



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

File Ref. : ES18120002

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT** : Spark Glory Sdn. Bhd.  
**PARENT COMPANY** : Spark Glory Sdn. Bhd.  
**RSPO MEMBERSHIP No.:** 1-0261-18-000-00

**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	
Spark Glory Sdn Bhd	Spark Glory Sdn Bhd	5° 18' 52" N	118° 34' 34" E	CL 095333467/476/458, 421/430/412/449, Sg Segama, 91117 Kinabatangan District, Lahad Datu, Sabah.

**MAP** : See Attachment 1

**AUDIT DATE** : 21-24 Nov 2022

**DURATION** : 8 auditor days

**TYPE OF AUDIT** :  Annual Surveillance Audit No.3

Recertification Audit

**STANDARD** : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

**SCOPE OF CERTIFICATION:** Production of Sustainable Fresh Fruit Bunches

**VALIDITY OF RSPO CERTIFICATE** : 24/02/2020 – 23/02/2025

**The following attachments form part of this report:**

Non-conformity Report(s)

List of additional site(s)

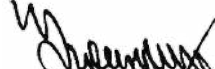
**Report by Audit Team Leader**

**Acknowledgement by Client's Representative**

Name : MOHD AB RAOUF BIN ASIS

Name : Yvonne Chew Siok Fong

Signature : 

Signature : 

Date : 28/02/2023

Date : 3/3/2023

## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF AUDITS

<b>Stage 2 audit</b>					
On-site audit date	:	19 – 20 September 2019		No. of auditor days: 6 auditor days	
Audit team	:	Mahzan B Munap (LA), Mohd Zulfakar Kamaruzaman, Mohd Ab Raouf Asis and Selvasingam a/l Kandiah, Dzulfiqar Azmi			
No. of major NCR	:	2	Indicator: RSPO P&C (4.6.11)	Closing date: 20/01/2020	
No. of minor NCR	:	1	Indicator: RSPO P&C (6.5.3)		
Indicate the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		√	-	√	√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		-	-	-	-
		Indigenous people	Contractor	Others (Please specify)	
		NA	-	-	NA
Supply base sampled	:	Own plantation – Spark Glory			
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	:	Dr Dzolkhifli Omar			
Report approved by	:	Kamini A/P M.Sooriamoorthy	Approval date : 24/02/2020		

<b>Annual Surveillance Audit 1</b>					
On-site audit date	:	19-21/04/2021		No. of auditor days : 10	
Audit team	:	Rozaimee, Mohd Zulfakar, Ismail Adnan, Selvasingam T Kandiah			
No. of major NCR	:	2	Indicator: 7.10.1 & 7.12.2	Closing date: 9/07/2021	
No. of minor NCR	:	1	Indicator: 3.3.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		√		√	√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
			√	√	
		Indigenous people	Contractor	Others (Please specify)	
		NA			NA
Supply base sampled	:	Own plantation – Spark Glory			
Changes since the last audit	:	No changes.			
Justification of audit planning	:	The allocated mandays use to cover the following – visits to the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.			
Name of peer reviewer	:	NA			
Report approved by	:	Kamini A/P M.Sooriamoorthy	Approval date : 13/07/2021		

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<b>Annual Surveillance Audit 2</b>				
On-site audit date	: 4 – 7 January 2022	No. of auditor days	: 10	
Audit team	: Carol Ng, Mohd Zulfakar Kamaruzaman, Dzulfiqar Azmi			
No. of major NCR	: 2	Indicator: 2.1.1 & 7.8.2	Closing date	: 5 April 2022
No. of minor NCR	: 0	Indicator	: -	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√	NA	NA	√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	NA	√	√	√
	Indigenous people	Contractor	Others (Please specify)	
	NA	NA	NA	
Supply base sampled	: Own plantation – Spark Glory Sdn. Bhd.			
Changes since the last audit	: No changes.			
Justification of audit planning	: The allocated mandays use to cover the following – visits to the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.			
Name of peer reviewer	: NA			
Report approved by	: Kamini Sooriamorthy		Approval date : 8/04/2022	

<b>Annual Surveillance Audit 3</b>				
On-site audit date	: 21-24 Nov 2022	No. of auditor days	: 10	
Audit team	: Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman, Rozaimie bin Ab Rahman			
No. of major NCR	: 1	Indicator: 6.2.2	Closing date:	: 23/2/2023
No. of minor NCR	: Nil	Indicator	: N/A	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√	NA	√	√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	NA	√	√	
	Indigenous people	Contractor	Others (Please specify)	
	NA	NA	NA	
Supply base sampled	: Own plantation – Spark Glory Sdn. Bhd.			
Changes since the last audit	: No changes			
Justification of audit planning	: The allocated mandays use to cover the following – visits to the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.			
Name of peer reviewer	: NA			
Report approved by	: Kamini Sooriamorthy		Approval date : 28/02/2023	

**RSPO PUBLIC SUMMARY REPORT**

**SUMMARY OF INFORMATION**

**TABLE 1**

	<b>STAGE 2 / RA</b>	<b>ASA 1</b>	<b>ASA 2</b>	<b>ASA 3</b>	<b>ASA 4</b>
<b>Projection Period</b>	October 2019 to September 2020	April 2021 to March 2022	*January 2022 – December 2022	*Nov 2022 – Oct 2023	
<b>Certified FFB Processed (MT)</b>	2,380.00	2,000.00	2,000.00	1,200.00	
<b>Production of Certified CPO (MT)</b>	500.00	400.00	400.00	240.00	
<b>Production of Certified PK (MT)</b>	125.00	100.00	100.00	60.00	
<b>Certified Areas (Ha)</b>	126.83	126.83	126.83	126.83	
<b>Planted Areas (Ha)</b>	121.46	121.46	121.46	121.46	
<b>Production Areas (Ha)</b>	121.46	121.46	121.46	121.46	
<b>HCV Areas / Conservation Areas (Ha)</b>	1.19	1.19	1.19	1.19	
<b>REMARKS</b>	Actual period for this reporting has covered between Jan and Oct 2022.				

**TABLE 2**

<b>FFB last year certified volume (MT)</b>	2,000.00	
<b>FFB actual certified volume (MT) (Jan 2022 to Oct. 2022)</b>	928.92	
<b>Last licence year's actual sold volume of certified FFB (MT, if applicable)</b>	928.92	
<b>Last license year's actual sold volume through Book &amp; Claim</b>	0.00	
<b>FFB new year certified volume (MT)</b>	1,200.00	
	<b>PO</b>	<b>PK</b>
<b>Last years certified volume (MT)</b>	400.00	100.00
<b>Last years actual certified sold (MT) (Jan 2022 to Oct. 2022)</b>	185.78	46.44
<b>Last years actual sold under other schemes (MT)</b>	0.00	0.00
<b>Last years sold conventional (MT)</b>	0.00	0.00
<b>New year certified volume (MT)</b>	240.00	60.00

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## **1.0 AUDIT PROCESS**

### **1.1 Certification Body**

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

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

### **1.2 Qualification of audit team**

<b>Member of the Audit Team</b>	<b>Role/area of RSPO requirements</b>	<b>Qualifications</b>
Mohd Ab Raouf bin Asis	Lead Auditor, GAP, Metrics Template, TBP	Holds a B.Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. He has experience in auditing since 2016. He has successfully attended Quality Management System (ISO 9001:2015) and OHS 18001:2007 lead assessor course in 2016. Currently he qualified for RSPO P&C Lead Auditor and MSPO Lead Auditor.
Mohd Zulfakar bin Kamaruzaman	Auditor, HCV & Social	Holds B.Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operations. He has experience in auditing since 2015. He has been trained and qualified as a RSPO P&C and MSPO.
Rozaimiee bin Ab Rahman	Auditor, Safety & Environment	Holds a B. Sc. of Agriculture. He had 7 years of working experience in the oil palm operation. He has experience in auditing since 2016. He has been trained and qualified Lead Auditor for RSPO P&C and MSPO.

### **1.3 Audit methodology**

The audit covers Spark Glory Sdn Bhd (SGSB) Estate. Since this is an assessment of an outgrower who owns a single estate, a parcel of land with the size of 126.83 ha, the standard sampling formula of  $0.8\sqrt{y}$  does not apply. The audit included an on-site audit of SGSB 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.

### **1.4 Stakeholder Consultation**

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

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Stakeholders interviewed	Evidence from stakeholder consultation
<p>1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male &amp; female)</p>	<ul style="list-style-type: none"> <li>▪ Five (5) interviewed workers constituted local and foreign, all male, daily paid, monthly paid and piece rated at estate. They include Spark Glory Plantation workers – 2 local and 3 foreign. There are no female workers employed by the company. The workers do all field work including harvesting, spraying, manuring and field maintenance.</li> <li>▪ All workers interviewed acknowledged they have signed employment agreements with the estates. The contents of agreement were understood, as these were prepared in English/Bahasa. The contents were explained to them in Bahasa by the management team.</li> <li>▪ Pre-induction briefing on conditions and terms of employment was explained to them during first reporting of duty</li> <li>▪ They are aware of their working hours (8 hours). They also acknowledged being paid overtime for any work in excess of 8 hours. There is no forced overtime. Workers are paid on piece-rate basis when doing harvesting, spraying or manuring work and do not get overtime.</li> <li>▪ Workers have been getting salaries above RM1,500 since May 2022. Salaries are paid before the 7th of every month.</li> <li>▪ Through worker's interview, they confirmed there are no abuse at work, and no sexual harassment. They understand what constitutes sexual harassment and the function of Gender Committee.</li> <li>▪ There is no discrimination between migrant workers and local workers, or between male and female workers as there (are no female workers).</li> <li>▪ All workers are provided with comfortable housing with free water and electricity. Electricity is supplied 24 hours through solar panels installed at the housing.</li> <li>▪ They have access to affordable food from close by Tomanggong Estate canteen/sundry shops. Spark Glory has made arrangement with Hap Seng Plantation Management to allow it workers have access at this canteen/sundry shops. The workers can also request the estate management to bring in groceries from town based on their order list.</li> <li>▪ They are entitled to free medical facilities at the Hap Seng Estate clinic. Spark Glory has made arrangement with Hap Seng Plantation Management to debit it for treatment received by its workers.</li> <li>▪ Workers had representatives who attend regular meetings with the management (in the JCC)</li> <li>▪ Workers confirmed knowledge of Grievance complaints procedure, where they can put forward any complaints and or raise any issues. They are aware of the complaints form in the procedure. Books and complaints forms were used to complain about house defects at the Estates.</li> <li>▪ They knew the types of work offered at Spark Glory estate when they were still in their own countries (no contract substitution).</li> <li>▪ All migrant workers confirmed that they keep their own passports although some allowed their passport to be kept in the office for safekeeping with their own consent.</li> <li>▪ Indonesians and local workers were interviewed accordingly.</li> </ul>
<p>2) Settlers</p>	<p>Not applicable</p>
<p>3) Villagers / Local communities (including women representatives, displaced communities)</p>	<ul style="list-style-type: none"> <li>▪ Confirmed there is no land dispute between Spark Glory CU and neighbouring estate, LKM Trading</li> <li>▪ Representatives from surrounding estates are occasionally are called to attend meetings by Spark Glory Estate.</li> <li>▪ No social issues arising from estate workers.</li> <li>▪ All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings.</li> <li>▪ Litang Village is no longer listed as one of the CU's stakeholders as the village is located approximately 30km from the company site and is not affected by the estate's activities. No other villages or local</li> </ul>

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	communities are listed as the company's stakeholders. Nevertheless, Kg. Litang village representatives were visited and interviewed during this surveillance audit.
4) Suppliers	No issues were raised by interviewed suppliers and no complaints of late payments.
5) Contract workers (local / foreign / Orang Asli workers / male & female)	Not applicable as none being used.
6) Local & national NGOs	Not applicable
7) Government agencies / Statutory bodies	Not applicable
8) Independent growers / Smallholders	Not applicable.
9) Indigenous people	Not applicable.
10) Contractor	Not applicable as none used.
11) Previous land owner (if any)	The company's land was purchased from 7 previous land owners as seen from history of transfer for country leases (CL) from the previous land owners to Spark Glory Sdn. Bhd. in August 2002. The history of land transfer from all previous land owners is stated in the company's 7 land titles. The land transfer was done in year 2002 (20 years ago) through a law firm, and there has been no direct contact between the previous land owners and the company's management. Hence all previous land owners are uncontactable. There is no evidence of any existing conflict with the previous land owners.
12) Others (please specify)	Not applicable



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1.5 Audit plan : Refer to Attachment 2

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

### 2.0 SCOPE OF CERTIFICATION AUDIT

#### 2.1 Description of the certification unit

Spark Glory Sdn Bhd is a private company established on 4 August 1994 as stated in the company certificate of incorporation. It is located in Kinabatangan District, Sabah, and is about 87 km from Lahad Datu town, 66 km from Kampung Paris and can be accessed through the government road, estate road and ferry. Spark Glory Sdn. Bhd.'s neighbors are Hap Seng Plantations Berhad (Kapis Estate) and Tabin Wildlife Forest Reserve.

The estate is fully developed with 100% oil palm plantings since 2002. All produced crops are sent to RSPO certified palm oil mills managed by Hap Seng Plantation (River Estates) Sdn. Bhd. The company does not have its own palm oil mill and does not have any other management units.

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

The FFB is sourced only from Spark Glory Sdn. Bhd. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

**Table 1: Actual FFB production by the supply base for the last reporting period (January to Oct 2022)**

Estates	FFB Production	
	Tonnes	Percentage (%)
Spark Glory Sdn Bhd	928.92 MT	100.00
<b>Total</b>	928.92 MT	100.00

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

Division	FFB Production	
	Tonnes	Percentage (%)
Spark Glory Sdn Bhd	1,200.00	100.00
<b>Total</b>	1,200.00	100.00

**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period (January to Oct 2022)**

	Total (MT)
FFB Production	928.92
CPO Production @ 20%	185.78
PK Production @5%	46.44
Product sold under Book & Claim	0.00

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**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period  
(Nov 2022 to Oct 2023)**

	Total (MT)
FFB Produced	1,200
CPO Production @ 20%	240
PK Production @5%	60

**Table 5 Planted and certified area of the Spark Glory**

Estate	Planted (ha)	Certified (ha)
Spark Glory Sd Bhd	121.46	126.83
<b>Total</b>	121.46	126.83

**Table 6 Planting profile for Spark Glory**

Year of planting	Planting cycle (1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> , etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2002	1 <sup>st</sup> Generation	Mature	121.46	100
<b>TOTAL</b>			121.46	100

### 2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Yvonne Chew Siok Fong
Position	:	Managing Director
Address	:	Room 1401, 14 <sup>th</sup> Floor, Wisma Khoo Siak Chiew, Jln Buli Sim-sim, 90000 Sandakan, Sabah, Malaysia (Main Office)
Phone no.	:	0198138186
Email	:	spark.g@hotmail.com

### 3.0 AUDIT FINDINGS

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

No changes

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

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

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

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- 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?

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

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

No changes

3.4 Status of previous non-conformities \*  Closed  Not closed\*

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

3.5. Complaint received from stakeholder (if any)

No complaint received from the stakeholders.

**4.0 DETAILS OF NON-CONFORMITY REPORT**

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

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

Total no. of major NCR(s) List : 6.2.2

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

Total no. of minor NCR(s) List : N/A

Total no. of major NCR(s) List : N/A

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**5.0 AUDIT CONCLUSION**

The audit team concludes that the organization has / ~~has not~~\* established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

**6.0 RECOMMENDATION**

No NCR recorded. Recommended to continue certification.

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

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

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

Recommended to continue certification.

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

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

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

Audit Team Leader : MOHD AB RAOUF BIN ASIS

\_\_\_\_\_  
(Name)



\_\_\_\_\_  
(Signature)

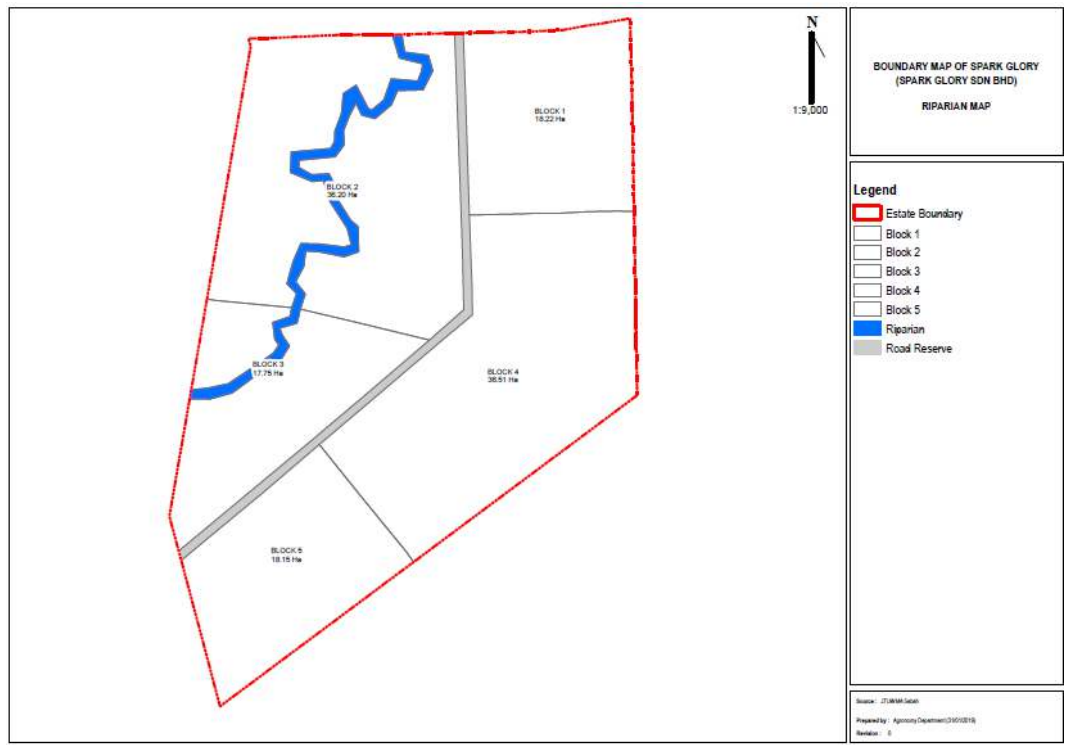
23/02/2023

\_\_\_\_\_  
(Date)

Attachment 1 - Map



Figure 1: GPS map of Spark Glory Sdn. Bhd.



## SURVEILLANCE AUDIT PLAN

### 1. Objectives

The objectives of the audit are as follows:

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

**2. Date of assessment** : 21- 24 November 2022

**3. Site of assessment** : Spark Glory Sdn Bhd

### 4. Reference Standard :

- a. MYNI 2019 of RSPO P&C 2018
- b. RSPO Certification System Documents, Nov 2020
- c. MSPO MS 2530-3:2013
- d. Company's audit criteria including Company's Manual/Procedures

### 5. Assessment Team

- i) Lead Auditor:  
Mohd Ab Raouf bin Asis (MAR) – Environment, External Stakeholder, TBP, Metrics Template
- ii) Auditor:  
Rozaimie bin Ab Rahman (RAR) – Safety, GAP  
Mohd Zulfakar bin Kamaruzaman (MZK) – HCV, Internal Stakeholder (Employees)

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

### 8. Audit Findings

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

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

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

### 9. RSPO 2018 Principles and Criteria (P&C) Metrics Template

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

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

- a) Reporting time frames for economic data are:
  - i. Calendar year (January to December): **January 2021 to December 2021**, and
  - ii. 12 month period counting up to two months before audit month: **Aug 2021 to Jul 2022**
- b) Reporting time frames for demographic data:
  - i. For mill and estate workers: **as of 31 December 2021**
  - ii. For smallholders and outgrowers: **January 2021 to December 2021**
- c) Reporting time frame for all other social and environmental data:
  - i. **January 2021 to December 2021**

The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021.

### 10. 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.

11. **Working Language** : English and Bahasa Malaysia

### 12. Reporting

- a) Language : English
- b) Format : Verbal and written
- c) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.

### 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 below

**Day 1: Monday (21/11/2022).**

<b>Time</b>	<b>Activities / areas to be visited</b>	<b>Auditee</b>
9.00am	Opening Meeting at SGSB – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.	
9.15am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative. Logistics discussion to the sites to be visited.	Management Representative
9.30am	To assign each audit team members – site and the P&C requirements	
	<b>(Raouf) SGSB</b>	
	<ul style="list-style-type: none"> <li>• Social aspects -SIA, management plan &amp; implementation, workers’ quarters,</li> <li>• Stakeholder consultation with employees, contractors, etc</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Land titles user rights</li> <li>• Good agriculture practices</li> <li>• New planting</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Legal &amp; Other requirement</li> <li>• Time Bound Plan</li> <li>• Metrics Template</li> <li>• Info required</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• GHG Calculation</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> </ul>	
12.30pm	<b>LUNCH BREAK</b>	All
14.00pm	Continue assessment	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / End of Day 1 audit	All



**Day 2: Tuesday (22/11/2022).**

<b>Time</b>	<b>Activities / areas to be visited</b>	<b>Auditee</b>
9.00am	Overview of current activities at Supply base sites	Respective Scheme Manager
9.15am	To assign each audit team members – site and the P&C requirements	Guide(s) for each auditor
	<p align="center"><b>(Raouf, Zulfakar, Rozaimie)</b> <b>SGSB</b></p> <ul style="list-style-type: none"> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with employees, contractors, etc</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Land titles user rights</li> <li>• Good agriculture practices</li> <li>• New planting</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Legal &amp; Other requirement</li> <li>• Time Bound Plan</li> <li>• Metrics Template</li> <li>• Info required</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• GHG Calculation</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> </ul>	Guide(s) for each auditor
12.30pm	<b>LUNCH BREAK</b>	All
14.00pm	Continue assessment	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / End of Day 2 audit	All

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### Day 3: Wednesday (23/11/2022).

Time	Activities / areas to be visited	Auditee
9.00am	Overview of current activities at Supply base sites	Respective Scheme Manager
9.15am	To assign each audit team members – site and the P&C requirements	Guide(s) for each auditor
	<p style="text-align: center;"><b>(Raouf, Zulfakar, Rozaimie)</b> <b>SGSB</b></p> <ul style="list-style-type: none"> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with employees, contractors, etc</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Land titles user rights</li> <li>• Good agriculture practices</li> <li>• New planting</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Legal &amp; Other requirement</li> <li>• Time Bound Plan</li> <li>• Metrics Template</li> <li>• Info required</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• GHG Calculation</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> </ul>	Guide(s) for each auditor
12.30pm	<b>LUNCH BREAK</b>	All
14.00pm	Continue assessment	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / End of Day 3 audit	All

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**Day 4: Thursday (24/11/2022).**

<b>Time</b>	<b>Activities / areas to be visited</b>	<b>Auditee</b>
8.30am	Overview of current activities at Supply base sites	Respective Scheme Manager
8.30am	To assign each audit team members – site and the P&C requirements	Guide(s) for each auditor
	<p align="center"><b>(Raouf, Zulfakar, Rozaimie)</b> <b>SGSB</b></p> <ul style="list-style-type: none"> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with employees, contractors, etc</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Land titles user rights</li> <li>• Good agriculture practices</li> <li>• New planting</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Legal &amp; Other requirement</li> <li>• Time Bound Plan</li> <li>• Metrics Template</li> <li>• Info required</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• GHG Calculation</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> </ul>	Guide(s) for each auditor
12.30pm	<b>LUNCH BREAK</b>	All
14.00pm	<p align="center">Continue assessment Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.</p>	Guide(s) for each auditor
16.00 - 18.00pm	<p align="center">Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager Closing meeting at CU End of audit</p>	All

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**Attachment 3**

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

**Principle 1: Behave ethically and transparently**

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	Yes	Spark Glory Sdn Bhd has established and implemented document for responding to any communication in an undated Procedure Request for Information (' <i>Prosedur Memohon Maklumat Syarikat</i> '). Information made available include matters on environmental, social and/or legal that are relevant to RSPO Criteria. The procedure had involved internal and external consultation. The procedure provided a form to be filled up by any stakeholder who has the interest to request any information pertaining to Principle 1. Nonetheless, the method of requesting information was not limited by filling up the form alone. It was also described in the procedure that other means of request such as verbal or in writing, would also be entertained. The CU continued to use letter, Phone call, Complaints book and public notice board for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through request.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	Spark Glory continued to maintain stakeholders for vendors/suppliers, government agencies, local communities, etc. it was seen Logbook Titled Grievance book Internal and External Stakeholder was seen maintained as means and evidence of recording information requested by any stakeholders, either internal or external. Viewed the Summary Logbook for External and Internal Stakeholder found no information had been requested to date of this audit.
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	Spark Glory maintain records of communication and consultation with external and internal parties. These includes communication with DOSH, Labour Department, Immigration Department, Department of Environment, suppliers and their own workers. Comments by DOSH and DOE on mill and estate operation were recorded in the respective DOSH and DOE inspection book. It was noted during this surveillance audit that there were no requests of information from the authority and stakeholders with regards to the agriculture practice, environment, and safety and health requirements. There was no request of information especially on social related issue. During this ASA 3 audit as verified through 'Buku Rekod Permohonan Maklumat' at Spark Glory there is no complaint has been made by the workers in the book.

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Clause	Indicators	Comply Yes/No	Findings
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	The consultation and communication procedures were documented. External and internal communication procedures developed by Spark Glory Sdn Bhd maintained to be followed and available at the audited sites. Consultation and communications procedures for Spark Glory CU is documented in the <i>Stakeholders Consultation Procedure – Group Level &amp; Estate Level</i> . This document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estates and mill followed the procedures and manuals developed by the company. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which were kept in the External Communication File.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	The lists of stakeholders were prepared by both the CU and the company headquarters. The lists included government agencies, suppliers, contractors, schools, bus operators, traders. The list of stakeholders was updated in Oct 2022 to include Government Agencies, NGO's, Supplier/Contractors, Internal Stakeholder and All neighboring estates were included in the lists.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Yes	Spark Glory has documented policy to committing on integrity for all their staffs and workers by publishing <i>Code Of Conduct And Business Ethics Policy</i> . The 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, Spark Glory also has a Vendor CODE of Conduct and Business Ethics which has been developed to outline the standards of behaviour required by Spark Glory 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 Spark Glory. Based on the Code of Business Conduct, it explains where to get guidance, raising a concern or reporting a violation. This is being brief to the worker during morning muster and internal/external stakeholder meeting.

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### **Principle 2: Operate legally and respect rights**

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	Yes	Spark Glory Sdn. Bhd. continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation was captured in a Legal Register.
	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	Spark Glory Sdn Bhd had a mechanism for ensuring that all applicable legal requirements were implemented. Established a procedure "mechanism for tracking any changes in the law". The changes in the law were monitored through: <ul style="list-style-type: none"> <li>• News release through daily newspaper</li> <li>• Lwnet</li> <li>• Current law journal</li> <li>• Law change tracked by publisher.</li> <li>• Circular from relevant association e.g MPOA, MPOB, MAPA, etc.</li> </ul>
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Yes	The perimeter boundary of the estate was visibly maintained by erecting pegs along the boundary. During the site review, the physical markers were visibly maintained at Spark Glory Sdn Bhd, especially the ones that are adjacent to other private estate – Hap Seng Plantations Berhad and with Tabin Wildlife Forest Reserve.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	Yes	The list of contracted parties is maintained by Spark Glory in stakeholder list. The lists contain name of contractors, designated contact persons, address, telephone/fax/email and type of contracted works done. The list mainly includes off-site suppliers of materials and chemicals, and a scheduled waste collector. The company currently does not have any contractors providing services on-site.
	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	The company does not engage any contractor to perform services for the company as the company has their own directly employed workers which perform all the estate field work and FFB transport to the mill. No recruitment agencies were used for the recruitment of foreign workers. Hence this indicator currently does not apply to the company.
	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	The company does not engage any contractor to perform services for the company as the company has their own directly employed workers which perform all the estate field work and FFB transport to the mill. No recruitment agencies were used for the recruitment of foreign workers. Hence this indicator currently does not apply to the company.

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Clause	Indicators	Comply Yes/No	Findings
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins.</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul>	N/A	This small-grower certification unit has no palm oil mill. 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.	N/A	This small-grower certification unit has no palm oil mill. Thus, this indicator is not applicable.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (min 3-years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	Yes	The Business Plan is available with attention focusing on the following among others to monitor the performance of the estate. <ul style="list-style-type: none"> <li>a) Yield potential, trend and projection</li> <li>b) cost of production, cost per FFB mt and per hectare</li> </ul> The cost of production was reviewed and compared against expenditure each year with projections in place for the for the forthcoming years.
	3.1.2 An annual replanting prog. projected for a minimum of five years with yearly review, is available.	Yes	A replanting program was available however, there is no replanting for the next 5 years. All palms were planted in 2002. The management in verbal has indicated that rreplanting is planned scheduled earlier in phases to even out the future planting age / year.
	3.1.3 The CU holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	Management review was conducted in Oct 2022 and attended by the managing director, estate manager and Sustainability team of Hap Seng Plantation. The agenda was discussing on effective implementation of RSPO through internal audit done by Sustainability team of Hap Seng Plantation. All pertinent elements for RSPO implementation have been reviewed and presented to top management.

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Clause	Indicators	Comply Yes/No	Findings
<p>3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>	<p>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.</p>	<p>Yes</p>	<p>SGSB has established the Social Impact Assessment Management Action Plan and Continuous Improvement Plan was reviewed in Dec 2021. 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. The sighted SGSB Social Impact Assessment Management Action Plan covered:</p> <ul style="list-style-type: none"> <li>• Review of social impacts and to implement plans to mitigate the negative impacts and promote the positive ones.</li> <li>• Compliance to SOP and legal requirements regarding to social.</li> <li>• To contribute to local communities' (workers) development.</li> <li>• To response on the issues discussed during the various avenues (Stakeholder Meeting, OSH Meeting, Workers Meeting, Complaint Books etc).</li> </ul>
	<p>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.</p>	<p>Yes</p>	<p>The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template before the audit started. This requirement refers to a small set of strategic outcome-based metrics, which are of value to growers, relates directly to the P&amp;C, and aligns with the RSPO Theory of Change1 (ToC) and RSPO organizational Key Performance Indicators (KPIs).</p>
<p>3.3 Operating procedures are appropriately documented, consistently implemented and monitored.</p>	<p>3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p>	<p>Yes</p>	<p>Spark Glory Sdn Bhd had adopted the following documented manuals and document as their standard operating procedures:</p> <ol style="list-style-type: none"> <li>1. MPOB Code of Good Agricultural Practice for Oil Palm Estates and Small Holdings.</li> <li>2. Standard Operating Procedure (SOP).</li> <li>3. Safe and Standard Operating Procedure (SSOP).</li> <li>4. Spark Glory Agriculture Manual.</li> </ol> <p>The Agriculture Manual has 5 Subjects:</p> <ul style="list-style-type: none"> <li>• SGAM – No.1 Harvesting</li> <li>• SGAM – No.2 IPM</li> <li>• SGAM – No.3 Manuring</li> <li>• SGAM – No.4 Upkeep of Mature Oil Palms</li> <li>• SGAM – No.5 Soil Conservation and Terracing</li> </ul>
	<p>3.3.2 A mechanism to check consistent implementation of procedures is in place.</p>	<p>Yes</p>	<p>The Estate Manager was accountable to check on consistent implementation of procedures. Among the means were:</p> <ol style="list-style-type: none"> <li>i) Periodic reporting to the Managing Director</li> <li>ii) On site visits, inspections and discussions with the Mandore.</li> <li>iii) Assessments and audits like Internal Audits,</li> <li>iv) Consultation with Management of Hap Seng Plantation Holdings Berhad, Spark Glory mentor for RSPO implementation.</li> <li>v) Information on FFB Quality check as informed by Hap Seng mill</li> </ol>



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Clause	Indicators	Comply Yes/No	Findings
			Implementation of these procedures included: <ul style="list-style-type: none"> <li>• briefing on the SOPs and related documents.</li> <li>• workers were frequently reminded about it during the morning muster.</li> <li>• relevant SOPs, sometimes an abridged version, were displayed at estate office notice board.</li> <li>• Monitoring of records such as those shown in the indicator 4.1.3 below.</li> </ul>
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	Evidence was available that Spark Glory Estate was able to demonstrate that it has maintained records of monitoring and action taken. Records of monitoring and the action taken were maintained and kept for a minimum of 12 months. Monthly Costing and Annual Reports on monitoring of all activities were made available. Some of the monitoring records sighted were: <ol style="list-style-type: none"> <li>i) Work Program sheets for selective weeding, Circle spraying, road maintenance, harvesting internal records, etc.</li> <li>ii) Bin cards &amp; stock statements,</li> <li>iii) Monthly Estate Report and Account,</li> <li>iv) Monthly rainfall,</li> <li>v) Agrochemical monthly consumption</li> <li>vi) Manuring returns</li> </ol>
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	Yes	SGSB also has a documented Social Impact Assessment (SIA) Management Action Plan and Continuous Improvement Plan. The initial SIA assessment was developed with participation of stakeholders (internal and external) as evidenced by the minutes of the stakeholder consultations (Estate Level) dated in January 2019 where 43 stakeholders comprising worker representatives, government agencies, internal stakeholders, suppliers, contractors or consultants, and neighboring plantations were present.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	Yes	Social Impact Assessment (SIA) Management Action Plan and Continuous Improvement Plan for Spark Glory was prepared by 2 members of the Hap Seng sustainability team with last review in Nov 2022. Follow up stakeholder meetings to review the SIA was conducted in Nov 2022 was done remotely by Zoom call due to the ongoing COVID-19 and the Management has decided to do the meeting by Online. Stakeholders of Spark Glory Sdn. Bhd. who joined the last stakeholder consultation meeting included an NGO (Humana Child Aid Society, WWF), government bodies (EPF, MPOB, DOSH), contractors and suppliers and surrounding estates. The annual stakeholder consultation meetings for Spark Glory Sdn. Bhd. are combined with stakeholder consultation meetings for other 6 other neighbouring outgrower companies that are supplying to palm oil mills owned by Hap Seng Plantations (3 companies are certified and 3 others are in progress of RSPO certification), as the stakeholders for all these out grower companies are similar.

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Clause	Indicators	Comply Yes/No	Findings
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	The EIA and SIA Management Action Plans of SGSB is implemented and monitored ensuing review and update once a year. Areas of concern/key findings were identified together with the action plan, person in charge and respective completion date. There is evidence that the areas of concern /key findings were developed with the consultation of affected parties.
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	SGSB 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). As stated in the company's Equal Opportunity Policy, the company commits to ensuring equal opportunities in the workplace. Hiring, remuneration, access to training, promotion, termination or retirement will be implemented based on business needs, job requirements and individual qualifications regardless to ethnic origins, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	Employment procedures are implemented, and records are maintained at Spark Glory. This was evidenced by sighted Workers Letter of Employment, "Workers Master List", Checkroll and Payslips of the workers. Workers' SOCSO Registration of workers was also verified.
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	Spark Glory Sdn Bhd had identified and reviewed all operations that has significant hazards and risks and had determined appropriate risk control measures in accordance with DOSH Hazard Identification, Risk Assessment and Risk Control (HIRARC) Guidelines 2008. The HIRARC Register was last reviewed in Dec 2022. Corresponding Standard Operation Procedure and Safe Work Procedure for these activities were documented, implemented and also used during employees training.
	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 health & safety plans is monitored during internal audits conducted annually by Hap Seng Plantations sustainability team. Date of last internal audit was in Oct 2022. Findings of internal audit included 3 major & 4 minor NCs has been raised. Corrective action and correction action plan has been implemented and closed accordingly. Management review also has been carried out in the same month to discuss related to the findings.  The company management also does regular safety inspections with records sighted as follows: <ul style="list-style-type: none"> <li>• PPE monthly checklist and replacement forms – to record inspections of PPE used by workers each month and any replacement or new PPE issued. Last PPE replacement for new gloves in Sept 2021.</li> <li>• First aid kit checklist – to check contents of 2 first aid boxes (one located at the chemical store and one held by the mandore) on monthly basis.</li> <li>• Fire extinguisher checklist – to check expiry date and condition of 8 units of fire extinguishers located at office, housing, skid tanks and store.</li> </ul>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	Yes	Formal Safety, Health & Environmental training program for year 2021 that covers aspects of the RSPO Principles and Criteria, with regular assessments of training needs were presented to auditors by both estates. Trainings were either conducted internally by its own manager or by sustainability team from Hap Seng Plantation. A training needs analysis for all company workers was also conducted for year 2022.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	Yes	Records of trainings conducted for year 2022 were sighted and include training meeting minutes, signed attendance lists and photos.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Yes	Not applicable. This CU is a single estate with no palm oil mill.

**SUPPLY CHAIN REQUIREMENTS FOR MILLS – Not applicable**

<b>Ref. in RSPO SCCS</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
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	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.		
3.8.2	<p>Mass balance Module</p> <p>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<sup>rd</sup> party certified supply base.</p>	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.
3.8.3	<p>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&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.
3.8.4	<p>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).</p>	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<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"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• 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.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</li> </ul>	N/A	Not applicable. This CU is a single estate with no palm oil mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<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"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>• Effectively implements and maintains the standard requirements within its organisation.</li> <li>• 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.</li> </ul>	N/A	Not applicable. This CU is a single estate with no palm oil mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	N/A	Not applicable. This CU is a single estate with no palm oil mill.

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



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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<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	<p>Not applicable. This CU is a single estate with no palm oil mill.</p>

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<b>Ref. in RSPO SCCS</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
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.	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.
	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.	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.
	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	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>conversion ratios stated by RSPO.                      c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)</p>		
3.8.13	<p>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.</p>	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<b>N/A</b>	
3.8.15	<p>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.</p>	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.
3.8.16	<p>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</p>	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>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</p>		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<b>N/A</b>	Not applicable. This CU is a single estate with no palm oil mill.

**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 dated in March 2020 was made available at Spark Glory. There is also a new sustainable Agriculture Policy, dated August 2020 signed by Managing Director contain the clause of prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staffs and workers during morning muster and training.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	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
<p>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.</p>	<p>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.</p>	<p>Yes</p>	<p>Spark Glory have developed procedures to handle grievances and disputes titled as ‘Procedure for reporting complaints and grievances (Prosedur Melapor <i>Aduan dan Permasalahan</i>)’ and ‘Grievances Procedure – Appendix 1’ for staffs and workers, Prosedur Aduan and also company has developed procedure named “ Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)” dated Nov 2020 to protect the complainants.</p>
	<p>4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>Yes</p>	<p>Based on interview with stakeholders at Litang Estate, 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. Spark Glory 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 was held in Nov 2022 for both Internal &amp; External Stakeholders at Spark Glory. For foreign workers, the procedure was explained during initial report for duty with assistance of translators.</p>
	<p>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.</p>	<p>Yes</p>	<p>The system used by the Spark Glory in resolving disputes and grievances exists in the procedure called ‘Prosedur Melapor <i>Aduan dan Permasalahan</i>)’ and ‘Grievances Procedure – Appendix 1’ for staffs and workers, <i>Stakeholders Consultation Procedure – Group Level &amp; Estate Level</i>. The Spark Glory 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 the Grievance procedure has already include an ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>
	<p>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.</p>	<p>Yes</p>	<p>Human Rights policy was made available at Spark Glory. There is also a new sustainable Agriculture Policy signed by Managing Director contain the clause of prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staffs and workers during morning muster and training for all workers in June 2022.</p>
<p>4.3 The CU contributes to local sustainable</p>	<p>4.3.1 Contributions to community development that are based on the results of consultation with local</p>	<p>Yes</p>	<p>There was no local community lived nearby or within the Spark Glory area. However, the CU has made a donation to NGO’s namely Fair LD at Lahad Datu.</p>

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Clause	Indicators	Comply Yes/No	Findings
development as agreed by local communities.	communities are demonstrated.		
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. At Spark Glory the land was previously owned by a group of smallholders (Chin Chee Man, Chu Vee Len, Chin Mei Kuen, Liew Kok Yong, Tai Chee Keong, Liew Moi Yin and Lee Fook San. Smallholder bought the land from Sabah Land Development Board in 1987 and they developed the land in 2002 with planting of Oil Palm. In July 2008, Spark Glory Sdn Bhd purchased the land. There were clear land ownership documents available for review. The original copies of the documents were kept in Spark Glory office in Lahad Datu. Copies of land titles for Spark Glory was also sighted at Estate office. The Spark Glory estate is under the jurisdiction of Kinabatangan District. Review of the documents confirmed the terms and condition of the land is for cultivation of agricultural crop of economic value and ii has been complied.  As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. The audit team had confirmed that there were no land issues related to previous owners.
	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	

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Clause	Indicators	Comply Yes/No	Findings
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Yes	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate as per interview with Kampung Litang, Hap Seng Plantation and IOI Plantation, hence the evidence required under this clause was not available.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Yes	This requirement in this indicator does not apply to Spark Glory
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Yes	This requirement in this indicator does not apply to Spark Glory.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	This requirement in this indicator does not apply to Spark Glory.

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Clause	Indicators	Comply Yes/No	Findings
<p>4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>	<p>4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>Yes</p>	<p>Based on Social Impact Assessment (SIA) Report for Spark Glory 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 Spark Glory since 2008. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kampung Litang, Hap Seng Plantation and IOI Plantation. From the interviews, it can be concluded that there was no evidence of any land dispute at Spark Glory.</p>
	<p>4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>Yes</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kampung Litang, Hap Seng Plantation and IOI Plantation. From the interviews, it can be concluded that there was no evidence of any land dispute at Spark Glory, Hence the evidence required under this clause was not available.</p>
	<p>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.</p>	<p>Yes</p>	



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Clause	Indicators	Comply Yes/No	Findings
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kampung Litang, Hap Seng Plantation and IOI Plantation. From the interviews, it can be concluded that there was no evidence of any land dispute at Spark Glory, Hence the evidence required under this clause was not available.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Yes	As above.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	As above.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	Yes	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including estate as per stated in the land title.
4.6 Any negotiations concerning compensation for loss of legal,	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 Spark Glory. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Yes	In accordance with the ' <i>Prosedur Melapor Aduan dan Permasalahan - Pihak Berkepentingan Luaran dan Dalam</i> '/ SOP – Land Dispute Management, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at visited estate.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	Yes	Not applicable since Spark Glory is consider as Small Grower
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Yes	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management ". In accordance with the SOP – Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Spark Glory HQ. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Yes	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kampung Litang, Hap Seng Plantation and IOI Plantation. From the interviews, it can be concluded that there was no evidence of any land dispute at Spark Glory, hence the evidence required under this clause was not available. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given	Yes	As above.

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Clause	Indicators	Comply Yes/No	Findings
	opportunities to benefit from plantation development.		
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 Spark Glory since 2008. All the related documentation regarding the land acquisition was kept in Spark Glory HQ Office, Lahad Datu and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kampung Litang, Hap Seng Plantation and IOI Plantation. From the interviews, it can be concluded that there was no evidence of any land dispute at Spark Glory, Hence the evidence required under this clause was not available.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Yes	Land conflict is not present in the area of the unit of certification.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant req.	Yes	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. The audit team has also interviewed relevant stakeholders such as the Head of Village/ Representative Kampung Litang, Hap Seng Plantation and IOI Plantation. From the interviews, it can be concluded that there was no evidence of any land dispute at Spark Glory, Hence the evidence required under this clause was not available.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected	Yes	There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders such as the Head of Village/ Representative Kampung Litang, Hap Seng Plantation and IOI Plantation. From the interviews, it can be concluded that there was no evidence of any land dispute at Spark Glory.

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Clause	Indicators	Comply Yes/No	Findings
	parties (including neighboring communities where applicable).		

### **Principle 5: Support smallholder inclusion**

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	N/A	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.	N/A	Not Applicable since this Assessment is for Small Grower and no Mill has included
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	N/A	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.	N/A	Not Applicable since this Assessment is for Small Grower and The Director/Owner Spark Glory is woman and This company are assisted by Hap Seng Plantations.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	N/A	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	N/A	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

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	are given.		
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	N/A	Not Applicable since this Assessment is for Small Grower, and Spark Glory 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.	N/A	Not Applicable since this Assessment is for Small Grower and This company are 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.	N/A	Not Applicable since this Assessment is for Small Grower and This company are assisted by Hap Seng Plantations.
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.	N/A	Not Applicable since this Assessment is for Small Grower and This company are 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).	N/A	Not Applicable since this Assessment is for Small Grower and This company are assisted by Hap Seng Plantations.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	N/A	Not Applicable since this Assessment is for Small Grower and This company are assisted by Hap Seng Plantations.
	5.2.4 (C) Evidence exists that the unit of	N/A	Not Applicable since this Assessment is for Small Grower and This company are assisted

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Clause	Indicators	Comply Yes/No	Findings
	certification trains Scheme Smallholders on pesticide handling.		by Hap Seng Plantations.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	N/A	Not Applicable since this Assessment is for Small Grower and This company are 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, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	The company has an Equal Opportunity Policy available in English and Malay language and posted on the company notice board at the office. As stated in the policy, the company commits to ensuring equal opportunities in the workplace. Hiring, remuneration, access to training, promotion, termination or retirement will be implemented based on business needs, job requirements and individual qualifications regardless to ethnic origins, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. There is no evidence of discrimination based on feedback provided by employees interviewed. The company currently has only 5 male workers (3 Indonesian and 2 local) and no female workers, and one of Indonesian workers is a mandora. The estate manager is male, and the managing director is female.
	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 Equal Opportunity Policy which emphasizes 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 and equal based on principle of equal pay for equal work. Review of pay checks, contracts of employment, and interviews of staff, local and foreign workers showed discriminatory practices on the part of Spark Glory Sdn. Bhd. Foreign workers also accorded the same living standards and accommodations as local workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Yes	Records of hiring were reviewed during the audit. It was noted that the hiring was based on the skills, capabilities, qualities and medical fitness. This was confirmed by the employees who were interviewed during the audit. Interview of candidates was done by Management Staff where an evaluation form is filled up to determine the suitability of the candidate.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Yes	Currently, there were no female workers at SGSB CU. Nevertheless, if there shall be female workers in future, pregnancy test shall not be conducted as a discriminatory measure. Pregnancy test is only permissible when it is legally mandated, i.e. pregnancy testing is legally required only for female foreign workers in accordance with local immigration law.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Yes	A Gender Committee has been formed or appointed committee member and it was noted the committee was formed in line with SGSB CU Implementation of the Gender Policy. The latest Gender Committee Meeting and training was held in June 2022. The meeting agenda covers, among other things, policy awareness, grievances procedures, functions of the Gender Committee, male and female rights, prevention of sexual harassment and the activities for the year 2022. The minutes of meeting were verified by auditor and found that gender committee was in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for genders at SGSB CU.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	The equal opportunities policy developed by SGSB states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. All company CSR policies are displayed on notice boards in both Malay and English language. Interview with workers the Manager of SGSB, local and foreign male workers, they agreed that in the past when there was a female worker, they acknowledged that female worker received equal pay for the work given same work for example in the sprayer gang being paid by piece rate. All workers receive daily payment as per Minimum Wages Order (Amendment) 2022.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	Yes	Written employment contracts are provided in Malay language to all workers. Employment contracts clearly state the worker's position, basic wages, working hours, paid public holidays, paid annual leave, paid sick leave, hospitalization leave, maternity leave (for female employees only), medical benefits, insurance scheme, and retirement age. During interview with 4 out of 5 workers available onsite, they understood the content of their contracts of employment and pay slips.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for	No	Contracts and conditions of employment are contained in employment contracts signed between Spark Glory Sdn. Bhd.'s management on one hand, and their workers on the other. The employment contracts sampled were prepared in Malay language, which is similar to Indonesian and understood by both Indonesian and Malay workers. Employment contracts clearly state the worker's position, basic wages, working hours, paid public holidays, paid annual leave, paid sick leave, hospitalization leave, maternity leave (for female employees only), medical benefits, insurance scheme, and retirement age. Notice period for resignation/termination is not defined in the contracts and as such the notice period follows the requirements of the Sabah Labour Ordinance. Labour laws,

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Clause	Indicators	Comply Yes/No	Findings
	all work performed. This includes a form of record for work done by family members.		union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a management during induction. Monthly pay slips are available as the evidence of worker's remuneration. Payment of statutory contributions for local workers including EPF, SOCSO and Employment Insurance Scheme while foreign workers are covered under social security (SOCSO) in accordance with the relevant legal provisions. The employment contracts sighted during the audit were for the workers. However, pay slip at Spark Glory not detailing payments and conditions of employment (e.g. regular working hours, overtime, sick leave, holiday entitlement in compliance with national legal requirements). Sighted Records of Payroll documents (Payslip) was not detailing payments and conditions of employment e.g. regular working hours, overtime, sick leave, holiday entitlement, Absent. Therefore, major NCR was raised as MZK 01 2022.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	Yes	There is evidence of legal compliance to the Sabah Labour Ordinance for regular working hours, deductions, sickness, reasons for dismissal, period of notice and other legal labour requirements. It has been verified during this audit that all the above conditions were being complied with. This was from verification on Checkroll, Payslips and Contract of Employment (Letter of Employment Offer). Apart from statutory salary deductions for EPF, EIS and SOCSO, the company does not make any other deductions from workers' wages.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	Yes	Spark Glory Sdn. Bhd. has provided adequate housing, water supplies, medical and welfare amenities. Each housing unit is provided with 2 water tanks to collect rainwater and mineral water is provided free by the company. Electricity is supplied on 24 hour basis for free through solar panels installed at the housing. The prayer room is made available at the nearby office for Muslim workers. The workers' families do not live onsite so there are educational facilities or creche made available for children. The houses were all in reasonably good condition, and each house has between 2 – 3 bedrooms. The houses are generally well-maintained with not more than 6 persons live in each house. They are also furnished with the necessities such as cupboard, mattresses, pillows and cooking facilities. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner. Housing inspections are being conducted twice a month.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	Spark Glory workers are entitled to free medical facilities at the Hap Seng Estate clinic. Spark Glory has made arrangement with Hap Seng Plantation Management to debit it for treatment received by its workers. Workers have access to adequate, sufficient and affordable food where workers confirmed during interviews that they usually place orders with the Estate Manager who makes purchases of groceries for the workers at Lahad



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Clause	Indicators	Comply Yes/No	Findings						
			Datu Town, nearby Tamu in Jeroco or a sundry shop at Hap Seng Estate. Among the items ordered include Chicken, fish, sugar, rice, flour, cooking oil, eggs, detergent and other daily necessities.						
	<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"> <li>• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> <li>• There is annual progress on the implementation of living wages</li> <li>• 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.</li> <li>• 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</li> </ul> <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>Based on the suggested method(s) by RSPO guideline, an assessment of the Prevailing Wage was conducted for Spark Glory CU and the Prevailing Wage was found to be updated for year 2022 as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%;"></th> <th style="width: 20%; text-align: center;">Local Worker (RM)</th> <th style="width: 20%; text-align: center;">Foreign Worker (RM)</th> </tr> </thead> <tbody> <tr> <td style="text-align: right;"><b>Total Value of Prevailing Wage</b></td> <td style="text-align: center;"><b>1852.95</b></td> <td style="text-align: center;"><b>1849.55</b></td> </tr> </tbody> </table>		Local Worker (RM)	Foreign Worker (RM)	<b>Total Value of Prevailing Wage</b>	<b>1852.95</b>	<b>1849.55</b>
	Local Worker (RM)	Foreign Worker (RM)							
<b>Total Value of Prevailing Wage</b>	<b>1852.95</b>	<b>1849.55</b>							
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day	Yes	All Spark Glory CU, permanent and full-time workers are used for core work such as Harvesting, Manuring and Spraying. There are no temporary workers and contractors at SGSB.						

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	labour is limited to jobs that are temporary or seasonal.		
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	Spark Glory subscribes to the documented policy on Freedom of Association and Right to Collective Bargaining. This Policy is available in dual language, i.e. Malay and English and it recognizes and respects of employees to join trade union of their choice and to bargain collectively subject to the provisions of relevant national legislations. Employment contracts sighted do not contain any prohibitive clause from joining any trade unions. The workers who were consulted had confirmed that they were aware of their rights to join a union. Currently workers have chosen not to join any trade union. Sighted also all the policy has been posted in notice board at muster call area, notice board front gate and at office Spark Glory.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	Yes	In practice, there is no trade union/workers' union. However, the company and workers' representatives have formed a Joint Consultative Committee (JCC) comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers. The last JCC meeting with all workers was held in Nov 2022 with records of meeting minutes in Malay language, signed attendance lists and photo of the meeting sighted.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Yes	There is no evidence that Spark Glory management interferes with the formation or operation of registered unions/ labour organizations or associations, or other freely elected representatives for all workers including migrant and contract workers. There is currently no workers union at SGSB, although the workers are allowed to join any registered organizations or associations they pleased. The Company and workers' representatives have formed a Joint Consultative Committee (JCC) comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Yes	The company has a Child Labour Policy which is publicly available in English and Malay at Spark Glory estate. The policy states that the employer and its' suppliers/ contractor shall not employ or promote the use of child labour and shall take appropriate measures to prevent the use of such labour in connection with their activities. Remedial action with appropriate follow-up action shall be employed if any child labour case is discovered in order to protect the welfare of the child. This policy is posted on notice boards in the estate office. Audit team has verified identification cards of local workers and passports of foreign workers. There is no evidence found of workers being under the age of eighteen.
	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.	Yes	There was no evidence that the estate has employed anyone below the age of 18 years. This was verified by examining the workers master lists, personal file, employment contracts and payslips of all workers at Spark Glory where details of the workers' IC numbers or passports and dates of birth are available.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	There is a documented age screening verification procedure.		
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	There was no evidence that the estate has employed anyone below the age of 18 years.
	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	Spark Glory Estate 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 Spark Glory'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	Spark Glory has and implements Sexual Harassment, Violence and Abuse Policy available in both English and Malay language and posted on the office notice board. The policy states that the company's commitment to providing a safe, supporting and respectful working environment free from sexual harassment, violence and abuse where all employees shall be treated with dignity, courtesy and respect. The company shall take remedial steps to protect its employees from intimidation. All workers interviewed confirmed that they have been briefed on and understand the policy.
	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	Spark Glory has and implements a Policy on Reproductive Rights available in both English and Malay language and posted on the office notice board. The policy states that the company's commitment to improve maternal and newborn health, reduce sexually transmitted infections, including HIV and other reproductive morbidities and respect the reproductive rights of workers in accordance with local law. All workers interviewed confirmed that they have been briefed on and understand the policy.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	Yes	During time of this audit, there was no female worker at Spark Glory, so no assessment of needs of new mothers is required.
	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

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Clause	Indicators	Comply Yes/No	Findings
			<p>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.</p> <p>Records of complaints received from internal stakeholders are recorded in the Grievance Logbook for Internal stakeholders. For year 2022, all complaints received were only related to damaged housing facilities that needed repair, and it is confirmed by workers that all complaints were addressed in a timely manner.</p>
6.6 No forms of forced or trafficked labour are used.	<p>6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	Yes	<p>All workers in Spark Glory CU Estate have entered into employment voluntarily; it was verified during the interview with all Indonesian and local workers. The Indonesian foreign workers were previously already working in Malaysia and recruited through word of mouth on job vacancies by other workers. None were brought in directly from Indonesia by the company or employed through recruitment agencies, hence they did not pay any recruitment fees.</p> <p>SGSB does not withhold foreign workers passport as verified during workers interviews. Workers also confirmed there is no involuntary overtime as work is paid on piece rate basis and working hours is limited to 8 hours a day with no work on rest days.</p> <p>There was no contract substitution, debt bondage and withheld wages. Interview with workers confirmed they also understood that they need to do all the above to go to Malaysia, and the agent also already explained to them regarding the work they should get in Malaysia which is in oil palm plantation.</p>
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	<p>The company has a Labour policy for Foreign Workers made available in both English and Malay languages. The policy mentioned that foreign employees will not be discriminated against in terms of recruitment, no forms of forced labour, trafficked labour shall be used, all foreign workers shall be ensuring valid work permits, all statutory and just wages are made in a timely manner and there shall be no contract substitution or payment of recruitment fees.</p> <p>Separate procedure with flowcharts for hiring both local and foreign labour has been established at Spark Glory. The company has only hired one new worker in the past one year, who is a local. No new foreign workers were hired in the past one year.</p>
6.7 The unit of certification ensures that the working	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	Yes	<p>Estate(s) Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the mandore for the down line implementation of OSH practices in the estate.</p>

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Clause	Indicators	Comply Yes/No	Findings
environment under its control is safe and without undue risk to health.	parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.		All identified Executives 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. Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2022 was available. The Estate/Mill Manager is the chairman, and the Mill Engineer/Assistant Manager is the secretary. OSH Committee meetings confirmed that among the agenda discussed. OSH Committee meetings were held once in three months.
	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	Emergency Response Plan (ERP) was established. Random interview with the estate workers showed that they were aware of accident and emergency procedures. First aid training was conducted at estate annually latest in Nov 2022. First Aid boxes were available at work operations in the field in estate. This have been confirmed by site inspection at weeding operation, manuring operation, harvesting operation, workshop, chemical & fertilizers store for all estates. Furthermore, the first aid kit sighted with completed contents and no medication with expired date. The stock of first aid box is regularly check and refill, when necessary, by estate manager. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and Klinik Kesihatan were also included. It was sighted Emergency Response Plan was available at Chemical Store, Workshop and Lubricant Store.
	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	Training and briefing on the operations were provided for workers to educate them on safe working practices. This is also made to ensure that the applicable precautions are adhered. Training for employees is conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, harvesters, pruners, field workers, sprayers, and fertilizer were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. During site visit at chemical and premix area stores, sanitation facilities for sprayer and manuring operator was available for workers washing the PPE and clothes. Based on the HIRARC carried out at the estates, the PPE types for the various activities were identified and recommended. Sanitation facilities for those applying pesticides was available near to chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area.
	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	All workers had been 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. Local and foreign workers are covered by local social security (SOCSO) as verified through records of SOCSO payment made to the local authority.

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Clause	Indicators	Comply Yes/No	Findings
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	The company has not recorded any accidents since year 2018. As per the register of accidents, dangerous occurrences and poisonings annual summary report (JKKP8) required to be submitted annually to the Department of Occupational Safety & Health (DOSH) in accordance with local law, zero accidents were reported, and the LTA was calculated to be zero. The JKKP8 form was submitted to DOSH in January 2022.

### **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	Spark Glory Sdn Bhd had a documented integrated pest management (IPM) system in place. The IPM program among others included pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and wild boar. The IPM technique included the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera subulata</i> and Spark Glory Sdn Bhd had put up 1unit wooden barn owl box in Block 1. The plan also included the maintenance of beneficial plants and soft weeds in the interline, appropriate IPM techniques it is guided by the Agriculture Manual SGAM – No. 2 Integrated Pest Management. In order to minimize use of pesticides the estates had planted beneficial plants mainly <i>Cassia cobanensis</i> with maps indicating areas. Rat baiting was done when damage was above 5%. However, so far, no baiting had been carried on Spark Glory Sdn Bhd.
	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	None of the Species referenced in the Global Invasive Species Database and CABI.org are used in Spark Glory Sd Bhd.
	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	Spark Glory Sdn Bhd had established and documented a Zero Burning Policy in its Sustainable Agriculture Policy under Environment and Biodiversity. The policy advocated: "A strict Zero Burning Policy is practiced for all operations". Furthermore, there had been no pest outbreaks to warrant the use of fire.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	Yes	Justification of all pesticides used had been documented in Doc: SGAM – No.4. The use of selective products that are specific to the targeted weed had been demonstrated in the table Appendix 1.
	7.2.2 (C) Records of pesticides use	Yes	Spark Glory Sdn Bhd continued to maintain records to show the types of pesticides used with

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
environment.	(including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.		active ingredients, their LD50, where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register and in progress reports. 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	Spark Glory Sdn Bhd had a Pesticide Reduction and Chemical Reduction Plan. The plan covered planting of nectariferous beneficial plants ( <i>Cassia cobanensis</i> ) as part of the IPM plan. Soft weeds and <i>Nephrolepis bisserata</i> were maintained and encouraged to grow in the inter rows. A nursery for the beneficial plant planting was available to ensure continuous planting and availability of the beneficial plants stocks, hence reducing the use of insecticides on bagworms and a plan for control of rats by rearing barn owls ( <i>tyto alba</i> ). Spark Glory Sdn Bhd had put up 1unit wooden barn owl box in Block 1. Spraying weeds was carried out as programmed and so as at now, no chemical had been used to control rats and of other leaf eating pest.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Yes	Spark Glory Sdn Bhd did not practice prophylactic use of pesticides. It is specifical mentioned in document SGAM no. 2 dated under item 2.2.
	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	Spark Glory Sdn Bhd only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated both estates had none of the chemicals. Most pesticides used were class class IV.
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used in Spark glory Sdn Bhd.
	7.2.5b Why there is no other alternative which can be used.	Yes	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Yes	
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	

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Clause	Indicators	Comply Yes/No	Findings
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Yes	There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used in Spark glory Sdn Bhd.
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	Yes	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. During field inspection, there is no chemical pesticides was carried out due to wet season. Additionally, the operators have been given training regarding the usage safety and health issue and proper way for chemical application by the estate manager with knowledge on chemical handling and applications. Latest training on pesticides/chemical handling was carried out Spark Glory in Feb 2022.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	<p>Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH USECHH Regulations (2000). At all visited estate the storage of pesticides was in accordance with recognized best practices. They were stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing. At estate visited, their chemical stores were inspected, and it was noted that they all comply with the relevant act as well as best practice.</p> <ul style="list-style-type: none"> <li>• All stores were secured under lock and key with restricted access.</li> <li>• Provision of ventilation fan.</li> <li>• Display of Safety Pictorial poster, namely the required PPE and</li> <li>• Chemical Safety hazards pictogram.</li> <li>• Pesticides were separated by class.</li> <li>• Were kept in the store under lock and key.</li> </ul>



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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> <li>• Concrete cemented floor, bund wall and provision of sump pond.</li> <li>• Store keeper was trained in the handling of all pesticides. SDS leaflets were available at all pesticide stores.</li> </ul>
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	Empty pesticide containers were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	Aerial spraying of pesticides was not practices in the Spark Glory Sdn. Bhd.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	Specific annual medical surveillance for pesticide operators and documented action to treat related health conditions, had been demonstrated in Oct 2022 for 2 employees handling chemical and manuring at Klinik Mabello (Paris) Sdn. Bhd. and checked by OHD. The result of medical surveillance was indicated all the employees were fit to handle chemicals.
	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	At time of visit, there were only 5 male workers on Spark Glory Sdn Bhd. Hence, no work has been undertaken by pregnant or breast-feeding women.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Yes	<p>Waste management and disposal plan to avoid or reduce pollution had been documented and implemented. Sighted waste management plan has established in the document “environmental impact assessment management action plans and continuous improvement plan – list of waste generated at waste” were used to guide the waste disposal activities and to reduce pollution during routine operation.</p> <p>Among of types of waste has been identified in the CU were:</p> <ul style="list-style-type: none"> <li>• Organic waste</li> <li>• Domestic waste</li> <li>• Empty chemical container</li> <li>• Electric waste</li> </ul>

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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> <li>Paper and cartridge ink</li> <li>Liquid waste – used engine oil &amp; lubricant oil.</li> </ul>
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	Yes	Spark Glory domestic waste from the housing area was well managed and all domestic wastes were disposed via own transport to Majlis Daerah Lahad Datu (MDLD) waste collection bin. Sighted there was no practice of open fires within Spark Glory. The secondary containments, signages, sump pits, spillage kits and SDS were seen effectively displayed and made available at chemical / pesticide store, diesel drum and fertilizer store.
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	During site visits there was no evidence fire has been used to dispose a waste. all domestic wastes were disposed via own transport to Majlis Daerah Lahad Datu (MDLD) once per week by manager of estate.
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	Spark Glory Sdn Bhd had complied with good agriculture practices, as contained in SOPs, to manage soil fertility to optimise yield and minimise environmental impacts. Spark Glory had adopted the following document as their standard operating. The fertilizer application SOP was referred in the Agriculture Manual Ref SGAM No. 3. It covered the Field manuring programs for Mature oil palm on Timing, Placement, Supervision and Nutrient Antagonism.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	Spark Glory Sdn Bhd carried out annual foliar and soil sampling on a 5 yearly cycle basis to monitor changes in nutrient status. The annual foliar sampling to determine Ash levels and nutrients levels of N, P, K, Mg, Ca, B, Cu & Zn was conducted in June 2021 by Agronomy Department Hap Seng Plantations. The latest soil sampling was also carried out in May 2019. Report No: R19/5/330 dated 22/06/2019 for PH, K, Ca, Mg, C.E.C., P, Org. C and N. The soil analysis was carried out by KL – Kepong (Sabah) Sdn Bhd. The results of the foliar and soil analysis formed the basis for the fertilizer recommendations to maintain and to improve soil fertility.
	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	A nutrient recycling strategy was in place which included stacking pruned fronds and manually weeded weeds / grass that were left to decompose in the respective fields. There was no application of Empty Fruit Bunches (EFB) and Palm Oil Mill Effluent (POME) in Spark Glory Sdn Bhd. As mentioned under Indicator 7.4.4 optimal use of inorganic fertilisers was based on the recommendation of fertilizers by Agronomist from Hap Seng Estates Holdings Berhad (Estate Division).
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Spark Glory Sdn. Bhd. continued to monitor record their fertilizer inputs as recommended by their agronomist. The information was available in the Manuring Schedule for FY 2021. The fertilizers recommended for 2021 were, NK., AS, MOP, RP and HGFB.
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes	Based on the Soil Map dated in Nov 2018 extracted from “The Soils of Sabah” document, by the Agronomy Department of Hap Seng Plantations Holdings Berhad listed there were no fragile soils present in Spark Glory Sdn Bhd. The soils in Spark Glory were of Kinabatangan and Kretam series. As per the Slope Maps prepared by the Agronomy Department, HSP there only a small area with 20° slope.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	As per the Slope Maps dated in Nov 2018 prepared by the Agronomy Department, HSP there only a small area with 20° slope. There was no steep terrain (greater than 25°).
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	No new planting on steep terrain.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Yes	As mentioned under Indicator 7.5.1 Spark Glory Sdn Bhd had prepared both soil and slope map dated Nov 2018 to demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	Yes	Based on the Soil Map dated Nov 2018 extracted from “The Soils of Sabah” document, by the Agronomic Department of Hap Seng Plantations Holdings Berhad listed there were no fragile soils present in Spark Glory Sdn Bhd.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	Yes, based the Soil Map dated Nov 2018 extracted from “The Soils of Sabah” document, by the Agronomic Department of Hap Seng Plantations Holdings Berhad, the planning of drainage and irrigation systems, roads and other infrastructure is carried out.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Yes	Based on the Soil Map dated Nov 2018 extracted from “The Soils of Sabah” document, by the Agronomic Department of Hap Seng Plantations Holdings Berhad listed there were no Peat soils present in Spark Glory Sdn Bhd. This was also confirmed during the field visit at the Estate.
	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	Yes	As above.

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Clause	Indicators	Comply Yes/No	Findings
	Procedural Note for 7.7.5 below).		
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	Based on the Soil Map dated Nov 2018 extracted from “The Soils of Sabah” document, by the Agronomic Department of Hap Seng Plantations Holdings Berhad listed there were no Peat soils present in Spark Glory Sdn Bhd. This was also confirmed during the field Estate.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.	Yes	
	7.7.6 (C) All existing plantings on peat are managed according to the ‘RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat’, version 2 (2018) and associated audit guidance.	Yes	

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Clause	Indicators	Comply Yes/No	Findings
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2018) and associated audit guidance.	Yes	Based on the Soil Map dated Nov 2018 extracted from “The Soils of Sabah” document, by the Agronomic Department of Hap Seng Plantations Holdings Berhad listed there were no Peat soils present in Spark Glory Sdn Bhd. This was also confirmed during the field visit at the Estate.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	Yes	Spark Glory Water Management Plan has been reviewed and updated in Dec 2021. This plan is confined to only Spark Glory, covering only the water used for daily operation. Among the water management plans are: <ol style="list-style-type: none"> <li>1) Soil Moisture Conservation Programme</li> <li>2) Buffer zone / riparian reserve of the streams</li> <li>3) Water for domestic use</li> <li>4) Contingency plan during drought season</li> <li>5) Sewage and septic tank</li> <li>6) Lubricant and fertilizer store</li> <li>7) Rainfall records</li> </ol>
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	Spark Glory certification unit does not restrict access to clean water or contribute to pollution of water used by communities. It was confirmed through interviewed with nearby estate and stakeholder. CU also conduct river water analysis thru accredited Hap Seng Plantation central Laboratory by yearly basis, latest analysis has been carried out Oct 2022 at 2 points (upstream and downstream) of Sungai Tagas-Tagas located in the CU. There were several parameters above limits such as turbidity and total suspend solids. This because of the water sampling has been carried out during raining season.
	7.8.1b Workers have adequate access to clean water.	Yes	Water for domestic use is supplied from the rainwater for washing and shower. Proper filtration and treatment are yet to be installed. The company has provided a tank or jar for a worker to get treated water from Bukit Mas POM. Besides that, the estate also provided the mineral bottle as access to clean water with average 15 to 19 cotton per months for the workers.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other	Yes	A major river, Sg. Tagas, has been identified located nearby Spark Glory and is linked to Tabin Wildlife Reserve. During site inspections at Spark Glory Sdn. Bhd. was confirmed no chemical spraying activities was carried out close to the water edge along of the artificial drainage that directly channel to Sg. Tagas. All that artificial drainage has been left with natural grasses.

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Clause	Indicators	Comply Yes/No	Findings																											
	buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).																													
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially BOD, is regularly monitored.	Yes	Not applicable since CU were individual certification.																											
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	Not applicable since CU were individual certification																											
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 on 30/10/2022. The plan only focusses on diesel usage by FFB Transport and use of fertilizers. Sighted environmental impact and mitigation measure has been identified and documented accordingly. Consumption of diesel was monitored on monthly basis. Sighted the data from year 2017 to 2021.																											
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 Spark Glory 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 on 03/01/2021. The input data FY2021 have been verified and checked. The input data as per below.</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Unit</th> <th>Value</th> </tr> </thead> <tbody> <tr> <td>Oil Palm Planted On Mineral Soil</td> <td>Ha</td> <td>121.46</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>121.46</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>0.00</td> </tr> <tr> <td>FFB Supplied To This Mill</td> <td>Mt</td> <td>937.38</td> </tr> <tr> <td>FFB Produced By This Estate/Pantation</td> <td>Mt</td> <td>937.38</td> </tr> <tr> <td>FFB Production Per Hectarage</td> <td>Mt/Ha</td> <td>7.72</td> </tr> </tbody> </table>	Description	Unit	Value	Oil Palm Planted On Mineral Soil	Ha	121.46	Oil Palm Planted On Peat	Ha	0.00	Total Oil Palm Planted Area	Ha	121.46	Conservation Area (Forested)	Ha	0.00	Conservation Area (Non-Forested)	Ha	0.00	FFB Supplied To This Mill	Mt	937.38	FFB Produced By This Estate/Pantation	Mt	937.38	FFB Production Per Hectarage	Mt/Ha	7.72
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			<p>Plantation / field emission</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Total emission (tCO2e)</th> <th>tCO2e/ha</th> <th>tCO2e/t FFB</th> <th>Emission allocated to this mill (tCO2e)</th> </tr> </thead> <tbody> <tr> <td>Land Conversion</td> <td>1199.62</td> <td>9.88</td> <td>1.28</td> <td>1199.62</td> </tr> <tr> <td>Crop Sequestration</td> <td>-1137.08</td> <td>-9.36</td> <td>-1.21</td> <td>-1137.08</td> </tr> <tr> <td>*CO2 Emissions from Fertiliser</td> <td>28.24</td> <td>0.23</td> <td>0.03</td> <td>28.24</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>42.96</td> <td>0.35</td> <td>0.05</td> <td>42.96</td> </tr> <tr> <td>Fuel Consumption</td> <td>13.54</td> <td>0.11</td> <td>0.01</td> <td>13.54</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><b>TOTAL</b></td> <td><b>147.28</b></td> <td><b>1.21</b></td> <td><b>0.16</b></td> <td><b>147.28</b></td> </tr> </tbody> </table> <p>*Includes transport and manufacture emissions from mineral fertilizers and emissions from urea</p> <p>*This only includes N2O emissions form mineral fertiliser application and peat soil. The N2O emissions from organic fertiliser application is not included here and can only be displayed in the final summary.</p>	Description	Total emission (tCO2e)	tCO2e/ha	tCO2e/t FFB	Emission allocated to this mill (tCO2e)	Land Conversion	1199.62	9.88	1.28	1199.62	Crop Sequestration	-1137.08	-9.36	-1.21	-1137.08	*CO2 Emissions from Fertiliser	28.24	0.23	0.03	28.24	N2O Emissions from Peat	0.00	0.00	0.00	0.00	N2O Emissions from Fertiliser	42.96	0.35	0.05	42.96	Fuel Consumption	13.54	0.11	0.01	13.54	Peat Oxidation	0.00	0.00	0.00	0.00	Sequestration in Conservation area	0.00	0.00	0.00	0.00	<b>TOTAL</b>	<b>147.28</b>	<b>1.21</b>	<b>0.16</b>	<b>147.28</b>
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	Yes	Auditors has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Spark Glory 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	Yes	The Environmental Impact Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation,																																																		

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	minimise them implemented and monitored.		Crop Sequestration, Fertiliser, N <sub>2</sub> 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 Spark Glory Sdn. Bhd.
	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 "Pelaksanaan Tindakan Menghadapi Kebakaran" sighted a training has been conducted by estate manager to employees and mandore in July 2022.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	Engagement with adjacent stakeholders on fire prevention has been conducted and briefed during external stakeholders' consultation meeting through online meeting conducted in Dec 2021.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	N/A	Not Applicable since there is no new land clearing available. Auditor also has verified planting data, and through website <a href="https://www.globalforestwatch.org/">https://www.globalforestwatch.org/</a> . It was confirmed that no new planting at the CU
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	Yes	The report of "Potential High Conservation Value Area Assessment Report of Spark Glory 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 2019 and reviewed on Dec 2020. Based on the assessment, there was no identified RTE at Spark Glory estate. Spark Glory had identified a Potential HVC4 which the estate has controlled and maintained the river buffer zone for Sg. Tagas Tagas. The Assessor also identify that Estate was adjacent to Tabin Wildlife Forest reserve. The total area is 1.19 Ha. Sighted also the new Report namely "HCV-HCSA Assessment Report of Spark Glory 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 Nov 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 plantations remains valid.	Yes	
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include	Yes	



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Clause	Indicators	Comply Yes/No	Findings
	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).	Yes	Spark Glory estate has established HCV action plan for Sg Tagas Tagas titled “HCV areas Management Action Plans’ dated in Nov 2022. The estate planned to maintain the riparian reserve by: <ul style="list-style-type: none"> <li>• Prohibiting the cutting down of the tree at the area,</li> <li>• Prohibiting manuring and spraying operation at the riparian reserve area</li> <li>• Workers are constantly informed not to encroach into the riparian reserve and disturb the area</li> <li>• Periodic visit to the riparian reserve to monitor any illegal activities</li> </ul> And also to maintain or enhance measures adjacent with Tabin Wildlife reserve by: <ul style="list-style-type: none"> <li>• Prohibition workers entrance to this area</li> <li>• Signboard are erected at the boundary</li> <li>• Constantly briefed workers regarding RTE</li> <li>• Prohibition of logging at the estate boundary</li> <li>• Prohibition of illegal hunting</li> <li>• Periodic monitoring to the reserve boundary</li> </ul>
	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 Spark Glory. So, this indicator was not applicable with this CU.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the	Yes	Spark Glory continued to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that prohibition signage was erected, that is, <ul style="list-style-type: none"> <li>• No hunting, no fishing and no pesticide spraying within buffer area at Sg. Tagas Tagas, and</li> </ul>

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Clause	Indicators	Comply Yes/No	Findings
	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.		<ul style="list-style-type: none"> <li>No hunting and no illegal activities at forest border with Tabin Wildlife forest reserve.</li> </ul>
	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	Spark Glory continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the Sg. Tagas Tagas,
	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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Clause	Indicators		Comply Yes/No	Findings
5.5.2 Time-bound plan  A time-bound plan for certifying all its management units and/or	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	N/A	The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.

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<p>entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>				
	(b)	<p>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;</p>	N/A	<p>The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.</p>
	(c)	<p>Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);</p>	N/A	<p>The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.</p>
	(d)	<p>Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised.</p>	N/A	<p>The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.</p>

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		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 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	N/A	The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	N/A	The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	N/A	The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	N/A	The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.

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	(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,	N/A	The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.	
		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"> <li>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;</li> </ul>	N/A		
		<ul style="list-style-type: none"> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>	N/A		The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.
		<ul style="list-style-type: none"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>	N/A		The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.
		<ul style="list-style-type: none"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>	N/A		The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a	N/A	The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.	

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		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.		
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	N/A	The company is not managing any mills or other estates, so requirements for uncertified management units are not applicable.
<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</p>		No additional indicators	Yes	As reported in indicator 4.4.1, 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. At Spark Glory the land was previously owned by a group of smallholders (Chin Chee Man, Chu Vee Len, Chin Mei Kuen, Liew Kok Yong, Tai Chee Keong, Liew Moi Yin and Lee Fook San. Smallholder bought the land from Sabah Land Development Board in 1987 and they developed the land in 2002 with planting of Oil Palm. In 2008 Spark Glory Sdn Bhd purchased the land. There were clear land ownership documents available for review. The original copies of the documents were kept in Spark Glory office in Lahad Datu. Copies of land titles for Spark Glory was also sighted at Estate office. The Spark Glory estate is under the jurisdiction of Kinabatangan District. Review of the documents confirmed the terms and condition of the land is for cultivation of agricultural crop of economic value and it has been complied.

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<p>size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>			
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**ATTACHMENT 4**

**DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN**

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Root Cause &amp; Corrective Action Taken by the CU</b>	<b>Verification Statement by Auditors</b>
<p>MZK 01 2022</p> <p>6.2.2</p>	<p>Major</p>	<p>Finding: Pay slip at Spark Glory not detailing payments and conditions of employment (e.g. regular working hours, overtime, sick leave, holiday entitlement in compliance with national legal requirements).</p> <p>Objective evidence: Sighted Records of Payroll documents (Payslip) was not detailing payments and conditions of employment e.g. regular working hours, overtime, sick leave, holiday entitlement, Absent.</p>	<p>Root cause: Management does not include such detailed in monthly payslips.</p> <p>Correction: Payslips for the month of November 2022 have been corrected to include regular working hours, overtime, sick leave, holiday entitlement in compliance with national legal requirements. Attached November 2022 payslips for workers.</p> <p>Corrective Action: To prevent this issue from happening in the future, estate management will periodically check with JTK or neighbouring plantation on the updated payslip format and/or requirement.</p>	<p>Verified workers' payslips for the month of November 2022. The payslips have detailing on regular working hours, overtime, sick leave, holiday entitlement, absent, etc.</p> <p>Status: CLOSED</p>



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**ATTACHMENT 5**

**STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED**

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Verification Statement by Auditors</b>
CN 01 2022  IN 2.1.1	Major	<p>Finding: Safety Data Sheets (SDS) for several chemicals at the estate store are only available in English but not the Malay language.</p> <p>Objective evidence: Safety Data Sheets (SDS) for the following chemicals sighted at the estate chemical stores are only available in English but not the Malay language: Caltex 1000THF &amp; Petronas Urania 500 40.</p> <p>(Note: No fertilizers were in stock at the estate stores during time of this audit, however SDS for fertilizers Glyphosate IPA 41%, Disodium tetraborate pentahydrate and Ammonium sulphate were also observed to only available in English but not the Malay language)</p>	<p>During site visit at chemical &amp; fertilizer store was sighted all the SDS were available in Bahasa Malaysia &amp; English. Among of SDS were verified such as below:</p> <ul style="list-style-type: none"> <li>• Egyptian Phosphate rock (Agromate (m) sdn Bhd)– version updated on 31/03/2021</li> <li>• AS -version updated on 02/03/2021</li> <li>• Fertibor fertilizer (Agromate (m) sdn Bhd)— version updated on 24/02/2021</li> <li>• MOP – version updated on 05/07/2021</li> <li>• Shell diesel B7 – version updated on 27/09/2021</li> <li>• Sime Kunota Super multipurpose transmission plus – version updated on 31/10/2022</li> <li>• Dewana Glyphosate – version updated on 06/01/2020</li> </ul> <p>Thus, previous Major nonconformity CN 01 2022 was satisfactory closed.</p>
DA 01 2022  IN 7.8.2	Major	<p>Finding: Water courses and wetlands was not protected, including maintaining and restoring appropriate riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>Objective evidence: During site inspections at Spark Glory Sdn. Bhd. (Field Block 3 and Block 5), sighted chemical spraying activities was carried out close to the water edge along of the artificial drainage that directly channel to Sg. Tagas. Besides that, observed also chemical spraying activities was carried out at the monsoon drain (directly channel to Sg. Tagas) at office compound. Based on circle &amp; strip spraying programme 2021, last chemical spraying activities was carried out on November 2021.</p>	<p>A major river, Sg. Tagas, has been identified located nearby Spark Glory and is linked to Tabin Wildlife Reserve.</p> <p>During site inspections at Spark Glory Sdn. Bhd. was confirmed no chemical spraying activities was carried out close to the water edge along of the artificial drainage that directly channel to Sg. Tagas. All that artificial drainage has been left with natural grasses. Thus, Major NCR DA 2022 was satisfactory closed.</p>

Not applicable