA and EIA reports separated. SIA was conducted in Jan 2019 by Agronomy Department (Sustainability Team). The SIA are conducted, and review annually latest dated in Nov 2022 and includes mainly issues raised by stakeholders. The methodology of the assessment was through field interview with internal and external stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as neighboring smallholders or estate plantations, suppliers, government authorities, local communities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly. The SIA Report also included the baseline for socio economic data of estate and the social profile, as well as their stakeholders. The report also contained the estate background information, labour policies, grievance procedures (internal and external), sexual harassment policies, facilities and amenities offered by the estates, and the social impact assessment procedures and results. The secondary data collection – document review/file checking also been made. The report includes both positive and negative impact and its recommendation.</p> <p>The estate Environmental Impact Assessment (EIA) was carried out for each activity such as harvesting, spraying, manuring, scheduled wastes store, housing area, etc 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 Assistant General Manager, mandora, and Sustainability Team with external stakeholders such as from Govt. agencies, neighboring smallholders/estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting.</p>
	<p>3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p>YES</p>	<p>Significant environmental aspect and impact from estate operation mitigation methods was implemented from EIA. The plan was reviewed annually and latest reviewed in Nov 2022. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. A timetable with responsibilities for mitigation and monitoring was reviewed and updated as necessary. The estate had appointed specific person in charge (PIC) responsible for taking actions on each of the mitigation measures with specific time intervals.</p> <p>The social management action plans are being reviewed and updated via annual basis dated in Nov 2022. The review of the plans involved external stakeholder consultation, joint consultative</p>

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Clause	Indicators	Comply Yes/No	Findings
			committee consultation, grievance records, and employee consultative committee. Among the social issues for management and monitoring were awareness on complaint and grievances, occupational safety and health enforcement, upgraded and improve living quarters condition and wastes management at housing area. The reviews done had involved respective Assistant GM, mandore and Sustainability Team with internal stakeholders such as workers representative, non-worker representative, religious leaders etc. and external stakeholders such as from Govt. agencies, neighbouring smallholders/estates, local communities, suppliers and contractors.
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	HASB has developed employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. The procedures were established for foreign and local workers. The procedures described via walk in process and supply by foreign workers agencies. The recruitment process was clearly stated in the procedure where the recruitment was based on age, medical fitness etc. There is no discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. The procedure was briefed and explained to all workers during induction weeks and refresher morning muster.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Based on the files sighted, the estate is able to demonstrate the implementation of the employment procedures, and records are maintained. Audit team has also verified all recruited workers from Indonesia and Philippines through personal file by employment no./ name of employee, employment contract, offer letter, passport consent form. etc. Review of the above employment records of HASB employees proved that the Employment procedures had been implemented, and records are maintained at HASB. Application form, interview assessment form, medical check-up report, photocopied of identification card and employment contract was sighted for new recruited employees. Interviewed with the Assistant General Manager and mandore confirmed that if there is any job vacancy available in the estate, they will pass the information through word of mouth to all the workers and recommended by estate mandore. Mostly recruitments workers at HASB via walk in process. No recruitment agencies were hired by the HASB.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	The Occupational Safety and Health Policy was established and signed by the <i>Managing Director</i> . Therein the policy emphasized on the strict compliance with all laws /regulations of OSHA 1994 along with its relevant regulations. The policy had been communicated to all levels of the organization through briefings and also displayed prominently in <i>Bahasa Malaysia and English</i> on notice boards at estate office and muster ground. All operations had been risk assessed to identify H&S issues. Mitigation plans and procedures were documented in the HIRARC document and implemented. Based on the risk assessment done in accordance to DOSH Hazard Identification, Risk Assessment and Risk Control (HIRARC) Guidelines 2008, HASB had identified 16 key activities such as harvesting, spraying, pruning, road maintenance etc. and reviewed its hazards and risks and determined appropriate risk control measures. The HIRARC records, as well as Chemical Health Risk Assessment (CHRA) records were verified during

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Clause	Indicators	Comply Yes/No	Findings
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	NO	<p>the assessment. The HIRARC Register was last reviewed in Dec 2022. It was reviewed on COVID 19 pandemic prevention and genset operation. The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that are conducted by HASB in each of the operations. It was sighted during the site visits and documents reviews that the sampled HIRARC were in place.</p> <p>Occupational health and safety (OHS) management plan for estate had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2022 were acceptable.</p> <p>Specific annual medical surveillance for pesticide operators was conducted in Dec 2021 at Klinik Mabello (Paris) Sdn. Bhd. by OHD and from the report result indicated both of them are fit to handled chemicals.</p> <p>Noise Risk Assessment Report were available, and the assessment was conducted in Sept 2021 by competent third party. This assessment was carried out to identified and explain the finding of noise risk assessment at estate operation. From this assessment 3 work unit i.e., harvesting, mature oil palm upkeep maintenance, FFB evacuation, genset house, mist blower, heavy machinery, farm tractor has been risk assessed. Baseline audiometric testing shall be conducted for heavy machinery operator, FFB evacuation and mist blower operator only as per the recommendations. However, baseline audiometric testing yet to be carried out as per NRA Report recommendation. <i>Thus, Major NCR DA 01 2022 was raised.</i></p>
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	Formal training program for the year 2022 was established dated in Jan 2022 and made available at the beginning of each financial year and implemented accordingly. Training identification and needs analysis were applied to recognize the staff, workers deficient skills or knowledge gaps, particularly, in aspects of RSPO P&C. There is no associated smallholders at this Certification Unit and thus no training given to them. Following the training given, regular assessment of training was conducted either by the training provider or their immediate supervisor to evaluate trainees' understanding. Else, refresher course will be organized. Training methodology given to workers are commonly On-The-Job Training, Coaching/Mentoring and Hands-on Practical Session with plenty of Graphical/Pictorial illustration than wordings as these approaches get their attention and better understanding.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training was maintained, where appropriate on an individual basis. Sighted the training record for 2022 conducted.
	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).	YES	Not applicable because there are no personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at HASB.

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Clause	Indicators	Comply Yes/No	Findings
	Training is specific and relevant to the task(s) performed.		

SUPPLY CHAIN REQUIREMENTS FOR MILLS – NOT APPLICABLE

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

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> - Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. - Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). - Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. - The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 		
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organisation. c) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	N/A	Not applicable. This CU is a single estate with no palm oil mill.
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	N/A	Not applicable. This CU is a single estate with no palm oil mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; 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 	N/A	Not applicable. This CU is a single estate with no palm oil mill.
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> a) 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. b) The mill shall ensure the following: <ul style="list-style-type: none"> c) The mill has legal ownership of all input material to be included in outsourced processes d) 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. e) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. f) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance. 	N/A	Not applicable. This CU is a single estate with no palm oil mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	N/A	Not applicable. This CU is a single estate with no palm oil mill.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	N/A	Not applicable. This CU is a single estate with no palm oil mill.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	N/A	Not applicable. This CU is a single estate with no palm oil mill.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	N/A	
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	N/A	Not applicable. This CU is a single estate with no palm oil mill.
	a) For Mass Balance Module, the mill: b) 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. c) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. d) 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.)	N/A	Not applicable. This CU is a single estate with no palm oil mill.
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	N/A	Not applicable. This CU is a single estate with no palm oil mill.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	N/A	Not applicable. This CU is a single estate with no palm oil mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.15	<p>Processing</p> <p>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.</p>	N/A	Not applicable. This CU is a single estate with no palm oil mill.
3.8.16	<p>Registration of Transactions</p> <p>a) 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.</p> <p>b) 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</p>	N/A	Not applicable. This CU is a single estate with no palm oil mill.
3.8.17	<p>Claims</p> <p>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.</p>	N/A	Not applicable. This CU is a single estate with no palm oil mill.

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Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	Human Rights policy was made available at HASB. There is also a new sustainable Agriculture Policy signed by Managing Director contain the clause of prohibiting retaliation against Human Rights Defenders. This policy has been communicated to field supervisor and workers through training and morning muster ground. The policy in Bahasa Malaysia and English was seen displayed on notice board of the estate offices. During interview with the field supervisor and workers, they are aware and understood with their human rights.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As at time of audit, it was confirmed that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	HASB have developed procedures to handle grievances and disputes titled as 'Procedure for reporting complaints and grievances (Prosedur Melapor <i>Aduan dan Permasalahan</i>)' and 'Grievances Procedure – Appendix 1' for staffs and workers, Prosedur Aduan and also company has developed procedure named " Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)" to protect the complainants. So far, there is no negative issues or complained by external stakeholders based on verification of External Communication/Complaint Form/Book. The Internal Complaint Books are mostly for employees to lodge complaint pertaining to their houses. Based on documents verification and interview session conducted, the above mutually agreed system was 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.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Based on interview with stakeholders at HASB, found the system was understood by the affected parties, including by illiterate parties. The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting. Sighted document for HASB showed briefing the stakeholders meeting was held in Nov 2022 with Internal Stakeholder via JCC Meeting and Nov 2021 with External Stakeholder via Internal/External Stakeholders Consultation. For foreign workers, the procedure was explained during initial report for duty with assistance of translators.

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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	HASB keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders as evidenced by stakeholders meeting, as above.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The system used by the HASB in resolving disputes and grievances exists in the procedure called 'Prosedur Melapor Aduan dan Permasalahan' and 'Grievances Procedure – Appendix 1' for staffs and workers, <i>Stakeholders Consultation Procedure – Group Level & Estate Level</i> . Sighted the new Procedure Title the Grievance procedure has already include an ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. Furthermore, the company Human Right Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	There was no local community lived nearby or within the HASB area, only smallholder nearby estate and Harus Abadi has given Permissions to all small holder to use their road without charges. All surrounding small holder also in the scheme smallholder support programmed assist by Hap Seng Plantation for RSPO certification.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	The right to use the land at the CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Harus Abadi Div. the land was previous owned by Sabah Land Development and HASB has buy and develop the land in Sept 1989. For First Rain Tree Div., the land was previously owned by company of several villagers which obtained the land from Sabah Land Development in 1997-1998. The Company sold their land to the First Rain Tree in June 2000. There were clear land ownership documents available for review. The original copies of the documents were kept in the Central Office, Lahad Datu. Copies of land titles for all estate was also sighted at HASB Estate office. The HASB estate is under the jurisdiction of Kinabatangan District. Review of the documents confirmed the terms of the land title for all the estate cultivation of Oil Palm has been complied.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989 & 2000. 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
	process are available and include:		As above.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal	YES	This requirement in this indicator does not apply to HASB.

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Clause	Indicators	Comply Yes/No	Findings
	arrangements.		
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	This requirement in this indicator does not apply to HASB.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	This requirement in this indicator does not apply to HASB.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for HASB and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by HASB since 1989 & 2000. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	As above.
	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	YES	As above.

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Clause	Indicators	Comply Yes/No	Findings
	agreements are non-coercive and entered into voluntarily and carried out prior to new operations.		
	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	Based on Social Impact Assessment (SIA) Report for HASB and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by HASB since 1989 & 2000. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	As above.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As above.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including estate as per stated in the land title.
4.6 Any negotiations concerning compensation for	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the HQ Office HASB. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.

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Clause	Indicators	Comply Yes/No	Findings
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.	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the 'Prosedur Melapor Aduan dan Permasalahan - Pihak Berkepentingan Luaran dan Dalam' / SOP – Land Dispute Management, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at visited estate.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	Not applicable since HASB is consider as Small Grower
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management ". In accordance with the SOP – Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the HASB HQ. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholder concluded that there was no evidence of any land dispute at HASB, hence the evidence required under this clause was not available.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by HASB since 1989 & 2000. All the related documentation regarding the land acquisition was kept in HASB HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
4.8 The right to use the land is demonstrated and	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	YES	As above.

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Clause	Indicators	Comply Yes/No	Findings
<p>is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>	<p>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.</p>		
	<p>4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>YES</p>	<p>Land conflict is not present in the area of the unit of certification.</p>
	<p>4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>YES</p>	<p>There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.</p>
	<p>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).</p>	<p>YES</p>	<p>There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders concluded that there was no evidence of any land dispute at HASB.</p>

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Principle 5: Support smallholder inclusion

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

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

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

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	<p>A publicly available non-discrimination and equal opportunity policy is available and implemented at HASB. It is one of the policies relevant to social aspects verified by the auditor during the audit i.e.:</p> <ul style="list-style-type: none"> i) Policy for foreign workers ii) Reproductive rights policy iii) Freedom of association and right to collective bargaining iv) Equal opportunity policy v) Human rights policy vi) Child labour policy vii) Sexual harassment, violence and abuse policy viii) Rare, threaten and endangered policy

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Clause	Indicators	Comply Yes/No	Findings
			ix) Code of conduct policy The Social Policy statements at HASB generally include aspects of worker information, recruitment and selection, training, employee development, terms of service and records of service. The policy has been communicated to all workers during morning muster and the policy is posted on notice boards in the estates office board. The equal opportunities polic) states that the Company provide equal opportunity to all and does not practice discrimination based on race, caste, national, origin, disability, gender, sexual orientation, union membership, political affiliation, or age. There is no evidence of discrimination from feedback provided by employees interviewed. A functioning grievance mechanism is also in place.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Apart from the Social Policy which emphasized that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by sighted employment contract and salary slips of the workers, interviews and field observation, provision of housing and access to benefits and amenities is fair. Review of pay checks, contracts of employment, and interviews of staff, local and foreign workers showed no discriminatory practices on the part of HASB. Foreign workers also accorded the same living standards and accommodations as local workers. Interviewed workers at HASB also confirmed there was no discriminatory recruitment fees imposed on them by recruitment agent. They confirmed that they pay fee only for passport, visa, medical, and food, transportation from village and flight ticket. Workers also understood that they need to do all the above to go to Malaysia, and the agent has already explained to them regarding the work they should get in Malaysia which is in oil palm plantation.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	Records of hiring were reviewed during the audit. It was noted that the hiring was based on the skills, capabilities, qualities and medical fitness. This was confirmed by the employees who were interviewed during the audit. Interview of candidates was done by Management Staff where an evaluation form is filled up to determine the suitability of the candidate.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	Currently, there were 1 female clerk at HASB. Feedback from interviewed, there are no pregnant worker at the time of audit. Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	There is no female worker was hired by HASB. Only female clerk presented during the audit. However, the estate managed to form a gender committee and communicated latest updates in Apr 2022 via meeting to raise awareness, identify and address issues of concern, as well as opportunities and improvements for male workers.

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Clause	Indicators	Comply Yes/No	Findings																																
	6.1.6 There is evidence of equal pay for the same work scope.	YES	<p>There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and meeting with worker representative. Sighted the job description of each worker mention the same regardless of skin colour, religion, race or caste. The equal pay can be seen through the pay slip reviewed for 6 male and 1 female foreign worker:</p> <table border="1" data-bbox="1070 488 1603 722"> <thead> <tr> <th>No.</th> <th>Sex</th> <th>Nationality</th> <th>Job Description</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>M</td> <td>Indonesian</td> <td>Mandore</td> </tr> <tr> <td>2.</td> <td>M</td> <td>Indonesian</td> <td>Harvester</td> </tr> <tr> <td>3.</td> <td>M</td> <td>Indonesian</td> <td>Harvester</td> </tr> <tr> <td>4.</td> <td>M</td> <td>Indonesian</td> <td>Tractor Driver</td> </tr> <tr> <td>5.</td> <td>M</td> <td>Indonesian</td> <td>Harvester</td> </tr> <tr> <td>6.</td> <td>M</td> <td>Indonesian</td> <td>Harvester</td> </tr> <tr> <td>7.</td> <td>F</td> <td>Philippines</td> <td>Clerk</td> </tr> </tbody> </table>	No.	Sex	Nationality	Job Description	1.	M	Indonesian	Mandore	2.	M	Indonesian	Harvester	3.	M	Indonesian	Harvester	4.	M	Indonesian	Tractor Driver	5.	M	Indonesian	Harvester	6.	M	Indonesian	Harvester	7.	F	Philippines	Clerk
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6.	M	Indonesian	Harvester																																
7.	F	Philippines	Clerk																																
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	<p>For the HASB documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthly pay slips and employment contracts were made available and reviewed. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction.</p> <p>Each pay slip included the name of employee, month of pay, income (basic, overtime, allowances) and deductions (if any). Interview with workers reveal that they understand the contents of the pay slips and seeks explanation from the office whenever they needed clarifications.</p>																																
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	<p>Contracts and conditions of employment are contained in employment contracts signed between HASB management on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Indonesia or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. Details on monthly salary and deductions for every worker and staff are reflected in their pay slips which are issued to the workers during pay day.</p> <p>Conditions of pay are contained in the workers' respective employment contracts. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management staff during induction.</p> <p>Each pay slip included the name of employee, month of pay, income (basic, overtime, allowances) and deductions (if any). Interview with workers reveal that they understand</p>																																

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Clause	Indicators	Comply Yes/No	Findings
			the contents of the pay slips and seeks explanation from the office whenever they needed clarifications.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	YES	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, and reasons for dismissal, period of notice and other legal labour requirements in HASB Letter of Employment Offer to its workers. HASB has complied with legal requirements of Sabah Labour Ordinance on regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. The working hours as per regulation was for 8 hours and 0.5 hours break in the between the time. The time for break at the Estate is 1030-1100am. For overtime, it has been mutually agreed upon between the management and workers and met the legal requirements. Overtime will be offered when there is additional job and no discrimination observed.
	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	HASB has provided adequate housing, water supplies, medical and welfare amenities. The houses were all in good conditions, and each house has between 2 – 3 bedrooms. The houses are generally well-maintained with not more than 6 persons live in each house. They are also furnished with the basic necessities such as cupboard, mattresses, pillows and cooking facilities. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner. Housing inspection was conducted weekly by the field supervisor and using the <i>“Residential & Utility Buildings Inspection Report”</i> . Any issues found during the inspection was remarked in the checklist and action will be taken accordingly. HASB workers are entitled to free medical facilities at the Hap Seng Estate clinic. HASB has made arrangement with Hap Seng Plantation Management to debit it for treatment received by its workers. Drainage system design at worker quarters HASB was found had been further enhanced on effectiveness to continuously flow.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	There is no grocery shop available in the HASB, however the management has initiative to collect the order from workers and buy from supermarket outside for food and everything. Sometimes workers also buy the food and groceries at nearby Plantation estate e.g., Hap Seng Litang Estate and Bukit Mas Estate for First Raintree Division and IOI Unico Desa at Harus Abadi Main division. Sometimes also workers going to Lahad Datu for buy their food. They also have access to affordable food from close by Litang Estate canteen/sundry shops.
	6.2.6 A “DLW” is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work	YES	Based on the suggested method(s) by RSPO guideline, an assessment of the Prevailing Wage was conducted for HASB and the Prevailing Wage was found to be as follows:

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Clause	Indicators	Comply Yes/No	Findings						
	<p>hours.</p> <p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a “decent living wage” is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> - An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. - There is annual progress on the implementation of living wages - Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. - The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		<table border="1" data-bbox="1070 347 1995 419"> <thead> <tr> <th></th> <th>Local Worker</th> <th>Foreign Worker</th> </tr> </thead> <tbody> <tr> <td>Total Value of Prevailing Wage</td> <td>RM1882.42</td> <td>RM1567.98</td> </tr> </tbody> </table> <p>Verification of the Salary slips for the workers confirmed that Minimum Wage Order (2022) had been complied with for monthly, daily and piece rate salary/wages at HASB.</p>		Local Worker	Foreign Worker	Total Value of Prevailing Wage	RM1882.42	RM1567.98
	Local Worker	Foreign Worker							
Total Value of Prevailing Wage	RM1882.42	RM1567.98							
	<p>6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>YES</p>	<p>At HASB, permanent and full-time workers are used for core work such as Harvesting, Manuring and Spraying, there are no temporary workers and contractors at HASB.</p>						

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Clause	Indicators	Comply Yes/No	Findings
<p>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.</p>	<p>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.</p>	<p>YES</p>	<p>HASB subscribes to the documented policy on Freedom of Association and Right to Collective Bargaining. This Policy is available in dual language, i.e. Bahasa Malaysia and English and it recognizes and respects of employees to join trade union of their choice and to bargain collectively subject to the provisions of relevant national legislations. In practice, there was no trade union/workers' union. However, the Harus Abadi have implemented and formed a meeting with management representative and worker representative in JCC (Joint Consultative Committee) latest meeting dated in Jan 2022.</p>
	<p>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.</p>	<p>YES</p>	<p>In practice, there was no trade union/workers' union. However, the Company and workers' representatives have formed a Joint Consultative Committee (JCC) – Estate Level comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers. Minutes of meetings with the JCC held in Jan 2022 are documented and sighted during the audit.</p>
	<p>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.</p>	<p>NO</p>	<p>HASB does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant workers. However, in practice, there was no workers' union at HASB although the workers are allowed to join any registered organizations or associations they please. The Company and workers' representatives have formed a Joint Consultative Committee (JCC) comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers. It was noted that the review of the records of the JCC at HASB found workers representation in the (JCC) i.e. Joint Consultation Committee (HASB and workers) was not adequate. This was evidenced by:</p> <ol style="list-style-type: none"> 1) Representatives for workers were not chosen freely by the workers themselves (no supporting documents on free selection of representatives) 2) Workers Representatives are not representative (i.e. by Gender, Country of origin, type of work etc). <p><i>Hence a Minor NCR was therefore raised against the indicator 6.3.3.</i></p>
<p>6.4 Children are not employed or exploited.</p>	<p>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.</p>	<p>YES</p>	<p>“Polisi Buruh Kanak-Kanak” is publicly available at the notice board. The policy statements emphasized on child under 18 years must not be employed to work in hazardous areas. This policy is posted on notice boards in the housing and estate office. Audit team has verified employment card, copies of passports of Indonesian workers, and List of Foreign Workers. No record of person’s underage of eighteen at HASB.</p>
	<p>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</p>	<p>YES</p>	<p>There is evidence that minimum age requirements are met at HASB. There was no evidence that the estates have employed anyone below the age of 18 years. This was verified by examining the Workers Master Lists, personal file, employment contracts and payslips of all workers at HASB where details of the workers' IC numbers and dates of</p>

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Clause	Indicators	Comply Yes/No	Findings
	policy minimum age, whichever is higher. There is a documented age screening verification procedure.		birth are available.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that the HASB estates had employed anyone below the age of 18 years. This Indicator is not applicable.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	The management has communicated to the internal and external stakeholders regarding the no child labour policy and the negative effects of child labour and promotes child protection to supervisors and emphasized that the risk of child labour to the stakeholders.
6.5 There is no harassment or abuse in the workplace, and reproductive rights 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	A policy on sexual harassment titled 'Polisi Gangguan Seksual, Keganasan dan Penderaan' was available. The policy was signed by the Managing Director. The policy is also written in Bahasa and displayed at the notice boards within the estate office. No evidence or acts that contradict this policy were observed. Based on excel databased provided to the auditor and interviewed with AGM, field supervisor and office clerk, there was only 19 employees (males and females) at HASB.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	HASB maintained its documented policy to protect reproductive rights of women, (i.e., "Polisi Hak Reproduksi". Policy implementation is through periodic meeting reviewing violation of reproductive right policy during Gender Committee Meetings. The policies have been communicated to all workers during morning muster and the policy is posted on notice boards in the housing and estates office board. Sighted latest company policies briefing was conducted in Jan 2022.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	There is no new mother at HASB. Thus, this indicator not applicable.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	HASB has SOP for complaints and grievance namely, 'Procedure for reporting complaints and grievances (Prosedur Melapor Aduan dan Permasalahan)' and 'Carta alir mekanisme aduan dan masalah (pihak berkepentingan luaran dan dalaman)' and also company has developed procedure named " Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)" to protect the complainants. Grievance mechanism briefing to relevant stakeholders as evidenced by stakeholders meeting was held in Jan 2022 with Internal Stakeholder via JCC Meeting and in Nov 2022 with External Stakeholder via Internal/External Stakeholders Consultation.

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Clause	Indicators	Comply Yes/No	Findings
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: a) Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) b) Charging the workers for recruitment fees c) Contract substitution d) Involuntary overtime e) Lack of freedom of workers to resign f) Penalty to the workers for termination of employment g) Debt bondage h) Withholding of wages	YES	All workers in HASB CU have entered into employment voluntarily; it was verified during the interview 9 Indonesian male workers. The workers know they will work in Oil Palm Sector since from their country. HASB had not withheld foreign worker's passport as verified during worker's interviews. Workers also confirmed that there is no involuntary overtime as they will work for overtime if management ask to. They understand that in their contract, if they resign from HASB prior to 8 weeks of notice, they will not have debt of bondage. Foreign workers also confirmed they pay service fee and the others for passport, visa, medical, food, transportation from village and flight ticket. There was no contract substitution, debt bondage and withheld wages. Interview with workers confirmed they also understood that they need to do all the above to go to Malaysia, and the agent also already explained to them regarding the work they should get in Malaysia which is in oil palm plantation. HASB have undergone ' <i>Kelulusan Bersyarat Pekerja Asing Regularisasi Sabah</i> for their migrant workers. Immigration Department Sabah has issued the approval letter. Work Permit renewal for 16 HASB workers are through Employment Agency; Sri Balung Sdn. Bhd.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	A labour policy titled 'Labour Policy for Foreign Worker' for employment of foreign workers is available and has been addressed as one of Social policies at HASB. The policy mentioned that foreign employees will be treated fairly in terms of recruitment, terms and conditions of work; provide decent living and no contract substitution. 'Procedures for Hiring Workers (Local and Foreign) and 'Recruitment, Termination, Retirement and Promotion Procedure (Local and Foreign Workers)' were available. Document review and workers interviewed showed the procedure had been followed in worker recruitment exercise and had been implemented for any employment related with local and foreign workers.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	Although HASB is exempted by OSHA 1994 to form OSH Committee it nevertheless had form one. Assistant General Manager were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. All identified OSH Committee were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. OSH Committee meetings were held once in three months. Review of the minutes of the meeting accordingly. The Assistant General Manager is the chairman, and the clerk is the secretary. OSH Committee meetings confirmed that among the agenda discussed, included the following: <ul style="list-style-type: none"> ▪ Passing of previous minutes and arising matters. ▪ Accident report (Monthly Data of Mill/Estate Safety Performance) ▪ Workplace inspection

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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> ▪ Safety report and programme <p>In addition to the OSH Committee meeting, another platform to raise any concerns about health, safety and welfare was at morning muster. Records of morning muster showed at least two to three times per week the mandore and/or field staff stressed on safety, health and safe work practice.</p>
	<p>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.</p>	YES	<p>Accident and Emergency procedure was available in the SSOP. Among of procedure of ERP Document, such as Accidents & Dangerous Occurrences Notification, Physical Injury, Chemical Spillage, Fire Outbreak, Control and Prevention of COVID 19 Infection. ERP Teams & ER Procedures were formed for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Sighted the estate already conducted ERP of Fire Drill training conducted in March 2022. Site inspection at harvesting operation, chemical & fertilizers store for the estate, noted on evidence that first aid kit is available at all works place with complete contents and no medication with expired date. The stock of first aid box is regularly check and refill, when necessary, via outsider pharmacy. Latest first aid training was also conducted in March 2022.</p> <p>Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Injury (LTI) board and monthly accident key performance indicator. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.</p>
	<p>6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	YES	<p>All staff and workers such as the storekeepers, harvesters and sprayers/manurers were continuously trained in safe working practices including SSOP for PPE related to their job function and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Sighted PPE issuance to all workers have been recorded in the "PPE Personal Record". All workers were provided with appropriate PPE where the cost is bared by the estate management. Interviews conducted during the site visit at the estate showed understanding and approval from the workers that the management bares the cost of all PPEs and the workers are entitled to valid PPE, the importance of using required PPE at all times during work and proper storage and disposal methods of PPE.</p> <p>During field visit, at Harus Abadi and First Raintree harvesting operation, it was observed that all harvesters wearing the appropriate PPE according to HIRARC and SSOP. Based on interview and site inspection, sighted sanitation facilities for those applying pesticides was available near to chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area. Clothing lockers are provided for mill and estate workers to change their street clothing to work clothing and vice versa at the end of their work shift.</p>
	<p>6.7.4 All workers are provided with medical</p>	YES	<p>Medical care and accident insurance is provided to all employees, both Local and Foreign</p>

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Clause	Indicators	Comply Yes/No	Findings
	care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.		workers under Employees' Social Security Act 1969 (Act 4).
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Injury (LTI) board and monthly accident key performance indicator. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting. Form JKKP 8 for 2021 was submitted to DOSH timely on the 1 st week of Jan 2022 for both divisions. Accident statistics were being maintained in a satisfactory manner and periodically reviewed.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	HASB continued to implement Integrated Pest Management (IPM) in both division and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the "Code of Good Agricultural Practice For Oil Palm Estate and Smallholdings" from MPOB and SOP on Agricultural Practices on harvesting, integrated pest management and upkeep of mature oil palms were also referred. Contents of the manual were disseminated to the workers through morning roll call and trainings. The manual was kept in the administration office for reference. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants such as <i>and Turnera subulata</i> . In order to minimize use of pesticides the estates had planted beneficial plants mainly <i>Tunera subulata</i> , with maps indicating areas planted.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	Species referenced in the Global Invasive Species Database and CABI.org. was not used in managed areas of the 2 divisions.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	HASB continued to use the Harus Abadi Sdn Bhd's policy of no open burning. As advocated, the 2 estates division practised Zero burning thus no use of fire for pest control. There was no replanting in both divisions, as replanting will be start in the year 2024 at HASB.

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Clause	Indicators	Comply Yes/No	Findings
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	HASB continued to use agrochemicals based on its technical guidelines such as the “Code of Good Agricultural Practice For Oil Palm Estate and Smallholdings” from MPOB and SOP on Agricultural Practices on harvesting, integrated pest management and upkeep of mature oil palms were also referred, where written justifications had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	HASB had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, cost books. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	Based on chemical register and site visit, no prophylactic use of pesticides used in both estates.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	Not applicable because HASB doesn’t used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	Not applicable because HASB doesn’t used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	
	7.2.5b Why there is no other alternative which can be used.	YES	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	
7.2.5d What is the process to limit the negative impacts of the application.	YES		

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Clause	Indicators	Comply Yes/No	Findings
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	Records showed that pesticides were handled, used and applied by trained personnel and as per the MSDS of the pesticide. The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat baits were trained. Random interviews conducted showed that they understood the hazards involved and the usage and handling of chemicals in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS training. It was also noted that MSDS are available at all sites such as chemical store, lubricant store and laboratory. The trainings held in relation to the chemical handling as shown under Indicator 3.7.2.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The storage of pesticides at HASB was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorized personnel i.e. storekeeper. The stores in estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. During site visit chemical and fertilizer store, sighted relevant SDS were seen displayed. Adequate safety signage has been placed at both internal and external of the building. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The 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	Application for Registration of Scheduled Waste generated by HASB had been submitted to Department of Environment (DOE), Kota Kinabalu in February 2019 and approved. To date no chemical and their containers had been disposed although some Used Lubricant Oil, SW 305, had been generated and its inventory had been notified to DOE via e-SWIS accordingly. The SW 305 has been disposed through licensed third party.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying was not practiced by HASB. There was no evidence to show that aerial spraying was carried out.

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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, is demonstrated. Several workers involved or handlings pesticides has been conducted the medical surveillance and send to Mabello Group of Clinic. From the results, all workers fit to handle chemical.												
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	The HASB had stated they will have complied with pesticide act “No work with pesticides shall be undertaken by pregnant or breast-feeding women”. As per stated in the List of Legal register. There was also no evidence that work with pesticides was undertaken by pregnant or breast-feeding women.												
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Appendix 5 – List of waste generated at HASB estates as additional documents for EIA had been maintained. Among the waste and mitigation action been identified were: <table border="1" data-bbox="1070 619 2040 738"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Mitigation measure</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Kept at landfill</td> </tr> <tr> <td>2</td> <td>Empty chemical container</td> <td>Reuse / proper SW management</td> </tr> <tr> <td>3</td> <td>Lubricant/used oil engine</td> <td>Proper SW management</td> </tr> </tbody> </table>	No	Type of waste	Mitigation measure	1	Domestic waste	Kept at landfill	2	Empty chemical container	Reuse / proper SW management	3	Lubricant/used oil engine	Proper SW management
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2	Empty chemical container	Reuse / proper SW management													
3	Lubricant/used oil engine	Proper SW management													
7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	CU domestic waste from the housing area was well managed and all domestic wastes were disposed via own transport to land fill area located at block 03. Sighted there was no practice of open fires within the estate. The secondary containments, signages, sump pits, spillage kits and SDS were seen effectively displayed and made available at chemical / pesticide store, diesel drum and fertilizer store.													
7.3.3 The unit of certification does not use open fire for waste disposal.	YES	No sign of open burning for waste disposal sighted. Domestic waste had been disposed at the landfill area and dispose in municipal.													
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	HASB continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the organization SOPs. The process of the fertilizer application follows a flow chart Fertilizer application, which was of utmost importance for maintenance of soil commencing from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire requirement in the field identified. The periodic tissue and soil sampling were carried out in the estates to monitor changes in nutrient status. The results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Soil samplings are made on a year basis to detect the following analysis PH, Carbon and Total N, P, K, Ca, Mg, Na. The soil sampling analysis by Hap Seng Plantations (River Estates) Sdn Bhd was carried out in Dec 2021 to facilitate the 2021 fertilizer program.												
	7.4.2 Periodic tissue and soil sampling is	YES	The periodic tissue and soil sampling were carried out in the estates to monitor changes in												

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Clause	Indicators	Comply Yes/No	Findings
	carried out to monitor and manage changes in soil fertility and plant health.		nutrient status. Latest leaf sampling has been carried out in Jan 2022. The results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Soil samplings are made on a year basis to detect the following analysis PH, Carbon and Total N, P, K, Ca, Mg, Na.
	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	All 2 estates division had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field. No EFB application sighted and recorded.
	7.4.4 Records of fertiliser inputs are maintained.	YES	The periodic tissue and soil sampling were carried out in the estates to monitor changes in nutrient status. Latest leaf sampling has been carried out in Jan 2022. The results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Fertilizer recommendation for year 2022 has been carried out by Agronomist report made by Hap Seng agronomist team in Dec /2021.
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	Based on soil maps, provided by agronomists Hap Seng Plantation was identified no marginal and fragile soil in both division estate, the soil series at both estate division were Kretam Series.
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	No replanting until the year of 2024 based on replanting program provided. Based on soil maps, slope map, and site visits there was no steep terrain (greater than 25°) in both estates division.
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	Based on the audit findings, it was confirmed that there were no new planting or new development of areas at HASB. Hence, there was no need for soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation was required.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	Based on the audit findings, it was confirmed that there were no new planting or new development of areas at HASB. Hence, there was no need for soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation was required.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	No replanting until the year of 2024 based on replanting program provided. Based on soil maps (kretam series), slope map, and site visits there was no fragile and marginal soils located in CU.

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Clause	Indicators	Comply Yes/No	Findings
incorporated into plans and operations.	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	The soil map, topography maps, was available for CU used as a guidance for planning the roads, infrastructure and drainage construction.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	Based on soil map and site visit, there was no peat soil in both estates.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat Land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	Based on soil map and site visit, there was no peat soil in both estates.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	Based on soil map and site visit, there was no peat soil in both estates.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	Based on soil map and site visit, there was no peat soil in both estates.
	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	YES	Based on soil map and site visit, there was no peat soil in both estates.

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Clause	Indicators	Comply Yes/No	Findings
	Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', ver.2 (2018) and associated audit guidance.	YES	Based on soil map and site visit, there was no peat soil in both estates.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in acc. with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', ver. 2 (2018) and associated audit guidance.	YES	Based on soil map and site visit, there was no peat soil in both estates.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	<p>HASB Water Management Plan has been reviewed and updated. This plan is confined to only HASB, covering only the water used for daily operation. Among the water management plans are:</p> <ol style="list-style-type: none"> 1) Soil Moisture Conservation Programmed 2) Buffer zone / riparian reserve of the streams 3) Water for domestic use 4) Contingency plan during drought season 5) Sewage and septic tank 6) Lubricant and fertilizer store 7) Rainfall records <p>Water for domestic use is supplied from the rainwater for washing and shower. Proper filtration and treatment are yet to be installed. The company has provided a tank or jar for a worker to get treated water from JPOM2. Besides that, the estate also provided the mineral bottle as access to clean water with average 15 to 19 cotton per months for the workers. There was no natural waterways or river passing through the estate.</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	There was no natural waterways or river passing through the Harus Abadi Main Division and First Raintree Division.

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Clause	Indicators	Comply Yes/No	Findings									
	7.8.1b Workers have adequate access to clean water.	YES	Water for domestic use is supplied from the rainwater for washing and shower. Proper filtration and treatment is yet to be installed. The company has provided a tank or jar for a worker to get treated water from Bukit Mas POM. Besides that, the estate also provided the mineral bottle as access to clean water with average 15 to 19 cotton per months for the workers.									
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	During site visit at Harus Abadi Division and Raintree Division (Field Block 1, Block 3, and Block 6), and estate compound was sighted no evidence of chemical spraying activities was carried out close to the natural waterways that directly channel to stream inside IOI Unico and Smallholder. Besides, observed also all-natural grasses has been left along the drainage banks. The best practices based on '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 mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	Not applicable.									
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Not applicable.									
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<p>The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Among the plan for improving fossil fuel are:</p> <ul style="list-style-type: none"> ▪ Regular servicing of the generator set for smooth running of engine and prevent excessive emission of greenhouse gas ▪ Drivers are required to inspect their vehicle on daily basis and recorded inside the vehicle inspection checklist. <p>Site visit to HASB, showed evident that they are compiling the data by monthly basis and document it for further action to improve on their efficiency of using the renewable and non-renewable energy. Slightly increased ration for year 2022 related to low crop production.</p>									
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and	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>During audit in January 2022, auditor was unable to approved through Palm GHG Version 4. This was due to some error in the system. Email has been sent to the RSPO secretariat informed on the problem and RSPO secretariat acknowledged on the matter. However, auditor can log in and verify the data in the Palm GHG Version 4. The data was as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Description</th> <th style="text-align: center;">Unit</th> <th style="text-align: center;">Value</th> </tr> </thead> <tbody> <tr> <td>Oil palm planted on mineral soil</td> <td style="text-align: center;">Ha</td> <td style="text-align: center;">564.67</td> </tr> <tr> <td>Oil palm planted on peat</td> <td style="text-align: center;">Ha</td> <td style="text-align: center;">0</td> </tr> </tbody> </table>	Description	Unit	Value	Oil palm planted on mineral soil	Ha	564.67	Oil palm planted on peat	Ha	0
Description	Unit	Value										
Oil palm planted on mineral soil	Ha	564.67										
Oil palm planted on peat	Ha	0										

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Clause	Indicators	Comply Yes/No	Findings					
monitored and new developments are designed to minimise GHG emissions.			Total oil palm planted	Ha	564.67			
			Conservation area (Forested)	Ha	0.00			
			Conservation area (Non-forested)	Ha	0.015			
			FFB supplied to this mill	Mt	8908.00			
			FFB produced by this estate/plantation	Mt	8908.00			
			FFB production per hectare	Mt/ha	15.77			
			Description	Total emission (tCO ₂ e)	tCO ₂ e/ha	tCO ₂ e/mt FFB	Emission allocated to this mill (tCO ₂ e)	
			Land conversion	2382.24	4.22	0.27	2382.24	
			Crop sequestration	-2258.05	-4.00	-0.25	-2258.05	
			*CO ₂ emissions from fertilizer	0.00	0.00	0.00	0.00	
			N ₂ O emissions from peat	0.00	0.00	0.00	0.00	
			N ₂ O emissions from fertiliser	0.00	0.00	0.00	0.00	
			Fuel consumption	223.62	0.40	0.03	223.62	
Peat oxidation	0.00	0.00	0.00	0.00				
Sequestration in conservation area	0.00	0.00	0.00	0.00				
TOTAL	347.81	0.62	0.04	347.81				
7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at HASB. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.					
7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	The Environmental Impact Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversion, Crop Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consumption. Plans to reduce or minimize them are in place.					

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Clause	Indicators	Comply Yes/No	Findings
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	HASB complied to the strict Zero Burning Policy. There was no evidence to show that fire had been used for preparing land for replanting.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	HASB had established fire prevention and control measures for the areas under its direct management. Fire emergency procedures were available in adherence to the HASB policy on 'Emergency Response' plan—updated Jan 2021. The important telephone contact numbers were also provided therein. HASB had valid fire extinguishers at the office, worker's quarters, chemical & fertiliser stores, diesel skid tank, etc.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	HASB had engaged its adjacent stakeholders on fire prevention and control measures with Hap Seng Plantations.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the 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.	N/A	No new land clearing since Nov 2015 available at HASB, thus this Indicator was not Applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The report of "Potential High Conservation Value Area Assessment Report of Harus Abadi Sdn Bhd" was made available to the auditor. It was noted that the report was prepared by the Sustainable Unit of Hap Seng. The assessment was carried out in Jan 2019. The report was completed .in the same month. Based on the assessment, there was no identified RTE at Harus Abadi estate. Harus Abadi had identified an HCV 3 (Mud Volcano) which the estate has conserved and maintained. Sighted also the new Report namely "HCV-HCSA Assessment Report of Harus Abadi Sdn Bhd" which was made available to the auditor. It was noted that the report was prepared by the Sustainable Unit of Hap Seng. The report included the HCV Management/Action Plan for the Year. The assessment was last carried out in Dec 2022. No change to the above conclusion.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other	YES	
			Identification and assessment of HCV habitats or protected areas is done prior the main assessment through. The report "Potential High Conservation Value Area Assessment

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Clause	Indicators	Comply Yes/No	Findings
	<p>conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>		<p>Report of Harus Abadi" is available. The study was conducted by the Sustainable Unit of Hap Seng. The assessment plan was revised in Dec 2021 after consultation with stakeholder in the same month. The study had covered all the High Conservation Value (HCV) within and adjacent to the 2 Estate under Harus Abadi Sdn Bhd. Based on the assessment, there was no identified RTE at Harus Abadi. The Assessor had identified potential HCV 3 in the estate which is Mud Volcano i.e., 0.0015 Ha. The 'Annual HCV Management Plan' was in the above 'HCV-HCSA Assessment Report', updated in Nov 2022 and made available for verification. It outlined the HCV protection and maintenance measures to be taken in FY 2022 at HASB.</p>
	<p>7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p>	<p>N/A</p>	<p>There were no local communities living nearby with Harus Abadi. So, this indicator was not applicable with this CU.</p>
	<p>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.</p>	<p>YES</p>	<p>HASB has develop an HCV Management Plan 2022 in the 'HCV-HCSA Assessment Report' based on assessment by the Assessor, the plan last updated in Nov 2022 with objectives to protect the HCV 3 in the CU. Harus Abadi is committed to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting were erected at border. Patrolling by mandore for Illegal hunting is also being implemented to control the illegal activities.</p>
	<p>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</p>	<p>YES</p>	<p>HASB also is committed to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting were erected at border. Patrolling by mandora for Illegal hunting is also being implemented to control the illegal activities.</p>

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Clause	Indicators	Comply Yes/No	Findings
	fed back into the management plan.		Monthly monitoring for RTE and Mud Volcano was conducted by Harus Abadi Sdn. Bhd, were evident. The monitoring activities was recorded in the form 'Harus Abadi HCV and RTE Monthly Checklist'.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Not applicable since there is no new land clearing.

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

Clause	Indicators	Comply Yes/No	Findings
5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	N/A	Not applicable. This CU is a single estate with no palm oil mill.
	(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;	N/A	Not applicable. This CU is a single estate with no palm oil mill.
	(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	N/A	Not applicable. This CU is a single estate with no palm oil mill.

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		notary or chamber of commerce (or equivalent);		
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	N/A	Not applicable. This CU is a single estate with no palm oil mill.
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;	N/A	Not applicable. This CU is a single estate with no palm oil mill.
	(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;	N/A	Not applicable. This CU is a single estate with no palm oil mill.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	N/A	Not applicable. This CU is a single estate with no palm oil mill.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	N/A	Not applicable. This CU is a single estate with no palm oil mill.
	(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:	N/A	Not applicable. This CU is a single estate with no palm oil mill.
		A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require	N/A	

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		evidence of the self-assessment against each requirement;		
		Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	N/A	
		Desktop study e.g. web check on relevant complaints	N/A	
		If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.	N/A	
	(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.	N/A	
	(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.	N/A	

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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>	<p>No additional indicators</p>	<p>YES</p>	<p>The right to use the land at the CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Harus Abadi the land was previous owned by Sabah Land Development and Harus Abadi Sdn. Bhd. has bought and develop the land in Sept 1989.</p> <p>For First Rain Tree, the land was previous owned by company of several villagers which is the land has obtained from Sabah land development on 1997/1998. The Company has sold their land to the First Rain Tree in June 2000. There were clear land ownership documents available for review. The original copies of the documents were kept in Harus Abadi Central Office, Lahad Datu.</p>
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ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.6.2 DA 01 2022	Major	<p>Finding: The effectiveness of the H&S plan to address health and safety risks to people was not fully monitored.</p> <p>Objective evidence: Noise Risk Assessment Report were available, and the assessment was conducted on 29/09/2021 (First Raintree Division) and 30/09/2021 (Harus Abadi) by Utlus Venture (M) Sdn. Bhd. From the assessment, it was stated that the baseline audiometric testing shall be conducted for heavy machinery operator, FFB evacuation and mist blower operator as per the recommendation. This however, was not carried out by the CU.</p>	<p>The root cause: The management has overlooked on the audiometric testing for workers.</p> <p>Correction: Management has arranged workers to conduct audiometric test with Mabello Clinic on 29/12/2022.</p> <p>Corrective action: HASB management will continue monitor on the audiometric testing matter and comply with recommendation stated in the NRA Report. OSH Plan will be updated to include the monitoring of the audiometric testing together with medical surveillance to ensure the implementation complied at the same time.</p>	<p>Auditor had verified evidence attached of audiometric report. The baseline audiometric test was conducted on 29/12/2022 for 2 workers (sprayer and driver). The audiometric test carried out by third party. From the report, noted that both workers were identified with normal hearing. PPE was recommended i.e., to use ear plug or earmuff during work to prevent further impairment and workers must go for annually audiometric test and to be test again on 28/12/2023. The document and corrective action considered to be satisfactory to address the findings. The implementation will be verified during next surveillance audit.</p> <p>Status: Closed</p>
6.3.3 ISMA 01 2022	Minor	<p>Finding: Worker's representation in the (JCC) i.e., Joint Consultation Committee (HASB and workers) was not adequate.</p> <p>Objective evidence: Worker's representation in the JCC (Joint Consultation Committee) established for HASB was not adequate due to the following:</p> <ol style="list-style-type: none"> 1) Representatives for workers were not chosen freely by the workers themselves (no supporting documents on free selection of representatives) 2) Workers Representatives are not representative (i.e., by Gender, Country of origin, type of work etc.) 	<p>The root cause: The management has overlooked on the choosing method on the JCC representative.</p> <p>Correction: Management has arranged a voting session during the daily master call where the workers have the opportunity choose their desired representative among the workers group.</p> <p>Corrective action: HASB management will continue to monitor on the free selection of JCC representative issues. Furthermore, management will arrange for voting session once in a year.</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>

RSPO PUBLIC SUMMARY REPORT

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
7.8.2	Major	<p>Finding: Water courses and wetlands was not protected, including maintaining and restoring appropriate riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>Objective evidence: During site inspections at Harus Abadi Sdn Bhd (Field Block 2 and Block 3), sighted chemical spraying activities was carried out close to the Natural waterways that directly channel to Stream inside IOI Unico. observed also chemical spraying activities was carried out at the monsoon drain (Stream inside IOI Unico) at workers housing compound. Based on circle & strip spraying programme 2021, last chemical spraying activities was carried out on November 2021.</p>	<p>During site visit at Harus Abadi Division (Field Block 2, Block 3, Block 5, and Block 7), and Raintree Division (Field Block 1, Block 3, and Block 6), and estate compound was sighted no evidence of chemical spraying activities was carried out close to the natural waterways that directly channel to stream inside IOI Unico and Smallholder. Besides, observed also all-natural grasses has been left along the drainage banks. The best practices based on 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). Training to spraying operator has been carried out on 13/01/2022, and 03/08/2022.</p>

Harus Abadi Sdn. Bhd. is a single entity; thus all area has been certified under Harus Abadi Sdn. Bhd.