



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

File Ref. : EB02930002

RSPO PUBLIC SUMMARY REPORT

CLIENT : BOUSTEAD RIMBA NILAI SDN BHD – SEGAMAHA CU

PARENT COMPANY : BOUSTEAD PLANTATIONS BERHAD

RSPO MEMBERSHIP No.: 1-0012-04-000-00

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	
SEGAMAHA CU	Segamaha Palm Oil Mill	05° 12.63' N	117° 48.63' E	KKS Segamaha, Lot CL 115343336, 91114, Lahad Datu, Sabah, Malaysia
	Bukit Segamaha Estate	05° 12.55' N	117° 45.57' E	Ladang Bukit Segamaha, KM 50.5, Jalan Lahad Datu-Sandakan, Kampung Paris 2, 91114, Lahad Datu, Sabah, Malaysia
	Sungai Segamaha Estate	05° 12.18' N	117° 48.50' E	Ladang Sungai Segamaha, KM 50.5, Jalan Lahad Datu-Sandakan Off Road 30 KM, Kampung Paris 2, 91114, Lahad Datu, Sabah, Malaysia
	G&G Estate	05° 9.90' N	117° 46.65' E	Ladang G&G, KM 50.5, Jalan Lahad Datu-Sandakan, Off Road 40 KM, Kampung Paris 2, 91114, Lahad Datu, Sabah, Malaysia
	Tabung Tentera Estate	05° 9.80' N	117° 46.75' E	Ladang Tabung Tentera Sabah, KM 50.5 Jalan Lahad Datu-Sandakan Off 16km, Kampung Paris 2, 91114, Lahad Datu, Sabah.

MAP : See Attachment 1

AUDIT DATE : 27 – 31 March 2023

DURATION : 19 auditor days

TYPE OF AUDIT : ☒ Annual Surveillance Audit No. 4

☐ Recertification Audit

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 28/05/2019 to 27/05/2024

The following attachments form part of this report:

Non-conformity Report(s) ☒

List of additional site(s) ☐

Report by Audit Team Leader

Name : **MOHD ZULFAKAR BIN KAMARUZAMAN**

Signature :

Date : **6 / 07 / 2023**

Acknowledgement by Client's Representative

Name : **MITAH BINTI LIMPU**

Signature :

Date : **10/07/2023**

SUMMARY OF AUDITS

Stage 2 audit				
On-site audit date	:	1-4 & 15-18 Oct 2018 (audit reschedule for HCV & social)	No. of auditor days	: 17
Audit team	:	Mohd Ab Raouf bin Asis (LA), Ruzita binti Abdul Gani (A), Mohd Razman bin Salim (A), Rozaimie bin Ab Rahman (A), Dzulfihar bin Azmi (TA), Suzalina Kamaralarifin (A)		
No. of major NCR	:	10	Indicator: 1.1.2, 2.1.1, 4.4.2, 4.6.11, 4.7.2, 5.3.2, 6.5.2, 6.9.1, 5.3.1 (SC), 5.3.2 (SC).	Closing date: 29/4/2019
No. of minor NCR	:	5	Indicator: 2.1.2, 4.1.2, 5.1.2, 4.8.2, 6.5.3	
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
	:	/	/	/
	:	Contract workers	NGOs	Govt. agency
	:	Indigenous people	Contractor	Others (Please specify)
	:	NA		
Supply base sampled	:	Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Ladang Tabung Tentera Sabah.		
Justification of audit planning	:	Total allocation of auditor days for Segamaha CU were: 17.0 auditor days Mill = 5 days (4 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). Estate = 3 days each for the four estates (Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Ladang Tabung Tentera Sabah) for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Report approved by	:	Radziah binti Mohd Daud	Approval date : 28/05/2019	

Annual Surveillance Audit 1				
Audit date	:	13 – 15 May 2020 (REMOTE)	No. of auditor days:	6 Auditor days
Audit team	:	Dzulfihar Azmi (TLA), Mohd Ab Raouf bin Asis, Rozaimie bin Ab Rahman (SC)		
No. of major NCR	:	1	Indicator: 3.8.7 (Supply Chain)	Closing date: 17/07/2020
No. of minor NCR	:	0	Indicator: NA	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
	:			
	:	Contract workers	NGOs	Govt. agency
	:	Indigenous people	Contractor	Others (Please specify)
	:			
Supply base sampled	:	Bukit Segamaha Estate, Sungai Segamaha Estate and Ladang Tabung Tentera Sabah. G&G Estate not sampled due to COVID 19 matters.		
Changes since the last audit	:	No changes.		
Justification of audit planning	:	Total allocation of auditor days for Segamaha CU were: <ul style="list-style-type: none"> • Mill = 1 days (For safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) • All estate = Total 5 days for verification on safety and health, environment, good agriculture best practices, GHG verification. 		
Report approved by	:	Kamini a/p M. Sooriamoorthy	Approval date : NA	

Annual Surveillance Audit 2 (Combine with Surveillance Audit 1)				
On-site audit date	:	3 – 8 May 2021	No. of auditor days:	24 Auditor days
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Mohd Ab Raouf Asis, Mohd Norddin Abd Jalil, Amir Bahari, Ismail Adnan, Rohazimi Mat Nawi (Trainee auditor)		
No. of major NCR	:	6	Indicator: 2.1.1, 3.4.3, 3.8.9, 6.2.2, 6.2.3, 6.7.3	Closing date: 28/07/2021
No. of minor NCR	:	5	Indicator: 2.1.2, 2.1.3, 3.3.2, 4.2.4, 7.11.3	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
		√		√
		Contract workers	NGOs	Govt. agency
				Independent growers
		Indigenous people	Contractor	Others (Please specify)
		NA		
Supply base sampled	:	Bukit Segamaha Estate, Sungai Segamaha Estate, Ladang Tabung Tentera Sabah and G&G Estate		
Changes since the last audit	:	No changes.		
Justification of audit planning	:	Allocation of mandays during onsite: 5-man days for each site units (estates) and as for POM 4-man days. Combined audit ASA 1-2020 & ASA 2-2021.		
Report approved by	:	Kamini Sooriamoorthy	Approval date: 6/08/2021	

Annual Surveillance Audit 3				
On-site audit date	:	25-29/04/2022	No. of auditor days:	24 Auditor days
Audit team	:	Rozaimiee Ab Rahman, Mohd Zulfakar Kamaruzaman, Mohd Ab Raouf Asis, Mohd Razman Salim		
No. of major NCR	:	2	Indicator: 3.3.1, 3.8.12	Closing date: 28/07/2022
No. of minor NCR	:	2	Indicator: 6.3.2, 3.2.2	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
		√		√
		Contract workers	NGOs	Govt. agency
				Independent growers
		Indigenous people	Contractor	Others (Please specify)
		NA	√	
Supply base sampled	:	Bukit Segamaha Estate, Sungai Segamaha Estate, Ladang Tabung Tentera Sabah and G&G Estate		
Changes since the last audit	:	No changes.		
Justification of audit planning	:	Total allocation of auditor days for Segamaha CU were: 19.0 auditor days Mill = 3 days (2 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). Estate = 4 days each for the four estates (Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Ladang Tabung Tentera Sabah) for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Report approved by	:	Kamini Sooriamoorthy	Approval date: 4/08/2022	

Annual Surveillance Audit 4				
On-site audit date	:	27 – 31 March 2023	No. of auditor days :	19 Auditor Days
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Rozaimée Ab Rahman, Dzulfiqar Azmi, Rohazimi Mat Nawi		
No. of major NCR	:	7	Indicator: 3.4.3, 3.6.1, 4.2.1, 6.1.5, 6.2.3, 6.7.3, 7.8.2	Closing date: 30/6/2023
No. of minor NCR	:	3	Indicator : 3.7.2, 6.7.2, 7.12.7	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
	:	X		X
	:	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	:			
	:	Indigenous people	Contractors	Others (Please specify)
	:	NA	X	
Supply base sampled	:	Bukit Segamaha Estate, Sungai Segamaha Estate, Ladang Tabung Tentera Sabah and G&G Estate		
Changes since the last audit	:	Adjustment of planted hectare due to drone mapping by AAR from 9,255.20 ha to 9,357.80 ha		
Justification of audit planning	:	Total allocation of auditor days for Segamaha CU were: 19.0 auditor days: Mill = 3 days (2 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). Estate = 4 days each for the four estates (Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Ladang Tabung Tentera Sabah) for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini Sooriamoorthy	Approval date : 6/07/2023	

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Oct. 2018 – Sep. 2019	May 2020 – Apr 2021	May 2021 – Apr 2022	**May 2022 – Apr 2023	May 2023 – Apr 2024
Certified FFB Processed (MT)	137,474.00	193,123.00	164,700.00	167,500.00	172,200.00
Production of Certified CPO (MT)	27,494.80	40,556.00	35,822.25	36,347.51	36,651.39
Production of Certified PK (MT)	6,190.00	8,208.00	7,609.14	6,700.00	6,249.37
Certified Areas (Ha)	10,092.80	10,092.80	10,092.80	10,092.80	10,092.80
Planted Areas (Ha)	9,377.40	9,377.40	9,377.40	*9,255.20	*9,357.80
Production Areas (Ha)	7,617.30	7,762.90	7,762.90	8,383.50	8,258.20
HCV Areas / Conservation Areas (Ha)	199.57	199.57	199.57	199.57	199.57
REMARKS	*ASA 3 & 4 – Adjustment made to the planted hectareage, based on drone mapping by AAR. Planted area revised from 9,255.20 ha to 9,357.80 ha. **The actual reporting period is from April 2022 – February 2023				

TABLE 2

	PO	PK
Last years certified volume (MT)	36,347.51	6,700.00
Last years actual certified sold (MT)	21,452.07	4,365.09
Last years actual sold under other schemes (MT)	0.00	0.00
Last year's sold conventional (MT)	13,551.39	724.56
Last year actual sold CSPO credits (where applicable)	0.00	0.00
New year certified volume (MT)	36,651.39	6,249.37

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar Kamaruzaman	Lead Auditor Social External, HCV, SCCS	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Rozaimée Ab Rahman	Auditor Social	Holds a B.Sc. Agriculture from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Rohazimi Mat Nawi	Auditor Safety, Metrics Template	Hold B. Sc (Hons) Chemical Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill more than 5 years. He was qualified in the auditing line with experienced in Sustainability (MSPO), QMS, EMS, OHSMS and RSPO/MSPO Supply Chain audit.
Dzulfiqar Azmi	Auditor Environmental, GHG, TBP	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is a qualified RSPO And MSPO Lead Auditor.

1.3 Audit methodology

The audit covered Segamaha palm oil mill and all four Segamaha CU supply bases; Sungai Segamaha, Bukit Segamaha. Tabung Tentera Sabah Estate and G&G Estate. The audit included an on-site audit to the estates, mill, line sites, amenities and facilities to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<ul style="list-style-type: none"> Workers work 6 days a week with one rest day (Friday). They work 8 hours with a minimum of 30 minutes' break in between. All workers confirmed that they receive a minimum of RM1500 per month. They receive their salaries before 7th of every month. As of the date of this audit, all workers sampled aware on the new Minimum Wages (Amendment 2022). Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. Gender Committee – At all OU's, membership of the Gender Committees is open to male and female employees, where they have separate committees to address issues such as domestic violence, sexual harassment and reproductive rights. Joint Consultative Committees – each estate and mill have its own JCC to discuss issues related to health, safety and welfare of workers. The JCC comprise of worker and employer representatives. The worker representative was chosen from those elected by the workers. They confirmed that they can make decisions independently.
2) Settlers	NA
3) Villagers / Local communities (including women representatives, displaced communities)	Ketua Kampung Sri Takala Mr Rasit Rajah
4) Suppliers	FFB Suppliers: Tan Leong Kee, Magna Jadi Sdn Bhd, Tan Chok Peng, Omar bin Lapo, Ladang Irat
5) Contract workers	NA
6) Local & national NGOs	NA
7) Government agencies / Statutory bodies	NA
8) Independent growers / Smallholders	NA
9) Indigenous people	NA
10) Contractor	Some of the contractors sampled; Chong Shu Min (FFB Transporter), Z & T (FFB Transporter), P & L Company (Road maintenance).
11) Previous land owner (if any)	NA
12) Others (please specify)	NA

1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Boustead Segamaha Certified Unit is one of the business units registered under the Boustead Estates Agency Sdn. Bhd., a subsidiary company of Boustead Plantations Bhd (BPB). The CU is located about 80 km away from Lahad Datu town. The mill is located with the Ladang Sungai Segamaha and consisted of four other estates namely the Bukit Segamaha Estate, Sungai Segamaha Estate, G&G Estate and Ladang Tabung Tentera Sabah (LTTS) Estate. Segamaha Palm Oil Mill was established and commissioned in July 1996 with the capacity of 55 MT FFB per hour. The mill has received FFB from own estate such as Ladang Sungai Segamaha, Ladang Bukit Segamaha, Ladang Tabung Tentera and Ladang G&G. The mill also received FFB from other plantation such as Tobe Property Sdn Bhd, Tawau Cacao Imports and Exports, Hektar Pujian, Pasir Citra, Grandeed Sdn Bhd, Pertanian Selangor (Ldg PKPS Irat) and Magna Jadi Sdn Bhd, and smallholders like Tan Chok Peng, Tan Leong Kee and Chong Shu Min. All the estates within the CU have been fully developed before the year 2005. Boustead Segamaha CU has ISO 9001 quality management system certification besides MSPO and P&C and Supply Chain.

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

The FFB sourced from company owned estates that are certified, outside plantations and smallholders. Details of the FFB contribution from each source to the Segamaha POM are shown in the following tables:

Table 1: Actual FFB production by the supply base for the period from March 2022 to February 2023

Estates	FFB Production		Certifying CB
	Tonnes	%	
Bukit Segamaha	52,421.15	24.94	SIRIM QAS International
Sungai Segamaha	63,312.72	30.12	SIRIM QAS International
LTTS	27,536.96	13.10	SIRIM QAS International
G&G Estate	25,738.93	12.25	SIRIM QAS International
Tawau Cacao Import & Export Agency SB	439.51	0.21	-
Tobe Property Sdn Bhd	3,542.66	1.69	-
Hektar Pujian Sdn Bhd	3,092.42	1.47	-
Magna Jadi Sdn Bhd	3,896.96	1.85	-
Pasir Citra Sdn Bhd	5,099.72	2.43	-
Tan Chok Peng	2,512.64	1.20	-
Ldg Perbadanan Kemajuan Pertanian Selangor	11,913.76	5.67	-
Grandeed Sdn Bhd	468.10	0.22	-
Ladaco Sdn Bhd	8,670.71	4.13	-
Total	208,646.25	99.26	
Smallholders - Tang Leong Kee	1,546.66	0.74	-
Overall Total	210,192.91	100	

**Table 2: Projected FFB production by supply base for the next reporting period
(March 2023 – February 2024)**

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Ladang Sungai Segamaha	63,900	37.11
Ladang Bukit Segamaha	53,500	31.07
Ladang Tabung Tentera	25,400	14.75
Ladang G&G	29,400	17.07
TOTAL	172,200	100

**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(March 2022 to February 2023)**

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	210,192.91
FFB Processed	210,192.91
Certified FFB Processed	169,009.75
Crude Palm Oil (CPO)	
Overall CPO Production	44,083.00
Certified CPO Production	35,003.46
Certified CPO delivered as RSPO	21,452.07
Certified CPO delivered as non-RSPO	13,551.39
Certified CPO delivered under other sustainable schemes	0.00
Credits traded thru Book & Claim	0
Palm Kernel (PK)	
Overall PK Production	7,312.00
Certified PK Production	5,089.65
Certified PK delivered as RSPO	4,365.09
Certified PK delivered as non-RSPO	724.56
Certified PK delivered under other sustainable schemes	0
Credits traded thru Book & Claim	0

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(March 2023 – February 2024)**

RSPO Supply Chain Model : Mass Balance	Total (MT)
Certified FFB Received	172,200.00
Certified FFB Processed	172,200.00
Certified CPO Production	36,651.39
Certified PK Production	6,249.37

Table 5 Planted and certified area of Segamaha CU

Estate	Planted (ha)	Certified (ha)
Bukit Segamaha Estate	2,267.70	2,415.10
Sungai Segamaha Estate	2,884.50	3,244.90
Tabung Tentera Sabah Estate	1,928.90	2,023.00
G&G Estate	2,276.70	2,409.80
Total	9,357.80	10,092.80

Table 6 Planting profile for Segamaha CU

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature (Ha)</u>	<u>Immature (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Bukit Segamaha	2013	2 nd	237.7	0	10.48	100	0
	2014	2 nd	538.3	0	23.74		
	2015	2 nd	530.7	0	23.40		
	2016	2 nd	313.5	0	13.82		
	2017	2 nd	323.1	0	14.25		
	2018	2 nd	324.4	0	14.31		
Sungai Segamaha	1999	1 st	21.0	0	0.73	100	0
	2007	2 ND	251.2	0	8.71		
	2008	2 ND	209.5	0	7.26		
	2009	2 ND	182.4	0	6.32		
	2012	2 ND	212.0	0	7.35		
	2013	2 ND	224.7	0	7.79		
	2014	2 ND	524.8	0	18.19		
	2015	2 ND	446.6	0	15.48		
	2016	2 ND	280.1	0	9.71		
	2018	2 ND	273.7	0	9.49		
Tabung Tentera Sabah	2019	2 ND	258.5	0	8.96	72.31	27.69
	PM98A	1 st	50.3	0	2.61		
	PM98B	1 st	40.3	0	2.09		
	PM98C	1 st	35.2	0	1.82		
	PM98D	1 st	38.2	0	1.98		
	PM98E	1 st	36.2	0	1.88		
	PM98F	1 st	38.3	0	1.99		
	PM06A	2 nd	81.8	0	4.24		
	PM07A	2 nd	68.1	0	3.53		
	PM08A	2 nd	56.9	0	2.95		
	PM09A	2 nd	83.4	0	4.32		
	PM14A	2 nd	45.1	0	2.34		
	PM14B	2 nd	48.5	0	2.51		
	PM14C	2 nd	44.1	0	2.29		
	PM14D	2 nd	56.9	0	2.95		
	PM15A	2 nd	48.5	0	2.51		
	PM15B	2 nd	54.4	0	2.82		
	PM15C	2 nd	46.9	0	2.43		
	PM15D	2 nd	43.6	0	2.26		
	PM18A	2 nd	68.2	0	3.54		
	PM18B	2 nd	68.5	0	3.55		
	PM18C	2 nd	30.9	0	1.60		
	PM18D	2 nd	57.3	0	2.97		
	PM19A	2 nd	41.8	0	2.17		
	PM19B	2 nd	80.5	0	4.17		
	PM19C	2 nd	33.4	0	1.73		
	PM19D	2 nd	58.8	0	3.05		
	PM19E	2 nd	38.7	0	2.01		
	PR21A	2 nd	0	258.1	13.38		
	PR22A	2 nd	0	276.0	14.31		
G&G Estate	PM19971	1 st	1357.50	0	59.63	75.16	24.84
	PM1999	1 st	353.70	0	15.54		
	PR2022	2 nd	0	361.30	15.87		
	PR2023	2 nd	0	204.20	8.97		

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Syed Muhammad bin Syed Abu Bakar
Position	:	Head of Business Unit
Address	:	Segamaha Mill, P.O. Box No. 60856, 91117 Lahad Datu, Sabah.
Phone no.	:	089-563 033
Fax no.	:	089-563 033
Email	:	muhammad@bplant.com.my

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 :

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?

There is a revision on TBP and RSPO Approved on on 28/3/2023, Refer attachment TBP.

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 * * If not closed, minor non conformity will be upgraded to major non conformity	<input checked="checked" type="checkbox"/> Closed	<input type="checkbox"/> Not closed*						
3.5.	Complaint received from stakeholder (if any) No complaint received.								
4.0 DETAILS OF NON-CONFORMITY REPORT									
4.1	For P&C (Details checklist refer to Attachment 3) : <table style="width: 100%; border: none;"> <tr> <td style="width: 35%;">Total no. of minor NCR(s)</td> <td style="width: 10%;">List :</td> <td style="width: 55%;">RMN 03 (6.7.2), RAR 04 2023 (3.7.2), MZK 03 2023 (7.12.7)</td> </tr> <tr> <td> Total no. of major NCR(s)</td> <td> List :</td> <td> DA 01 2023 RMN 01 (3.6.1), DA 02 2023 (7.8.2), RAR 03 2023, DA 03 2023, MZK 01 2023 (3.4.3), RMN 02 (6.7.3) RAR 01 2023 (6.2.3) RAR 02 2023 (6.1.5) MZK 02 2023 (4.2.1)</td> </tr> </table>			Total no. of minor NCR(s)	List :	RMN 03 (6.7.2), RAR 04 2023 (3.7.2), MZK 03 2023 (7.12.7)	 Total no. of major NCR(s)	 List :	 DA 01 2023 RMN 01 (3.6.1), DA 02 2023 (7.8.2), RAR 03 2023, DA 03 2023, MZK 01 2023 (3.4.3), RMN 02 (6.7.3) RAR 01 2023 (6.2.3) RAR 02 2023 (6.1.5) MZK 02 2023 (4.2.1)
Total no. of minor NCR(s)	List :	RMN 03 (6.7.2), RAR 04 2023 (3.7.2), MZK 03 2023 (7.12.7)							
 Total no. of major NCR(s)	 List :	 DA 01 2023 RMN 01 (3.6.1), DA 02 2023 (7.8.2), RAR 03 2023, DA 03 2023, MZK 01 2023 (3.4.3), RMN 02 (6.7.3) RAR 01 2023 (6.2.3) RAR 02 2023 (6.1.5) MZK 02 2023 (4.2.1)							
4.2	For SC (Details checklist refer to Attachment 3) : <table style="width: 100%; border: none;"> <tr> <td style="width: 35%;">Total no. of major NCR(s)</td> <td style="width: 10%;">List :</td> <td style="width: 55%;">-</td> </tr> </table>			Total no. of major NCR(s)	List :	-			
Total no. of major NCR(s)	List :	-							
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 90 days of the audit. Recommended for suspension of the certificate.

Note: Major NCRs which are not addressed within a further 90 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 ZULFAKAR
KAMARUZAMAN**

(Name)

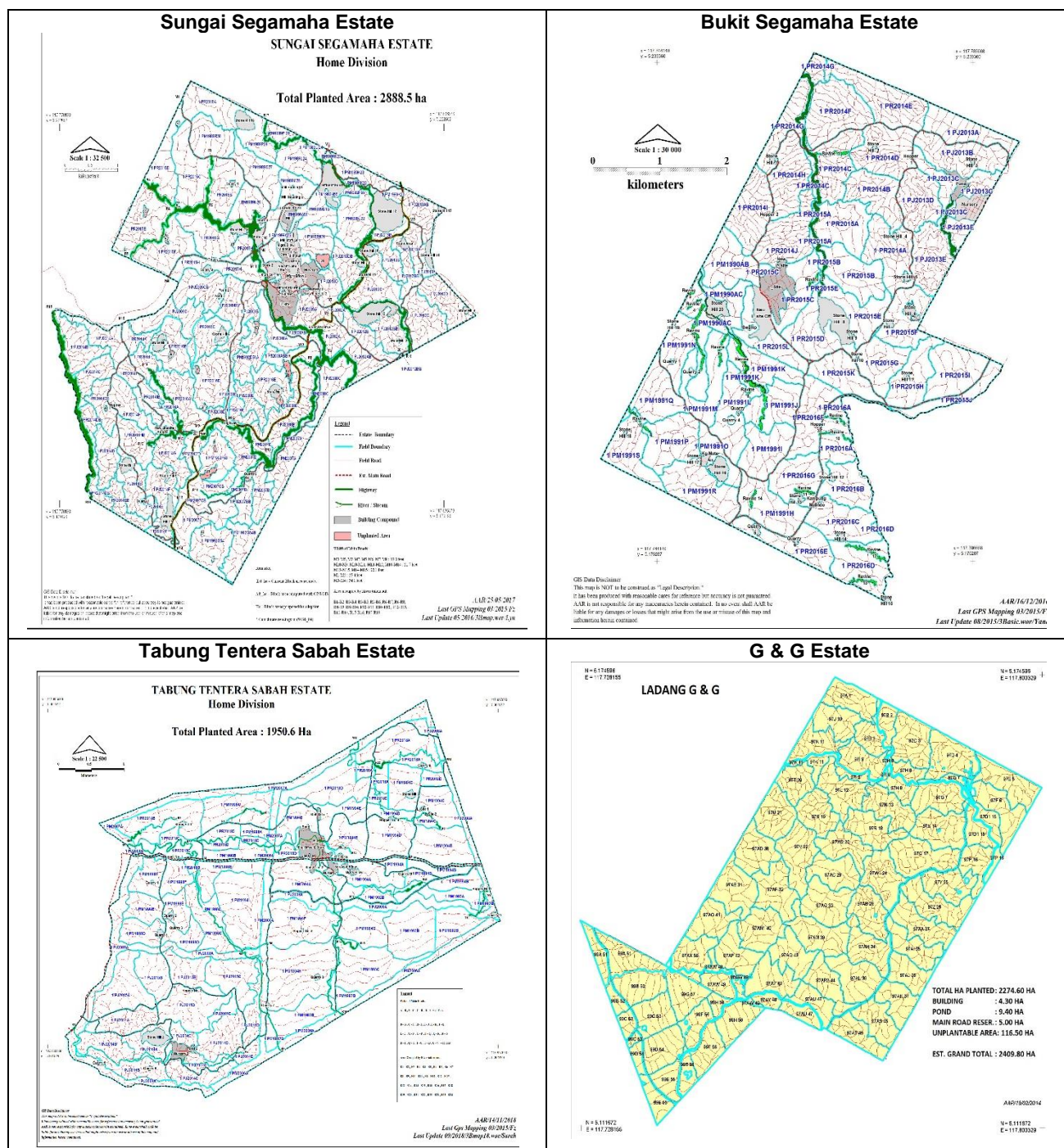


(Signature)

30/06/23

(Date)

Map of Segamaha CU



SURVEILLANCE 4 RSPO 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 : 27 – 31 March 2023.

3. Site of assessment : Segamaha Certification Unit:

- Segamaha POM
- Bukit Segamaha Estate
- G&G Estate
- Tabung Tenera Estate
- Sungai Segamaha

4. Reference Standard:

- a. MYNI 2019 of RSPO P&C 2018 / ~~RSPO Independent Smallholder Standard, Nov 2019 / RSPO Management System Requirements and Guidance for Group Certification of FFB Production, March 2018~~
- b. RSPO Certification System Documents
- c. Company's audit criteria including Company's Manual/Procedures

5. Assessment Team

Lead Auditor	:	Mohd Zulfakar Kamaruzaman (SCCS, Social – External, HCV)
Auditor	:	Rozaimiee Ab Rahman (Social – Internal, TPB)
		Rohazimi Mat Nawi (Environment, GHG, Metrics Template)
		Dzulfiqar Azmi (Safety, Environment (Mill only), GHG, GAP, GMP)
Observer	:	Ahmad Amirul Ariff , Nur Faizzatul Nadia (RSPO)
ASI Witness	:	Haye Semail and Shikin Rasikon (ASI)

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.

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. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain.

In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. Working Language : English and Bahasa Malaysia

11. 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.

12. 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

13. 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 2022 to December 2022, and
 - ii. 12-month period counting up to two months before audit month: January 2022 to December 2022
- b) Reporting time frames for demographic data:
 - i. For mill and estate workers: as of 31 December 2022
 - ii. For smallholders and outgrowers: January 2022 to December 2022
- c) Reporting time frame for all other social and environmental data:
 - i. January 2022 to December 2022

The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021. All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).

14. Assessment Programme Details : As below

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Date / Time	Coverage of assessment / Activity / Site	RAR	DA	MZK	RMN
Day 1: 27/03/2023 (Monday)					
8.00am – 8.30am	Opening Meeting – Venue: Segamaha POM <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings. 	/	/	/	NA
8.30am – 1.00pm	Site observation to Segamaha POM RSPO Supply Chain 2017 <ul style="list-style-type: none"> RSPO Supply chain standard implementation including model requirements P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Mill Best Practice such as grading, workshop, boiler, etc New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management GHG & Metric template verification 	/	/	/	NA
1.00pm	Lunch Break	/	/	/	NA
2.00pm – 4.00pm	Continue assessment at respective sites	/	/	/	NA
4.00-4.30pm	Discussion on any findings / briefing with cu	/	/	/	NA
5.00 pm	End of day 1 audit	/	/	/	NA
Date / Time	Coverage of assessment / Activity / Site	RAR	DA	MZK	RMN
Day 2: 28/03/2023 (Tuesday)					
8.30am – 1.00pm	Site observation to G&G Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Land titles user rights 	/	/	/	/

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	<ul style="list-style-type: none"> • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting • Occupational safety & health aspects, chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • GHG & Metric template verification 				
1.00pm	Lunch Break	/	/	/	/
2.00pm – 4.00pm	Continue assessment at respective sites	/	/	/	/
4.00-4.30pm	Discussion on any findings / briefing with cu	/	/	/	/
5.00 pm	End of day 2 audit	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	RAR	DA	MZK	RMN
Day 3: 29/03/2023 (Wednesday)					
8.30am – 1.00pm	Site observation to Sungai Segamaha Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7 • Occupational safety & health aspects, chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting • Interview with workers, contractors etc. • Occupational safety & health aspects, chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • GHG & Metric template verification 	/	/	/	/
1.00pm	Lunch Break	/	/	/	/
2.00pm – 4.00pm	Continue assessment at respective sites	/	/	/	/
4.00-4.30pm	Discussion on any findings / briefing with cu	/	/	/	/

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5.00 pm	End of day 3 audit	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	RAR	DA	MZK	RMN
Day 4: 30/03/2023 (Thursday)					
8.30am – 1.00pm	Site observation to Bukit Segamaha Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • GHG & Metric template verification 	/	/	/	/
1.00pm	Lunch Break	/	/	/	/
2.00pm – 4.00pm	Continue assessment at respective sites	/	/	/	/
4.00-4.30pm	Discussion on any findings / briefing with cu	/	/	/	/
5.00 pm	End of day 4 audit	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	RAR	DA	MZK	RMN
Day 5: 31/03/2023 (Friday)					
8.30am – 1.00pm	Site observation to LTT Sabah Estate <ul style="list-style-type: none"> • P1, P2, P3, P4, P5, P6, P7 • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Land titles user rights 	/	/	/	/

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	<ul style="list-style-type: none"> • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting • Interview with workers, contractors etc. • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • GHG & Metric template verification 				
12.00pm	Friday Prayer/Break	/	/	/	/
1.30pm – 3.30pm	Continue assessment at respective sites	/	/	/	/
3.30-4.30pm	Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.				
4.30-5.00pm	Discussion and acceptance on assessment findings with Management Representative. Closing meeting at CU	/	/	/	/

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

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	<p>The Segamaha CU continued to implement the procedure for responding to any communication as outlined in their Estate/Mill Quality Management System documents. The records of communication were identified and maintained in different files depending on the stakeholder. Among the records reviewed were correspondences with the authorities and employees.</p> <p>The CU continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Boustead Plantations website at http://www.bousteadplantations.com.my/home.html</p>
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	<p>Information are available both in Bahasa Malaysia and English and accessible to the relevant stakeholders through correspondence and request as sighted in the “Communication Record Book” and “Communication” as well as correspondence sighted at Sungai Segamaha Estate, G&G Estate and Segamaha Palm Oil Mill (POM) by the Auditor.</p> <p>The Boustead Plantations website address is available in English at http://www.bousteadplantations.com.my/overview.html</p>
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	<p>The Segamaha CU has identified personnel responsible for complaints. Records of communication (classified as internal and external) were identified and maintained in different files, depending on the stakeholders. Among the records reviewed were correspondences with the authorities, local communities and employees. The latest communications sighted in these records were the “Borang Aduan” requesting repairs of the employee’s houses.</p> <p>Records of requests for information and their responses are mainly kept in ‘Communication’ file at all Estates and the Mill. The summary of requests and their response is sighted in the ‘Communication Record Book’.</p>

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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	Segamaha CU has established procedures, flowcharts and forms that describe and facilitated the mechanism to be taken for consultation and communication with the stakeholders (external or internal). These procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders (workforce and external) through Internal and External Stakeholders' meeting held in 2022.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Stakeholder List of Segamaha CU continued to be maintained and updated with stakeholders' information (name of parties, address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools as well as contractors' employees and others. The latest stakeholders list at Segamaha CU was updated in Jan 2023. Identified in the list were also those relevant to the company's operation including workers & women representative.
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	Segamaha CU subscribe to the 'Code of Ethics and Conduct Policy' established by Boustead Plantations Berhad. The policy is implemented in all business operations evidenced from interviews with workers, suppliers/vendors', community representatives and other stakeholders' during the audit.
	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, Boustead Plantations Berhad (BPB) also has a Vendor Code of Ethics & Conduct which has been developed to outline the standards of behaviour required by Boustead Plantations Berhad's vendors which includes expectation to uphold human rights. The Vendor COBC applies to all its suppliers, consultants, agents, contractor's/service providers who have direct dealings with the Group.

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	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	It was evident that Segamaha CU continue to comply with of the applicable laws and regulations.
	2.1.2 A documented system for ensuring legal compliance is in place. This system	YES	Sustainability Department Executive who is based in Kuala Lumpur is responsible to track any changes to the Acts and Regulations. This was done through communicating with the publisher of the documents. This mechanism was outlined in its procedure. The updating

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Clause	Indicators	Comply Yes/No	Findings
laws and regulations.	has a means to track changes to the laws and regulations.		of the legal register was carried out on a periodical basis. Any change in the legal register is communicated to the respective CUs.
	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 estates have installed boundary markers, boundary trenches, and boundary stones were sighted during the visit at the estates. This confirmed that they have maintained boundary markers by installing the red/white pole, trenches, and signage.
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 available in the stakeholder lists of all units within Segamaha CU and duly updated when necessary. Only 4 contractors have been listed in the stakeholder list. They include suppliers, FFB transporters, replanting contractors, etc.
	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	Contract agreements with third parties contain clauses on meeting applicable requirements. It was evident that the legal due diligence carried out include getting the vendors to sign the 'Code of Ethics and Conduct where they undertake to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption. Also sampled during the audit included e-Agreements signed by the third parties. Additionally, contractors' background checks were also done as sighted at Segamaha POM where corporate background of vendors was sought before a contract was signed.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons. Contractors also subscribe the BPB 'Code of Ethics and Conduct' to comply with the BPB Sustainability Policy. The CEBC in turn, contains provisions which state that Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/ or formal and structured apprenticeship, educational and training programmes. Based on records available, interviews conducted, and observations made during the audit, there was no evidence of any young persons employed within Segamaha CU.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder 	YES	Segamaha POM has kept the following information for the directly source of FFB from external FFB supplier: <ul style="list-style-type: none"> a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder c) Valid MPOB license

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> One or more supporting documents for claims Valid MPOB license 		
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Currently in Segamaha POM there is indirectly sourced of FFB. All FFB are received direct from the suppliers.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	Segamaha CU continued to achieve long term economic and financial viability through documented management plan projected to year 2027. Expenditure, general charges, profit and loss covering the period of 2023 to 2027 had been prepared for all the estates as well as the POM and made available to the audit team.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Segamaha CU had a Long-Range Replanting Program up to 2027. The program was reviewed annually.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	Management review has been planned to conduct yearly basis. Sighted latest management review meeting has been conducted (combine RSPO, RSPO SCCS and MSPO) to discuss issues related to audit findings, estate and mill operations. The management review were discussed are: 1) Minutes / Actions of previous meeting 2) RSPO/MSPO Certification status 3) Result of internal audit 4) Customer feedback 5) Process performance and product conformity 6) Preventive and correction action status 7) Changes affecting policy 8) Recommendations for improvement 9) Complain and grievance 10) Resources needed 11) Any other business

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Clause	Indicators	Comply Yes/No	Findings
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	This has been established in the Continuous Improvement Plan 2023 updated in Jan 2023 compilation was made with subject to the consideration of the main social and environmental impacts. These include continued engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments remained available.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	RSPO metric template had updated latest report in Mar 2023 and verification of the data was found reliable and accurately reported by the organization.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	Relevant SOPs are in place.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Head of Business Unit, Plantation Advisory Department, Performance Monitoring Unit and Safety & Sustainability Department inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Operating units visited maintain all records of monitoring and available for review. Among other mechanisms to check consistent implementation of procedures include conducting the internal audits.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	The implementation of SOP is monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There was no new planting in Segamaha CU. Environmental Aspect and Impact (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have	YES	For Segamaha CU, the SIA and EAI reports separated. Environmental Aspect Impact Assessment (EAI), which covers form upstream activities

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Clause	Indicators	Comply Yes/No	Findings
management and monitoring plan is implemented and regularly updated in ongoing operations.	been developed with participation of affected stakeholders.		<p>such as FFB reception until downstream processes were sighted during assessment. The EAI was reviewed in Jan 2023 for Identification and evaluation of environmental impact was done for all activities and processes related to the estate and mill operation. For all estates, the assessment was to evaluate and analyze the operations impact on soil, water, and air associated with the organization activities. The EAI review process had included stakeholders' consultation in Feb 2023 with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done involved respective Managers, Assistants and Sustainability Team with external and internal stakeholders such as from Govt. agencies, neighboring estates, local villagers, suppliers, contractors and CU employees. So far, no issues related to environmental has been highlighted during stakeholders meeting.</p> <p>At the POM, specific impacts identified include smoke emissions, noise levels, POME and EFB management. Data was collected and analyzed for compliance with relevant regulations and further actions needed were documented and implemented. There are no significant changes from the current EAI established practice. Due to no changes identified in the mill operation, therefore no timetable for any change is required. During the mill visit, the EAI was used as guide and no discrepancy was found. The person in charge and the control required were properly recorded in the management plan. At the Estates, field activities that includes fertilizing, spraying, transportation of FFB, garbage disposal, landfill management, road maintenance, wildlife and land conservation activities. The mitigation measures were continued to be implemented to minimize the negative impacts.</p> <p>EIA for Replanting at G&G Estate, conducted by third party in April 2021, for the replanting program from 2021 to 2026.</p> <p>A Social Impact Assessment report, May 2017 was made available during the audit titled 'Social Impact Assessment (SIA) Sungai Segamaha, Bukit Segamaha, Ghafar and Group Estates and Sungai Segamaha Oil Palm Mill'. The assessment covered all estates and mills in the CU. The report has covered on stakeholder mapping, wages and decent living wage, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations.</p> <p>There is a new SIA Assessment updated by the Boustead Sustainability Unit dated in March 2023, covering all estates and mill in the CU. The report has covered on stakeholder mapping, wages and decent living wage, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations. As of the assessment report, there is no significant issues highlighted for the workers except for the approval of goat livestock and new houses. There is no significant issues from villagers and</p>

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Clause	Indicators	Comply Yes/No	Findings
			smallholders surrounding the area.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	NO	<p>Environmental management plan was implemented from EAI. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The EAI assessments had included the identification of aspects and impacts resulting from the POM and Estate operations. So far, no negative impact issues related to the environment have been highlighted during stakeholders' meetings. However, it was noted that the environmental management and monitoring plan was not well implemented, reviewed and updated regularly in a participatory way supported with several evidence observed onsite. At the same time, the waste was also not disposed of accordingly. As a result, Major NCR DA 03 2023 was highlighted.</p> <p>Social management and monitoring plans have been established. A timetable with responsibilities for mitigation and monitoring was reviewed and updated accordingly. Specific person in charge (PIC) has been identified and be responsible for taking actions on each of the mitigation measures with specific time intervals. Stakeholders' meetings were held by the CU to gather inputs during the process of reviewing and updating the 'Management Plan on Social Impact Assessment'. The monitoring records were verified at all visited estates and mills. However, there were some issues highlighted during the stakeholder consultation with details as listed in Major NCR MZK 01 2023. Sighted also, some issues where the social management and monitoring plan was not updated regularly in a participatory way. This is stated in Major NCR RAR 03 2023 has been raised.</p>
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented in the Workforce Management Unit Standard Operating Procedure on Foreign Worker Recruitment Sabah & Sarawak and made available to the workers and their representatives. Based on the Standard Operating Procedure, sighted clear procedure on walk in process and timeline for the working pass application. In addition, observed also clear procedure or mechanism to ensure zero recruitment fees has been emphasized. Based on interviews with sampled new workers engaged, confirmed they are aware of the flowchart walk in job application procedure and all the cost of recruitment fees are taken by the estate management. Employment procedures for retirement and termination are available in the local workers' employment contracts. Similarly, foreign workers' contracts also contain provision for mutual termination. Retirement procedure is not applicable to foreign workers.</p>

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Clause	Indicators	Comply Yes/No	Findings
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Based on the documentation review and interview, employment procedures are implemented, and records are maintained. Also, there was document sighted i.e., "Prosedur Pengambilan Kakitangan Baharu", date effective Feb 2020, on the process of undertaking new employees, report for duty, probationary period and confirmation. However, as of to date (2023) there is no new recruitment for Segamaha CU.
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.	NO	The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following. a) Change in work process. b) Revision/changes in legislative requirement c) Occurrence of accidents However, it was evident that there were several occurrences triggered for the review of the existing HIRARC, but this was not carried out by the CU. This noncompliance was highlighted as NCR RMN 01.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people are monitored.	YES	All the estates had address health and safety risks by OHS hierarchy control. Sighted the establishment of Prosedur Kerja Selamat to address on OH&S risks identified. The CU also established Main Access Road Maintenance programme and proportion including Ladang Tabung Tentera Sabah (LTTS), Ladang Sungai Segamaha (LSS), Ladang Bukit Segamaha (LBS) and Ladang G&G (LGG). It was also evident that the workplace inspection also been conducted to monitored on health and safety risk.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	A documented formal training programme 'training Program for the Year 2023 and records that covered aspects of RSPO Principles and Criteria was made available to the auditors during the conduct of audit.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	NO	Segamaha Business Unit had trained their staff, workers and records of training were kept in the RSPO training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. However, it has been noted that some trainings conducted were not properly recorded and not effectively done. Interviews with selected workers showed that they did not have good understanding on the implementation of the contract agreement such as, annual leave

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Clause	Indicators	Comply Yes/No	Findings
			entitlement, benefits, etc. This issue was highlighted in Minor NCR RAR04-2023.
	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	The training record was up to date and well maintained. Sighted last training on SCCS carried out in Dec 2022. The training has been conducted by the Mill engineer to all employees at each workstation such as, maintenance engineer, weighbridge clerk, admin supervisor, shift supervisor, grader, laboratory assistant, and weighbridge operator, boilerman, AP, etc. The intention on this training was to create awareness on understanding on supply chain requirement.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Not applicable due to Segamaha POM using Mass Balance model.
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	YES	Segamaha POM received certified FFB from own estate and Uncertified FFB from outsider FFB supplier as per below: Certified FFB <ul style="list-style-type: none"> Bukit Segamaha Sungai Segamaha LTTS

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> • G&G Estate • Nak Estate (Diversion) • Resort Estate (Diversion) • Sutera Estate (Diversion) <p>Noncertified FFB</p> <ul style="list-style-type: none"> • Tawau Cacao Import & Export Agency Sdn Bhd • Tobe Property Sdn Bhd • Hektar Pujian Sdn Bhd • Magna Jadi Sdn Bhd • Pasir Citra Sdn Bhd • Tan Chok Peng • Ladang Perbadanan Kemajuan Pertanian Selangor • Grandeed Sdn Bhd • Tang Leong Kee
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	YES	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill as in Table 2 (FFB) & Table 4 (CPO & PK) in this report.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information was: Name: Bousted Rimba Nilai Sdn Bhd – Segamaha Business Unit Country: Malaysia Member ID: 1-0012-04-00-00 Member Category: Oil Mil Products: CPO & Palm Kernel Program: MB Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the 	YES	<p>The RSPO SC procedure was sighted and found all elements of the RSPO Supply Chain standard were covered.</p> <p>The CPO and PK production records, weighbridge report, dispatch record and contract agreement, and training record were up to date and well maintained. The last training on SCCS was in Dec 2022. The training has been conducted by Mill engineer to all employees at each workstation such as, maintenance engineer, weighbridge clerk, admin supervisor, shift supervisor, grader, laboratory assistant, and weighbridge operator, boilerman, AP, etc. The intention on this training was to create awareness on understanding on supply chain requirement.</p> <p>The Mill Manager has the overall responsibility and authority over the implementation of the supply chain requirements in the Segamaha POM.</p> <p>Segamaha POM has implemented Clause 7.0 – traceability procedures for receiving and processing certified and non-certified FFBs. Segamaha POM has received noncertified FFB from outside plantations and smallholders.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>implementation of this standard.</p> <ul style="list-style-type: none"> The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 		
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	YES	<p>The RSPO SC procedure is in place. An audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard requirements and covered mass balance module requirements. RSPO supply chain internal audit was conducted in Feb 2023. There are 0 findings that were raised by auditor. Audit Attendance sheet, audit plan, audit notes, and NC were reviewed during the audit.</p> <p>Management review meeting in Feb 2023 was reviewed as follows (combine RSPO SC and RSPO MYNI 2019, MSPO and MSPO SCCS)</p> <ul style="list-style-type: none"> Internal audit – (0 NCR SCCS Only) Customer feedback Previous meeting – was highlighted Changes Recommendation for improvement – improve the established system

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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>	YES	<p>Segamaha POM received certified FFB from Sungai Segamaha Estate, Bukit Segamaha Estate, Tabung Tentera Sabah Estate, G&G Estate. And Uncertified FFB from Tawau Cacao Import & Export Agency Sdn Bhd, Tobe Property Sdn Bhd, Hektar Pujian Sdn Bhd, Magna Jadi Sdn Bhd, Pasir Citra Sdn Bhd, Tan Chok Peng, Ladang Perbadanan Kemajuan Pertanian Selangor, Grandeed Sdn Bhd, Tang Leong Kee.</p> <p>The Weighbridge Clerk checked and verified the consignment notes issued by the supplying estates for the in-coming RSPO and non-RSPO FFBs. SPOM still kept copies of the FFB Consignment Notes or FFB Delivery Notes issued by the supplying estates.</p> <p>Randomly selected FFB delivery notes/dispatch tickets for RSPO-certified FFBs issued by the supplying estates on the in-coming FFBs were verified. It was found that all delivery notes/dispatch tickets had indicated the estate's RSPO Certificate number, the name of the supplying estate and the quantity (weight in Kg) of the FFBs. The auditor has verified that there was no overproduction during the reporting period.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number 	YES	<p>Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, SPOM has delivered certified materials to several end buyers the records were following the standard requirement.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	<p>SPOM outsources transportation of certified products (CPO & CPK) to end buyer. The appointed transporter was bound by the signed agreement. There is a contract document between SPOM and the transporters) stating that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>The RSPO Supply Chain procedure has described the Outsource Contractor and it has been briefed to the contractor during stakeholder meeting in Feb 2023. An agreement covering the outsources activity was signed. It has been noted that the meeting highlighted the information on the implementation of RSPO standard.</p> <p>Inspection was carried out as an additional effort to ensure no contamination sighted book at AP Post.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contractors, specifically the transporter involved in transporting the certified products had been well maintained through the stakeholder listing dated Mar 2023. Among the details maintained are name, contact no. as well as address of the contractor.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors were used and the PIC was aware of the need to inform CB on those new contractors prior to next audit.
3.8.12	i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	SPOM maintained an accurate, complete, up-to-date and accessible records and reports pertaining to their traceability/supply chain system implementation. Among those sighted are as per listed in para 3.8.5 of this report.
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	All records related to RSPO SC were maintained minimum for 2 years. Sample CPO dispatch note since Jan 2015 until to date was available and well maintained.
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	NA since this mill is MB 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	YES	SPOM had continued to keep records and balances of all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table 'Mass Balance Record for Oil Mills'. The amount of purchased records of the volume purchased (input) and claimed (output) over a period of 12 months was updated in 'Mass Balance Records for Oil Mill'. The Mass Balance Record for Oil Mills –Segamaha POM indicated both positive balances for the certified CPO and palm kernel.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)		
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	YES	Segamaha POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	Not applicable, SPOM is an MB-mill.
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills	YES	Marketing Department personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>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>		<p>They shall update the system based on input provided by SPOM (e.g. of input Projected & Actual FFB Processed template, Mass Balancing Records for Oil Mills (3 monthly), daily production summary report, monthly production summary report etc.)</p> <p>SPOM has view access of their Palm Trace system, Summary of transaction had been generated and found acceptable.</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>	YES	<p>Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. SPOM does not use RSPO corporate logo as well as trademark logo.</p>

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	Boustead Plantations Berhad have a documented policy "Polisi Hak Asasi Manusia" dated 20/5/2020 that prohibits retaliation against Human Rights Defenders. Sighted also the BPB Sustainability Policy that includes Respect Human Rights in the clause 2.2. A policy titled 'Anti-Harassment Policy Statement' dated 1 March 2022 prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. The policy has been communicated to all workers during morning muster and training/briefing sessions and to all External Stakeholders through Joint Consultation meetings held for 2021 and 2022 as verified from the Training records and JCC meeting minutes for the two years (Refer 1.1.4).
	4.1.2 The unit of certification does not instigate violence or use any form of	YES	There is no evidence that Segamaha CU instigates any violence or uses any form of harassment including the use of mercenaries and paramilitaries in its operations. There was no issue regarding

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Clause	Indicators	Comply Yes/No	Findings
	harassment in their operations.		user rights and conflicts between local communities and other stakeholders with Segamaha CU
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	NO	<p>It has been noted that the documented SOP named Grievance Procedure was developed but not mutually agreed to by the affected parties. This was evident during interviews with Growers (as they have highlighted that they did not understand and didn't know about this procedure. Thus, Major NCR MZK 02 2023 is raised.</p> <p>Personnel had been appointed at all Estate and Mill for handling grievance/complaints and social issues as evidenced by sighted appointment letters and established Organization chart of Grievance/Complaints Committees for 2022. Anonymity of complainants and Whistleblowers are ensured under BPB's "Whistleblowing Policy", "Whistleblowing Procedure" and the "Code of Ethics and Conduct" which provides an avenue to direct the grievances to Segamaha CU authority and even higher BPB management. Grievance/Complaints can be channelled through toll-free numbers, email, fax, or letters to the Sustainability Unit at HQ. The existing dispute and grievance procedure contain provisions that prohibit retaliation against Human Rights Defenders, community spokespersons and whistleblowers where requested.</p>
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	The Segamaha CU maintained affirms that its dispute system is open to any affected parties. Relevant policy titled 'Polisi Pemberian Maklumat (Whistleblowing)' and procedures were available. In accordance with the procedure, the anonymity of complainants and whistle-blowers will not reveal to third parties.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	Segamaha CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders through stakeholders meeting as evidenced by Internal and External Stakeholders' meetings minutes (Refer 1.1.4).
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The system used by the Segamaha CU in resolving disputes and grievances exists in the procedure called "Grievance Procedure (Workers (Estates and Mill), Public, Aborigines and others)", "Flowchart for Grievance/Complaint (workers, Public and others)" and "Flowchart for Grievance/Complaint to higher authority". In accordance with the procedure, the anonymity of complainants and whistle-blowers will not be revealed to third parties.

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Clause	Indicators	Comply Yes/No	Findings
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	There is evidence that contributions to community development was provided based on consultations. Some sampled CSR activities at Segamaha units included contribution in school fees, food box, training on machineries & road maintenance.
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 documents related to the right to use the land was made available to the audit team. Records of ownership were maintained at respective estate's office. This plantation area was previously owned by Sabah State Government. Plantations has the right to use the land which is legitimately owned by their company.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Segamaha CU. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or	YES	

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Clause	Indicators	Comply Yes/No	Findings
	withhold their consent to the operation at the time that these decisions were taken.		
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of 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 Segamaha CU. The audit team had confirmed that there were no land issues related to previous owners. Hence, the requirement in the indicator 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	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Segamaha CU. The audit team had confirmed that there were no land issues related to previous owners. Hence, the requirement in the indicator was not available.
	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	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Segamaha CU. The audit team had confirmed that there were no land issues related to previous owners. Hence, the requirement in the indicator was not available.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Segamaha CU. The audit team had confirmed that there were no land issues related to previous owners. Hence, the requirement in the indicator was not available.

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Clause	Indicators	Comply Yes/No	Findings
	reviewed in consultation with affected parties.		
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there were no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha, and the audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there were no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha, and the audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders and it can be concluded that there was no evidence of any land disputes between Segamaha CU with local communities and neighbouring estates.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Segamaha CU. The audit team had confirmed that there were no land issues related to previous owners. Hence, the requirement in the indicator was not available.

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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	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha and the audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders, and it can be concluded that there was no evidence of any land disputes between at Segamaha CU with local communities and neighbouring estates
	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	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha and the audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders, and it can be concluded that there was no evidence of any land disputes between at Segamaha CU with local communities and neighbouring estates
	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	Based on Social Impact Assessment (SIA) Report for Segamaha CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Segamaha and the audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders, and it can be concluded that there was no evidence of any land disputes between at Segamaha CU with local communities and neighbouring estates
	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. The current operation area including mill and estates as per stated in the land title.
4.6 Any negotiations concerning compensation for loss of legal,	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 Segamaha CU has a standard procedure for identifying procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation issues known as "Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation". The procedures state out the detailed process of compensation for issues/disputes related to land, ownership and access to land. It also states how compensation are to be dealt with. However, as of the date of the audit, no evidence is available at

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Clause	Indicators	Comply Yes/No	Findings
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.			either the Estate or Mill of any dispute related to on customary rights, boundary disputes, etc.
	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 'Land Dispute Compensation and Calculation Procedure' and "Procedure For Calculating & Distribution Fair Compensation is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There were no scheme small holdings at Segamaha CU. The Fresh Fruit Bunches are supplied from Boustead owned estates which are certified to RSPO.
	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	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 Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation", the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Boustead Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighboring estate. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land disputes between at Segamaha CU with local communities and neighboring estates.

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Clause	Indicators	Comply Yes/No	Findings
negotiated agreements.	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Segamaha CU. The audit team had confirmed that there were no land issues related to previous owners. It has been confirmed via an interview with the relevant stakeholders and it can be concluded that there was no evidence of any land disputes between at Segamaha CU with local communities and neighboring estates.
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 Segamaha CU. The audit team had confirmed that there were no land issues related to previous owners. It has been confirmed via interviews with the relevant stakeholders and it can be concluded that there was no evidence of any land disputes between at Segamaha CU with local communities and neighboring estates.
	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 reqs.	YES	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.

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Clause	Indicators	Comply Yes/No	Findings
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	YES	There was no conflict or dispute over the land.

Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	During the audit, it was verified that the current and past prices for FFB (Jan – March 2022) are being displayed at the front of weighbridge station and notice board at Segamaha POM.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	Segamaha POM is currently on Mass Balance as not all of its suppliers are RSPO certified. Segamaha regularly explains the FFB pricing to the smallholders (FFB suppliers) as attachment to the monthly invoice. The calculation of FFB pricing as in the SECOND SCHEDULE was also included as attachment to the FFB Supplier Agreements. Monthly FFB price is also presented in detail and displayed at the notice board near the Segamaha POM weighbridge.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	At Segamaha POM, fair FFB pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base. This was confirmed by the feedback from representatives of FFB suppliers interviewed during the Audit.
	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 mechs. where applicable.	YES	At Segamaha CU, there are records kept of parties, including women and independent representative organisations assisting smallholders 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.

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Clause	Indicators	Comply Yes/No	Findings
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	There is evidence that contracts entered into with FFB suppliers, CPO transporters and other Contractors are fair, legal and transparent. Among others, the contracts are dated, with clear provisions on contract duration, scope of services, payment of fee, obligation and undertaking of parties, provisions related to default and termination, rights and obligations upon termination, clause on dispute, etc. Annexes of the FFB supplier and transporter contracts specify method of FFB pricing calculation, schedule of transportation rates and transport rate adjustment mechanism, respectively.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	The contractors interviewed confirmed that payments are made in a timely manner, namely within 7 to 10 days of invoice.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Segamaha POM has been calibrated on a yearly basis using accredited weighing company.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Segamaha CU 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. Noted that Segamaha CU has invited nearby smallholders to attend the Stakeholder meeting scheduled in Feb 2022 to promote RSPO certification. So far, all smallholders are preferred to certify under MSPO as this is Government requirement and no complaint received during the engagement.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	<p>The CU also has developed a Standard Operating Procedure (SOP) on 'Consultation Procedure'. It contains procedures for consultation and discussions, solving issues/grievances, records and improvements, which is the responsibility of the Manager and Assistant Manager. It also stipulates those issues and grievances can be raised via comments, complaints, or request for information, and that all issues are to be resolved fairly and within the stipulated timeframe. The SOP also states that Master List of Documents must be available for stakeholders' reference. This SOP are being exhibited at the office notice boards at muster grounds. The procedures have been communicated to nearby stakeholders & smallholders in Feb 2022. As at to date there is no complaint by stakeholders.</p> <p>The system used by the Segamaha CU in resolving disputes and grievances (including smallholders) exists in the procedure called 'Grievance Procedure. All grievances are recorded and dealt with within a timeframe. Complainants are informed of the status and progress of the grievance and complaint. Nevertheless, verification of the Grievance Record book and forms at Segamaha CU Estates and Mill showed no issues with</p>

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Clause	Indicators	Comply Yes/No	Findings
			Smallholders.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	YES	<p>Segamaha CU 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. Noted that Segamaha CU has invited nearby smallholders to attend the Stakeholder meeting scheduled in Feb 2022 to promote RSPO certification. So far, all smallholders are preferred to certify under MSPO as this is Government requirement and no complaint received during the engagement.</p> <p>Segamaha CU are interested to provide consultation to interested smallholders (irrespective of type and outside the supply base) including women or other partners to assess their needs for support to improve their livelihoods and their interest in RSPO certification. However, based on available records at the CU, no smallholders outside the supply base had shown interest in contacting Segamaha CU for consultation.</p>
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	As above. There was no specific program for smallholders as there were no smallholders outside of their supply base that showed interest in contacting Segamaha CU for consultation and involvement on any programs related to smallholders support. Moreover, there were no comments received from the surrounding smallholders pertaining this.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Noted that Segamaha CU has invited nearby smallholders to attend the Stakeholder meeting in Feb 2022 to promote RSPO certification, including promoting the legality of FFB production. Sighted the minutes meeting explained on the above-mentioned.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	There are no Scheme Smallholders in Segamaha CU FFB supply base.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Segamaha CU regularly reviews and publicly reports on the progress of its smallholder support programme.

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Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	A publicly available non-discrimination and Equal employment opportunity is available and implemented at Segamaha CU. The policy statements emphasized worker information, recruitment and selection, training, employee development, terms of service and records of service. This policy is posted on notice boards in the estates/mill office.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Evidence is available that no employee has been discriminated against. This is evident from sampled employment contracts where all workers, (male, female, foreign, local) signed the same employment contract. Workers interviewed also confirmed that they face no form of discrimination.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	Based on interviews with the estate and mill management and documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. As stipulated in the "Recruitment selection, Hiring and Promotion" for staff and "Recruitment of Workers" for workers the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	As of the date of the audit, there is no pregnant worker at Segamaha BU. As confirmed by the worker during the interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. The pregnancy test was done on her own free will. During the interview it was confirmed that if they require contact with chemicals, they will allocate it to other light works. Interview also done with the female employees, who was giving birth in 2021 and they confirmed that no sign of pregnancy testing done in discriminatory manner, unless on her own will.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and	NO	The meeting discussed various issues pertaining to the welfare of the gender committee members. The management had provided Kindergarten for employee's children without

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Clause	Indicators	Comply Yes/No	Findings
	address issues of concern, as well as opportunities and improvements for women.		<p>any fee. The committee had conducted monthly inspection at the kindergarten to monitor its safety and cleanliness. The committee also had organized a “gotong-royong” at the housing areas. Based on Gender Committee Meeting minute at Sg. Segamaha, Segamaha Estate and Segamaha POM, it was noted that the committee had discussed the following matters:</p> <ul style="list-style-type: none"> ▪ training on women’s rights; ▪ counselling for women affected by violence; ▪ child care facilities to be provided by the growers and millers; ▪ women to be allowed to breastfeed up to nine months before resuming chemical spraying or ▪ usage tasks; and ▪ women to be given specific break times to enable effective breastfeeding. <p>Chairman of Gender Committee called ‘Persatuan Wanita (Seganita- Segamaha POM)’ at each site responsible in handling and channeling issue to management, if any. Management has directed chairman of gender committee to respects and protects anonymity and complainants where requested. Complainants can submit their complaint either in writing or verbally. Workers interviewed know that they can either complain to their immediate supervisor, or if they wish, to the estate management.</p> <p>However, during interview and document review at all Segamaha BU (Estates & POM) was confirmed that the gender committee in Segamaha CU was not in place specifically to raise awareness on opportunities and improvements for women. Based on several minutes of meetings and interview with gender committee members at Segamaha CU, there was no discussion about opportunities and improvements for women. Moreover, there is no dedicated budget was provided to the committee to execute the opportunities and improvements for women. Thus, #Major NCR RAR 02 2023 has been raised.</p>
	6.1.6 There is evidence of equal pay for the same work scope.	YES	<p>Equal opportunities policy contained within the Segamaha Policy states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. Comparisons were made of sampled employment contracts and payslips of harvesters from Indonesia and harvesters from Indonesia. Evidence is available that sampled workers receive equal pay for equal work. Comparisons were also made of sampled employment contracts and payslips of harvesters from local, harvester from Philippines and harvesters from Indonesia. Evidence is available that sampled workers receive equal pay for equal work.</p>

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Clause	Indicators	Comply Yes/No	Findings
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	<p>Segamaha CU documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthly pay slips and employment contracts were made available and reviewed during the audit. Labour laws, union and/or other collective agreements detailing payments and other conditions, were made available in the languages understood by the workers and explained to them by a management during induction.</p> <p>Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO and non-statutory such as donation to mosque funds), net salary, annual leave and medical leave taken, etc. Interviews with workers reveal that they understand the contents of the pay slips and seek explanation from the office whenever they need any clarifications. Samples of payslips were also sighted and verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order and Sabah Labour Ordinance. The employment contracts issued to all Segamaha CU workers (local and migrant) have been prepared in Bahasa Malaysia and are generally available to the workers. The documents have been prepared in accordance with the requirements of the Sabah Labour Ordinance. Pay conditions are also contained in the employment contracts.</p> <p>Documentation of pay is available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Interviews conducted with the workers confirmed their understanding of the employment contracts and pay slips. If they have any doubts, they will refer to the office or their supervisors. Briefing on relevant provisions on the Sabah Labour Ordinance on their rights under the employment contract such as public holidays, paid annual leave, final repatriation costs to be paid by employer, and termination of contract.</p>
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	<p>Employment contracts signed between the Segamaha CU management and their employees contain employment and payment terms and provisions covering contract duration, minimum age requirement, retirement age, place of work, job specifications, workers' obligations, employer's obligations, payment of foreign workers' levy by employer, salary payable, working hours and overtime, payment of passport and PLKS by workers, designated public holidays, workers' annual leave, medical expenses, sick leave, maternity leave and allowances, insurance scheme, EPF for local workers, rights to join union, salary deduction to be in accordance with the Sabah Labour Ordinance, mutual termination of contract, contract extension, etc. during interviewed with sampled workers in Estate and POM. Procedures related to entitlement, calculation and implementation of vacation leave pay has been explained carefully to them by Assistant</p>

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Clause	Indicators	Comply Yes/No	Findings
			Manager and Manager during morning briefing and during renewing the contract.
	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.	NO	<p>Regular working hours as determined by the Sabah Labour Ordinance and stipulated in employment contracts were being implemented by Segamaha CU. Any work in excess of 8 hours was compensated as overtime. This is based on punch cards, check roll books, pay slips reviewed. Workers who have been certified ill are given paid medical leave. Salary deductions are made for EPF, SOCSO, EIS (local workers) and there are no deductions for migrant workers except for passport (dependent). The approval letter from JTK Sabah is available for payment of passport dependent.</p> <p>However, there is evidence of legal noncompliance for overtime at Segamaha POM on "Permit Sekatan Kerja Lebih Masa" as per Seksyen 104(7) Ordinan Buruh (Sabah Bab 67) – 1.3- prohibited to work not more than 12 hours per day. Hence, #Major NCR RAR 01 2023 has been raised to address this.</p>
	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	<p>Evidence is available that the Segamaha CU provides adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free. Each house has between 2 to 3 rooms and accommodates between 2 to 5 workers. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises. Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall. There is evidence that housing inspections are being carried out once a week based on housing inspection records.</p> <p>Water sampling analysis for drinking water has been conducted by quarterly basis. Water and electricity are also provided from genset and water treatment at each OU's. Free medical treatment above is provided also to all workers and their dependants.</p>
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Segamaha CU has demonstrated effort to monitor once a year the adequacy, sufficient and affordable of food supply and price at the sundry shop within the estate. The CU maintained has agreement with inside shoppers and ensured price are publicly displayed at shops. Workers' access to adequate, sufficient and affordable food is via sundry shops available near the workers' housing. Prices at the sundry shops are adequately labelled.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on	YES	Bukit Segamaha, Sungai Segamaha, G&G, LTT and Segamaha Mill had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare

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Clause	Indicators	Comply Yes/No	Findings																		
	<p>achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a “decent living wage” is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none">• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.• There is annual progress on the implementation of living wages• Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.• The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		<p>and healthcare.</p> <table><tr><td></td><td>Local worker (RM)</td><td>Foreign worker (RM)</td></tr><tr><td>Sungai Segamaha Estate</td><td>RM3,660.00</td><td>RM3,660.00</td></tr><tr><td>G&G Estate</td><td>RM2,325.16</td><td>RM2,076.53</td></tr><tr><td>Segamaha POM</td><td>RM4,548.52</td><td>RM4,161.10</td></tr><tr><td>Bukit Segamaha Estate</td><td>RM2306.40</td><td>RM2044.58</td></tr><tr><td>LTT Estate</td><td>RM 2956.00</td><td>RM2791.00</td></tr></table> <p>The auditor had verified the calculation and the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.</p>		Local worker (RM)	Foreign worker (RM)	Sungai Segamaha Estate	RM3,660.00	RM3,660.00	G&G Estate	RM2,325.16	RM2,076.53	Segamaha POM	RM4,548.52	RM4,161.10	Bukit Segamaha Estate	RM2306.40	RM2044.58	LTT Estate	RM 2956.00	RM2791.00
	Local worker (RM)	Foreign worker (RM)																			
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LTT Estate	RM 2956.00	RM2791.00																			
	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 the estates and mill employ full-time employees. Migrant workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesian. This contract duration can be mutually																		

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Clause	Indicators	Comply Yes/No	Findings
	labour is limited to jobs that are temporary or seasonal.		extended subject to the annual work permit from the Malaysian Immigration Department.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognizing 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	There is a policy titled “Polisi Kebebasan Berpersatuan” is available in the CU. The policy is written in Bahasa and languages. The policy is posted on the OU’s notice board and information wall. Interviews with workers they are aware of their workers’ representatives. Minutes of meeting refer 6.3.2 The policy included statements, among others, that the workers are allowed to join any registered organizations or associations. Foreign workers are not allowed to hold any positions in organizations or associations. The workers who were consulted had confirmed that they were aware of their rights to join a union.
	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	Although there is no trade union operating within the estate premises, workers are not prohibited from appointing their own group leaders to represent them in the Joint Consultative (JCC) meetings with the management team. The JCC comprise management representatives and worker representatives and is chaired by the Sustainability Officer. Worker representatives comprise Wakil Suku dan Ketua Blok. Although the Ketua Suku were appointed by the workers themselves, the Ketua Blok were appointed by the management.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Evidence is available that workers’ representatives that sit in the Workers’ Welfare and Social Committees have been independently and freely elected by the workers themselves. No evidence of any management interference was observed.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The formal Policy on protection of children and non-employment of children is contained in the “Polisi Penggajian Pekerja Kanak-Kanak Dan Had Umur Minima”. This undertaking to not hire child labour is included in all service contracts and supplier agreements. Review of the workers list 2023 found that the estate and the mill did not employed anyone below the age of 18 years. Auditor also verify through the contractors in the CU and confirmed there was no contractor workers available in the estate and mill. This was verified by examining the master lists of each operating unit where details of the workers’ IC numbers, passport and dates of birth are available.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening	YES	Review of the workers list (March 2023) found no evidence that the estate and mill employed anyone below the age of 18 years. Auditor also has verified contractor workers in the estate and mill. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers’ IC numbers, passport and dates of birth are available.

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Clause	Indicators	Comply Yes/No	Findings
	verification procedure.		Documented age screening verification procedure was available at Segamaha CU. Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout Segamaha BU. There also have a documented age screening verification procedure.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Based on documentation review such as personal files and employee databases, there was no young persons employed in Segamaha CU. Interviewed with sampled workers also, none of them in such categories. There was no evidence that any young persons were employed in any of the units at Segamaha CU as evidenced from documentation review, field observations and interviews.
	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	Based on the documents sighted, communication about no child labour Policy was established in "BPB Sustainability Policy" and communicated to all levels of employees as evidenced from training records at the Segamaha BU.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	The Sexual Harassment Policy states that the Company would comply with the relevant laws and increase awareness with regards to sexual harassment. The policy is written in the Bahasa Malaysia and English and displayed on the notice boards. Awareness on sexual, other forms of harassments and violence are also briefed during muster and Gender Committee meeting held at mill and estate. The Gender Committee meetings are being held regularly where topics discussed include sexual harassment and violence. Members to lodge complaints if members encounter such incidence. Trainings were carried out accordingly.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	The statement and commitment to protect women's reproductive rights are available in 'Workplace Harassment & Violence Policy' signed by the Plantation Director. This policy is also being displayed at the estate and mill notice board.
	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 this audit, there has been no evidence of any new mothers and therefore this indicator could not be verified. However, based on interview conducted with the Gender Committee members at Segamaha CU estates and mill, when she was pregnant, her needs were attended to which included a private room where she could express milk and a fridge for storage were made available.
	6.5.4 A grievance mechanism, which respects anonymity and protects	YES	A grievance mechanism has been maintained by the CU. Chairman of Gender Committee at each operating units responsible in handling and channeling issue to management. The

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Clause	Indicators	Comply Yes/No	Findings
	complainants where requested, is established, implemented and communicated to all levels of the workforce.		management has directed the chairman of the Gender Committee to respects and protects anonymity and complainants where requested. The mechanism has been communicated to all levels of the workforce as verified by auditor during interview with female workers at all estates and Mill.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	YES	Collective evidence is available that all sampled workers have entered into employment voluntarily. This is based on the following: <ol style="list-style-type: none"> a. review of sampled employment contracts which contain mutually agreed termination clause; b. review of documents where workers signed consenting for their passports to be kept at the office; c. interview with foreign workers who confirmed they could have access to the passports at any time; d. records of punch cards and workers confirmation that overtime work is mutually agreeable and not forced on them; e. confirmation from the foreign workers that they received accurate briefing in their home country on the job they would be doing in Malaysia; f. and confirmation from the workers that there is no debt bondage or withholding of wages.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	A special labour policy for employment of foreign workers has been addressed in the 'Polisi Pekerja Buruh Asing'. The policy mentioned that all employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival programme will be conducted once arrived for three months. The CU maintained its specific procedure / flowchart for employment of foreign workers titled 'Sourcing Process for Foreign Workers'. The procedure has been implemented for any employment related with foreign workers.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. Records of regular meetings between the responsible person and workers to discuss health and safety have been verified to the satisfactory. The Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2023 was available. OSH Committee meetings are held once in three months. The minutes of the meeting reviewed.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly	NO	Procedures for accident and emergencies have been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been

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Clause	Indicators	Comply Yes/No	Findings
	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.		summarized in a chart flow form and displayed for information of all employees in the estate. They includes emergencies relating fire, chemical spillage, flood and accident at work place. The organization chart for the ERP team was established and displayed for information of the employees. Important telephone contact numbers were also provided therein. The estates also conducted training related to First Aid to selective personnel. Sighted dated of training for each sample estates. However, they have failed to include all staff levels i.e., the mandors and mechanics. This issue was highlighted as NCR RMN 03. At the same time, the LTTS water treatment plant was not provided with emergency showers. This was also listed in the same NC.
	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.	NO	Based on the HIRARC carried out at the estates and mill the PPE types for the various activities have been identified and implemented. Monitoring via Personal Protective Equipment Card and verified. PPE also has been provided free of charge to employees including contractor workers. This can be confirmed through interviews with harvesting gangs, spraying gangs, and loose fruit gangs, among of PPE has been provided to employees. However, sanitation facilities at LSS for those applying pesticides was not adequate for workers can change out of PPE, wash, and put on their personal clothing. However, found at LTTS, no hearing protection been provided to tractor driver. All these nonconformance been highlighted as per NCR RMN 02.
	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	Both the Estates and Mill in the Segamaha CU uses SOCSO for the coverage for the local and foreign workers. The insurance coverage has ceased effective 2018 following the Government directive on the coverage.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Manday MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum of 10 years in the office. Summary for the year is described in the JKKP 8 as a mandatory requirement. Accident Statistics are being maintained in a satisfactory manner.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	IPM plans at Segamaha CU dated 24/01/2023 was implemented and monitored to ensure effective pest control. The objectives are: <ul style="list-style-type: none"> Minimise or possibly elimination of significant threats caused by pests to the palms growth health and safety of workers, staff and the public in general Prevention or minimize of loss or damage to palms and yield by pests Increase flora and fauna in the estate environment To ensure effective monitoring and early warning of pest incidence in the plantings To achieve insects' biological equilibrium as possibly can.
	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	Plan to prevent and monitor the spread of species referenced in the Global Invasive Species Database and CABI.org (if any). This is not practiced in the visited estate. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.
	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	It was identified that there is no use of fire for the pest control at the estates.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in the company SOPs. The Manual had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. All the Estates had maintained chemical registers and were updated periodically. The registers were updated in January 2023.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and	YES	The estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified.

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Clause	Indicators	Comply Yes/No	Findings
	number of applications) are provided.		
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	The estates have implemented a long-term chemical reduction plan where they are currently monitoring the usage of chemicals on a monthly basis to ensure reduction of chemical use in the long run. Paraquat was eliminated. In its place, alternatives such as Glyphosate and Glufosinate Ammonium were used instead. The estates also have implemented an IPM Plan to further reduce the use of pesticides. Sighted during the site visit the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at intended areas.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of prophylactic use of pesticides except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practised for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOPs.
	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	Segamaha CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register January 2023, it was noted that all pesticides used are of class II, III, IV. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	
	7.2.5b Why there is no other alternative which can be used.	YES	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	
	7.2.5d What is the process to limit the negative impacts of the	YES	

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Clause	Indicators	Comply Yes/No	Findings
	application.		
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	<p>Segamaha CU had records showing that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. Pesticide applications were guided by Oil Palm Circular (OPC), Safe Work Procedure (SWP), CHRA and by SDS supplied by the manufacturer. The SWP/OPC/CHRA had included a chemical register list, which indicates the purpose of usage (intended target), hazards signage, trade and generic names. The SOP procedure also had written justifications.</p> <p>The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Training including refresher sessions were provided to the workers involved in such activities to ensure a continued understanding of chemicals / hazard. Records showed that pesticides were handled, used and applied by trained personnel and as per the SDS of the pesticide. The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat baits were trained. Random interviews conducted showed that they understood the hazards involved and the usage and handling of chemicals in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training.</p>
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	<p>In Segamaha CU, all pesticides were stored in accordance with the legal requirement, in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations as well as recommendation by manufacturer as per applicable SDS. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e. storekeeper. The stores in the estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segreated according to the type. The fertilizers were well stacked. The stores are equipped with showers, wash area and a PPE storage area. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available at the estates. 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 was continually implemented for empty pesticide containers. The activities were carried out at a concrete pond of 3 levels. Empty pesticide containers observed were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health.</p>
	7.2.8 All pesticide containers are properly disposed of and/or	YES	<p>With the exception that some empty agrochemical containers were recycled for premixing pesticides for onward delivery to field, the rest of the empty chemical containers were triple rinsed, pierced and stored in</p>

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Clause	Indicators	Comply Yes/No	Findings
	handled responsibly if used for other purposes.		the schedule waste store. Empty chemical container classified as SW 409 and disposed to DOE's license contractor.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying of pesticides is not a practice in Segamaha CU. There was no evidence to show that such a method being used in all estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site inspection.
	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 was demonstrated by Segamaha CU. From the results, all workers 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	<p>All the estates and mill in the CU complied with procedure and guidelines provided in the <i>Polisi Pengendalian Racun Perosak Bertoksik Tinggi</i> signed by the CEO whereby <i>no work with pesticides is given to pregnant or breast-feeding women. Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i>)</p> <p>The estates maintained the "Laporan Ibu Mengandung Dari Klinik Ladang. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance. Medical screening for woman workers involved in chemical handling and application was conducted on a monthly basis. The latest medical screening conducted indicated none were found pregnant. During the site visit the female chemical handlers and manurer were interviewed and they mentioned that they are not pregnant no breastfeeding. Segamaha POM and their supply bases do not have people under the age of 18 working in the premises.</p>
7.3 Waste is reduced, recycled, reused and disposed of in	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous	YES	Waste management and disposal plan to avoid or reduce pollution had been documented. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution during routine operation. On the monitoring of water and effluent discharge, monthly and quarterly report for final discharge were submitted to DOE timely, as required by the written approval. Effluent quality monitoring

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Clause	Indicators	Comply Yes/No	Findings
an environmentally and socially responsible manner.	characteristics, is documented and implemented.		was also done on a monthly basis, with samples taken at final discharge point and sent for analysis. Results of laboratory showed that the discharges were within permissible limits. In estates, domestic waste from the housing area is not well managed and all domestic wastes are disposed at landfill sited in the estate area. Sighted the there is no practice of open fires within all estates. Monitoring is done weekly in both domestic waste collection areas and in landfill sites.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Standard Operating Procedure Scheduled Waste Disposal of empty pesticide containers was carried out as per established procedures. Triple rinsing procedures were continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. Scheduled wastes had been disposed of through a licensed contractor approved by DOE. Each house was provided with dustbins. The waste was removed weekly and disposed via landfill.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site inspection at housing area and landfill, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Segamaha CU have been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Fertilizers application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the Applied Agricultural Resources Sdn Bhd. Annual fertilizer recommendations were made based on annual foliar sampling. Fertilizer application program was monitored using program sheets, bin cards, Field Cost book and Fertilizer Quality Assessment by Applied Agricultural Resources Sdn Bhd.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Periodic foliar and soil sampling were carried out by the Applied Agricultural Resources Sdn. Bhd. (AAR) and its result formed part of the basis for the fertilizers input recommendation. Periodic tissue and soil sampling were carried out to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg, Ca & B. Foliar samplings and Soil sampling, which is conducted together. Relevant records were all reviewed during the audit.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	All estates continued to have a nutrient recycling strategy in place. Palm fronds were stacked and left to decompose in the fields and EFB applied. EFB was applied at 40 tons /Ha/year in single layers in plots between palms. Records of application and maps were made available to auditors. EFB applications carried out were also reviewed.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Segamaha CU continued to monitor their fertilizer inputs as recommended by their agronomist from Applied Agricultural Resources Sdn. Bhd (AAR). The records of the fertiliser inputs were maintained in the

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Clause	Indicators	Comply Yes/No	Findings
			Fertilizer Application Record Books and the Bin Card.
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	<p>On the 4 Estates, G&G Estate, Sg. Segamaha Estate, Bukit Segamha Estate and LTT Sabah Estate, maps identifying marginal and fragile soils, including steep terrain, had been prepared by AAR. The soil series in the estates were classified as follows:</p> <p>G&G: Soil Series – Kretam / Kumansi / Tanjung Lipat</p> <ul style="list-style-type: none"> Soil pHs: mainly low to medium / Soil organic carbon: mainly extremely low / Soil N: mainly low to medium / Soil total P: mainly marginal to extremely low / Soil K: mainly high to low / Soil Mg: mainly high to low / Soil CEC: low to marginal. <p>Sg. Segamha: Soil Series – Tanjung Lipat / Kapilit / Laab / Kumansi / Local Alluvium</p> <ul style="list-style-type: none"> Soil pHs: medium to extremely low / Soil organic carbon: mainly extremely low / Soil N: slightly better than organic C / Soil total P: mainly marginal to extremely low / Soil K: mainly mostly high / Soil Mg: mainly high to low / Soil CEC: marginal to extremely low <p>Bukit Segamaha: Soil Series – Juak / Kapilit / Kumansi / Laab / Malawati / Tanjung Lipat / Tingkayu</p> <ul style="list-style-type: none"> Soil pHs: mainly marginal to extremely low / Soil organic carbon: mainly extremely low / Soil N: mainly low to medium / Soil total P: mainly medium to low / Soil K: mainly high to low / Soil Mg: mainly high to low / Soil CEC: very low to high <p>LTT Sabah Estate: Soil Series – Juak / Kumansi / Laab / Libong / Local Alluvium / Lumpongong / Tanjong Lipat</p> <ul style="list-style-type: none"> Soil pHs: mainly marginal to very low / Soil organic carbon: very low to extremely low / Soil N: mostly medium / Soil total P: mostly low to extremely low / Soil K: mainly high to low / Soil Mg: mainly high to low / Soil CEC: very low to high <p>There were no problematic soils (e.g. podzols and acid sulphate soils) on Segamaha CU. The estates maintained the following maps and documents for proof of recognized legal rights. Documents were sighted and verified. A scale of map at 1:10000 to 1: 15000 is established. Maps were prepared by AAR and updated in 2018.</p>
	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	YES	Auditors had verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates, it is confirmed that there were no new planting or new development of areas at Boustead Segamaha CU.

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Clause	Indicators	Comply Yes/No	Findings
	steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.		
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	Auditors had verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates, it is confirmed that there were no new planting or new development of areas at Boustead Segamaha CU.
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	All estates in Segamaha Business Unit, to demonstrate the long-term suitability of land for palm oil cultivation, had conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain. As mentioned under indicator 7.5.1 soil maps dated in Dec 2015 and slope classification maps dated Jan 2016 (updated 2018) prepared by the AAR were made available. This was to take 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	This is not applicable as there is no marginal and fragile soils in the 4 estates visited, G&G Estate, Sg. Segamaha Estate, Bukit Segamaha Estate and LTT Sabah Estate, as supported by the soil maps of respective estates. No marginal and fragile soil areas were observed during the visit.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	All 4 Estates visited G&G Estate, Sg. Segamaha Estate, Bukit Segamaha Estate and LTT Sabah Estate, had used soil and topographic maps prepared by AAR to plan their drainage roads and other infrastructures.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	This is not applicable as there is no peat soil in the 4 estates visited, G&G Estate, Sg. Segamaha Estate, Bukit Segamaha Estate and LTT Sabah Estate, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
	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:	YES	This is not applicable as there is no peat soil in the 4 estates visited, G&G Estate, Sg. Segamaha Estate, Bukit Segamaha Estate and LTT Sabah Estate, as supported by the soil maps of respective estates. No peat areas were observed during the visit.

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Clause	Indicators	Comply Yes/No	Findings
	Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	This is not applicable as there is no peat soil in the 4 estates visited, G&G Estate, Sg. Segamaha Estate, Bukit Segamaha Estate and LTT Sabah Estate, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	This is not applicable as there is no peat soil in the 4 estates visited, G&G Estate, Sg. Segamaha Estate, Bukit Segamaha Estate and LTT Sabah Estate, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
	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	YES	This is not applicable as there is no peat soil in the 4 estates visited, G&G Estate, Sg. Segamaha Estate, Bukit Segamaha Estate and LTT Sabah Estate, as supported by the soil maps of respective estates. No peat areas were observed during the visit.

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	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.		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	This is not applicable as there is no peat soil in the 4 estates visited, G&G Estate, Sg. Segamaha Estate, Bukit Segamaha Estate and LTT Sabah Estate, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	YES	This is not applicable as there is no peat soil in the 4 estates visited, G&G Estate, Sg. Segamaha Estate, Bukit Segamaha Estate and LTT Sabah Estate, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
7.8 Practices maintain the quality and availability of	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water	YES	The water management plan is confined to only Segamaha CU engulfing the plans from nursery to fresh fruit processing. This report also includes domestic water use with the after effect of water use to the surrounding environment. The plans cover the process of water abstraction, shortage, utilization in cultivation, chemical and natural treatments to utilize water at processing, domestic purposes and

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Clause	Indicators	Comply Yes/No	Findings
surface and groundwater.	sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:		wastewater management. All of these aspects are included with monitoring, mitigation (if required), implementation and prevention or minimize pollution of these plan. Identified physical system in management: <ul style="list-style-type: none"> Treated water quality standard Baseline data for water quality and frequency quality standard Contingency plans during dry season Flow meter monitoring at TPOM.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. To ensure supply of clean drinking water to workers treated water sampling was carried out on a yearly basis. Drinking water quality has been monitored by an appointed third party. Results from analysis showed the parameters within the limits.
	7.8.1b Workers have adequate access to clean water.	YES	As verified at Segamaha CU facilities for workers and through interview with sampled workers, they have obtained adequate access to treated clean water. Cleanliness of drinking water supplied to worker was ensured by carrying water analysis. Drinking water quality has been monitored by an appointed third party on a yearly basis. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	NO	Water courses and wetlands were not fully protected, including not well 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). 1) During site inspection at G&G Estate Riparian Reserves (Sg. Bilong), sighted trace of chemical spraying activities was carried out at the signboard buffer riparian reserves. 2) During site inspection at Bukit Segamaha Estate Riparian Reserves, sighted trace of chemical spraying activities was carried out at the buffer riparian reserves to tackle the woodies. In addition, also sighted fertilizer bag, bottle and food packaging was disposed at the buffer riparian reserves. Furthermore, there is no buffer zone marking at the area. <i>As a result, Major DA 02 2023 was raised.</i>
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	Effluent license renewal application for year 2022/2023 and letter from Department of Environmental. An Effluent Treatment Plant (ETP) is available at Segamaha POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum mill capacity per hour is 60mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through land irrigation. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. Among the parameters required by the DOE to be monitored are bio-oxygen demand (BOD), suspended solid (SS), oil and grease (O&G), ammoniacal nitrogen (AN) total nitrogen (TN), pH and

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Clause	Indicators	Comply Yes/No	Findings												
			temperature. The results of analysis were submitted to the DOE on a quarterly basis. All parameters were within the regulatory limit such as BOD discharged to land irrigation was not more than 100 mg/l.												
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Processed water is obtained from water catchments near the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on a monthly basis.												
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<p>The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Among the plan for improving fossil fuel are:</p> <ul style="list-style-type: none">▪ Regular servicing of the generator set for smooth running of engine and prevent excessive emission of greenhouse gas.▪ Estate/mill has set up a schedule the usage of fuels and monitor it at 3 times per week basis <p>Site visit to Segamaha CU, showed evident that they are compiling the data on a monthly basis and document it for further action to improve on their efficiency of using the renewable and non-renewable energy. Apart from the use of grid electricity, palm fibre and shells were also used to generate electricity.</p>												
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends to RSPO on 29/03/2023. The input data was verified, checked and the following were determined:</p> <table><tr><td>Description</td><td>tCO₂e/tProduct</td><td>Production</td><td>t/yr</td></tr><tr><td>CPO</td><td>0.98</td><td>FFB Processed</td><td>195,164.28</td></tr><tr><td>PK</td><td>0.98</td><td>CPO Processed</td><td>41,163.00</td></tr></table>	Description	tCO ₂ e/tProduct	Production	t/yr	CPO	0.98	FFB Processed	195,164.28	PK	0.98	CPO Processed	41,163.00
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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	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Segamaha CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records which covers estates and mill activities / operation. ' <i>Pollution Identification Environmental Improvement Action Plan</i> ' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were: Segamaha Palm Oil Mill conducted boiler stack sampling for each of the boiler stacks. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit. ' <i>Pollution Prevention Plan and Waste Management Action Plan</i> ' is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly.
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	There was no land preparation in Segamaha CU by burning. Relevant policy was in place.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Boustead Plantations Berhad practices zero burning throughout the plantation properties within the management.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Records showed that Segamaha CU engaged adjacent stakeholders on fire prevention and control measures through stakeholders' meetings dated Feb 2023.
7.12 Land clearing	7.12.1 (C) Land clearing since November 2005 has not	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land

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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.	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.		clearing at Segamaha CU since Nov 2005. thus, This Indicators related to HCV/HCSA is not applicable for Segamaha CU.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The CU conducted HCV assessment as verified through HCV report titled 'The Assessment of High Conservation Value Sites within Sungai Segamaha, Bukit Segamaha and Ghafar & Group Estates and Mill Complex in Sabah'. The study was conducted by S.K Yap Forestry and Landscape Services and the report was completed in April 2017. The study had covered all the High Conservation Value (HCV) within and adjacent to the Segamaha CU. The HCV assessment had identified the rare, threatened and endangered species (RTEs) for estate named Sungai Segamaha, Bukit Segamaha and Ghafar & Group Estates including the management and action plan. The total of identified area is 199.57Ha.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan	YES	Segamaha CU has established and reviewed the action plan and monitoring programme for HCVs area after consultation with relevant stakeholders. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action. There were no major changes to the integrated management plan, except awareness training, and continuous monitoring for HCVs area.

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	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).		
	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 Segamaha CU only surrounded with smallgrower and Plantation Estate such as Tawau Cocoa, Ladang Irat, Pintasan Estate, Kwantas. so, this indicator was not applicable with this CU.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance	YES	<p>The following program has been established in relation to the HCV/RTE protection during the year 2023.</p> <p>A training programme for the year 2023 was available. An awareness on HCV was done during the morning briefing has been conducted by the Assistant Manager to all workers (Sprayer, Manuring, Harvester, and Maintenance) on HCV area, riparian buffer and patrolling HCV.</p> <p>An appropriate disciplinary measure was instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species, and also Policy and Statement has been developed for disciplinary measures. The statement also available at AP Post surrounding the Segamaha CU</p>

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	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.		
	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.	NO	<p>Segamaha CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying is not allowed within buffer area at the HCV Area. It was noted that AP has been monitoring surrounding the estate to control everything including any illegal activities.</p> <p>Segamaha CU had Management Plan already identify Wider landscape Level, and the RTE monitoring program, However, Outcomes of Latest HCV/RTE Monitoring was not fed back into the Latest management Plan to consider Plan Inventory Monitoring after the RTE such as Elephant etc. enter the estate. Thus, Minor NCR MZK 03 2023 is raised.</p>
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Segamaha CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

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

Clause	Indicators		Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	<p>For the time-bound plan, Boustead Plantations Berhad has committed to ensure all their certification unit (CU) to be certified within 5 years i.e. year 2019 to 2024. Samples TBP as per below:</p> <p><u>Tawai Business Unit -2021-2023</u> New Acquisition in 2018 and 2019, the planning to certified in 2021. However, due to the pandemic Covid-19, the company needs to postpone to 2023, apart from that the company plans to certify another 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2022.</p> <p><u>Kanowit Business Unit-2021-2024</u> The company has put out a Request for Proposal (RFP) for all assets in Sarawak. The process for disposal is in progress and waiting for a potential buyer.</p> <p><u>Loagan Bunut Business Unit 2021-2024</u> The company has put out a Request for Proposal (RFP) for all assets in Sarawak. The process for disposal is in progress and waiting for a potential buyer.</p> <p>Sighted the submission of "RSPO TBP Revision Template to RSPO and it has been approved by RSPO.</p>
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	<p>There are twelve (12) CU highlighted in the time-bound plan and the certification progress consistent with that in the time-bound plan. The progress details as provided in the TBP in Attachment 6. For another 4 CUs i.e. Lapan Kabu / Sugut / Loagan Bunut / Pertama / Kanowit and Tawai, the Sustainability Section team has conducted the periodic internal audit accordingly.</p>

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	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	There was revision of the time-bound plan being updated on 28/03/2023. Details as per attachment 6. This is due newly acquired properties i.e. Tawai CU in Telupid Sabah in 2019 from Sit Seng & Sons Realty Sdn Bhd. As per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	Yes	Boustead Plantations have deviations for certifying uncertified unit from year 2021 to 2023 and 2024. The RSPO Time Bound Plan Revision Template was submitted to RSPO secretariat approved on date 28/03/2023. The new TBP revision was endorsed by RSPO.
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	Yes	It is confirmed that land conflict was resolved through FPIC processes which facilitates compliance with requirement of RSPO, accordance to: <ul style="list-style-type: none"> • Criteria 4.4 – on adequate participation and negotiated agreements (Sighted PMC minutes of meeting) • Criteria 4.6 – on land acquisition whereby the right to use the land is demonstrated. (Refer Memorandum of Consent (MOC) between NCR Landowners & LCDA (as Managing Agent), (Refer Joint Venture

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				<p>Agreement (JVA) between Boustead Plantations Berhad, BPB and Pelita Holding Sdn Bhd (PHSB) to develop land into oil palm plantation)</p> <ul style="list-style-type: none"> Criteria 4.7 – on mutual agreement for identifying people entitled to compensation is in place. Criteria 4.8 – on the condition of land use as per land title to show evidence that necessary action has been taken to resolve the conflict with relevant parties. <p>These were reviewed - MRRS: Q-021053- 05/2012; Q-02-105405/2012; Q-01-282-06/2012. (Refer www.kehakiman.gov.my/judgment/file/Q-02-1053-052012) and application no. 08(f)-449-09/2014(Q) Appellate Jurisdiction); The management of BPKSB have conforms & respect all parties by adopting FPIC to protects community rights and investors from risks. In addition, those mechanism is part of best practice standards and requirement of RSPO.</p> <p>There was also Series of External Audit through MSPO Certification on their uncertified unit being made:</p> <ol style="list-style-type: none"> Teluk Sengat Estate (19-22/11/2021) Lapan Kabu Estate (21-22/10/2021) Rimba Nilai (Sugut) CU (10-15/03/2022) Tawai CU (14-18/06/2021) Loagan Bunut & Kanowit CU (11-15/11/2021) <p>The audit was conducted against MSPO P&C and MSPO Partial Certification Requirements.</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	Yes	<p>Series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above.</p> <ol style="list-style-type: none"> The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. There was no case of labour dispute reported in the internal audit report. <p>The management also has established grievances, compliant, and disputes mechanism which is open to all affected parties and ensures anonymity of complainant. There is "Carta Organisasi Panel Aduan" (Panel of Complaint Committee) to handle complaint or grievance, including related to gender issues.</p> <p>The management had taken prudent action by conduct engagement and</p>

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				<p>recommended action plans to:</p> <ul style="list-style-type: none"> a) Improved communication and engagement (PMC Meeting-With present of LCDA, Land Survey, BPKSB b) Personnel, BEA), MCCM Meeting, Estate Management Meeting) c) Review communication and consultation as well as complaint and grievance procedures. <p>Trained staff and create awareness among stakeholder on the Procedures (RSPO UBU Internal Assessment).</p>
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	<p>Series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above.</p> <ul style="list-style-type: none"> a) The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. b) Several issues of legal non-compliance reported in the internal audit report such as lapses in scheduled waste management, and it's being solved progressively. <p>The management also has established a list on "Legal and Other Requirement Register" There are 15 sections of requirements subscribed to the Plantations & Mills operation. Among the requirements stated are: Occupational Safety and Health Act, 1994; Factory and Machinery Act, 1967; Minimum Wages Order 2020; Employees' Minimum Standards of Housing, Accommodations and Amenities Act, 1990 (Amendment 2019); etc.</p> <p>The management has in place a license & permits register which captures all applicable local & national legal requirements such as: MPOB Licenses (menjual dan mengalih FFB). KPDNKK Permit Barang Kawalan berjadual for Diesel.</p>
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,	Yes	<p>Based on statement in (a) to (d) above, the CU has assessed the condition of their uncertified unit and has stated full commitment to comply with all relevant requirements as specified above.</p> <ul style="list-style-type: none"> a) Sighted the series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit as conducted and reported accordingly. The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. b) Evidence of audit attendance list, audit checklist & report were

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		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		made available to auditor as supporting evidence.
		<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 	Yes	c) Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting and no new development of area was observed. d) With this, it can be concluded that the positive assurance made was justified.
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	Yes	
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	Yes	
		<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	Yes	
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	Yes	As of this audit, Boustead Plantations Berhad is still on track and follows the requirement of uncertified requirement units, Further information can be obtained from Boustead ACOP. The details of the Time Bound Plan are described as per attachment 6. BPB is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.

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	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	Yes	As of this audit, Boustead Plantations Berhad is still on track and follows the requirement of uncertified requirement units, Further information can be obtained from Boustead ACOP. The details of the Time Bound Plan are described as per attachment 6. BPB is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/ mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators	Yes	Boustead owned the land (brought from the Government) as mentioned in 4.4.1 of these checklists. Based on the interviews and this audit finding, it has been confirmed that there was no such case concerning the rights of local communities and indigenous people at Segamaha CU.

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ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.4.3 MZK 01 2023	Major	<p>Requirement: 3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Finding: The social management and monitoring plan was not fully implemented, reviewed and updated regularly in a participatory way.</p> <p>Objective evidence:</p> <ul style="list-style-type: none"> - The report Review of SIA Assessment Report for Segamaha Certification Unit dated March 2023, sighted that Stakeholder consultation method was not effective. There is no list of stakeholder interviewed in the report. There were no specific group related to revising of SIA Management Plan such as discussion about main activities such as replanting, transporting, safety and health, land conflict, access right etc. and for worker, there is no detailing person who involved in the social management action plan. Inadequate involvement of workers such as non-union workers, dependence, gender, races, job scopes and etc. From the management plans, there was no discussion about previous Social Management Plan, either adequately addressed and can be closed. - There is a grievance from workers at GnG estate related to electricity time and this issue was not identify in the SIA Plan - There is 1 Grievance related to Transportation /to built church from workers at POM since 2020. From the latest management plans, there was no further discussion about this issues, either adequately addressed and can be closed. - There is a grievance from workers at GnG Estates related to sharing houses with not family related and too many family in 1 houses and this issue was not identified in the SIA plan. - There were no reviewed of Previous SIA Management Plan, No monitoring report of previous SIA Management Plan 	<p>Root cause: The root cause:</p> <ol style="list-style-type: none"> 1. All of the issues highlighted in the NCR was not identified due to The SIA Plan was not develop properly and the SIA Plan template is not comprehensive. And due to: 2. Person in-charge for SIA Management Plan at G&G Estate was not competent in updating the management plan. 3. Person in-charge for SIA Management Plan at Segamaha POM was not competent in updating the management plan. 4. Person in-charge for SIA Management Plan at G&G Estate was not competent in updating the management plan. 5. Person in-charge for SIA Management Plan at Segamaha BU was not competent in monitoring and reviewing the management plan. <p>Correction: SSD to redo the review of Social Impact and conduct discussion on previous SIA Management Plan on its status.</p> <ol style="list-style-type: none"> 1. Revise G&G's SIA Plan and include grievance regarding electricity duration into the plan. 2. Conduct discussion with affected stakeholder regarding transportation to church / to build church for mill's 	<p>The auditor has verify evidence of Review SIA Plan that include electricity duration, transportation to church / to build church for mill's workers, identify vacant house, and Review past SIA and found the evidence acceptable.</p> <p>There is also evidence reviewed which is Revised template that include the list of interviewed stakeholders, group (non-union workers, dependent, gender, races, job scopes) as per SIA Guideline & Approach for the MSPO sampling guideline and Appointment letter person in charge in revising SIA Plan.</p> <p>Auditor also reviewed the Training record for PIC Social and found all of the evidence enough to close this NC.</p> <p>Status: Closed</p>

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			<p>workers.</p> <ol style="list-style-type: none"> Identify the non-related families who share house. Identify vacant house. Relocate the respective family to the vacant house. Review previous SIA Management Plan. Revise the current SIA Management Plan template to include a space for monitoring remarks. <p>Corrective action: (<i>The corrective action shall address the root cause of this NC</i>)</p> <ol style="list-style-type: none"> Revise the report template by including the list of interviewed stakeholders, group (non-union workers, dependent, gender, races, job scopes) as per SIA Guideline & Approach for the MSPO sampling guideline; and person who are involved in revising the SIA Management Plan. Conduct training to the person in-charge at G&G Estate on how to update and feed input to SIA Management plan. Conduct training to the person in-charge at Segamaha POM on how to update and feed input to SIA Management plan. Conduct training to the person in-charge at G&G Estate on how to update and feed input to SIA Management plan. SSD conduct training to the person in-charge at Segamaha BU using the new Social Impact Management Plan template. 	
DA 03 2023		Requirement: 3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	<p>Root cause:</p> <ol style="list-style-type: none"> Lack of upkeep and less usage of spillage drip tray to prevent 	Auditor has verify evidence of Picture metal drip tray has been planted, Evidence of Water Quality

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		<p>Finding: The environmental management and monitoring plan was not well implemented, reviewed and updated regularly in a participatory way.</p> <p>Objective evidence:</p> <p>1) During site inspection at Diesel Genset Division 2 G&G Estate, sighted a lot of traces of lubricant/hydraulic oil spillage and diesel spillage which polluted on the ground. In addition, current design of oil trap was not efficient to ensure that no oil is being discharge to the environment.</p> <p>2) Water quality monitoring programme was not carried out at G&G Estate as per recommendation in the Environmental Aspect Impact (EIA) Report for Replanting 2,174.10 ha at G&G Estate dated April 2021 (Replanting program from 2021 to 2026). – Under Chapter 6: Recommended Monitoring Programmes.</p> <p>3) The waste management practice was not disposed accordingly:</p> <p><input type="checkbox"/> Based on site inspection at Sg. Segamaha Estate Field Block 33, sighted food packaging wastes and used 2T bottle was disposed at the area.</p> <p><input type="checkbox"/> Based on site inspection at Bukit Segamaha Estate Landfill Area, sighted food packaging wastes and recycle wastes was disposed outside from the landfill hole. The practice showed no wastes segregation was carried out. Besides, there is no trace of disposal domestic wastes in 9 days between 21/03/2023 to 30/03/2023 in the landfill based on open and closed date landfill hole. The domestic wastes collection was collected 2/3 times per week based on scheduled.</p> <p><input type="checkbox"/> During site inspection at Bukit Segamaha Estate Housing Area (Block E) near to rainwater puddle, sighted used motorcycle tire, food packaging wastes and recycle wastes was disposed at the area.</p> <p><input type="checkbox"/> During site inspection at recreation area and write off houses (Segamaha POM), sighted food packaging wastes and recycles wastes was disposed at the area.</p> <p><input type="checkbox"/> During site inspection at House near to HCV area, sighted agricultures waste was disposed at the area.</p> <p><input type="checkbox"/> It was found that clinical wastes SW 404 was</p>	<p>lubricant/hydraulic oil spillage and diesel spillage. Wrong design on the outlet pipe of the oil trap.</p> <p>2. G&G Estate has missed out to carry out the water quality monitoring programme as per recommendation in the Environmental Aspect Impact (EIA) Report for Replanting 2,174.10 at G&G Estate dated April 2021. (Replanting program from 2021 to 2026). – Under Chapter 6: Recommended Monitoring Programmes.</p> <p>3. Sg. Segamaha: The workers at field block 33 are newly recruited workers and have not yet received training related to waste management.</p> <p>Bukit Segamaha: No dedicated person to monitor the implementation of waste management plan.</p> <p>Bukit Segamaha: Person in-charge for landfill preparation is not competent.</p> <p>Segamaha POM: Housing inspection was not done at the write off house area.</p> <p>HCV area: HCV patrolling record was not reported to the management.</p> <p>G&G, Sg. Segamaha & Bukit Segamaha: The appointed VMO failed to collect the clinical wastes SW 404 as per agreed contract.</p> <p>Corrective Action:</p> <p>Correction: (The correction shall address the objective evidence)</p> <p>1. Order metal drip tray with dimension of 4 kaki(L) x 4 kaki(W) x 3 inci(H) and use the spillage drip tray each time of transferring/pumping the lubricant/hydraulic oil or diesel from the gallon/container to the genset. G&G Estate to redesign of the oil trap.</p> <p>2. Carry out the water quality</p>	<p>Programme, Picture evidence of Segregation has been made at recycle area, evidence picture signage at Land fill area, evidence of appointing VMO to collect clinical waste, evidence of Workplace inspection Template, Appointment letter to Ekohandal Sdn. Bhd. to conduct the Water Quality Monitoring Programme for replanting area and Appoint letter person in-charge to monitor the implementation of waste management plan and found all of the evidence enough to close this NC.</p> <p>Status: Closed</p>
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		<p>generated at the G&G Estate, Sg. Segamaha Estate and Bukit Segamaha Estate stored more than 180 days. No approval extension has been carried out.</p>	<p>monitoring programme as per recommendation in the Environmental Aspect Impact (EIA) Report for Replanting 2,174.10 ha at G&G dated April 2021 (Replanting program from 2021 to 2026). – Under Chapter 6: Recommended Monitoring Programmes.</p> <p>3. Sg. Segamaha: Collect and dispose the food packaging waste and used 2T bottle at field block 33 accordingly. Bukit Segamaha: Collect food packaging wastes and recycled wastes. Next, segregate the waste into recyclable and non-recyclable material. Bukit Segamaha: Redo the landfill open/close date. Segamaha POM: Collect and dispose the food packaging waste near recreation area and write off houses accordingly. HCV area (Bukit Segamaha): Collect and dispose agricultural waste near HCV area accordingly. G&G, Sg. Segamaha & Bukit Segamaha: The MA will make sure the appointed VMO to come and collect the clinical wastes SW 404 as per requirement within 180 days.</p> <p>Corrective action: (The corrective action shall address the root cause of this NC)</p> <p>1. Revise workplace inspection checklist by including the monitoring for genset housekeeping.</p> <p>2. Appoint Ekohandal Sdn. Bhd. to conduct the Water Quality Monitoring Programme for replanting area.</p> <p>3. Sg. Segamaha: Appoint person in-charge to monitor the implementation of waste management plan. Bukit Segamaha: Appoint person in-charge to monitor the implementation of waste management plan.</p>	
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			<p>Bukit Segamaha: Conduct training to the person in-charge for landfill preparation.</p> <p>Segamaha POM: Appoint person in-charge to monitor the implementation of waste management plan.</p> <p>HCV Area (Bukit Segamaha): Conduct training to person in-charge for HCV patrolling.</p> <p>G&G, Sg. Segamaha & Bukit Segamaha: Issue a memo to the VMO regarding the collection and disposal of clinical waste (SW 404).</p>	
RAR 03 2023		<p>Requirement: 3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Finding: The social management and monitoring plan was not update regularly in a participatory way</p> <p>Objective evidence: There was evidence of CAPEX or budget 2023 to construct new housing and drainage at all estates and mill. However, sighted Inadequate of "structural safety, unsafe condition, hygiene," at several samples housing areas.</p> <p>Site visit at estates and mill, observed that:</p> <ul style="list-style-type: none"> • Few housings without mosquito netting due to broken. • Unsafe condition such as robust ceiling and hornet nest. • Broken window was not replaced. • Monsoon drain is not in good condition, odour, full of muddy and stagnant water. • Not good in painted to present a satisfactory appearance. • housing inspection was not comprehensive. <p>However, all the issues above were not identified and updated in management plan</p>	<p>Root cause: The Segamaha CU SIA Plan did not identify the issue is because its already budgeted in the CAPEX, However management of Segamaha CU admitted that mistake did not identify all the issues in the Management Plan. Also, during Housing Inspection, The Housing inspection checklist did not cover item such as mosquito net condition, ceiling condition, absence of hornet nest, window condition, monsoon drain condition, paint appearance, etc. and resulted all aof the issue did not identify in the Plan.</p> <p>Corrective Action: Correction: <i>(The correction shall address the objective evidence)</i> Review the Social Management Plan and include the issues captured from housing inspection i.e., structural safety, unsafe condition, hygiene, etc. into the management plan.</p> <p>Corrective action: <i>(The corrective action shall address the root cause of this NC)</i> Appoint PIC for Social Issues and Review housing inspection checklist and include</p>	<p>Auditor has verified evidence of Review SIA Plan that include the issues captured from housing inspection i.e., structural safety, unsafe condition, hygiene, etc and found the evidence acceptable.</p> <p>There is also evidence reviewed which is revised housing inspection checklist and include missing item such as mosquito net condition, ceiling condition, absence of hornet nest, window condition, monsoon drain condition, paint appearance, etc and Appointment letter person in charge in revising SIA Plan. and found all of the evidence enough to close this NC.</p> <p>Status: Closed</p>

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			missing item such as mosquito net condition, ceiling condition, absence of hornet nest, window condition, monsoon drain condition, paint appearance, etc. so in the future there is no issues related to Housing.	
3.6.1 RMN 01	Major	<p>Requirement: 3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>Company procedure HIRARC stipulated that the organization need to review HIRARC immediately after accident happened.</p> <p>Finding: The organization did not comprehensively assess on all operations; mitigations plans and procedures are not effectively implemented and did not review HIRARC as per company procedure.</p> <p>Objective evidence: Sighted the evidence of HIRARC documentation as per below: 1.Ladang G&G has yet to identify river crossing activity for area which no bridge been provided. 2.Ladang Sungai Segamaha did not review HIRARC after accidents occurred on 19/12/2022,16/10/2022,24/10/2022 and 15/9/2022. 3.Ladang Bukit Segamaha has yet to identify river crossing activity for area which no bridge been provided and did not review HIRARC after accidents occurred on 27/09/2022,18/08/2022 and 14/4/2022. 4.Ladang Tabung Tentera Sabah has yet to identify HIRARC for Water treatment Operation.</p> <p>H&S plan not effectively monitor which can cause unsafe conditions were sighted as per below: 1.During site visit at Ladang G&G Block 26 sighted a harvesting pole was left uncover and hang at oil palm frond. 2.During site visit at Ladang G&G Block 48 sighted side bridge concrete was defected. 3.During site visit at Ladang Sungai Segamaha Chemical store sighted was defected.</p> <p>H&S plan was not monitored as below:</p>	<p>Root cause:</p> <ol style="list-style-type: none"> 1. No dedicated person in-charge was appointed to identify HIRARC for river crossing with no bridge at Ladang G&G and Ladang Bukit Segamaha. 2. No dedicated person in-charge was appointed to review HIRARC, where necessary, at both Ladang Sungai Segamaha and Ladang Bukit Segamaha. 3. The water treatment plant just started its operation, and no dedicated person in-charge was appointed to identify HIRARC for Water Treatment Operation. 4. No dedicated person in-charge was appointed to monitor H&S plan implementation at Ladang G&G and ladang Sungai Segamaha. 5. No dedicated person in-charge was appointed to monitor and implement audiometric test result recommendation. <p>Correction: (<i>The correction shall address the objective evidence</i>)</p> <ol style="list-style-type: none"> 1. Conduct the assessment of HIRARC for river crossing with no bridge at Ladang G&G and Ladang Bukit Segamaha. 2. Review HIRARC for accidents that occurred on 19/12/2022,16/10/2022,24/10/2022 and 15/9/2022 for Ladang Sungai Segamaha, and accidents occurred on 	<p>Auditor has verified evidence of Revised HIRARC for river crossing with no bridge at Ladang G&G and Ladang Bukit Segamaha, HIRARC for accidents that occurred on 19/12/2022,16/10/2022,24/10/2022 and 15/9/2022 for Ladang Sungai Segamaha, and accidents occurred on 27/09/2022,18/08/2022 and 14/4/2022 for Ladang Bukit Segamaha. HIRARC for Water Treatment Operation at Ladang Tabung Tentera Sabah, Training for PPE, Pictures evacuate chemicals from chemical store to old office and secure the chemical store and evidence management has Send workers for audiometric re-test. And Appointment letter person in-charge to identify HIRARC for any new work activities and Appointment letter PIC to monitor and implement audiometric test result recommendation and found all of the evidence enough to close this NC.</p> <p>Status: Closed</p>

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		<p>1. Sighted at Ladang G&G, the estate had yet to conduct further investigation by Occupational Health Doctor (OHD) for two (2) personnel identified from result of audiometric test which had been reported in August 2022.</p> <p>2. Sighted at Ladang Tabung Tentera Sabah, the estate had yet to conduct further investigation by Occupational Health Doctor (OHD) for five (5) personnel identified from result of audiometric test which had been reported in August 2022.</p>	<p>27/09/2022, 18/08/2022 and 14/4/2022 for Ladang Bukit Segamaha.</p> <p>3. Conduct the assessment of HIRARC for Water Treatment Operation at Ladang Tabung Tentera Sabah.</p> <p>4. Immediately instruct the harvester at block 26 (G&G) to put the harvesting pole down and cover the sickle with sickle cover; barricade bridge at block 48 (G&G); evacuate chemicals from chemical store to old office (Sungai Segamaha) and secure the chemical store.</p> <p>5. Send workers for audiometric re-test.</p> <p>Corrective action: (<i>The corrective action shall address the root cause of this NC</i>)</p> <p>1. Appoint person in-charge to identify HIRARC for any new work activities at Ladang G&G and Ladang Bukit Segamaha.</p> <p>2. Appoint person in-charge to review HIRARC, where required, at Ladang Sungai Segamaha and Ladang Bukit Segamaha.</p> <p>3. Appoint person in-charge to identify HIRARC for any new work activities at Ladang Tabung Tentera Sabah.</p> <p>4. Appoint person in-charge was appointed to monitor H&S plan implementation at Ladang G&G and Ladang Sungai Segamaha.</p> <p>5. Appoint person in-charge was appointed to monitor and implement audiometric test result recommendation.</p>	
DA 01 2023		Requirement: 3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	<p>The root cause:</p> <p>1. There is a stock of straw hats at the Mill Store, however there is no evidence distribution of straw hats had</p>	Auditor has verified evidence of Revised HIRARC to include Heat Stress at FFB Grader area and available to receive straw hat.

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		<p>Finding: The mitigation plans and procedures H&S was not fully implemented and monitored.</p> <p>Objective evidence:</p> <p>1) Based on interview with 6 sampled FFB Graders at Segamaha POM, the workers said that the management did provide safety helmets but all of them have been using straw hats since they claimed that the safety helmets unable to shield the sunlight. Some of them confirmed that they purchased the straw hats themselves. In addition, no distribution of straw hat sighted in the PPE distribution checklist. Based on site inspection at PPE storage, the straw hat was available and given to the gardener and effluent pond operator.</p> <p>2) During site inspection at mill compound, sighted 3 oxygen tank was left without safety chain.</p> <p>3) During site inspection at Final Discharge Pump House, sighted one of the moving part and rotating machinery were installed with machine guarding but not properly covered due to cracked. In addition, the building was not kept in good housekeeping.</p> <p>4) Based on JKPP 7 dated 19/01/2023, sighted one worker at POM has injury of "Bilateral Profound Mixed Hearing Loss @ Low & high Frequency". Based on medical report 19/01/2023, the OHD has recommended the worker to changed work area or scope which not involving high noise. The mill management already take action with letter dated 20/01/2023 to change the worker from Steriliser Station to Transfer Carrier. However, the Mill Management did not follow up with SOCSO on the compensation of benefit incurred from work-related incident leading to injury or sickness for Worker No. 0113E.</p>	<p>been given to the FFB Graders due to Risk Assessment/ HIRARC did not identify the FFB grader supposed to receive the Straw Hat.</p> <ol style="list-style-type: none"> No dedicated person to monitor the safety and health plan implementation Scheduled maintenance was not properly implemented due to no dedicated person to monitor the safety and health plan implementation No dedicated person to monitor SOCSO compensation claims towards the workers who injured due to work-related incident leading to injury or sickness <p>Correction: (<i>The correction shall address the objective evidence</i>)</p> <ol style="list-style-type: none"> Revised The HIRARC to include Heat Stress at FFB Grader area and available to receive straw hat. Management to provide and supply the straw hats to the workers involved (FFB Graders etc.). Install safety chain to the oxygen tank and conduct training to worker regarding the SOP. Perform scheduled maintenance and install machine guarding on the rotating machine. Fill out "Borang 34 ; Borang butiran notis dan tuntutan faedah" for worker 0113E <p>Corrective action: (<i>The corrective action shall address the root cause of this NC</i>)</p> <ol style="list-style-type: none"> The store clerk needs to make sure that the straw hat is given to the FFB Grader involved. Appoint person in-charge to monitor the safety and health plan 	<p>Evidence picture safety chain to the has been installed at oxygen tank evidence training has been conduct to worker regarding the SOP. Pictures of machine guarding already installed on the rotating machine. And evidence management has already Fill out "Borang 34 ; Borang butiran notis dan tuntutan faedah" for worker 0113E. auditor also verify the Appointment letter person in-charge to identify monitor the safety and health plan implementation and Appointment letter PIC to monitor SOCSO compensation claims towards the workers who injured due to work-related incident leading to injury or sickness and found all of the evidence enough to close this NC.</p> <p>Status: Closed</p>
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			<p>implementation</p> <p>3. Appoint person in-charge to monitor the safety and health plan implementation i.e., scheduled maintenances, etc.</p> <p>4. Appoint person in-charge to monitor SOCSO compensation claims towards the workers who injured due to work-related incident leading to injury or sickness</p>	
3.7.2 RAR 04 2023	Minor	<p>Requirement: Clause 3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p> <p>Indicator 3.7.2 Records of training are maintained, where appropriate on an individual basis</p> <p>Finding : Workers was not appropriate trained</p> <p>Objective evidence : Several samples' workers interviewed reveals lack of understanding on Contract agreement implementation such as: Annual leave entitlement, benefits, etc</p>	<p>Root cause: Training for contract agreement was scheduled to be conducted only one time per year. And management admit mistake for did not consider a new payment, leave entitlement, and benefits to the workers.</p> <p>Correction: (<i>The correction shall address the objective evidence</i>) Conduct training on contract agreement i.e., annual leave entitlement, benefits, etc.to all workers and evaluate their understanding of the training.</p> <p>Corrective action: (<i>The corrective action shall address the root cause of this NC</i>)</p> <ol style="list-style-type: none"> 1. Issuing a memo to all employees regarding the quarterly training schedule for the contract agreement. 2. Conduct training as per schedule. 	<p>Corrective action Plan accepted. The effectiveness of the corrective action Plan will be verified during next audit.</p> <p>Status: Open</p>
4.2.1 MZK 02 2023	Major	<p>Requirement: 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>Root cause: The complaint procedure was established by the Human Resources Department (HRD) at the head office. The procedural review process is limited to operational units only. It is the company's practice not to solicit input or suggestions from other stakeholders in the review process of any</p>	<p>Assessor has verified the evidence feedback form has distribute to growers and evidence of Training to growers and Appointment letter person in charge in monitor social issues at Segamaha CU. Auditor has found all of the evidence enough to close this NC</p>

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		<p>Finding: A documented SOP Grievance Procedure dated 1st March 2022 was not mutually agreed with all affected parties.</p> <p>Objective evidence: A documented SOP Grievance Procedure dated 1st March 2022 was develop However, not mutually agreed with affected parties, it was evidence During interview with Growers (Tan Chok Peng, Ladang Irat, Tan Leong Kee) and Villagers from Sg Tekala they was not understand and didn't know about this procedure.</p>	<p>procedure. But management admit mistake that did not explained and involved the stakeholders to give input</p> <p>Correction: Distribute feedback form to growers i.e., Tan Chok Peng, Ladang Irat, Tan Leong Kee, villagers from Kg Sungai Takala to obtain their feedback on the grievance procedure. Any comment or feedback obtained from growers to be communicated to HRD for procedure revision, if necessary. Immediately conduct briefing and Training to gather input from them if necessary.</p> <p>Corrective action: Communicate with procedure owner (HRD), where necessary, to solicit input or suggestions from other stakeholders in the review process of any procedure. Immediately update and revised procedure in case any comments/input from grower or villagers. Appoint PIC monitor social issues at Segamaha CU.</p>	Status: Closed
6.1.5 RAR 02 2023	Major	<p>Requirement: 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.</p> <p>Finding: The gender committee in Segamaha CU was not in place specifically to raise awareness on opportunities and improvements for women.</p> <p>Objective evidence: Based on several minutes of meetings and interview with gender committee members at Segamaha CU, there was no discussion about opportunities and improvements for women. Moreover, there is no dedicated budget was provided to the committee to execute the opportunities and improvements for women.</p>	<p>Root cause: There is no competent person in women's empowerment at Segamaha Business Unit or among the gender committee.</p> <p>Correction: 1. Review and revise the purpose of gender committee. Then, conduct a meeting discussing the opportunities and improvements for women. 2. Request additional budget for respective estates and mill's gender committee to execute the opportunities and improvements for women.</p> <p>Corrective action: 1. Request from Talent & Development</p>	<p>Auditor has verified evidence additional budget for respective estates and mill's gender committee to execute the opportunities and improvements for women and evidence of request from Talent & Development (Human Resource and Administration Department) to conduct training on the topic of empowering women to Segamaha Business Unit's management and all gender committee's chairman. Appointment letter person in charge in monitor dedicated person in-charge at HQ level to monitor the activities done by the gender committee at Segamaha Business Unit. Auditor has found all of the</p>

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			<p>(Human Resource and Administration Department) to conduct training on the topic of empowering women to Segamaha Business Unit's management and all gender committee's chairman.</p> <p>2. Appoint dedicated person in-charge at HQ level to monitor the activities done by the gender committee at Segamaha Business Unit.</p>	<p>evidence enough to close this NC.</p> <p>Status: Closed</p>
6.2.3 RAR 01 2023	Major	<p>Requirement: 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.</p> <p>Finding: there is evidence of legal noncompliance for overtime</p> <p>Objective evidence: At Segamaha POM noncompliance on "Permit Sekatan Kerja Lebih Masa" as per Seksyen 104(7) Ordinan Buruh (Sabah Bab 67) – 1.3- prohibited to work not more than 12 hours per day. Based on punch card verification as per below: Employee no: 0131G December 2022 January 2023 Date: 05/12/2022, Total overtime = 5hours Date: 04/01/2023, Total overtime: 9 hours Date: 6/12/2022, Total overtime = 6 hours Date 06/01/2023, Total overtime: 7 hours Date: 07/12/2022, Total overtime: 6 hours Date 12/01/2023, Total overtime: 10 hours Date: 08/12/2022, Total overtime: 6 hours Date: 27/01/2023, Total overtime: 5 hours Date 27/12/2022, Total overtime: 5 hours</p>	<p>Root cause: The Management did not monitor daily overtime as management focus on monthly/ cumulative hours only for overtime, resulted daily overtime is taken more than 4 hours and also no dedicated staff to monitor the overtime taken by each worker.</p> <p>Correction: Will enforce and monitor daily Limit workers overtime hours as per "Permit Sekatan Kerja Lebih Masa" by creating Overtime form and submit to the PIC.</p> <p>Corrective action: 1. Appoint dedicated staff to manage and monitor the overtime for each worker. 2. Conduct briefing on the "Permit Sekatan Kerja Lebih Masa" to all workers for their awareness.</p>	<p>Auditor has verify the evidence Overtime form to monitor daily Limit workers overtime hours as per "Permit Sekatan Kerja Lebih Masa, Appointment letter PIC to manage and monitor the overtime for each workers and evidences of Training Permit Sekatan Kerja Lebih Masa" to all workers</p> <p>Auditor has found all of the evidence enough to close this NC.</p> <p>Status: Closed</p>
6.7.2 RMN 03	Minor	<p>Requirement: 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.</p>	<p>Root cause: 1. Segamaha POM's personnel unaware of the necessity of emergency procedure for explosive situation 2. Mandor Ajis and mechanic Azmil was absent during the training. 3. Emergency shower and eye wash has</p>	<p>Corrective action Plan accepted. The effectiveness of corrective action Plan will be verified during next audit.</p> <p>Status: Open</p>

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		<p>Records of all accidents are kept and periodically reviewed.</p> <p>Finding: Emergency situation did not fully identify and trained in first aid are not present in both field and other operations.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> 1. Emergency procedure at Segamaha POM did not identify emergency for explosive situation. 2. Two (2) persons in charge at Ladang G&G (Mandor Ajis & Mechanic Azmil) had yet to attend first aid training. 3. No emergency shower and eye wash been provide at water treatment plant for Ladang TTS. 	<p>been purchased; however, it has not yet delivered as at day of audit.</p> <p>Correction:</p> <p>Conduct training on emergency procedure of explosive situation to all workers</p> <ol style="list-style-type: none"> 1. Conduct first aid training to Mandor Ajis and mechanic Azmil 2. Install emergency shower and eye wash immediately as it arrives <p>Corrective action:</p> <ol style="list-style-type: none"> 1. Invite Jabatan BOMBA Kinabatangan for fire drill and explosive situation 2. Monitor participation of all required workers on the training. 3. Monitor any purchasing related to required safety equipment/tools for the water treatment operation. 	
6.7.3 RMN 02	Major	<p>Requirement: 6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>Finding: PPE was not provided to tractor driver and sanitation facilities available was found not adequate.</p> <p>Objective evidence:</p> <p>At LTTS, based on the HIRARC register, the organization require to provide ear plug to all tractor drivers. Based on the PPE distribution record for tractor driver and interview with PIC, no evidence of ear plug been provided to tractor drivers.</p> <p>Designated sanitation facilities provided by Ladang Sungai Segamaha did not cover area for workers involve in pesticides to change out their PPE.</p>	<p>Root cause:</p> <ol style="list-style-type: none"> 1. No dedicated person in-charge was appointed to monitor and implement risk control as per HIRARC register. 2. No dedicated person in-charge was appointed to monitor the implementation of RSPO requirement 6.7.3 <p>Correction:</p> <ol style="list-style-type: none"> 1. Purchase suitable hearing protection device (HPD) as per NRA recommendation. Distribute the HPD to tractor drivers. 2. Build designated sanitation facilities for workers who handling pesticides to change out of their PPE at Ladang Sungai Segamaha. <p>Corrective action:</p> <ol style="list-style-type: none"> 1. Appoint person in-charge was appointed to monitor and implement 	<p>Auditor has verified the evidence records of LTTS has Purchase suitable hearing protection device (HPD) as per NRA recommendation and records Distribute the HPD to tractor drivers.</p> <p>And evidence of picture construction that designated sanitation facilities for workers who handling pesticides to change out., Appointment letter PIC to manage and monitor the OSH.</p> <p>Auditor has found all of the evidence enough to close this NC.</p> <p>Status: Closed</p>

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			<p>risk control as per HIRARC register.</p> <p>2. Appoint person in-charge was appointed to monitor the implementation of RSPO requirement 6.7.3</p>	
7.8.2 DA 02 2023	Major	<p>Requirement: 7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>Finding: Water courses and wetlands was not fully protected, including not well 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:</p> <p>1) During site inspection at G&G Estate Riparian Reserves (Sg. Bilong), sighted trace of chemical spraying activities was carried out at the signboard buffer riparian reserves.</p> <p>2) During site inspection at Bukit Segamaha Estate Riparian Reserves, sighted trace of chemical spraying activities was carried out at the buffer riparian reserves to tackle the woodies. In addition, also sighted fertilizer bag, bottle and food packaging was disposed at the buffer riparian reserves. Furthermore, there is no buffer zone marking at the area.</p>	<p>Root cause:</p> <p>1. The management did not train workers for the new BMP requirement and less training for the upkeep gang in charge of maintaining the buffer riparian reserves and no dedicated person to monitor riparian reserves.</p> <p>2. The management did not train workers for the new BMP requirement and less maintaining the riparian reserves and no dedicated person to monitor riparian reserves.</p> <p>Correction: Conduct training for the upkeep gang in charge of maintaining the buffer riparian reserves.</p> <p>Corrective action: To plan more training 3 monthly basis related to buffer zones/BMP so the workers di not forget what area can be spray and area which area prohibited to spray. (refer training Plan 2023) Appoint dedicated person to monitor riparian reserves.</p>	<p>Auditor has verified the evidence training has been conducted for the upkeep gang in charge of maintaining the buffer riparian reserves. Auditor also verify evidence Training plan that stated training for Buffer zones will be conducted on 3 monthly basis related to buffer zones/BMP.</p> <p>And appointment letter to person to monitor Environment/ riparian reserves/ Scheduled waste.</p> <p>Auditor has found all of the evidence enough to close this NC.</p> <p>Status: Closed</p>
7.12.7 MZK 03 2023	Minor	<p>Requirement: 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.</p> <p>Finding: The Outcomes of HCV/RTE monitoring program was not fed back into the management Plan</p>	<p>Root cause: No dedicated person to update the management plan on the monitoring plan for any elephants that roams into the estate. Since this incident just happen, and last elephant roam is in 2014, so the management doesn't know how to face this issue</p> <p>Correction:</p>	<p>Corrective action Plan accepted. The effectiveness of the corrective action Plan will be verified during next audit.</p> <p>Status: Open</p>

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		<p>Objective evidence: Segamaha CU had Management Plan already identify Wider landscape Level, and the RTE monitoring program, However, Outcomes of Latest HCV/RTE Monitoring was not fed back into the Latest management Plan to consider Plan Inventory Monitoring after the RTE such as Elephant etc. enter the estate.</p>	<p>Revise HCV/RTE management plan to include steps to be taken if there are any elephant roaming occurrences fed from the HCV/RTE monitoring plan.</p> <p>Corrective action: Management will immediately Appoint a dedicated person to update the management plan on the monitoring plan for any case of elephants roaming into the estate.</p>	
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ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
3.3.1 MZK 01 2022	Major	<p>Finding: Standard Operating Procedures (SOP) for the unit of certification was not in place for certain part which must in line with current applicable legal requirement.</p> <p>Objective evidence: Boustead Segamaha BU does not have SOP on recruitment and Recalibration/Legalisation of foreign workers for contractor workers. The SOP also must in line with current applicable legal requirement.</p>	<p>Recruitment process were managed centrally at head office (KL) and were established new revised SOP. Copy of recruitment SOP was not disseminated to all operating units.</p> <p>HQ to provide Recruitment SOP to Segamaha Business Unit. Refer <i>Recruitment Flow Process and latest Recruitment procedure SOP</i></p>	<p>During this Audit, Assessor has verify the new procedure to ensure recruitment and Recalibration/Legalisation of foreign workers for all workers including contractor workers "WORKFORCE MANAGEMENT UNIT GUIDELINES & PROCEDURES -Recruitment and Employment of Migrant Worker(s)" effective date 01/08/2022. The procedure has describe all the channel of workers to enter the Malaysia either through Recruitment agent or through 'walk-in' the assessor has found the procedure acceptable to close the past NCR MZK 01 2022.</p> <p>Status : Closed</p>
3.2.2 RAR 01 2022	Minor	<p>Finding: RSPO metric template data was not as per actual data and was not reported accordingly</p> <p>Objective evidence: data in the template was not reported and not as per actual data as per below:</p> <ul style="list-style-type: none"> • G&G Estate – total employees training (T.1.1) was contradict with no. total employees (D.2.0) • LTTS Estate - total employees training (T.1.1) was contradict with no. total employees (D.2.0) - Production FFB (F.1.0) 12 – month period counting backwards from audit month reported was not as per actual FFB produce. - Operation input (O.1.0 – O.2.1) 	<p>i. The details of Start Date of Audit were not updated from March 2022 to April 2022. Thus, the data of F.1.0 and PO.1.0 reported for LTTS estate and Segamaha POM was for February 2021 to January 2022, respectively, and not as per actual data.</p> <p>ii. O.1.0 – O.2.1, T.1.0, and Biodiversity data was not reported due to negligence.</p> <p>iii. The data for T.1.1 and D.2.0 for both G&G estate and LTTS estate was contradict due to accumulation of training participants in all training conducted in year 2021. The person</p>	<p>RSPO metric template had updated latest report on 25/3/2023 and verification of the data was found reliable and accurately reported by the organization. Thus, #Minor NCR RAR 01 2022 has effectively closed.</p> <p>Status : Closed</p>

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		<ul style="list-style-type: none">Segamaha POM -production and sales (P0.1.0-Palm Oil) non-certified PO & PK production was not reported -training (T.1.0) was not reported1.0 -Member details – biodiversity was not reported	<p>in-charge was not well equipped with knowledge to key-in data in the RSPO Metric.</p> <p>Correction: Sustainability & Safety Department (SSD) to conduct training to ensure all staff and assistant in Segamaha BU provided with adequate knowledge on RSPO Metric Template. Refer <i>RSPO Metric Training Report</i>.</p> <p>Corrective action: Estate to appoint designated person in-charge for updating data on RSPO Metric Template, providing proper training and briefing by competent person from SSD.</p>																																																	
3.8.12 RAR 02 2022	Major	<p>Finding: three-monthly basis accounting system was not balance for RSPO Certified CPO and PK</p> <p>Objective evidence: Certified CPO & PK contract from HQ has been used as a guidance for CU to sell the certified CPO & PK. It caused the negative balance on the MB accounting.</p> <table><tr><th>3-monthly basis period</th><th>Certified CPO contract</th><th>Certified produce (stock)</th><th>Certified despatch</th></tr><tr><td>July to Sep 2021</td><td>11,500</td><td>9,323.57</td><td>11,458.28</td></tr><tr><td>Oct to Dec 2021</td><td>14,900</td><td>10,676.24</td><td>12,915.56</td></tr></table> <table><tr><th>3-monthly basis period</th><th>Certified PK contract</th><th>Certified produce (stock)</th><th>Certified despatch</th></tr><tr><td>July to Sep 2021</td><td>2,000</td><td>1,486.81</td><td>1,880.32</td></tr><tr><td>Oct to Dec 2021</td><td>2,100</td><td>1721.79</td><td>2,028.17</td></tr></table>	3-monthly basis period	Certified CPO contract	Certified produce (stock)	Certified despatch	July to Sep 2021	11,500	9,323.57	11,458.28	Oct to Dec 2021	14,900	10,676.24	12,915.56	3-monthly basis period	Certified PK contract	Certified produce (stock)	Certified despatch	July to Sep 2021	2,000	1,486.81	1,880.32	Oct to Dec 2021	2,100	1721.79	2,028.17	<p>The root cause: No monitoring on three-monthly basis accounting system by Marketing Department.</p> <p>Correction: Table sales of conventional CPO/PK from Segamaha Mill to compensate the oversold certified CPO and PK. Refer <i>BEASB Marketing Letter</i>.</p> <p>Corrective action: 1. Sales contract agreement to compensate the oversold certified CPO and PK. Training to Segamaha POM about certified CPO and PK declaration to Marketing Department</p>	<p>Sighted during the audit the mass balancing record show positive balance as below:</p> <table><tr><th>three-monthly basis period</th><th>Certified CPO contract</th><th>Certified produce (stock)</th><th>Certified despatch</th></tr><tr><td>July to Sep 2022</td><td>5,500</td><td>7,027.17</td><td>4,434.07</td></tr><tr><td>Jan to Mar 2023</td><td>4,200</td><td>7,316.67</td><td>3,137.25</td></tr></table> <table><tr><th>three-monthly basis period</th><th>Certified PK contract</th><th>Certified produce (stock)</th><th>Certified despatch</th></tr><tr><td>July to Sep 2022</td><td>480</td><td>1,415.00</td><td>480</td></tr><tr><td>Jan to Mar 2023</td><td>1,590</td><td>1,261.29</td><td>1,410.95</td></tr></table> <p>Thus Past Major NCR RAR 02 2022 has been successfully closed.</p> <p>Status : Closed</p>	three-monthly basis period	Certified CPO contract	Certified produce (stock)	Certified despatch	July to Sep 2022	5,500	7,027.17	4,434.07	Jan to Mar 2023	4,200	7,316.67	3,137.25	three-monthly basis period	Certified PK contract	Certified produce (stock)	Certified despatch	July to Sep 2022	480	1,415.00	480	Jan to Mar 2023	1,590	1,261.29	1,410.95
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<p>6.3.2</p> <p>MZK 02 2022</p>	<p>Minor</p>	<p>Finding: Minutes of meetings between the unit of certification (Segamaha BU) with workers representatives were not available upon request</p> <p>Objective evidence: Tabung Tentera Estate and Bukit Segamaha does not have workers representatives with diversity of members, who are freely elected. Resulted no meetings has been conducted with workers representative. only meeting with Gender and All workers has been conducted.</p>	<p>Tabung Tentera Estate and Bukit Segamaha Estate was not aware that workers representative to represent workers who are diverse in background must be elected freely and a meeting to discuss any issues raised by the workers must be conducted.</p> <p>Conduct an election for all estate workers to freely select their representative and conduct first meeting. Refer attachment <i>Minutes of Meeting – Bukit Segamaha</i> and <i>Minutes of Meeting – LTT Sabah</i>.</p> <ul style="list-style-type: none"> i. To conduct election once in every two years or if any of the representative no longer want to be appointed as representative. ii. To conduct meeting with workers' representatives which was elected by estate workers, at least once a year and/ or when there is a need for a meeting. 	<p>During Interview with several employees and verified minute of election, it was found that, management of Segamaha CU have workers representatives, who are freely elected. Meetings were conducted with workers representative conducted Thus previous NCR was satisfactory closed.</p> <p>Status : Closed</p>
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ATTACHMENT 6 – Timebound Plan [Received 28/03/2023]

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	Certification Status (Certified / Not certified)	REVISION OF THE TBP (Only applicable when revision is made)		
					Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC
Lepan Kabu	Malaysia	Lepan Kabu	Km 88.8, Jln Kota Bharu – Gua Musang, 18000 Pahi, Kuala Krai, Kelantan	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Eldred Bekoh	Malaysia	Eldred	K/B No 102 86500 Bekok, Segamat, Johor.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.

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Eldred Bekoh	Malaysia	Bekoh	K/B 505 Bekoh Estate 84900 Tangkak Johor	Not Certified	Yes	2023	<p>The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped.</p> <p>The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.</p>
Rimba Nilai Business Unit	Malaysia	Rimba Nilai Palm Oil Mill	90100 Sugut, Sabah.	Not Certified	Yes	2023	<p>The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped.</p> <p>The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.</p>
Rimba Nilai Business Unit	Malaysia	Sungai Sungai 1	90100 Sugut, Sabah.	Not Certified	Yes	2023	<p>The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped.</p> <p>The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.</p>
Rimba Nilai Business Unit	Malaysia	Sungai Sungai 2	90100 Sugut, Sabah.	Not Certified	Yes	2023	<p>The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped.</p> <p>The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.</p>

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Rimba Nilai Business Unit	Malaysia	Sungai Sungai 3	90100 Sugut, Sabah.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Rimba Nilai Business Unit	Malaysia	Lembah Paitan	90100 Sugut, Sabah.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped.The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Rimba Nilai Business Unit	Malaysia	Kawananan	90100 Sugut, Sabah.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Tawai	Malaysia	Tawai Palm Oil Mill	KM 75, Telupid-Beluran Road, Locked Bag No.69, 89100, Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Tawai 1	KM 75, Telupid-Beluran Road, Locked Bag No.69, 89100, Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.

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Tawai	Malaysia	Tawai 2	KM 75, Telupid-Beluran Road, Locked Bag No.69, 89100, Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Pertama	KM 113, Jalan Telupid – Sandakan 89300 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Sapa Payau	KM 108, Jln. Telupid – Sandakan 89320 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Ruku Ruku	Km108, Jln. Telupid – Sandakan 89320 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Lokan	89320 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Lokan Baru	89320 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.