



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

File Ref. : EL26130001

**RSPO STAGE 2
PUBLIC SUMMARY REPORT**

CLIENT : LEBIJAYA SDN. BHD.

PARENT COMPANY : LEBIJAYA SDN. BHD.

RSPO MEMBERSHIP No.: 1-0297-20-000-00

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
	LEBIJAYA SDN BHD	5° 21' 38" N	118° 31' 1" E	CL 095332228, Litang, Kinabatangan Sabah, Malaysia

MAP : See Attachment 1

AUDIT DATE : 15 – 17 August 2022

DURATION : 9 auditor days

TYPE OF AUDIT : Stage 2 Audit

STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

SCOPE OF CERTIFICATION: Production of Sustainable Fresh Fruit Bunches

VALIDITY OF RSPO CERTIFICATE : 17/02/2023 – 16/02/2028

The following attachments form part of this report:

Non-conformity Report(s) 

List of additional site(s) 


Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : **MOHD ZULFAKAR KAMARUZAMAN**

Name : **ROSENI TAN**

Signature : 

Signature : 

Date : 13/02/2023 (Public Summary)
27/12/2022 (Final Report)

Date : 22. 02. 2023

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Stage 2 audit				
On-site audit date	:	15 – 17 August 2022	No. of auditor days	: 9 auditor days
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Mohd Ab Raouf Asis, Dzulfiqar Azmi		
No. of major NCR	:	3	Indicator: 3.4.3, 7.12.2, 7.12.4	Closing date: 23/12/2022
No. of minor NCR	:	1	Indicator: 6.7.5	
Indicate the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
		√	-	√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
		-	√	√
		Indigenous people	Contractor	Others (Please specify)
		-	-	
Supply base sampled	:	Own plantation – Lebijaya		
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	:	Harso Yuli Antena		
Report approved by	:	Kamini A/P M.Sooriamoorthy	Approval date	: 13/02/2023

SUMMARY OF INFORMATION

	STAGE 2
Projection Period	August 2022 – September 2023
Certified FFB Processed (MT)	3,600.00
Production of Certified CPO (MT)	720.00
Production of Certified PK (MT)	180.00
Certified Areas (Ha)	250.00
Planted Areas (Ha) (<i>Mature + Immature area</i>)	215.80
Production Areas (Ha) (<i>Mature area only</i>)	215.80
HCV Areas (Ha)	0.00
Buffer Zones/Conservation Area	23.00
REMARKS	-

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar Kamaruzaman	Lead Auditor Social (External) Metrics Template, & HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He had a certificate of Lead Assessor in ISO 9001, OHS 45001, ISO 4001 and qualified social Auditor under RSPO Training. He also attend DLW training in 2022 and worker welfare training in 2021 which is conducted by RSPO. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Dzulfiqar Azmi	Auditor / Safety & Environment, GHG	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He had a certificate of Integrated Management System consist of Lead Assessor in ISO 9001, OHS 45001, EMS ISO 4001 and has been trained in SA8000. He also attend DLW training in 2022 and worker welfare training in 2021 which is conducted by RSPO. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Mohd Ab Raouf Asis	Auditor / Social (Internal), GAP,	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He had a Lead Assessor in ISO 9001, OHS 45001, ISO 4001 and has been trained in SA8000. He also attends DLW training in 2022 and worker welfare training in 2021 which is conducted by RSPO. He has been trained as RSPO Lead Auditor as well as MSPO Lead Auditor.

1.3 Audit methodology

The audit only cover the Lebijaya Sdn Bhd Estate. Since this is an assessment of an outgrower who owns a single estate, a land size 250ha has been audited. The audit included an on-site audit of Lebijaya Estate and its line site 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.

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1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 17/06/2022. This was then followed by sending letters to relevant stakeholders requesting for input regarding the company – Lebijaya Sdn. Bhd. There were no comments received during this process. Among the stakeholders consulted included Forestry Department, Department of Environment (Lahad Datu), Department of Occupational and Safety Health, (Lahad Datu), Kota Lahad Datu Police Station, Lahad Datu Fire Department, Department of Labour Lahad Datu, SOCSO Lahad Datu, Sabah Environmental Protection Association, Kota Kinabalu, Immigration Department, Kampung Litang, Environmental Protection Department, Kota Kinabalu, NGO's Such as WWF Lahad Datu. During the on-site audit, the audit team had also consulted the, workers' representative and field workers.

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 (local / foreign / Orang Asli workers / male & female)	<ul style="list-style-type: none"> a. All workers in Lebijaya currently using document Imm. 13. b. Workers work 6 days a week with one rest day (Friday). They work 8 hours with a minimum of 30 minutes' break in between. c. Workers sampled does not received a minimum of RM1100 per month due to several circumstances. They receive their salaries before 7th of every month. Starting from May 2022, Minimum Wages Order 2022 which RM 1500 is applicable. d. All workers receive their wages in cash. e. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. f. The workers are not subjected to any recruitment fee due to all workers using IMM 13. No foreign workers worked in the LSB. Only local workers and IMM 13 workers. g. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts. h. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer. i. For newly-arrived workers who do understand Bahasa or English, translations are provided during briefings.
2) Settlers	Not Applicable
3) Villagers / Local communities (including women representatives, displaced communities)	Ketua Kampung Litang
4) Suppliers	No contractors/Suppliers as this are small grower.
5) Contract workers (local / foreign / Orang Asli workers / male & female)	No contract workers currently at the LSB.
6) Local & national NGOs	Not Applicable
7) Government agencies / Statutory bodies	As in public stakeholder consultation exercise
8) Independent growers / Smallholders	IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder representative

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9) Indigenous people	Not Applicable
10) Contractor	No contractors/Suppliers as this are small grower
11) Previous land owner (if any)	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. As of the Audit Auditor has make attempt to call the SLDB to found the records of previous land owner and the company stated the transaction happen for more than 20 years ago and the records is non traceable, but the officer stated there is no issue regarding the transaction due to SLDB is for Rural Development and the transaction is legit.
12) Others (please specify)	-

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.

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2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

Lebijaya Sdn Bhd is private company located in Kinabatangan District, Lebijaya established in 9 November 1996. The plantation starts planting on year 2001 with oil palm. Lebijaya Sdn Bhd is located about 70 km from Lahad Datu town, 70 km from Kampung Paris and can be assessed through the government road estate road. All of the crops sent to the Tomanggong POM and Jeroco 2 POM (owned by Hap Seng). The estate currently 100% oil palm planting. The management heading by the Estate Manager, Mrs. Nerwanah Binti Tajudin. Lebijaya Sdn Bhd within the CU have been fully developed before the year of 2005. Hence, New Planting of the RSPO P&C is therefore not applicable.

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

The FFB is sourced from Lebijaya Sdn Bhd, a single estate, with total land area at 250ha.

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

**Table 1: Projected FFB production by supply base for the next reporting period
(August 2022 -September 2023)**

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Lebijaya	3,600.00	100
Total	3,600.00	100

Table 2 Planted and certified area of Lebijaya CU

Estate	Planted (ha)	Certified (ha)
Lebijaya	215.80	250.00
Total	215.80	250.00

Table 3 Planting profile for Lebijaya CU

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2001	1 st Generation	Mature	215.80	100
Total			215.80	100

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as shown below:

Name	:	NERWANAH BINTI TAJUDIN
Position	:	ADMIN - MANAGER
Address	:	TAMAN UTAMA BATU 6, SANDAKAN
Phone no.	:	011-1868 5518
Fax no.	:	-
Email	:	lebijaya@yahoo.com

3.0 AUDIT FINDINGS

3.1 Changes to the products in accordance to the production of the previous year
Not Applicable as this is main assessment

3.2 Progress and changes in time bound plan

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

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

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

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

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

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

If no, please state reasons Not Applicable

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

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

Not Applicable as this is main assessment

3.4 Complaint received from stakeholder (if any)

None.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s)
(details refer to Attachment 3) List : DA 01 2022 (6.7.5)

Total no. of major NCR(s)
(details refer to Attachment 3) List : MAR 01 2022 (3.4.3), MZK 01 2022 (7.12.2), MZK 02 2020 (7.12.4)

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

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

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

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.

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.

7.0 It is confirmed that all corrective actions taken have been satisfactorily verified.
Recommended for certification.

Audit Team Leader : MOHD ZULFAKAR KAMARUZAMAN

(Name)

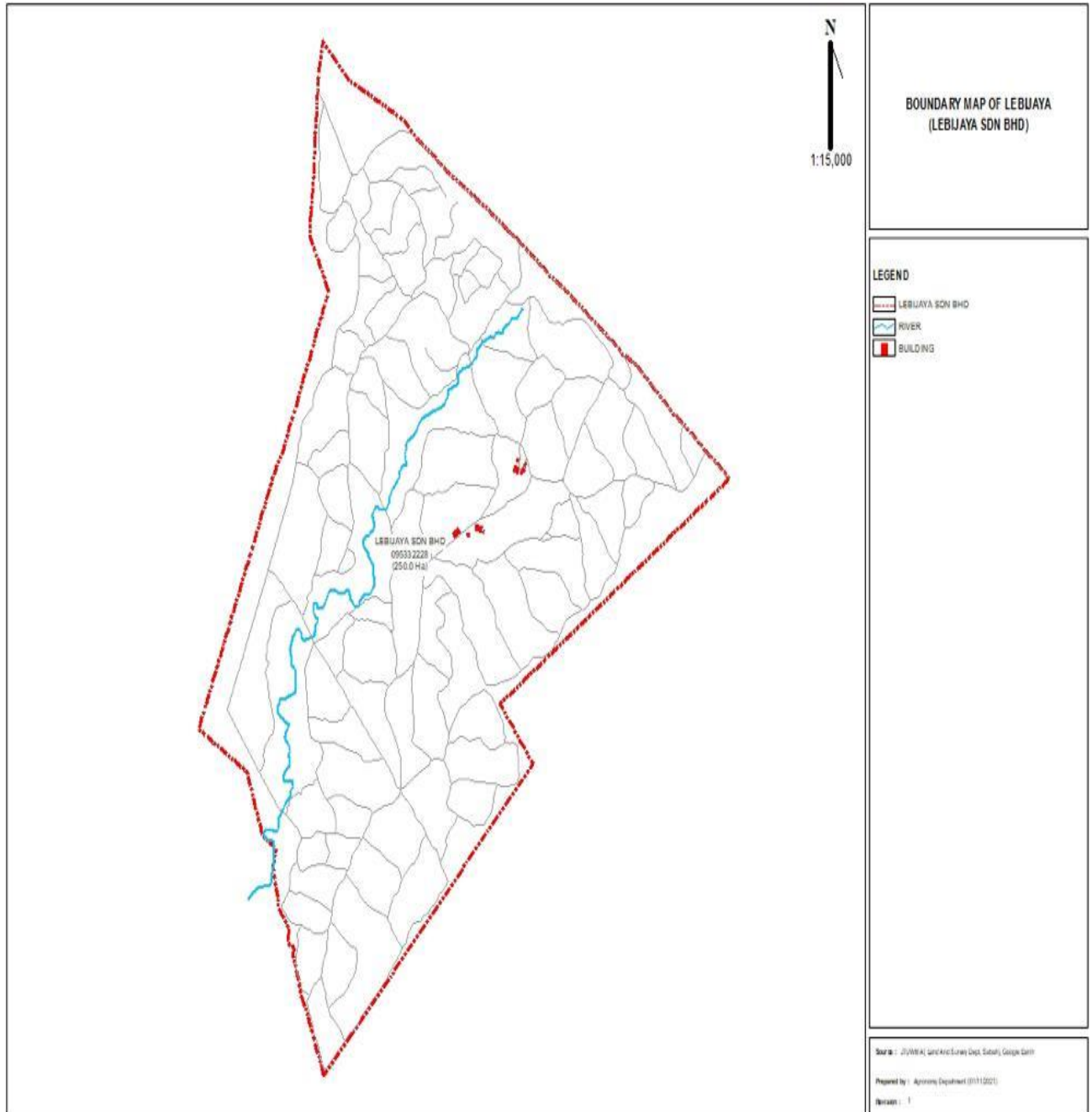


(Signature)

23/12/22

(Date)

Attachment 1 - Map



RSPO STAGE 2 AUDIT PLAN

1. Objectives

The objectives of the assessment are as follows:

- (i) To evaluate **Lebijaya Sdn Bhd** continued conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI) 2019.
- (ii) To verify the effective implementation of issue of concerns arising from the stage 1 assessment.
- (iii) To make appropriate recommendations based on the assessment findings.

2. **Date of assessment** : **15-18 August 2022**

3. **Site of assessment** : **Lebijaya Sdn Bhd**

4. **Scope of Certification** : Production of sustainable Fresh Fruit Bunch (FFB)

5. Reference Standard :

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

6. Assessment Team

Assessor: Mohd Zulfakar Kamaruzaman (RSPO Lead Auditor)
 Dzulfiqar Azmi (MSPO Lead Auditor)
 Mohd Ab Raouf Asis

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

7. Audit Method

Site audits including observation of practices, interviews with interested parties (all categories of contractors, employees, nearby population, etc.), documentation evaluation and evaluation of records.

8. Audit Findings

Audit findings shall be classified as major and/or minor.

9. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain. In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. Conflict of interest

Auditors have not been employed by the organization concerned nor provided consultancy services relating to the development of its system in the past five years and next five years.

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- 11. Working Language** : English and Bahasa Malaysia
- 12. Reporting**
- a) Language : English
 - b) Format : Verbal and written
 - c) Distribution list : Client file
- 13. Facilities Required**
- a. Room for discussion
 - b. Relevant document and record
 - c. Personnel protective equipment if required
 - d. Photocopy facilities
 - e. A guide for each group
- 14. Assessment Programme Details** : As shown below

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Date / Time	Coverage of assessment / Activity / Site	MZK	MAR	DA
Day 1-15/8/22 8.30am – 9.00am	Opening meeting at Lebijaya Estate Lead Auditor to introduce audit team member, brief on audit objectives, scope, methodology, criteria and programmes Organization Representative to brief on the following : <ul style="list-style-type: none"> Briefing on Lebijaya Estate organization's background, operations, RSPO implementation & legal non compliances such as land / labour dispute - if any (Please provide maps that have details of surrounding stakeholders, terrain, soil profile and conservation/HCV area). Time bound plan for Lebijaya. (if Any) Significant changes on organization activities, machinery, supply bases capacity etc. 	/	/	/
9.00am – 12.30pm	Site observation to Lebijaya P1, P2, P3, P4,P5, P6, P7 <ul style="list-style-type: none"> Verification of basic information estate/Metric templates Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. GHG Calculation New planting 	/	/	/
12.30pm – 1.30pm	Lunch Break	/	/	/
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/

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Date / Time	Coverage of assessment / Activity / Site	MZK	MAR	DA
Day 2 – 16/8/22 8.30am – 12.30pm	Site observation to Lebijaya P1, P2, P3, P4,P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects, chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 	/	/	/
12.30pm – 1.30pm	Lunch Break	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/

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Date / Time	Coverage of assessment / Activity / Site	MZK	MAR	DA
Day 3 – 17/8/22 8.30am – 12.30pm	Site observation to Lebijaya P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighboring land use, riparian zone • Occupational safety & health aspects, chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 	/	/	/
12.30pm – 1.30 pm	Lunch Break	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/

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Date / Time	Coverage of assessment / Activity / Site	MZK	MAR	DA
Day 4 – 18/8/22 8.30am – 12.30pm	Site observation to Lebijaya P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects, chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 	/	/	/
12.30pm – 1.30 pm	Lunch Break	/	/	/
2.30pm –3.00pm	Continue assessment at respective site	/	/	/
2.30pm –4.00pm	Audit Team Discussion	/	/	/
4.00pm – 5.00pm	Closing meeting at chosen site by Management	/	/	/

Note: Please note that the Audit Plan merely serves as a guide and there may be changes as the audit progress

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Public documents available in Lebijaya Sdn. Bhd. (LSB) such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports and EIA. Management plans & continuous improvement plans and company policies also available publicly.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	Lebijaya Sdn Bhd had identified personnel responsible for handling of complaints at site as the Estate Manager is nominated to coordinate activities of the stakeholders described above related to indicator 1. The Estate Manager appointment letter, issued in March 2021 was sighted. Records of communication were maintained at respective offices. Communication with the authority such as DOSH, DOE and Labour Department were maintained in the communication file, External Communication Form and Communication Record.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The records of requests as mentioned in indicator 1.1.2, had been logged in the Communication Record were used for records including authority visits books. As at to date audit, there is no information had been requested.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by LSB maintained to be followed and available at the audited sites. Consultation and communications procedures for Lebijaya CU is documented in the <i>Stakeholder Consultation Procedure</i> SOP Group/Estate33 Level. This document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estates and mill followed the procedures and manuals developed by the company.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The lists of stakeholders, internal and external, were prepared by the LSB and the company headquarters.
1.2	1.2.1 A policy for ethical conduct is in	YES	LSB has documented policy to committing on integrity for all their staffs and workers by

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Clause	Indicators	Comply Yes/No	Findings
The unit of certification commits to ethical conduct in all business operations and transactions.	place and implemented in all business operations and transactions, including recruitment and contracts.		publishing <i>Code of Conduct and Business Ethics Policy</i> . The CU has communicated the policy for staffs and foreign workers during induction course.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	In addition, LSB also has a Vendor CODE of Conduct and Business Ethics which has been developed to outline the standards of behaviour required by LSB which includes expectation to uphold human rights. The COBC applies to all its suppliers, consultants, agents, contractor's/service providers who have direct dealings with the LSB.

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	Lebijaya Sdn. Bhd. (LSB) continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation was captured in a Legal Register and monitored by the Estate Manager.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	LSB 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. Changes to the law and regulation are monitored by the Admin Manager. Various sources were referred in obtaining information about the updates of legal requirements. This includes checking with the industrial association (e.g., MPOA, EMPA, SECA, etc.), attending seminar/conference, buying of the law books, government agencies websites, etc. The estate was tracking any changes to applicable law and had Admin Manager as the person responsible to monitor any changes to the law and to cascade those changes to all sites.
	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 Lebijaya Sdn Bhd. The perimeter boundary of the estate was visibly maintained by erecting pegs along the boundary, especially the ones that adjacent to other private estate.
2.2 All contractors providing operational services and	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties is maintained by LSB in stakeholder list. The lists contain name of villagers, Nearby Estates, External Mills, NGO's, Government Agencies. designated contact persons, address, telephone/fax/email and type of contracted works done.

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Clause	Indicators	Comply Yes/No	Findings
supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	As of to date in LSB, 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 all of their worker is IMM 13 (refer to Immigration Act Sabah). Thus, this indicator is not applicable.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	YES	There is no mill involve in this small grower certification. Thus, this indicator is not applicable.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	LSB continued to achieve long term economic and financial viability through documented management plan projected to year 2026. A business plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2023 to 2026 had been prepared the estate 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 estate was made available for the period between 2023-2027.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	The Management Review Meeting (MRM) was conducted after internal audit (assisted by Sustainability Teams from HSP) was done in June 2022. The MRM was attended by all the estate management and sustainability team from HSP. It was chaired by Estate Manager. Among the management review were discussed are: 1. Follow up actions from earlier MRM 2. Sustainability and adequacy of all SOPs 3. Sustainable Agriculture Policy 4. Results of internal audits 5. Changes In legal requirement of any compliance 7. Complaint's/ Customer (internal/external) feedback 8. Accident & injury 9. Environmental quality 10. Waste management 11. Energy usage performance 12. Status of corrective actions 13. 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	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	LSB has established the Social Impact Assessment Management Action Plan and Continuous Improvement Plan in Jan 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. had been plan and person responsible to monitor the implementation. Plans and impact assessments relating to environmental impacts were available. The LSB have conducted environmental assessment titled 'Environmental Impact Assessment

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Clause	Indicators	Comply Yes/No	Findings
plans that allow demonstrable continuous improvement in key operations.			Management Action Plans and Continuous Improvement Plans'. The EIA action plan was updated and each of the issues was identified for the estate.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template. The auditor already verified and checked the data and figure given was consistent with their database system.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	LSB adopted the following documented manuals and documents as their standard operating procedures: 1. Safe and Standard Operating Procedures (SSOP) updated in January 2022 2. Agricultural Manual 2020 Agricultural Manual 2020 and MPOB Guideline for smallholders is the manual used for the operations in the estate. It was confirmed that all activities in the estate from seedlings in nursery to planting in the fields have been included in the Agricultural Manual. The document specifies the following sections such as harvesting, manuring, integrated pest management, and upkeep of mature oil palms. Safe and Standard Operating Procedures is the Standard Operating Procedures used for the safety precautions for all operations in the estate.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by LSB are internal audits conducted by Hap Seng Plantations Sustainability Team.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	On Estate, the estate manager and his subordinates were accountable to check on consistent implementation of procedures. The LSB 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 LSB 'Code of Conduct and Business Ethics Policy was also monitored.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There was no new planting in LSB. Environmental Impact Assessment (EIA) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate operations, developed with participation of stakeholders (internal and external) as evidenced by the minutes of the stakeholder consultations (Estate Level).
	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	YES	For LSB, the SIA and EIA reports separated. Environmental Impact Assessment (EIA), Management Action Plans and Continuous Improvement Plans which covers form upstream activities such as FFB reception until downstream processes was sighted during assessment. Identification and evaluation of environmental impact was done for all activities and processes related to the estate operation. The assessment was to evaluate

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Clause	Indicators	Comply Yes/No	Findings
implemented and regularly updated in ongoing operations.	affected stakeholders.		and analyze the operations impact on soil, water, and air associated with the organization activities. The EIA review process had included stakeholders' consultation with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done had involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighboring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting. The consultation with the relevant and affected stakeholders took place in Dec 2021 and Aug 2022 through virtual meeting, face to face and phone call and establishment of EIA Action Plan. It was noted that the meeting was participated by various government agencies, local communities, NGOs, and neighboring estates. Evidence of participation of the stakeholders was available in signed attendance list as well as photographs showing evidence of the consultation that had took place. The minutes of the meeting of the consultation were also maintained. So far, no negative impact issues related to environment have been highlighted during stakeholders meeting. LSB also has a documented Social Impact Assessment (SIA) Management Action Plan and Continuous Improvement Plan. The SIA was conducted in January 2022 was developed with participation of stakeholders (internal and external) as evidenced by the minutes of the stakeholder consultations (Estate Level) where 43 stakeholders comprising worker representatives, government agencies, internal stakeholders, suppliers, contractors or consultants, and neighbouring plantations were present. No issues or complaints were raised by participants of the last stakeholder consultation meeting.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	NO	As mentioned above, it was evident that the EIA & SIA has been developed in participatory way. However, the social management and monitoring plan is not updated accordingly. Inadequate involvement of workers such as non-union workers, dependence, gender, races, job scopes and etc was noted as the gathering of negative and positive impact was conducted during morning master call. Some issues on minimum wages and productivity workers were not reviewed. Additionally, no consultation with neighbouring villages from Kg Litang. Therefore, NCR was raised as MAR 01 2022.
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	LSB has developed an employment procedure for recruitment, selection; hiring, promotion, retirement and termination are documented and made available to the workers and their representatives, as detailed under SOP for Recruitment, Retirement and Promotion of Workers (Local & Foreign) 2021. The workers confirmed that the procedure and policy was made available at their house compound, and they understand the policy and procedure.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	The above-mentioned records are maintained.

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Clause	Indicators	Comply Yes/No	Findings
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, 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 with DOSH Hazard Identification, Risk Assessment and Risk Control (HIRARC) Guidelines 2008. The LSB has conducted assessment on health and safety issue in their operation and documented in the HIRARC register. The HIRARC register was reviewed at minimum once a year and during accident occur or change in the operation.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that are conducted by LSB in each of the operations. It was sighted during the site visits and documents reviews that the sampled HIRARC were in place. Occupational health and safety (OHS) management plan for estate had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2022 were acceptable. The assessment enables further appropriate actions, based on evaluation on existing control measures and exposure for all chemicals by CHRA. CHRA was conducted by competent 3 rd party in Feb 2020 and safety trainings were conducted accordingly.
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	LSB's Training Schedule for 2021 and Training Matrix for 2022 were sighted by the auditor. Dates of training for 2021 and 2022 were also presented. Formal training programs for 2021 and 2022 covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs. Trainings were either conducted internally by its own manager or by sustainability team from Hap Seng Plantation.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue, maintained appropriately.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the	N/A	Not Applicable since this Management is a small grower company. No Mill involved in this Assessment.

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Clause	Indicators	Comply Yes/No	Findings
	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 since this Management is a small grower company. No Mill involved in this Assessment.
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	
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	N/A	

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	N/A	Not Applicable since this Management is a small grower company. No Mill involved in this Assessment.
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. <p>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	N/A	

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

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number 	N/A	Not Applicable since this Management is a small grower company. No Mill involved in this Assessment.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	N/A	Not Applicable since this Management is a small grower company. No Mill involved in this Assessment.

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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 since this Management is a small grower company. No Mill involved in this Assessment.
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	
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	
	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	
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by	N/A	

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)		
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	N/A	Not Applicable since this Management is a small grower company. No Mill involved in this Assessment.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	N/A	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	N/A	
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date	N/A	

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform		
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	N/A	Not Applicable since this Management is a small grower company. No Mill involved in this Assessment.

Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	Human Rights policy available at LSB. There is also a new sustainable Agriculture Policy contains clause of prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staffs and workers during morning muster and training.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As at time of audit, it was confirmed that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.

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Clause	Indicators	Comply Yes/No	Findings
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	LSB have developed procedures to handle grievances and disputes titled as 'Procedure for reporting complaints and grievances (Prosedur Melapor Aduan dan Permasalahan)' and 'Grievances Procedure – Appendix 1' for staffs and workers, Prosedur Aduan and also company has developed procedure named " Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)" to protect the complainants.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Based on interview with stakeholders at LSB, found the system was understood by the affected parties. The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting. For foreign workers, the procedure was explained during initial report for duty with assistance of translators.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	LSB 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 for internal and external stakeholders.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The system used by the LSB in resolving disputes and grievances exists in the procedure called 'Prosedur Melapor Aduan dan Permasalahan' and 'Grievances Procedure – Appendix 1' for staffs and workers, <i>Stakeholders Consultation Procedure – Group Level & Estate Level</i> . The LSB has its own Internal Complaint Form/Book and External Communication/Complaint Form/Book available. The Internal Complaint Books are mostly for employees to lodge complaint pertaining to their houses. The external stakeholder complaint record/book reviewed did not show complaints against the CU. Sighted the new Procedure Title, Grievance procedure has already included 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.
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	Based on information based on SIA documents indicated that there is no community surrounding LSB, hence there no contribution to local community development. Only smallholder nearby estate and Harus Abadi has given Permissions to all small holder to use their road without charges.

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Clause	Indicators	Comply Yes/No	Findings
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 Lebijaya Sdn Bhd the land was previous owned by Sabah Land Development and LSB has buy and develop the land in 1999, There were clear land ownership documents available for review. The original copies of the documents were kept in the Central Office, Sandakan. Copies of land titles for all estate was also sighted at LSB Estate office. The LSB estate is under the jurisdiction of Kinabatangan District. Review of the documents confirmed the terms of the land title for all the estate cultivation of Oil Palm has been complied. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999 the land was previous owned by Sabah Land Development and LSB has buy and develop the land in 1999. Auditor has make attempt to call the SLDB to found the records of previous land owner and the company stated the transaction happen for more than 20 years ago and the records is non traceable, but the officer stated there is no issue regarding the transaction due to SLDB is for Rural Development and the transaction is legit.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	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	YES	

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Clause	Indicators	Comply Yes/No	Findings
	implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.		
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	As reported in 4.4.1 of this checklist. This indicator is not applicable.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	N/A	Based on Social Impact Assessment (SIA) Report for LSB 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 LSB since 1999. 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	N/A	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.

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Clause	Indicators	Comply Yes/No	Findings
FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	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.		
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	N/A	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	N/A	
	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	N/A	

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Clause	Indicators	Comply Yes/No	Findings
	independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.		
	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.	N/A	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.5.7 New lands are not acquired for plantations and mills after 15 Nov 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.	N/A	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including estate as per stated in the land title
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the HQ Office LSB. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or 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 ' <i>Grievances Procedure</i> ', ' <i>Prosedur Aduan</i> ' ' <i>Prosedur Melapor Aduan dan Permasalahan - Pihak Berkepentingan Luaran dan Dalaman</i> ' / SOP – Land Dispute Management, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at visited estate.
	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	LSB is single-owned Small Grower.

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Clause	Indicators	Comply Yes/No	Findings
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	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 LSB 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.	N/A	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. There was no evidence of any land dispute at LSB, 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.	N/A	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable	YES	Land conflict is not present around the unit of certification.

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

Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders	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.

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Clause	Indicators	Comply Yes/No	Findings
(Independent and Scheme) and other local businesses.	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 LEBIJAYA doesn't have Weighbridge, all weighing has been done by Outsider Mill.
	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 This company is assisted by Hap Seng Plantations.
	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 This company is assisted by Hap Seng Plantations.

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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 This company is assisted by Hap Seng Plantations.
	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 This company is assisted by Hap Seng Plantations.
	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 This company is assisted by Hap Seng Plantations.
	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 This company is assisted by Hap Seng Plantations.
	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 This company is assisted by Hap Seng Plantations.

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,	YES	The Sustainable Agriculture Policy approved by the Director stated that respects, supports and upholds fundamental human rights and does not engage in discrimination based on race, religion or gender.

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Clause	Indicators	Comply Yes/No	Findings
	gender, sexual orientation, gender identity, union membership, political affiliation or age.		
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Apart from the indicator 6.1.1 policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment.
	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	Based on interviews with the estate management including documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files. Among the sampled documents sighted belonged to the following workers as per indicator 6.2.1.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	As of the date of the audit, it was confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test was done on the worker own free will. Based on the interview, if there any case of pregnancy, the female worker will be assigned to do light general work.
	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	Gender committees were formed at Lebijaya CU, it consists of men and women since there is only one women workers in Lebijaya CU and their estate manager. Among the issue/suggestion/briefing: <ol style="list-style-type: none"> 1. Awareness on the social policy and men and women's right. 2. Awareness on the reproductive rights and human rights charter. 3. Awareness on the sexual harassment. 4. Family day. 5. Give counselling to the workers to whom need a help. 6. Next plan to conduct Gotong Royong at Mosque.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	Based on letters of job offer and monthly pay slips reviewed, evidence is available that workers receive equal pay for the same work scope except for piece rate work (Harvesting). Workers have received average Salary RM1800 which is more than Minimum Wages Order 2022.
6.2 Pay and conditions for staff and workers and for contract	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	YES	Applicable labour laws, documentation of pay and conditions are contained in in employment contracts (for migrant workers), letters of employment offer (for Malaysian workers). The contracts contain conditions of pay and terms of employment related to contract duration, regular working hours, deductions, overtime, sick leave, holiday

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Clause	Indicators	Comply Yes/No	Findings
workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	languages (English or Bahasa Malaysia) and explained to them in language they understand.		entitlement, maternity leave, reasons for dismissal, period of notice, etc. The employment contracts are signed in dual language, namely English/Bahasa Malaysia.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal reqs) and payroll documents give accurate info on compensation for all work performed. This includes a form of record for work done by family members.	YES	The employment contracts signed between the estate/mill management contain employment and payment terms and provisions covering duration of employment, place of work, salary, working hours, medical, accommodation, SOCSO, transportation, public holidays, sick leave, annual leave, mutual termination of service, etc. These are all in compliance with the provisions of the Sabah Labour Ordinance.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	YES	There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Sabah Labour Ordinance. This was verified from the Estate workers' employment contracts, punch cards and interviews with the workers themselves. They are also entitled to at least 30 minutes' rest after 5 hours of work. Similarly, workers with medical certificates are given a paid medical leave, and female workers are given 3 months maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit. Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS. For non-statutory deductions such as for payment of electricity and water bills, records are available of written permits from the Department of Labour, Sabah.
	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 Rec. 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	The LSB have provided adequate housing, water supplies, medical, educational and welfare amenities. These were found to be in accordance with the Workers' Minimum Standard of Housing Standard of Housing and Amenities Act 1990 (Act 446). Workers' housing inspection was carried on weekly as per Section 23(2) of the Workers' Minimum Standards of Housing & Amenities Act 1990 (Act 446).

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Clause	Indicators	Comply Yes/No	Findings												
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Currently, in the estate, there was no sundry shop. The owner and the manager make efforts by enter the estate from Lahad Datu twice a week to provide the grocery and raw food to the workers to make sure workers get adequate, sufficient and affordable food. The workers will make order with the staffs at least once a week and staffs will buy the necessary items at nearest town.												
	<p>6.2.6 A “DLW” is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a “decent living wage” is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none">• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.• There is annual progress on the implementation of living wages• Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.• The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>	YES	<p>Lebijaya Sdn Bhd had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The breakdown of the prevailing wages calculation as follows:</p> <p><u>LSB CU</u></p> <table><tr><th></th><th>Local worker (RM)</th><th>Foreign worker (RM)</th></tr><tr><td>Total cost of in-kind benefits per worker</td><td>355.59</td><td>355.59</td></tr><tr><td>Average monthly take-home salary per worker</td><td>1,340.39</td><td>1,500.00</td></tr><tr><td>Total prevailing wages</td><td>1,695.98</td><td>1,855.59</td></tr></table> <p>The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.</p>		Local worker (RM)	Foreign worker (RM)	Total cost of in-kind benefits per worker	355.59	355.59	Average monthly take-home salary per worker	1,340.39	1,500.00	Total prevailing wages	1,695.98	1,855.59
	Local worker (RM)	Foreign worker (RM)													
Total cost of in-kind benefits per worker	355.59	355.59													
Average monthly take-home salary per worker	1,340.39	1,500.00													
Total prevailing wages	1,695.98	1,855.59													

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Clause	Indicators	Comply Yes/No	Findings
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	Recognition of freedom of association is available in the "Policy on Freedom of Association and Right to Collective Bargaining" Lebijaya Sdn Bhd. The policy states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Briefing to the workers were done during policy trainings.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	In LSB, the JCC (Joint Consultative Committee) is the meeting where employee & employer representatives met to discuss and disseminate the policy and relevant information on RSPO & MSPO implementation to the workers.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	It was evident that the employee representatives were selected through the election.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The formal Policy on "Polisi Buruh Kanak-Kanak" specifies that the CU undertook not to hire child labour in all service contracts and supplier agreements. In addition, the company respect to the policy which the company did not take any person/children below 18 years old.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout the LSB.

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Clause	Indicators	Comply Yes/No	Findings
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout the LSB.
	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	LBS has a No Child Labour Policy, which is publicly available. There was no evidence that the estate had employed anyone below the age of 18 years. Communication of LBS's 'no child labour' policy was implemented to both workers and external stakeholders (including neighbouring estates, suppliers, local community) through workers training programmes and JCC meetings respectively.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	The formal Policy on prevention of sexual and other forms of harassment and violence exists in 'Polisi Gangguan Seksual, Keganasan' dan displayed at all main notice boards throughout the Lebijaya CU. Communications on this Policy were also done during Gender Committee meetings sampled at Lebijaya. Among the discussions included forms of sexual harassment, complaint procedure, responsibility of gender representatives in handling related complaints, etc.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	The formal Policy to protect the reproductive rights of all, especially of women exists in "Polisi Hak Reproduksi", is displayed at all main notice boards throughout the Lebijaya CU. It stated that the Company would facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	The above-mentioned policy has been communicated to all levels of workforce. Based on interviews conducted with the only one female worker at Lebijaya CU, Policy is being implemented as they confirmed that their reproductive rights are assured i.e., freedom to plan their own family, paid maternity leave, right to take time off to nurse their child, and pregnant female workers are given light work. But as of now, the female worker has no plan for pregnancy, hence this indicator was 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	The company has a Grievance Procedure, made available in both English and Malay languages, which include grievance procedure process flow charts for external and internal stakeholders. The procedure states that grievances from internal stakeholders shall be resolved within 7 working days while complaints from external stakeholders shall be acknowledged within 7 working days and resolved within 30 days. The procedure allows all stakeholders to communicate to management either by phone, email, letter or complaints form. The procedure states a commitment to ensuring the anonymity of complainants, Human Rights Defenders, community spokes persons and whistleblowers where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. Records of complaints received from internal stakeholders are recorded in the Grievance Logbook for Internal stakeholders. For year 2022, all complaints received were only

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Clause	Indicators	Comply Yes/No	Findings
			related to damaged housing facilities that needed repair, and it is confirmed by workers that all complaints were addressed in a timely manner.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	YES	All workers in LSB currently on Imm 13. They don't have the passport. They enter the premise without using the recruitment agent. Confirmed through interviewed with the workers, there was no element of: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign. • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	Employment procedures for foreign workers exists under SOP Recruitment, which provides the procedures for recruitment, selection and hiring. Based on observations and interviews of foreign workers (harvesters, general workers), there was no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given on the contents of their employment contracts, safety, benefits/ LSB also adopted "Polisi Untuk Pekerja Asing & Tempatan", ensure several commitment statement i.e., <ol style="list-style-type: none"> 1. No discrimination practice. 2. Contract agreement. 3. Good condition living.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	Estate Manager were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. Occupational Safety Health (OSH) Committee has been established together. The Manager subsequently assigned duties of ESH coordinator to the mandore for the down line implementation of ESH practices in the estate. All identified committee were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. OSH Committee meetings were held once in three months. Minutes of meetings were made available during the audit.

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Clause	Indicators	Comply Yes/No	Findings
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	Accident and Emergency procedure was available in the SSOP. Among of procedure of ERP Document, such as Accidents & Dangerous Occurrences Notification, Physical Injury, Chemical Spillage, Fire Outbreak, Control and Prevention of COVID 19 Infection. ERP Teams & ER Procedures were formed for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Site inspection at harvesting and spraying 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 clinic/pharmacy.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	YES	All staff and workers such as the storekeepers, harvesters, sprayers/manurers were continuously trained in safe working practices including SSOP for PPE related to their job function. Appropriate PPE were given to workers based on HIRARC and SSOP recommendations suitable for the job position or hazardous operation undertaken. During site inspection at production area such as harvesting operation and spraying operation, sighted they were seen to wearing PPE such as face masks respirators, goggles, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat, to cover all potentially hazardous operations. The condition of each PPE item and their validity lifespan were found good. Records of PPE issued, and acknowledgement of receipt are maintained individually for all category of workers at LSB. Sighted common PPE issued included face masks respirators, goggles, safety shoes, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat. All workers were provided with appropriate PPE where the cost are borned by the management. Interviews conducted during the site visit at the estate showed understanding and approval from the workers that the management bares the cost of all PPEs and the workers are entitled to valid PPE, the importance of using required PPE at all times during work and proper storage and disposal methods of PPE.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	Medical care and accident insurance is provided to all employees. Costs incurred from work-related incidents leading to injury or sickness are covered by Chubb Insurance Malaysia Berhad.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	NO	The occupational injuries are recorded using Lost Time Accident (LTA) metrics. However, based on JKPP 8 form dated in Feb 2022, sighted there is no total hours work for year 2021 was recorded or declared in the JKPP 8 via MyKKP System. <i>Thus, Minor NCR DA 01 2022 was raised.</i>

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	The estate continues to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rats among others. IPM techniques applied at the estate include monitoring of pest numbers and the use of triggers for initiation of control measures. Census records show that there was minimal outbreak of rats, monkey and Ganoderma. Although there no outbreaks of leaf eating pests, beneficial plants are being established to attract natural predators and further reduce the outbreak. Beneficial plants such as <i>Turnera subulata</i> are grown in the estate and their records of planting in new areas and maintenance of existing areas of beneficial plants and location maps are available. Rat damage and Ganoderma census was regularly carried out to obtain information about threshold level and action to be taken thereafter. The records of census rat (averaging fruitlet damage < 2%) where available for verification.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There were no species referenced in the Global Invasive Species database and CABI.org within the LSB.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	No record of using fire as pest control in the LSB, verification by interview and site verification.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of pesticides applied is available in the Agricultural Manual. The use of pesticide is specific to the targeted pest, weed and disease. Justification takes consideration to minimize effect on non-target species. It includes Glyphosate, Metsulfuron methyl, Triclopyr and 2,4 Amine. In addition to the above, LSB Sustainable Agriculture Policy, states that: No use of paraquat policy is practiced. The use of other Class 1 Chemicals (such as metamidophos and monocrotophos) approved by the Pesticides Board and included in the MPOB list of approved Pesticide for use in oil palm plantations can only be carried out under strict supervision and in absolutely necessary circumstances such as severe outbreak and critical pest infestation, and, with special method of application specified in the Highly Toxic Pesticides Regulation 1996 of the Pesticides Act 1974, after authorization has been received from relevant authorities.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active	YES	LSB 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,

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Clause	Indicators	Comply Yes/No	Findings
	ingredients applied per ha and number of applications) are provided.		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 in May 2022 and site visit, no prophylactic use of pesticides used in the estate.
	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 LSB 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 LSB doesn't used pesticides Class 1A or Class 1B. This was evident 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.		
	7.2.5b Why there is no other alternative which can be used.		
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.		
	7.2.5d What is the process to limit the negative impacts of the application.		
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.		
	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	YES	The estate has the SSOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. Observed during site visit, the PPE provided to the operators such as google, face respirator, nitrile hand glove, rubber boot and apron. Additionally, the operators involved with pesticides have been given training regarding the usage safety and health issue and proper way for chemical application by the

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	products are properly observed, applied, and understood by workers. Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		estate manager and chemical supplier with knowledge on chemical handling and applications.
	7.2.7 (C) Storage of all pesticides is in accordance with recognized best practices.	YES	In LSB, pesticides were stored in accordance with the legal requirement, in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations as well as recommendation by manufacturer as per applicable MSDS. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e., storekeeper. The stores in the estate were ventilated with no chemical smell during the inspection. All the chemicals were arranged/segreated according to the type. The fertilizers were well stacked. The stores are equipped with showers, wash area and a PPE storage area. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available at the estate. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. All information regarding the chemicals and its usage, hazards, trade and generic names were available in both English & in most cases, Bahasa Malaysia and understood by workers. The SDS for concerned pesticides used, were available in both English and in most cases, Bahasa Malaysia. Relevant information of the agrochemical used by estate workers, largely via morning muster and the use of Safety Pictorial poster, were conveyed and understood by all workers interviewed during the spraying activities and fertilizer application. It was also verified in the training records that training in chemical handling especially to the sprayers, had been conducted with the aim of disseminating the correct information and ensuring understanding regarding the usage and hazards of the agrochemicals.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes. Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing activities was continually implemented for empty pesticide containers. Empty pesticide containers observed were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Records on usage and disposal were well recorded and documented.
	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	YES	Aerial spraying was not practices by LSB. There was no evidence to show that aerial spraying was carried out.

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Clause	Indicators	Comply Yes/No	Findings
	local communities at least 48 hours prior to application of aerial spraying.		
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	All workers involved with pesticides were carried out the medical surveillance were sent to outside clinic and checked by the OHD. From the result, all workers fit to handle chemical.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	Pregnant and breast-feeding women are not allowed to work with pesticides and hazardous chemicals in LSB. This instruction was tabulated in SSOP Chemical Spraying and OSH USECH Regulation 2000, Medical Removal Protection No.28 3b. There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in the estate. Workers interviewed were aware that pregnant and breast-feeding women should not handle chemicals. During the monthly check-up by the VMO, pregnancy status is remarked and if of any cases the worker will be withdrawn from spraying duties.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Waste management and disposal plan to avoid or reduce pollution had been documented. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution during routine operation. In estate, domestic waste from the housing area is well managed and all domestic wastes are disposed at landfill sited in the estate area. Sighted the there is no practice of open fires within LSB. Monitoring is done weekly in both domestic waste collection areas and in landfill sites.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Standard Operating Procedure Scheduled Waste Disposal has been established. The documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material. Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. Each house was provided with dustbin. The wastes were removed weekly and disposed via landfill.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at LSB, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at LSB have been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	The LSB continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP - Safe and Standard Operating Procedures (SSOP) & the Agricultural Manual. LSB operations were guided through the manuals and SOP. The procedures as documented in the Agricultural Manual were disseminated to the staff/workers through morning briefings and training.
	7.4.2 Periodic tissue and soil sampling is		Periodic tissue and soil sampling were carried out in the estate 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.	YES	nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years' intervals. The soil sampling been done periodically latest dated in Sept 2020 by Central Laboratory of HSP. The latest leaf sampling was conducted in Oct 2021 for fertilizer recommendation FY 2022.
	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	LSB had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field. No EFB application was applied in FY 2021 and 2022.
	7.4.4 Records of fertiliser inputs are maintained.	YES	The records of agronomic and fertilizer recommendation for year 2022 by Agronomic Advisory Report for 2021 shown the application date, field number, dosage applied per palm, types of fertilizer and number of applications. The program consists of compound and straight fertilizer. However, based on actual fertilizer application for year 2022, only compound fertilizer were applied with dosage 3kg/palm/year at Block 1/2/3. The fertilizer application was not followed as per program or recommendation by the agronomic report dated in Oct 2021. Thus, records of fertilizer inputs need to enhance as per recommendation from agronomic report with normal fertilizing range 8 to 10 kg fertilizer per palm per year to improve soil fertility and level that ensures optimal and sustained yield.
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in LSB. As per the Soil Maps, the soil series were Kinabatangan and Kretam.
	7.5.2 No replanting on steep slopes (above 25 degress) 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 2026 based on replanting program provided. Based on slope map prepared by HSP Agronomy Department, there was no steep terrain (greater than 25°) in LSB.
	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 LSB. 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	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying	YES	Based on the audit findings, it was confirmed that there were no new planting or new development of areas at LSB. 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.

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Clause	Indicators	Comply Yes/No	Findings
for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	marginal and fragile soils, including steep terrain, are taken into account in plans and operations.		
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	There were no marginal and fragile soils in the LSB.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	LSB had a management strategy for palm oil cultivation, taking into account the soil surveys and topographic information in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information was provided and reviewed by the auditors
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands 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.	NA	Not applicable. Based on soil map prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.
	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).	NA	
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	NA	
	7.7.4 (C) A documented water and ground cover management programme is in place.	NA	
	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	NA	

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	<p>replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	NA	Not applicable. Based on soil map prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	NA	
7.8 Practices maintain the quality and availability of surface	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	YES	A Water Management Plan was available in the estate, reviewed in Aug 2022 to include the water source, activities, water use, possible threats, action plans, timelines and related records. The management have identified in the water management 1 areas that require regular monitoring which is Sungai Sikok. The Inlet and Outlet of the river/water catchment

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Clause	Indicators	Comply Yes/No	Findings
and groundwater.	other users in the catchment. The plan addresses the following:		are monitored on a quarterly basis. Water samples are obtained from the pre-determined water sampling points at the upstream and downstream areas. The samples are submitted to HSP Plantations Central Laboratory. The results are then provided to the estate for monitoring. All workers have access to clean water provided by the estate management via mineral or drinking water. Each worker will be provided with 24 bottles 1.5 L for every month. Based on interview and records of distribution of drinking water was available and provided accordingly.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the LSB does not restrict access to clean water or contribute to pollution of water used by communities.
	7.8.1b Workers have adequate access to clean water.	YES	As verified through interview with workers, all workers have obtained adequate access to clean water via mineral or drinking water. Each worker will be provided with 24 bottles 1.5 L for every month.
	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	LBS had begun to reduce use of pesticides since August 2021. There isn't any river passing through Lebijaya Sdn Bhd property, as sighted in the map and verified in the field. Additionally, steps were taken not to contaminate man-made water courses. For example, grass along water ways were let to grow and slashing maintained when needed.
	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 since this is Smallholder Growers.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Not applicable since this is Smallholder Growers.
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	Sighted "Fossil Fuel Management Plan" had been developed and reviewed in Jan 2022. The plan only focuses on diesel usage by FFB Transport and use of fertilizers. Sighted environmental impact and mitigation measure has been identified and documented accordingly. Consumption of diesel was monitored on monthly basis.

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7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>The Lebijaya Sdn. Bhd. had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends via email to RSPO in Aug 2022. The input data FY2021 have been verified and checked. The input data as per below:</p> <table><tr><th>Description</th><th>Unit</th><th>Value</th></tr><tr><td>Oil Palm Planted On Mineral Soil</td><td>Ha</td><td>215.80</td></tr><tr><td>Oil Palm Planted On Peat</td><td>Ha</td><td>0.00</td></tr><tr><td>Total Oil Palm Planted Area</td><td>Ha</td><td>215.80</td></tr><tr><td>Conservation Area (Forested)</td><td>Ha</td><td>0.00</td></tr><tr><td>Conservation Area (Non-Forested)</td><td>Ha</td><td>7.50</td></tr><tr><td>FFB Supplied To This Mill</td><td>Mt</td><td>3091.17</td></tr><tr><td>FFB Produced By This Estate/Pantation</td><td>Mt</td><td>3091.17</td></tr><tr><td>FFB Production Per Hectarage</td><td>Mt/Ha</td><td>13.74</td></tr></table> <p>Plantation / field emission</p> <table><tr><th>ription</th><th>Total emission (tCO2e)</th><th>tCO2e/ha</th><th>tCO2e/t FFB</th><th>Emission allocated to this mill (tCO2e)</th></tr><tr><td>Land Conversion</td><td>2222.24</td><td>9.88</td><td>0.72</td><td>2222.24</td></tr><tr><td>Crop Sequestration</td><td>-2106.39</td><td>-9.36</td><td>-0.68</td><td>-2106.39</td></tr><tr><td>*CO2 Emissions from Fertiliser</td><td>82.47</td><td>0.37</td><td>0.03</td><td>82.47</td></tr><tr><td>N2O Emissions from Peat</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>N2O Emissions from Fertiliser</td><td>123.67</td><td>0.55</td><td>0.04</td><td>123.67</td></tr><tr><td>Fuel Consumption</td><td>78.63</td><td>0.35</td><td>0.03</td><td>78.63</td></tr><tr><td>Peat Oxidation</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Sequestration in Conservation area</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>TOTAL</td><td>400.62</td><td>1.78</td><td>0.13</td><td>400.62</td></tr></table> <p>*Includes transport and manufacture emissions from mineral fertilizers and emissions from urea *This only includes N20 emissions form mineral fertiliser application and peat soil. The N2O emissions from organic fertiliser application is not included here and can only be displayed in the final summary.</p>	Description	Unit	Value	Oil Palm Planted On Mineral Soil	Ha	215.80	Oil Palm Planted On Peat	Ha	0.00	Total Oil Palm Planted Area	Ha	215.80	Conservation Area (Forested)	Ha	0.00	Conservation Area (Non-Forested)	Ha	7.50	FFB Supplied To This Mill	Mt	3091.17	FFB Produced By This Estate/Pantation	Mt	3091.17	FFB Production Per Hectarage	Mt/Ha	13.74	ription	Total emission (tCO2e)	tCO2e/ha	tCO2e/t FFB	Emission allocated to this mill (tCO2e)	Land Conversion	2222.24	9.88	0.72	2222.24	Crop Sequestration	-2106.39	-9.36	-0.68	-2106.39	*CO2 Emissions from Fertiliser	82.47	0.37	0.03	82.47	N2O Emissions from Peat	0.00	0.00	0.00	0.00	N2O Emissions from Fertiliser	123.67	0.55	0.04	123.67	Fuel Consumption	78.63	0.35	0.03	78.63	Peat Oxidation	0.00	0.00	0.00	0.00	Sequestration in Conservation area	0.00	0.00	0.00	0.00	TOTAL	400.62	1.78	0.13	400.62
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	7.10.2 (C) Starting 2014, the carbon stock	YES	Auditors has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the estate area. Based on the observation during																																																																													

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	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).		the audit, it is confirmed that there were no new planting or new development of areas at Lebijaya Sdn. Bhd. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	The Environmental Impact Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conservation, Crop Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place.
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	During site visit there was no new planting or replanting at LSB.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Estate has established fire prevention and control measures as per procedure SSOP "Pelan Tindakan Menghadapi Kebakaran" sighted a training has been conducted by estate manager to employees and mandore.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Engages with adjacent stakeholders on fire prevention has been conducted and briefed during external stakeholders' consultation meeting through online meeting.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	No new land clearing since Nov 2015 available at LBS, 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 "HCV-HCSA Area Assessment Report of LBS 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 December 2019., and reviewed in Aug 2022.
	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	NO	Based on the assessment, The HCV assessment had identified 1 potential HCV. The SOU observed to maintain its identified HCV, i.e. HCV 4 Buffer Zones Sungai Sikok. However, it was found that the Assessment failed to identify and take into account wider landscape-level considerations, such as the Elephant movement Belt trail. Thus, Major NCR MZK 01

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Clause	Indicators	Comply Yes/No	Findings
	plantations remains valid.		2022 has been raised.
	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.		
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	NO	<p>The HCV assessment had identified 1 potential HCV. The SOU observed to maintain its identified HCV, i.e. HCV 4 Buffer Zones Sungai Sikok. The assessor has outlined several recommendations for HCV management by estate among others as follows:</p> <ul style="list-style-type: none"> • Continue prohibiting workers from entering the area • Continue to prohibit indiscriminate spraying at the area • To put up signboard prohibiting entrance of workers to the area. The area must be properly marked or designated • For RTE continue prohibiting illegal Hunting • Continue to conduct yearly training to educate the workers on RTE species. <p>HCV Management Plan 2022 updated on 5th August 2022 stated that to protect HCV4, However, it was found that HCV Plan (updated in Aug 2022) was not developed in consultation with relevant stakeholders such as PERHILITAN and includes the directly managed area and any relevant wider landscape level considerations (where these are identified), i.e., the area intrusion by Wildlife such as Borneon Pigmy Elephant. Thus, Major NCR MZK 02 2022 has been raised.</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.	YES	There were no local communities living nearby with Lebijaya Sdn Bhd. So, this indicator was not applicable with this CU.

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Clause	Indicators	Comply Yes/No	Findings
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	<p>LSB has develop action plan base on assessment by the Assessor, the plan name HCV Management Plan 2022 updated in Aug 2022 stated that to protect HCV 4. LSB also is committed to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting were erected at border. Patrolling by mandore for Illegal hunting is also being implemented to control the illegal activities.</p> <p>LBS has conducted training on HCV and wildlife for the staffs and field workers and the Company also has established a disciplinary measure titled 'Dilarang Memburu'.</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 fed back into the management plan.	YES	LBS 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. Monthly monitoring for RTE was conducted by LBS Records and the monitoring activities was recorded in the form 'Lebijaya 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

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RSPO Certifications Systems for P&C and RISS, Nov 2020 – Not Applicable

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

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		plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.		
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	Not applicable. LBS didn't have other mills or estates within it company.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	YES	Not applicable. LBS didn't have other mills or estates within it company.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	YES	Not applicable. LBS didn't have other mills or estates within it company.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Not applicable. LBS didn't have other mills or estates within it company.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,	YES	Not applicable. LBS didn't have other mills or estates within it company.

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		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 	YES	
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	Not applicable. LBS didn't have other mills or estates within it company.
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	YES	Not applicable. LBS didn't have other mills or estates within it company.
		<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	YES	Not applicable. LBS didn't have other mills or estates within it company.
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	YES	Not applicable. LBS didn't have other mills or estates within it company.
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above	YES	Not applicable. LBS didn't have other mills or estates within it company.

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		may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.		
<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>	YES	No additional indicators		<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.</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
3.4.3 MAR 01 2022	Major	<p>Requirement: 3.4.3 (C) - The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Finding: Social management and monitoring plan is not updated in a participatory way.</p> <p>Objective evidence: Inadequate involvement of workers such as non-union workers, dependence, gender, races, job scopes and etc. Gathering of negative and positive impact was conducted during morning master call. Some issues on minimum wages and productivity workers were not reviewed. Additionally, no consultation with neighbouring villages from Kg Litang.</p>	<p>The root cause:</p> <ol style="list-style-type: none"> 1. Management Of Lebijaya does not understand the new Requirement of RSPO P&C MYNI 2018 as last attended training is P&C MYNI 2014, management has Miss-out to include the result of social impact assessment and not updated in the report. 2. Management Of Lebijaya does not understand the new Requirement of RSPO P&C MYNI 2018 as last attended training is P&C MYNI 2014, Resulted Misunderstanding on the participatory of neighbouring villagers in the social impact assessment that need to be included head villagers, not only adjacent villagers. <p>Correction: <i>(The correction shall address the objective evidence)</i></p> <ol style="list-style-type: none"> 1. Immediately include the result of social impact assessment with stakeholders in the report. 2. Immediately conduct social impact assessment by consulting face to face with head villager. <p>Corrective action: <i>(The corrective action shall address the root cause of this NC)</i></p> <ol style="list-style-type: none"> 1. Estate manager will establish annual plan for stakeholder meeting & monitor it according to ensure that the social impact assessment is conducted and updated in timely manner. 2. Estate manager will invite to social and environmental impact assessment annually and consult the Head/Representative Kg. Litang respectively. 	<p>Status: Closed</p> <p>Auditor has verified the Evidence of amendment of SIA report that include consultation with Kg Litang face to face. Result of the consultation has been included in the Assessment and the SIA Plan. Auditor also has verified the Training Plan that included SIA Plan and Stakeholder Meeting dated November 22.</p>

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6.7.5 DA 01 2022	Minor	<p>Requirement: 6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>Finding: The total hours work for year 2021 yet to be recorded or declared in the JKPP 8 via MyKKP System.</p> <p>Objective evidence: The occupational injuries are recorded using Lost Time Accident (LTA) metrics. However, based on JKPP 8 form dated 14/02/2022, sighted there is no total hours work for year 2021 was recorded or declared in the JKPP 8 via MyKKP System.</p>	<p>Root cause: The total work hours were not updated due to Management of Lebijaya is changes to a new management, the new management is lack of Knowledge on Plantation and OSH Regulation Resulted JKPP 8 data late updating by the reporting officer.</p> <p>Correction: To update the missing information of total work hours in MYKKP 8 immediately. Copy of latest JKPP 8 for year 2021, dated 16 September 2022 is attached for evidence.</p> <p>Corrective action: To consult DOSH or Safety Officer of HSPSB to get better understanding on JKPP 8 online reporting system to ensure it is updated correctly in the future. Training on JKPP 8 online reporting had been updated in the annual training program. Copy of the latest training program is attached for evidence.</p>	<p>Status: Open The effectiveness of the corrective action is accepted and will be verified during next audit.</p>
7.12.2b MZK 01 2022	Major	<p>Requirement: 7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows: 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.</p> <p>Finding: The HCV Assessment was not taken into account wider landscape-level considerations.</p> <p>Objective evidence: The report of "HCV-HCSA Area Assessment Report of Lebijaya Sdn Bhd" was available, However, it was found that the Assessment was failed to identify and take into account wider landscape-level considerations. Such as Elephant movement Belt trail.</p>	<p>Root cause: Management Of Lebijaya does not understand the new Requirement of RSPO P&C MYNI 2018 as last attended training is P&C MYNI 2014, Resulted improper HCV Report has been made, Management also didn't know the details of meeting with Wildlife Department need to be include in the HCV-HCS Assessment report.</p> <p>Correction: Immediately update all the actions and current situation on Elephant movement sighted in the estate into the HCV-HCS Assessment Report (please refer page 8).</p> <p>Corrective action: Lebijaya's management will take into account wider landscape-level considerations and update the HCV-HCS Assessment Report accordingly by yearly basis if there is rare threaten endanger species animal sighted in the estates.</p>	<p>Status: Closed Auditor has verified the Evidence of amendment of HCV-HCSA report that include consultation with Sabah Wildlife Department. Result of the consultation has been included in the HCV-HCSA Assessment and the HCV Plan dated 5th August 2022.</p>

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<p>7.12.4 MZK 02 2022</p>	<p>Major</p>	<p>Requirement: 7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>Finding: The HCV integrated management plan was not 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>Objective evidence: The HCV Integrated Management Plan was available, However, HCV Plan is not developed in consultation with relevant stakeholders such as PERHILITAN, and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). e.g area intrusion by Wildlife such as Borneon Pigmy Elephant</p>	<p>Root cause: Management of Lebijaya does not understand the new Requirement of RSPO P&C MYNI 2018 as last attended training is P&C MYNI 2014, Resulted improper HCV Report and Plan has been made, Management also didn't know the details of meeting with Wildlife Department need to be include in the HCV-HCS Assessment report.</p> <p>Correction: Immediately update the HCV Integrated Management Plan with Wildlife Department and relevant stakeholders in the HCV-HCS Assessment Report (please refer page 20).</p> <p>Corrective action: Lebijaya's management will monitor and update the integrated management plan in HCV-HCS Assessment Report accordingly by yearly basis if there is rare threaten endanger species animal sighted in the estates.</p>	<p>Status: Closed Auditor has verified the Evidence of amendment of HCV-HCSA report that include consultation with Sabah Wildlife Department. Result of the consultation has been included in the HCV-HCSA Assessment and the HCV Plan dated 5th August 2022.</p>
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Not Applicable.

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ATTACHMENT 6 – Stakeholder Listing

GOVERNMENT AGENCIES

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
1	Malaysian Palm Oil Association	Tn. Hj. A.R Azmeer Bin Shamsuddin	Malaysian Palm Oil Association (MPOA)- Sabah (Nombor Pendaftaran Pertubuhan 1045), 1 st Floor, Lot 3, Block 6 Bandar Indah, Mile 4, Jalan Utara, 90000 Sandakan, Sabah, Malaysia.	Tel: 089-615863 E-mail address: mpoa.sabah@email.com	
2	Malaysian Palm Oil Board	Syahril Amri Bin Amrun Muhammad Faizal Bin Ambo Sudin	Pejabat MPOB Cawangan Kinabatangan, Block F, Lot 12, Tingkat 1 Bangunan Perkasa Realty Sdn Bhd, 90200, Bukit Garam, Kinabatangan, Sabah.	Tel: 089-551386/88 Fax: 089-551387	
3	Department Of Environment (Kota Kinabalu)	Amirul Bin Aripin (Pengarah)	Jabatan Alam Sekitar Sabah, Aras 4, Blok A, Kompleks Pentadbiran kerajaan Persekutuan Sabah, Jalan UMS- Sulaman, Likas, 88450 Kota Kinabalu Sabah.	Tel: 088-488171 / 172 ext 244 Fax: 088-488177	
4	Department Of Environment (Sandakan)	1. Aliudin @ Din Atat @ Mohd Arsyid 2. En. Zulmie	Jabatan Alam Sekitar Negeri Sabah, Cawangan Sandakan, Tingkat 2, Wisma Sabah, Lot 1 & 2, Megah Light Industrial Estate, 90000, Sandakan, Sabah.	Tel: 089-674653 Email: aliudin@doe.gov.my	
5	Environmental Protection Department	Vitalis Modyuing (Pengarah)	Environment Protection Department, Wisma Budaya, 1-3 Floor, Tungku Abdul Rahman Road, Locked Bag 2078, 88999 Kota Kinabalu, Sabah, Malaysia	Tel: 088-238188 Fax: 088-239046	
6	Department Of Agriculture	En. Idrus Bin Shafie	Jabatan Pertanian Sabah, Aras 1,5,6&7, Wisma Pertanian, Jalan Tasik (Off Jalan Maktab Gaya), Beg Berkunci No.2050, 88632 Kota Kinabalu, Sabah.	Tel:088-283283/282 Fax:088-239046 Email: doasabah@sabah.gov.my	
7	Immigration Department	Tuan Noor Alam Khan Bin A. Wahid Khan (Kota Kinabalu)	Pejabat Imigresen Negeri Sabah, Aras 1- 4,Block B, Kompleks Pentadbiran kerajaan Persekutuan, Jalan	Tel: 088-488700 Fax: 088-488800	

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		Pn. Rosie Maharan (Lahad Datu)	UMS, 88300 Kota Kinabalu, Sabah Jalan Silam, 91100, Lahad Datu	Tel: 089-887552/089-887584	
8	Ibu Pejabat Polis Daerah Kinabatangan, Sandakan.	En. Dzulbaharin Bin Hj. Ismail	Ibu Pejabat Polis Daerah Kinabatangan, W.D.T. No. 17, 90200 Kinabatangan, Sabah.	Tel: 089-561890/891/443 Fax: 089-561559 Email: kpdckinabatangan@rmp.gov. my	
8	Ibu Pejabat Polis Kontinjen Sabah	DSP Mohammad Bin Taib (Bahagian Pentadbiran) 016-8036628	Ibu Pejabat Polis Kontinjen Sabah, Polis Di Raja Malaysia, Beg Berkunci No2062, 88560 Kota Kinabalu, Sabah	Tel: 088-253555 Fax: 088-240475 Email: cpo.sabah@rmp.gov.my	
9	Jabatan Tenaga Kerja Lahad Datu	Puan Asriyah Abdul Hafid En. Rizal Bin Osman	MDLD 3988, Lot 103, Tingkat Bawah dan 1, Bangunan Lembaga Koko Malaysia, Fajar Centre, Jalan Segama, 91120 Lahad Datu	Tel:089-881623 Email: jtkblahaddatu@mohr.gov.my	
10	Jabatan Tenaga Kerja Kinabatangan	En. Zarul Afiq Bin Rosmi	Pejabat Tenaga Kerja Kota Kinabatangan (Kementerian Sumber Manusia) Block E5 & E6 Bangunan Perkasa Reality 90200 Kota Kinabatangan, Sabah.	Tel:089-881623 Email: jtkbkkbtgn@mohr.gov.my	
10	Suruhanjaya Tenaga	En. Mohd Yusrul Bin Yusof (Pengarah Suruhanjaya Tenaga, kawasan pantai timur)	Pejabat Kawasan (Pantai Timur Negeri Sabah), Tingkat 3, Wisma Saban, KM 12, Jalan Labuk, WDT No. 25,90500 Sandakan, Sabah	Tel: 089-666694 Fax: 089-660279	
11	Department Of Safety and Health (Kota Kinabalu)	Ir. Hamsain Bin Baniamin En. Zulkifli Bin Yahaya	Jabatan Keselamatan dan Kesihatan Perkerjaan Sabah/W.Labuan (Kementerian Sumber Manusia), Tingkat 1, Sayap Kanan, Wisma Perkeso, No.11, Lorong Sempelang, P.O Box 60, 88858 Tanjung Aru, Kota Kinabalu, Sabah	Tel:088- 235855/230855/253576 Email: jkkpsb@mohr.gov.my Zulkifli_y@mohr.gov.my	
12	Jabatan Keselamatan & Kesihatan Pekerjaan (JKKP) Sandakan	Pn. Siti Hawa Binti Sadek	JKKP (Kementerian Sumber Manusia), Tingkat 1, Wisma Sabah, Batu 7, Jln Labuk, WDT No. 71, 90500 Sandakan	Tel. No.: 010-4474631 Office Tel. No.: 089-672059 Email: sitihawasadek@mohr.gov.my	

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13	Jabatan Bomba dan Penyelamat Kinabatangan	Pegawai Bomba	Balai Bomba dan Penyelamat, Jalan Datuk Hj Abdul Malek Chua, Pekan Kota Kinabatangan, 90000 Kinabatangan, Sabah.	Tel: 089-562630	
14	Jabatan Bomba Dan Penyelamat Lahad Datu	En. Samsuah Bin Rashid	Jalan Tengah Nipah, Peti Surat No. 60994, 91118 Lahad Datu	Tel: 089-884444/994 Fax: 089--884244	
15	Lahad Datu Wildlife Department	Mr. Sylvester Saimin Mr Rayner Benedict	No 8125, lot 1, blok 10, singga point, peti surat 61224, 91121 lahadau.	Tel: 089-863736	
16	Lahad Datu Forestry Department	Jurimin Ebin	Peti Surat No. 61, 91007 Lahad Datu	Tel: 089-881425 Email: Jurimin.Ebin@sabah.gov.my	
17	Pejabat Kesihatan, Hospital Daerah Lahad Datu	Pengawai Perubatan	Hospital Lahad Datu, Peti Surat 60182, 91111 Lahad Datu	089-895111	
18	Jabatan Buruh	En Rusdi Bin Bustami	Jabatan Tenaga Kerja, Peti Surat 60181, 91111 Lahad Datu	089-881623 Fax: 089-880623	
19	S.K Litang	Mr. Gusmit Hj. Ning	S.K Litang, WDT 22,90200 Kota Kinabatangan, Sandakan, Sabah	Tel: 014-8618893	
20	Konsulat Republik Indonesia, Tawau	Pak Ridwan Bin Tahir	Batu 2 ½ Jalan Sin Onn P.O.Box No 742, 91000 Tawau.	Tel: 089 772052	
21	Philiphine Embassy, Kuala Lumpur, Malaysia	Bernard Bonina Social Welfare Attache	No.1 Changkat Kia Peng, 50450, Kuala Lumpur, Malaysia.	Tel: +(603) 2148 4233	

NEIGHBOURING ESTATES

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
1	Sungai Segama Group of Estates & Jeroco Group of Estates Hap Seng Plantations Holdings Berhad.	Mr. Daniel Lo	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel : 089-278128 / 089-278138 Fax: 089-278186 / 089-278168	
2	Unico Desa Plantation Berhad (Unico 4 Estate)	Estate Manager	P.O.Box 60397, 91113, Lahad Datu, Sabah.	010-9319014	
2	First Raintree Sdn Bhd / Harus Abadi Sdn Bhd	Mr Tey You Lai	MDLD 9075 Bungalow Lot 1, I Peak Business Centre, Dam Road, 91100 Lahad Datu, Sabah	016-9288150	

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NON-GOVERNMENTAL ORGANIZATION (NGO)

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
1	World Wide Fund for Nature (WWF) (Lahad Datu)	Mr. Fredinand Lobinsiu	WWF Lahad Datu Field Office, Forest Restoration, MDLD 6575, 1 st Floor, Lot 9, Block Airport Plaza, 91100 Lahad Datu	Tel: 089-886376/377 Fax: 089-886378	

INTERNAL STAKEHOLDERS

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
1	Lebijaya Sdn Bhd	Abd. Hamad Bin Abd Karim	P.O.BOX 812, 90709 Sandakan, Sabah	Office Number: 011-31845520	
2	Lebijaya Sdn Bhd	Norhazierah Bt. Karim			
3	Lebijaya Sdn Bhd	Azman Bin Karim			

SUPPLIER / CONSULTANT

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
1	Hap Seng Sasco Fertilizers Sdn. Bhd	HS	MDLD0093, Jalan Kastam Baru, Cocoa Export Centre, Sabah, 91100 Lahad Datu	089-887176	
2	Agromate (M) Sdn. Bhd	Agromate	MDLD 524, KM 5, 1/2, Jalan Tengah Nipah, 91100 Lahad Datu, Sabah	089-880425	
3	Rising Star Properties Sdn Bhd	Manager	MDLD 9495, Km 5, Jalan Tungku Bypass, I-peak Business Center, 91112, Lahad Datu, Sabah.	089-863205	
4	Dynason Corporation Sdn.Bhd	Manager	Mile 3.5, Jalan Lahad Datu/Sandakan, P.O.Box 61198, 91120, Lahad Datu, Sabah.	089-880696	
5	Fook Kam Loong Hardware Sdn Bhd	Manger	Lot No 36, MDLD 0624, Dam Road, P.O.Box 103, Sabah, 91107 Lahad Datu	089-882762	
6	Perniagaan Sinar Jaya	Manager	P.O.Box 1411, 90715 Sandakan, Sabah.	089-224166	
7	Pentas Flora Sdn Bhd	Mr. Hassan Firdaus Tahir	MDLD 8933, Lot 50, Phase 5, 1 st Floor D'Perdana Square, Lorong 9, Jalan Silam, 91100, Lahad Datu.	016-2111389	
8	Utius Venture Sdn Bhd	Mr. Vijaiyagaadaan Balakrishnan	No.21-11, Centrol Mall, No. 8, Jalan Batu Tiga Lama, 41300 Klang, Selangor, Malaysia	Tel: 013-6123555 Email: utiusventure@outlook.com	

LOCAL VILLAGES

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
1	Kampung Litang	En. Mohd Azman Bin Ismail	S.K Litang, WDT 22,90200 Kota Kinabatangan, Sandakan, Sabah	HP: 011-35419510	

CONTRACTORS / MILLS

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
1	Jeroco Palm Oil Mill 2	En. Jumansha A.	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel : 089-278128 / 089-278138 Fax: 089-278186 / 089-278168	
2	Tomanggong Palm Oil Mill	Mr. Aaron Dahing	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel : 089-278128 / 089-278138 Fax: 089-278186 / 089-278168	