



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

**File Ref. :  
 EB28910001**

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : BUKIT KRETAM SDN. BHD.**  
**PARENT COMPANY : BUKIT KRETAM SDN. BHD.**  
**RSPO MEMBERSHIP No.: 1-0292-20-000-00**

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

Certification Unit	GPS Location		Location
	Latitude	Longitude	
Bukit Kretam Sdn. Bhd.	5.482115	118.593382	Batu 13, KM 56 Jalan Jeroco, 90200 Kota Kinabatangan, Sabah.

**MAP :** See Attachment 1

**AUDIT DATE :** 6 – 8 June 2023 **DURATION :** 9 auditor days

**TYPE OF AUDIT :**  Annual Surveillance Audit No. 01  Recertification Audit

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

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

**VALIDITY OF RSPO CERTIFICATE :** 19 July 2022 – 18 July 2027

**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 : 15/09/2023

**Acknowledgement by Client's Representative**

Name : HELMY ARIZAL BIN HUSSIN  
 Signature :   
 Date : 18/09/2023



## SUMMARY OF AUDITS

<b>Stage 2 Audit</b>			
On-site audit date	:	6th – 8th April 2022	No. of auditor days: 9 auditor days
Audit team	:	Dzulfiqar Azmi (LA), Mohd Ab Raouf Asis, Ismail Adnan.	
No. of major NCR	:	3	Indicator: 3.4.3, 6.2.3, 6.7.3
No. of minor NCR	:	1	Indicator: 7.4.4
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers
		√	-
		Contract workers	NGOs
		-	-
		Indigenous people	Contractor
		NA	-
Supply base sampled	:	Bukit Kretam Sdn. Bhd.	
Justification of audit planning	:	During stage 2 audit, the audit team visited the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.	
Name of peer reviewer	:	Prof Emeritus Dr Jalani Sukaimi	
Report approved by	:	Kamini M. Sooriamoorthy	Approval date: 19/07/2022

<b>Annual Surveillance Audit 1</b>			
On-site audit date	:	6-8 June 2023	No. of auditor days : 9 Auditor Days
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Rozaimée Ab Rahman, Dzulfiqar Azmi	
No. of major NCR	:	2	Indicator: 6.1.5, 6.2.2
No. of minor NCR	:		Indicator :
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees / Workers organizations	Settlers
		√	-
		Contract workers	Local & National NGOs
		-	-
		Indigenous people	Contractor
		NA	√
Supply base sampled	:	Bukit Kretam Sdn. Bhd.	
Changes since the last audit	:	No Changes	
Justification of audit planning	:	During this ASA 1 audit, the audit team visited the estate, linesite, chemical stores, schedule waste store, and other surrounding facilities such as waste collection area. In addition to the above, interviews were held with the management, employees and other relevant internal and external stakeholders.	
Name of peer reviewer	:	NA	
Report approved by	:	Kamini M. Sooriamoorthy	Approval date : 15/09/2023

**SUMMARY OF INFORMATION**

**TABLE 1**

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
<b>*Projection Period / Reporting Period</b>	April 2022 to May 2023	June 2023 – May 2024			
<b>Certified FFB Processed (MT)</b>	20,202.00	25,350.00			
<b>Production of Certified CPO (MT)</b>	4,040.40	5,070.00			
<b>Production of Certified PK (MT)</b>	1,010.10	1,267.50			
<b>Certified Areas (Ha)</b>	1,375.72	1,375.72			
<b>Planted Areas (Ha)</b>	1,288.59	1,288.59			
<b>Production Areas (Ha)</b>	1,288.59	1,288.59			
<b>HCV Areas / Conservation Areas (Ha)</b>	6.20	6.20			
<b>REMARKS</b>	-				

**TABLE 2**

	PO	PK
<b>Last years certified volume (MT)</b>	4,040.40	1,010.10
<b>Last years actual certified sold (MT)</b>	4,021.80	1,005.45
<b>Last years actual sold under other schemes (MT)</b>	-	-
<b>Last years sold conventional (MT)</b>	-	-
<b>Last year actual sold CSPO credits (where applicable)</b>	-	-
<b>New year certified volume (MT)</b>	5,070.00	1,267.50

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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) Metrics Template, & HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He had a certificate of Lead Assessor in ISO 9001, OHS 45001, ISO 4001 and qualified social Auditor under RSPO Training, He also attend DLW training in 2022 and worker welfare training in 2021 which is conducted by RSPO. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Dzulfiqar Azmi	Auditor / Social (Internal), GAP	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 RSPO Lead Auditor since Oct. 2020.
Rozaimiee Ab Rahman	Auditor / Safety & Environment, GHG	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

### 1.3 Audit methodology

The audit was conducted at Bukit Kretam Sdn. Bhd. (BKSB). The standard sampling formula of  $0.8\sqrt{y}$  as specified in the RSPO Certification Systems Document; Nov 2020 does not apply at this certification unit. The audit included an on-site audit to the estate and workers houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

#### 1.4 Stakeholder Consultation

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<ul style="list-style-type: none"> <li>▪ Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between.</li> <li>▪ There was contravene with legal labour requirement for Minimum Wages Order Amendmend 2022 for several workers sampled in BKSB. NCR was raised and can be refer to indicator 6.2.2.</li> <li>▪ Workers receive their wages in cheque, and they changed it with cash money at sundry shop in the estate. All workers satisfy with the cheque payment method due to the nearest town is Lahad Datu, far from the estate if they want to withdraw their money. Approximately 90-100 km.</li> <li>▪ Any overtime work is mutually agreed between workers and management, and that there is no element of forcing.</li> <li>▪ Documented foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent.</li> <li>▪ Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts.</li> <li>▪ Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer.</li> <li>▪ For newly arrived foreign workers who do understand Bahasa or English, translations are provided during briefings.</li> </ul>
2) Settlers	<ul style="list-style-type: none"> <li>▪ Not applicable</li> </ul>
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> <li>▪ Confirmed there is no land dispute between BKSB CU and neighbouring estates IOI Plantation (Unico 3 Estate) and Trusan Kinabatangan Forest Reserve).</li> <li>▪ No social issues arising from local communities (Kg Sri Ganda).</li> <li>▪ All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings.</li> <li>▪ Kg Sri Ganda representative interviewed confirmed no user rights issues between BKSB and villagers. Estate operation has no negative impact on village livelihood.</li> </ul>
4) Suppliers	<ul style="list-style-type: none"> <li>▪ BKSB usually buy chemicals, PPE and other estates tools directly from suppliers in Lahad Datu town themselves.</li> <li>▪ Fair dealings with suppliers and traders in Lahad Datu.</li> <li>▪ Payments are made within 1 months of invoice.</li> <li>▪ Representatives from suppliers confirmed fair dealings and prompt payments through invoices.</li> </ul>
5) Contract workers	<ul style="list-style-type: none"> <li>▪ There is no contractor workers has been hired.</li> </ul>
6) Local & national NGOs	<ul style="list-style-type: none"> <li>▪ Not applicable</li> </ul>
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> <li>▪ None at site as invitation letter sent out did not received any comments . See item 1.4 above.</li> <li>▪ Phone interview with District Forest Officer of</li> </ul>

		Lahad Datu confirmed no issues with boundary and enforcement at BKSB (shared boundary with Trusan Kinabatangan Forest Reserve).
8) Independent growers / Smallholders		▪ Not applicable
9) Indigenous people		▪ Not applicable
10) Contractor		▪ No contractor has been hired.
11) Previous land owner (if any)		▪ The right to use the land at the CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified during the audit. At BKSB, the land was previously owned by a group of smallholders with a total of 17 lots. Verified copies of the land titles showed that the ownership of the Lots was transferred to BKSB on 9/9/1986.
12) Others (please specify)		▪ Sustainability Team from Hap Seng Plantations have consulted with interested smallholders partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.
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)	
<b>2.0 SCOPE OF CERTIFICATION AUDIT</b>		
<b>2.1 Description of the certification unit</b>		
<p>Founded on 9th November 1981 as S.K Low Sdn. Bhd. and later on changed its name to Bukit Kretam Sdn. Bhd. (BKSB) on 10th October 1985. The head quarter located at Lot 23, MDLD 0718, Jalan Bahagia 1, Taman Bahagia, 91100 Lahad Datu, Sabah. The company started their oil palm planting with Bukit Kretam 1st generation planting in year 1998 until completion in year 2006.</p> <p>Bukit Kretam Estate located at Mukim Sg. Merah Mukim Kinabatangan comprises 17 land titles with a total certified area of 1,375.72 hectares. All areas located at Mukim Sungai Merah Kinabatangan which is accessible through government road via Jeroco Road. There are surrounding estates such as IOI Plantations (Unico 3 Estate), Yeoh Eng Chong (smallholder), Yeoh Eng Cheang Company Sdn. Bhd., Kulamba Wildlife (Forest Reseved) and Kg. Sri Ganda.</p> <p>The management of BKSB was headed by Estate Manager (Mansor Hj. Salaman) and assisted by assistant manager (Kaharuddin Nordin).</p> <p>All the Fresh Fruit Bunches (FFB) from BKSB were sent to Jeroco 2 POM/ Unico Desa POM/ Tomanggong POM. After being certified, the FFB is sent to Bukit Mas POM.</p> <p>The BKSB did not have other management system certification besides MSPO P&amp;C.</p>		

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

The FFB is sourced from Bukit Kretam Sdn Bhd

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

Table 1: Actual FFB production by the supply base for the last reporting period (April 2022 to May 2023)

CU own estates	FFB Production	
	Tons	Percentage (%)
Bukit Kretam	20,109.02	100.00
<b>Total</b>	<b>20,109.02</b>	<b>100.00</b>

Table 2: Projected FFB production by supply base for the next reporting period (June 2023 – May 2024)

CU own estates	FFB Production	
	Tons	Percentage (%)
Bukit Kretam	25,350.00	100.00
<b>Total</b>	<b>25,350.00</b>	<b>100.00</b>

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

	Total (MT)
<b>FFB Production</b>	20,109.02
<b>CPO Production @ 20%</b>	4,021.80
<b>PK Production @5%</b>	1,005.45
<b>Product sold under Book &amp; Claim</b>	-

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

	Total (MT)
<b>FFB Production</b>	25,350.00
<b>CPO Production @ 20%</b>	5,070.00
<b>PK Production @5%</b>	1,267.50
<b>Product sold under Book &amp; Claim</b>	-

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Bukit Kretam	1,288.59	1,375.72
<b>Total</b>	<b>1,288.59</b>	<b>1,375.72</b>



Table 6 Planting profile for Bukit Kretam CU

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature &gt;3years (Ha)</u>	<u>Immature &lt; 3 years (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Bukit Kretam	1998	1st	270.04	0.00	270.04		
	1999	1st	436.06	0.00	436.06		
	2001	1st	19.08	0.00	19.08		
	2004	1st	39.47	0.00	39.47		
	2005	1st	222.10	0.00	222.10		
	2006	1st	301.84	0.00	301.84		
<b>Total</b>			<b>1,288.59</b>	<b>0.00</b>	<b>1,288.59</b>	<b>100.00</b>	<b>0.00</b>

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

The details of the contact person are as below:

Name	:	Helmy Arizal Bin Hussin
Position	:	Asst Manager Internal Audit & RSPO
Address	:	Lot 23, MDLD 0718, Jalan Bahagia 1, Taman Bahagia, 91100, Lahad Datu, Sabah.
Phone no.	:	089-881322 013-4790556
Email	:	<a href="mailto:bksb2004@yahoo.com">bksb2004@yahoo.com</a> <a href="mailto:helmyarizal.hussin@yahoo.com.my">helmyarizal.hussin@yahoo.com.my</a>

**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 – Not applicable (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?

iii.	Are there associated smallholders (including scheme smallholders) in the CU	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
	If no, please state reasons	Not Applicable			
iv.	Any new acquisition which has replaced primary forests or HCV areas	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
<b>3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.)</b>					
No Changes					
3.4	Status of previous non-conformities *	<input checked="" type="checkbox"/>	Closed	<input type="checkbox"/>	Not closed*
	* If not closed, minor non conformity will be upgraded to major non conformity				
3.5.	Complaint received from stakeholder (if any)	No complaint received.			
<b>4.0 DETAILS OF NON-CONFORMITY REPORT</b>					
4.1	For P&C (Details checklist refer to Attachment 3) :				
	Total no. of minor NCR(s)	List : -			
	Total no. of major NCR(s)	List : 2      DA 01 2023 (6.1.5), DA 02 2023 (6.2.2)			
4.2	For SC (Details checklist refer to Attachment 3) :				
	Total no. of minor NCR(s)	List : NA			
	Total no. of major NCR(s)	List : NA			
<b>5.0 AUDIT CONCLUSION</b>					
The audit team concludes that the organization has / <del>has not</del> * 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.

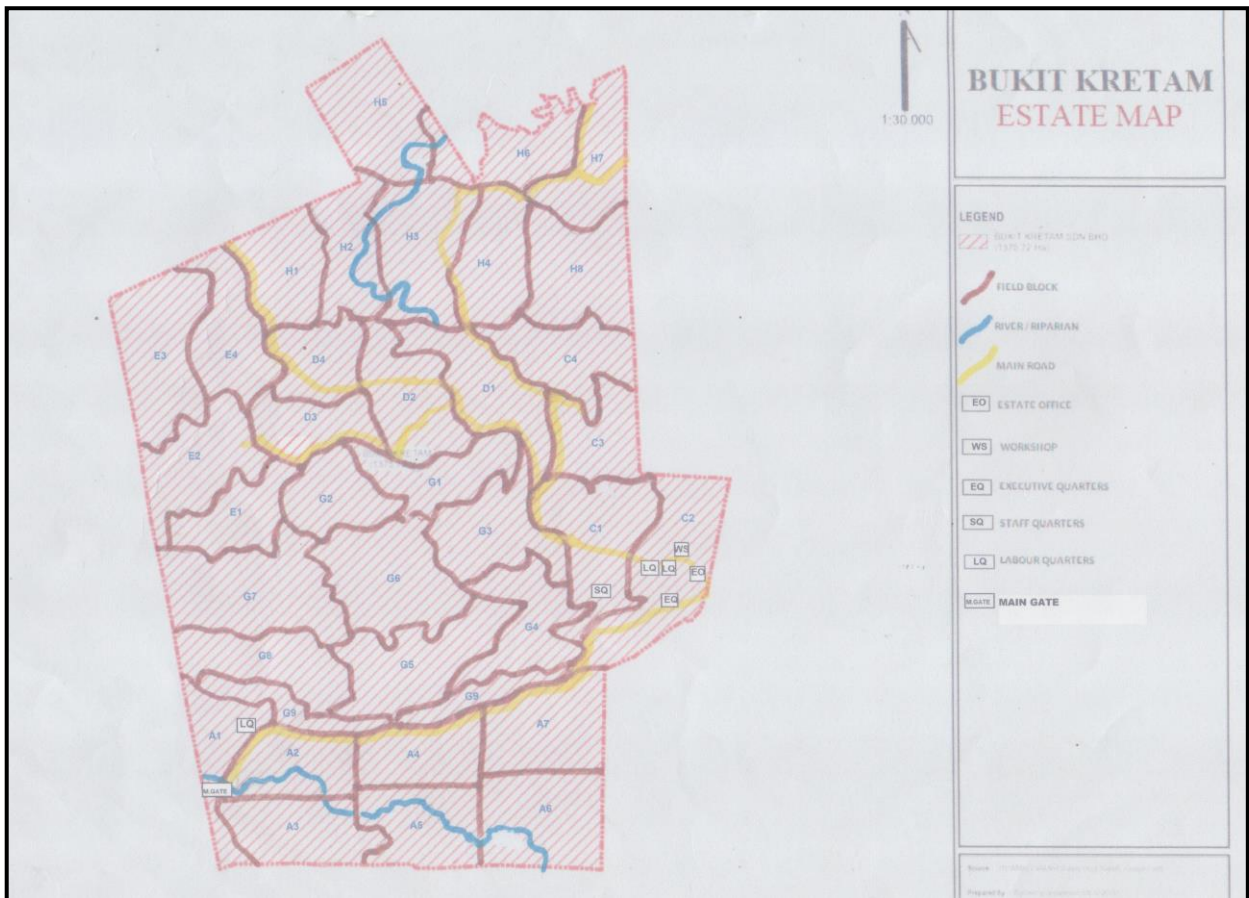
- Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

*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 :	<b>MOHD ZULFAKAR KAMARUZAMAN</b>		<b>7/09/2023</b>
	_____ (Name)	_____ (Signature)	_____ (Date)

Map Of Bukit Kretam Sdn Bhd



## SURVEILLANCE 1 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** : 6 – 9 JUNE 2023.

3. **Site of assessment** : BUKIT KRETAM SDN. BHD

### 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 (Social – External, HCV, Metrics Template)

Auditor : Dzulfiqar Azmi (Social – Internal, GAP, TPB)  
Rozaimiee Ab Rahman (Safety Environment GHG)  
Rohazimi Mat Nawi (, Metrics Template)

Observer : N/A

ASI Witness : N/A

*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 satisfactorily 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: March 2022 to April 2023
- 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).

**Assessment Programme Details** : As below

## RSPO PUBLIC SUMMARY

Date / Time	Coverage of assessment / Activity / Site	RAR	DA	MZK	RMN
<b>Day 1:6/06/2023 (Tuesday)</b>					
10.30 am	<b>Opening Meeting – Venue: Bukit Kretam</b> <ul style="list-style-type: none"> <li>• Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes</li> <li>• 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.</li> </ul>	NA	NA	/	<b>NA/MSPO Audit</b>
8.30am – 1.00pm	<b>Site observation to Bukit Kretam P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Land titles user rights</li> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• GHG &amp; Metric template verification</li> </ul>	NA	NA	/	<b>NA/MSPO Audit</b>
1.00pm	Lunch Break	NA	NA	/	<b>NA/MSPO Audit</b>
2.00pm – 4.00pm	Continue assessment at respective sites	NA	NA	/	<b>NA/MSPO Audit</b>
4.00-4.30pm	Discussion on any findings / briefing with cu	NA	NA	/	<b>NA/MSPO Audit</b>
5.00 pm	End of day 1 audit	NA	NA	/	<b>NA/MSPO Audit</b>

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Date / Time	Coverage of assessment / Activity / Site	RAR	DA	MZK	RMN
<b>Day 2: 7/06/2023 (Wednesday)</b>					
8.30am – 1.00pm	<b>Site observation to Bukit Kretam</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>Occupational safety &amp; health aspects , chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>Land titles user rights</li> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting</li> <li>Occupational safety &amp; health aspects, chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>GHG &amp; Metric template verification</li> </ul>	/	/	/	NA/MSPO Audit
1.00pm	Lunch Break	/	/	/	NA/MSPO Audit
2.00pm – 4.00pm	Continue assessment at respective sites	/	/	/	NA/MSPO Audit
4.00-4.30pm	Discussion on any findings / briefing with cu	/	/	/	NA/MSPO Audit
5.00 pm	End of day 2 audit	/	/	/	NA/MSPO Audit
Date / Time	Coverage of assessment / Activity / Site	RAR	DA	MZK	RMN
<b>Day 3: 8/06/2023 (Thursday)</b>					
8.30am – 1.00pm	<b>Site observation to Bukit Kretam</b> <ul style="list-style-type: none"> <li><b>P1, P2, P3, P4, P5, P6, P7</b></li> <li>Occupational safety &amp; health aspects, chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the estate</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>Land titles user rights</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application,</li> </ul>	/	/	/	NA/MSPO Audit



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	<p>IPM, New planting</p> <ul style="list-style-type: none"> <li>• Interview with workers, contractors etc.</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• GHG &amp; Metric template verification</li> </ul>				
12.00pm	Lunch/Break	/	/	/	<b>NA/MSPO Audit</b>
1.30pm – 3.30pm	Continue assessment at respective sites	/	/	/	<b>NA/MSPO Audit</b>
3.30-4.30pm	<p>Verification on outstanding issues for CU</p> <p>Auditor to inform auditee on the required document / records</p> <p>Continue Audit Team discussion and preparation of assessment findings.</p>				<b>NA/MSPO Audit</b>
4.30-5.00pm	<p>Discussion and acceptance on assessment findings with Management Representative.</p> <p>Closing meeting at CU</p>	/	/	/	<b>NA/MSPO Audit</b>

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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	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Public documents available in Bukit Kretam Sdn. Bhd. (BKSB) such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports and EIA. Management plans & continuous improvement plans and company policies also available publicly.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	Information requests and responses implemented based on Communication Procedure to handle communication for internal and external stakeholders. External Communication Form and Communication Record were used for records including authority visits books. During interview with internal and external stakeholders found that they were aware of the procedure consultation and communication related to their operation.
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	The records of requests as mentioned in indicator 1.1.2, had been logged in the Communication Record were used for records including authority visits books. As at todate audit, there is no information had been requested.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	The consultation and communication procedures were established and available at BKSB. External and internal communication procedures developed by BKSB were followed at the audited sites. Consultation and communications procedures for BKSB CU were documented in the <i>Stakeholders Consultation Procedure – Group Level &amp; Estate Level</i> . This document was sighted during the audit. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which was kept in the office.

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Clause	Indicators	Comply Yes/No	Findings
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	The lists of stakeholders, internal and external, were prepared by both the CU and the company headquarters.
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	BKSB through their policy committed to develop an organizational culture that will exhibit the highest standard of ethical conduct among through the following: <ol style="list-style-type: none"> <li>1. Prohibit any forms of corruption, bribery and fraudulent use of funds and/or resources.</li> <li>2. Preserve books, records and accounts that accurately and fairly reflect the nature of the business transactions and providing accurate and proper disclosure of information in accordance with applicable laws and regulations.</li> <li>3. Comply with all applicable laws, rules and regulations of the governments, regulatory authorities and public exchanges in jurisdictions within which company operates.</li> </ol>
	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, BKSB also has a Vendor CODE of Conduct and Business Ethics which has been developed to outline the standards of behaviour required by BKSB which includes expectation to uphold human rights. The COBC applies to all its suppliers, consultants, agents, contractor's/service providers who have direct dealings with the BKSB.

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

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	Bukit Kretam Sdn. Bhd. (BKSB) continued to comply with the legal requirements as per indicator. Compliance with each applicable law and regulation was captured in a Legal Register and monitored by the Estate Manager.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	BKSB has identified and documented their legal register with written information on legal requirements applicable to their operation. The record titled " <i>List of legal register – Estate</i> ". The acts and its regulations were evaluated for compliance annually.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	The perimeter boundary of the estate was visibly maintained by erecting pegs along the boundary. During the site review, the physical markers were visibly maintained at Bukit Kretam Sdn Bhd, especially the ones that are adjacent to other private estate.

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Clause	Indicators	Comply Yes/No	Findings
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties is maintained by BKSB in the stakeholder list latest updated in May 2023.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	As of to date in BKSB being a small grower, there is no Contractor/ contract involved in all works. All work is done by themselves. Their foreign workers also were employed directly by the CU, not through Recruitment agencies as the workers applied for themselves. Thus, this indicator is not applicable
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	As BKSB is a small grower, there is no Contractor/ contract involved in all works. All work is done by themselves. Their foreign workers also were employed directly by the CU, not through Recruitment agencies as the workers applied for themselves. Thus, this indicator is not applicable.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins.</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul>	NA	There is no mill involved in this small grower certification. Thus, this indicator is not applicable.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	NA	There is no mill involved in this small grower certification. Thus, this indicator is not applicable.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	BKSB continued to achieve long term economic and financial viability through documented management plan projected to year 2026. A business plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2023 to 2026 had been prepared for both estates and made available to the auditors.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Replanting program for each estate was made available for review during the audit.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	<p>The Management Review Meeting (MRM) was conducted after internal audit. The MRM was carried out in May 2023 and attended by all the estates management and sustainability team from HSP. It was chaired by Estate Manager. Among the management review were discussed are:</p> <ol style="list-style-type: none"> <li>1. Follow up actions from earlier MRM</li> <li>2. Sustainability and adequacy of all SOPs</li> <li>3. Sustainable Agriculture Policy</li> <li>4. Results of internal audits</li> <li>5. Changes In legal requirement of any compliance</li> <li>6. Changes that could affect RSPO/MSPO/ISCC/SCCS management system</li> <li>7. Complaint's/ Customer (internal/external) feedback</li> <li>8. Accident &amp; injury</li> <li>9. Environmental quality</li> <li>10. Waste management</li> <li>11. Energy usage performance</li> <li>12. Status of corrective actions</li> <li>13. Recommendations for improvement</li> <li>14. Improvement of the effectiveness</li> <li>15. Resources needed</li> </ol>
3.2 The unit of certification regularly monitors	3.2.1 (C) The action plan for continuous improvement is implemented, based on	YES	<p>Unit of Certification has had several continuous improvements, particularly on social aspect during year 2023 and 2024 as below:</p> <ol style="list-style-type: none"> <li>1) To build new 6 units of concrete labour quarters</li> <li>2) To build new Staff &amp; Cadet quarters</li> </ol>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	consideration of the main social and environmental impacts and opportunities of the unit of certification.		<p>3) To install Solar Lamp on main road (24 points)</p> <p>4) To propose to top management to allocate fund for estate surau</p> <p>5) To recommend current clinic helper to obtain estate hospital assistant license from JKNS</p> <p>Action plan for continuous improvement implemented by CU based on environmental impacts and opportunities as per sampled sighted as follows:</p> <ol style="list-style-type: none"> <li>1) harvesting – pruned oil palm fronds – impacts will results in soil erosion and breeding ground for rats- action taken - continue progressive pruning and proper stacking will be effects on soil degradation and erosion.</li> <li>2) Spraying – chemical spillages- impacts will created environmental and safety and health issues – action taken – to focus on providing training to ensure PIC handling chemical are competent.</li> <li>3) Schedule waste – impacts- leaking to ground and will impact the ground water – action taken – manage as per DOE requirement and further continuous training.</li> <li>4) Vehicles – impacts – release carbon – action taken -regular servicing, and daily checking to ensure engine vehicles in good condition.</li> </ol>
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template before the audit started. The auditor already verified and checked the data and figure given was tally with their database system.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	BKSB adopted the following documented manuals and documents as their standard operating procedures: <ol style="list-style-type: none"> <li>1. Safe and Standard Operating Procedures (SSOP)</li> <li>2. Agricultural Policy Oil Palm</li> </ol>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by BKSB are internal audits conducted by Hap Seng Plantations Sustainability Team. Internal audit covering MSPO & RSPO internal audit has conducted latest in May 2023. Results from the assessment internal audit recorded 2 Major NCR and 3 Minor NCR 1 OFI. BKSB has taken necessary action to close out the NCR. Audit report was established and maintained.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	On Estate, the estate manager and his subordinates were accountable to check on consistent implementation of procedures. The implementation of procedures was also carried out through: <ul style="list-style-type: none"> <li>• RSPO/MSPO internal audits by Hap Seng Plantations Sustainability Team, safety and health meetings</li> <li>• routine inspection (workplace inspection) by field staff.</li> <li>• Periodic reporting from estate</li> <li>• On site visits, inspections by estate manager</li> </ul>

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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> <li>Assessments by RSPO Audits</li> <li>Consultation with RSPO team &amp; management.</li> </ul> <p>The BKSB has managed and monitored foreign workers' status compliance against the RSPO requirements such as legality of the workers, appropriate license, employment contract, insurance and wages. Suppliers/Vendors compliance with BKSB 'Code of Conduct and Business Ethics Policy was also monitored.</p>
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There was no new planting in BKSB. Environmental Impact Assessment (EIA) and Social Impact Assessment (SIA) were conducted internally considering activities associated to estate operations. Thus, this indicator is not applicable.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	For BKSB, the SIA and EIA reports separated. Social impact assessment management action plans and continuous improvement plans were guided and approached by MPOCC SIA Guidelines. Stated in the procedure that social impact assessment will be done every 5 years and stakeholders meeting and stakeholder list will be updated/done at least once a year. Social impact assessment was prepared by the Sustainability Department in January 2019. The latest review was carried out in March 2023. The assessment is based on consultation with stakeholders of which the main objective is for information collection for both social and environmental issues.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	The social management action plans are being reviewed and updated on an annual basis at BKSB. This takes into account inputs from external stakeholder meetings (Group Level) and internal stakeholder meetings called JCC (Estate Level). Social aspects identified such as access and use right, economics livelihood and working conditions, subsistence activities/amenities, human rights, cultural and religious values, medical and health facilities, education facilities and operational activities. The SIA review process had included stakeholders' consultation with regards to social issues. The reviews done involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighboring estates, local communities, suppliers and contractors.
3.5 A system for managing human resources is in	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and	YES	BKSB has developed employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented 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

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Clause	Indicators	Comply Yes/No	Findings
place.	made available to the workers and their representatives where applicable.		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 borne by the estate management.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	For local workers, application forms, employment interview assessment forms, medical check-up reports and employment contracts were sighted for newly recruited employees. For foreign workers, recruitment is based on walk in process. The records include copies of passports, work permits, personal file and medical report was maintained of all appoints and processes leading to the appointments.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	The Occupational Safety and Health Policy was established and signed by the <i>Executive Director</i> . Therein the policy emphasized strict compliance with all laws /regulations of OSHA 1994 along with its relevant regulations. The policy had been communicated to all levels of the organization through briefings and also displayed prominently in <i>Bahasa Malaysia and English</i> on notice boards at estate office and muster ground. All operations had been risk assessed to identify H&S issues. Mitigation plans and procedures were documented in the HIRARC document and implemented. Based on the risk assessment done in accordance with DOSH Hazard Identification, Risk Assessment and Risk Control (HIRARC) Guidelines 2008. The BKSB has conducted assessment on health and safety issues in their operation and documented in the HIRARC register. The HIRARC register was reviewed at minimum once a year and during accident occur or change in the operation.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people are monitored.	YES	The effectiveness of the HIRARC is monitored and ensured through checklist and training that are conducted by BKSB in each of the operations. It was sighted during the site visits and documents reviews that the sampled HIRARC were in place. Occupational health and safety management plan for estate had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2022 and 2023 were acceptable. The assessment enables further appropriate actions, based on evaluation on existing control measures and exposure for all chemicals by CHRA.
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,	YES	BKSB's Training Schedule for 2023 and Training Matrix for 2023 were sighted by the auditor. Dates of training for 2023 were also presented. Formal training programs for 2023 covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs. Training was either conducted internally by its own manager or by a sustainability team from Hap Seng Plantation.



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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	and which includes assessments of training.		
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Not applicable because there are no personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at BKSB.

**SUPPLY CHAIN REQUIREMENTS FOR MILLS – NOT APPLICABLE**

<b>Ref. in RSPO SCCS</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	NA	Not applicable. BKSB didn't have other mills or estates within its company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.2	<p>Mass balance Module</p> <p>A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3<sup>rd</sup> party certified supply base.</p>	NA	Not applicable. BKSB didn't have other mills or estates within its company.
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	NA	Not applicable. BKSB didn't have other mills or estates within its company.
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	NA	Not applicable. BKSB didn't have other mills or estates within its company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</li> </ul>	NA	Not applicable. BKSB didn't have other mills or estates within its company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>• Effectively implements and maintains the standard requirements within its organisation.</li> <li>• Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</li> </ul>	NA	Not applicable. BKSB didn't have other mills or estates within its company.

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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>	NA	Not applicable. BKSB didn't have other mills or estates within its company.

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

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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>	NA	<p>Not applicable. BKSB didn't have other mills or estates within its company.</p>

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<b>Ref. in RSPO SCCS</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	NA	Not applicable. BKSB didn't have other mills or estates within its company.
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.	NA	Not applicable. BKSB didn't have other mills or estates within its company.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	NA	Not applicable. BKSB didn't have other mills or estates within its company.
	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.	NA	Not applicable. BKSB didn't have other mills or estates within its company.
	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.	NA	Not applicable. BKSB didn't have other mills or estates within its company.
	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	NA	Not applicable. BKSB didn't have other mills or estates within its company.



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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>		
3.8.13	<p>Extraction rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	NA	Not applicable. BKSB didn't have other mills or estates within its company.
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	NA	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	NA	Not applicable. BKSB didn't have other mills or estates within its company.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date 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>	NA	Not applicable. BKSB didn't have other mills or estates within its company.
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>	NA	Not applicable. BKSB didn't have other mills or estates within its company.

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**Principle 4: Respect community and human rights and deliver benefits**

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	A Human Rights policy was made available at BKSB. There is also a Sustainable Agriculture Policy signed by the Managing Director containing the clause prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staff and workers during morning muster and training sessions. External stakeholders were also briefed on the BKSB's Human Rights and Equal Opportunity Policies during the JCC meeting in March 2023. Consultation with sampled grocery shop contractors, suppliers and neighboring estate by the auditor confirmed the formers' understanding of BKSB's Human Rights Policy and prohibiting retaliation against Human Rights Defenders.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As at time of audit, it was confirmed that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. No records of violence or use any form of harassment in BKSB's operations were found.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	BKSB had developed Grievance Procedures for External stakeholders and Internal Stakeholders (Workers and Staff) respectively to handle grievances and complaints. A procedure titled 'Procedure for reporting complaints and grievances ( <i>Prosedur Melapor Aduan dan Permasalahan</i> )' was also available. A procedure named " <u>Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)</u> ", to protect the complainants was also presented.
	4.2.2 Procedures are in place to ensure that the system is	YES	Based on interviews with stakeholders, it was found that the system was understood by the affected parties. The procedure for complaint/grievance resolution was explained to all workers and external

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Clause	Indicators	Comply Yes/No	Findings
	understood by the affected parties, including by illiterate parties.		stakeholders through management/workers/stakeholders meeting.
	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	BKSB had developed Grievance Procedures for External stakeholders and Internal Stakeholders (Workers and Staff) respectively to handle grievances and complaints and keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcomes for every grievance. A procedure titled 'Procedure for reporting complaints and grievances ( <i>Prosedur Melapor Aduan dan Permasalahan</i> )' was also available. A procedure named " <i>Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)</i> ", to protect the complainants was also presented.
	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 BKSB in resolving disputes and grievances exists in the procedure called ' <i>Prosedur Melapor Aduan dan Permasalahan</i> ' and 'Grievances Procedure – Appendix 1' for staffs and workers, <i>Stakeholders Consultation Procedure – Group Level &amp; Estate Level, dated 4/1/2021</i> . BKSB has its own Internal Complaint Form/Book and External Communication/Complaint Form/Book available. The Internal Complaint Books are mostly for employees to lodge complaint pertaining to their houses. The external stakeholder complaint record/book reviewed did not show any complaints against the CU. The Grievance Procedure had included the option for complainant/aggrieved party to access to independent legal and technical advice, choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	There was only one (1) local community located nearby BKSB estate. The CU has made CSR contributions to the Kampung in the form of Backhoe works to clear land for house construction and Village Road Repair and monetary contributions to SK Sri Ganda for MSSS and PIBG and for Police a contribution for Sports Day. These CSR contributions were based on the results of consultation with the local community and other external stakeholders.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their	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	YES	The right to use the land at the CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified during the audit. At BKSB, the land was previously owned by a group of smallholders with a total of 17 lots. Verified copies of the land titles showed that the ownership of the Lots was transferred to BKSB 1986. There were clear land ownership documents available for review. The original copies of the documents were kept by BKSB main office. Copies of land titles for BKSB were available for verification. The BKSB estate is under the jurisdiction of Kinabatangan District. Review of the documents confirmed the terms

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Clause	Indicators	Comply Yes/No	Findings
free, prior and informed consent.	history of land tenure and/or the actual legal or customary use of the land are available.		and condition of the land for cultivation of agricultural crops of economic value had been complied with.
	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 BKSB since 9/9/1986. The audit team had confirmed that there were no land issues related to previous owners. There was no FPIC issue between BKSB and local community because the land is now legitimately owned by BKSB since 1986.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status	YES	

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	of their land at the expiry of the unit of certification's title, concession or lease on the land.		
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	Maps of BKSB Estate i.e. legitimate land owned by BKSB titled 'Boundary Map of Bukit Kretam (BKSB) was available and presented.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	This requirement in this indicator does not apply to BKSB.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	This requirement in this indicator does not apply to BKSB.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	This requirement in this indicator does not apply to BKSB.
4.5 No new plantings are established on local peoples' land	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 BKSB and land title, there were no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by BKSB since 9/9/1986. The audit team had also confirmed that there were no land issues related to previous owners.

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Clause	Indicators	Comply Yes/No	Findings
<p>where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>	<p>4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 9/9/1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.</p>
	<p>4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and neighboring estate.</p>
	<p>4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 9/9/1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and neighboring estate.</p>

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Clause	Indicators	Comply Yes/No	Findings
	<p>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.</p>		
	<p>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.</p>	<p align="center">YES</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and neighboring estate.</p>
	<p>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.</p>	<p align="center">YES</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 9/9/1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, and neighboring estate.</p>
	<p>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.</p>	<p align="center">YES</p>	<p>There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area includes estate as per stated in the land title.</p>



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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the HQ BKSB. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. At the time of audit, there was no land and user rights issues at BKSB CU.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the ' <i>Prosedur Melapor Aduan dan Permasalahan - Pihak Berkepentingan Luaran dan Dalaman</i> '/ SOP – Land Dispute Management, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with local community and External stakeholders.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	Not applicable since BKSB CU is a Small Grower.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	At the time of audit, there was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties at BKSB CU.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management ". In accordance with the SOP – Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the BKSB HQ. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. At the time of audit, there was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties at BKSB CU.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	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.
	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 BKSB since 9/9/1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable 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	YES	Land conflict is not present in the area of the unit of certification. The audit team has also interviewed relevant stakeholders such as the as reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by BKSB since 9/9/1986. All the related documentation regarding the land acquisition was kept in BKSB HQ Office and the copy in the estate was verified by the auditor.

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Clause	Indicators	Comply Yes/No	Findings
	through appropriate conflict resolution mechanisms.		
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs. (Indicators 4.4.2, 4.4.3 and 4.4.4).	YES	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	YES	There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land dispute at BKSB.

## RSPO PUBLIC SUMMARY

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

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	NA	Not Applicable since this Assessment is for single unit certification and a small grower. No Mill is included. There are no smallholders as BKSB's stakeholder.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	NA	Not Applicable since this Assessment is for single unit certification and a small grower. No Mill is included. There are no smallholders as BKSB's stakeholder.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	NA	Not Applicable since this Assessment is for single unit certification and a small grower. No Mill is included. There are no smallholders as BKSB's stakeholder.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	YES	This Assessment is for single unit certification and a small grower. No Mill is included. There are no smallholders as BKSB's stakeholder.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	This Assessment is for Small Grower and no contractor was appointed since all work has been done internally due to money restrictions.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	This Assessment is for single unit certification and a small grower. No Mill is included.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis.	YES	Weighing Equipment in Bukit Kretam has been calibrated on a yearly basis using Metrology Corporation Malaysia Sdn Bhd last March 2023.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	NA	Not Applicable since this Assessment is for Small Grower. There are no smallholders as BKSB's stakeholders.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	NA	Not Applicable since this Assessment is for Small Grower. There are no smallholders as BKSB's stakeholder.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	NA	Not Applicable since this Assessment is for Small Grower. There are no smallholders as BKSB's stakeholder.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	NA	Not Applicable since this Assessment is for Small Grower. There are no smallholders as BKSB's stakeholder.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	NA	Not Applicable since this Assessment is for Small Grower. There are no smallholders as BKSB's stakeholder.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	NA	Not Applicable since this Assessment is for Small Grower. There are no smallholders as BKSB's stakeholder.

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Clause	Indicators	Comply Yes/No	Findings
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	NA	Not Applicable since this Assessment is for Small Grower. There are no smallholders as BKSB's stakeholder.

### **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	BKSB implemented Sustainability Agriculture Policy statement signed by Executive Director. The policy was be guided by the commitments spelt out in the para 3.2 under respect human right were stated promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of race, nationality, religion, or gender, and practice no contract substitution. BKSB according to the statement, also will facilitate opportunities for advancement for their employees, especially women by removing barriers to progress and respecting reproductive and maternal rights. The sustainability policy and equal opportunity policy was communicated through the morning muster briefing to all workers. The policy was placed publicly in the notice board at housing area and office. It is also being explained during the induction course for the newly arrived workers.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Through document reviewed on the list of employees found that the composition of workers consisted of local, foreign workers, male and female workers. Interview conducted with the sampled female and male workers from different nationalities confirmed that no discrimination was happened. Overtime was given to all the workers without any prejudice based on caste, gender, race and nationalities. They are allowed to transfer workstation by getting approval from management if they felt unfit on the work assigned. In addition, there is also no evidence of payment of recruitment fees by migrant workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness	YES	BKSB has developed SOP to explain the procedure of recruitment of local and foreign workers. The procedures provide clear flowcharts from recruitment, retirement until termination. Review of the sampled workers files sampled during this audit demonstrated that medical fitness is one of the elements for job selection.

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Clause	Indicators	Comply Yes/No	Findings
	necessary for the jobs available.		
	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	Based on interview held with representatives of Gender Committee members and sampled female workers, pregnancy tests are not conducted on discriminatory manner and health screenings are conducted only when legally mandated (when handling chemicals).
	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.	NO	Gender committee was established in the BKSB. Meeting was conducted and seen the last meeting minutes in March 2023. Among the input discussion in the minutes are complaint and grievance, raise awareness, identify and address issues of concern. There was no issue related to sexual harassment or violence reported as seen in the meeting minute. Interview with the Chairman of the committee confirmed the chairman was willingness to carrying their duties and understood of their roles. In addition, confirmed that no case of sexual harassment and violence reported. However, the gender committee in BKSB was not in place specifically on opportunities and improvements for women. Based on latest minutes meeting, 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. Therefore, Major NCR DA 01 2023 was raised.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	BKSB implemented Sustainability Agriculture Policy statement signed by Executive Director. The policy was guided by the commitments spelt out in the para 3.2 under respect human right were stated promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination. The Policy identifies under-represented groups where they are encouraged to apply for training and employment opportunities with the company, and that where possible, special training will be provided for such groups to prepare them to compete on equal terms for jobs and promotion. Comparisons were made of sampled employment contracts and payslips of harvesters from Philippines and harvesters from Indonesia. Evidence is available that sampled workers receive equal pay for equal work.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are	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	The employment contract is in accordance with Sabah Labor Ordinance Cap.67. Both local and foreign employment adopt the same contract. As Sabah State has not recognized the Malaysian National Union for Plantation Workers, no collective agreements are in place. At the estates, the piece rate pricing is published on notice board. Sample of workers' employment contract were reviewed to confirm contracts are in Bahasa Malaysia. Bahasa Malaysia language is deemed appropriate and sufficient as generally the workers of the certified units are either local, Indonesian or Philippines who understand Bahasa Malaysia. Furthermore, as stated in the employment contract, it is the

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Clause	Indicators	Comply Yes/No	Findings
sufficient to provide decent living wages (DLW).			responsibility of the company to explain the terms of employment and the company regulations before the workers sign the contracts. In general, the workers understood the basic employment terms. The documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts.
	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.	NO	<p>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are following the Sabah Labour Ordinance.</p> <p>Working hours are 8 hours. From Monday to Saturday and Sunday (Rest Day). Total monthly working hours are 208 hours. There was none that has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of over time well distributed. Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Sample of payslip checked during low crop, peak crop and normal crop season as per evidence in the indicator 6.2.1. Employment contracts and related documents detailing payments and conditions of employment such as deductions, holiday entitlement and payment of wages was not compliance with national legal requirements. Hence, Major NCR DA 02 2023 was raised.</p>
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	YES	<p>The employment contract is drafted according to the Sabah Labor Ordinance Cap.67. Both local and foreign employment adopt the same contract. As Sabah State has not recognized the Malaysian National Union for Plantation Workers, no collective agreements are in place. At the estates, the piece rate pricing is published on notice board. There is evidence of legal compliance as per contract agreement such as regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>The working hours as per contract agreement were, working hours at 48 hours per week. For overtime, it has been mutually agreed upon between the management and workers and met the legal requirements. Overtime will be offered when there is additional job and no discrimination observed.</p>



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Clause	Indicators	Comply Yes/No	Findings
	<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.</p>	YES	<p>Evidence is available that the BKSB provided adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to its employees in accordance with national standards. Houses are provided rent free. Workers quarters was conducted weekly by the Staff in charge and using the Housing Inspection Report. Any issues found during the inspection were noted down in the checklist and action will be taken accordingly.</p> <p>During the workers quarters inspection at BKSB, the cleanliness and up-keeping of the housing compound and workers' house are found satisfactory. The houses were all in good conditions, and each house has between 2 – 3 bedrooms. Among the facilities provided are creche ayah, HUMANA school, clinic where medical treatment and facilities are provided for free, sundry shops selling daily necessities such as rice, flour, sugar, cooking oil, etc. The workers' housing areas also have a community hall, a football field, and badminton/volleyball court. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner.</p> <p>All houses have constant water supply and electricity which are provided free of charge for water and RM5 charged for electricity. Even if the water and electricity supply is not continuous daily, this is not seen as an inconvenience because each house has its own water storage tank. The water catchment for BKSB was treated for drinking water and supplied to all workers' quarters. Water quality has been monitored by a third party. Based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.</p>
	<p>6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	YES	<p>The management ensured access to adequate, sufficient and affordable food by providing a canteen and sundry shop facility to workers within the estate area. Based on site inspection at sundry shop/canteen, the price of the goods and foods was displayed. Monitoring of the prices of the goods and foods was carried out by the management.</p>
	<p>6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in</p>	YES	<p>BKSB has followed the Sabah Labour Ordinance which is payment of the wages following the Minimum Wages Order 2022. As per current situation in Malaysia, all workers in BKSB have been paid by following the Minimum Wages Order 2022. Prevailing wages per months calculations based on DLW guidelines approached. The total per months for Local Workers is RM 3,068.61 and for Migrant Workers RM 2,792.36.</p>

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Clause	Indicators	Comply Yes/No	Findings
	<p>place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> <li>• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.</li> <li>• The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation</li> </ul> <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	<p>6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>YES</p>	<p>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.1 above. No casual, temporary and day labour employed within BKSB. .</p>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	The published statement recognizing freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) was available in the Sustainability Agriculture Policy Statement signed by Executive Director and was publicly available on the notice board. The policy was explained to all workers during morning muster and demonstrably implemented in the Workers Representative Committee (JCC). The JCC implemented for the employees to speak freely, and the meeting will be conducted once a year.
	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 were no official trade unions in the estate, workers had appointed their own representatives to sit on the Workers Representative Committee known as Joint Consultative Committee (JCC). The JCC is comprised of workers and management representatives. The latest minutes of the JCC meetings were documented, sighted and verified. All issues highlighted in the minutes of meetings between the unit of certification with workers' representatives were not fully addressed.
	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	Interviewed with the workers' representatives in BKSB confirmed that the management did not interfere with the formation of the association. All of them were elected freely by the workers via election.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	The formal policy for the protection of children, including prohibition of child labour and remediation was in place under the Sustainability Agriculture Policy Statement signed by Executive Director. The policy emphasized that the company is committed to ensuring all workers and children's safety are protected and all employment are within the minimum age limit and in compliance with national regulations and state ordinance. The policy was communicated directly during various meetings with both internal and external stakeholders of BKSB.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	The records of employment documentation verified including the Employee Master Lists and sample personal particulars confirmed that minimum age requirements of above 18 years old met for all the workers employed in the estate.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Based on documents sighted, interviews and observations, there was no evidence that the BKSB employ anyone below the age of 18 years. This was verified by examining the master lists of the estate where details of the workers' particulars and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	The company has a no child labour policy which is displayed on the company's noticeboards. Interview with sampled workers indicates the policy has been communicated to them at their morning musters. Also, during stakeholders' consultations with the communities and neighboring plantations, they confirmed the policy has been shared with them and communicated to their understanding. In addition, BKSB have issued a Sustainability Policy Pledge by Vendor that is to be signed by all contractors, suppliers and vendors. The Pledge states that the undersigned has read, understood and will comply to The Vendor Code of Business Conduct and BKSB Sustainability Policy.
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 policy to prevent sexual and all other forms of harassment and violence was implemented under Sustainability Agriculture Policy statement and Sexual Harassment, Violence and Abuse Policy statement, signed by Executive Director. The policy is displayed on notice boards at the estate offices. As at todate, there is no evidence or acts that contradict this policy were observed as interviewed the women workers/staffs and representative from gender committee during the audit in the estate.
	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	BKSB has developed a Policy on Reproductive Rights where provides protection of reproductive rights of all workers. The Labour Standard specifies that the company recognizes the rights of employees to reproduction and reproductive health, including the right to make decisions on reproduction. Based on interviews with the sampled workers, there is evidence that this standard is being implemented where female workers are entitled to 60 days paid maternity leave, and pregnant women are given light work to do.
	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	Assessment for new mothers (with infants under 24 months) was conducted by each operating unit medical/hospital assistants. Management has assessed the needs of new mothers and consultation with the new mothers. The Gender Committee has supported the assessment. Based on verification of the assessment report and interviews, there were no specific needs reported as the babies are taken care of in the nurseries. The actions are taken to address the needs that have been identified. Adequate space and paid breaks were provided to enable mothers with infants 24 months or younger to breastfeed or express and store breast milk with privacy.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is	YES	BKSB has established Grievances Procedure. The procedure outlines respecting anonymity and protects complainants where requested. In addition, Human Right Defender under Sustainability Agriculture Policy was established as guideline and

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Clause	Indicators	Comply Yes/No	Findings
	established, implemented and communicated to all levels of the workforce.		procedure actions to be taken if any case reported. The timeline for each of the stages was outlined in the procedure. A complaint panel was established to handle any complaint in the estate. The grievance procedure was communicated during morning muster and gender committee meeting.
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"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	YES	Based on interviews with the sampled workers, they keep their passports in the estate office with their concern and approval. There is no contract substitution reported as most of them are dependents of workers and they requested work by walk-in to the estate. Overtime was on a voluntary basis and payment was made accordingly. There is no restriction of movement as they are allowed to go out anytime. They have freedom to resign and no penalty on the termination of employment. In addition, 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	BKSB has established labour policy for foreign workers statement signed by the Executive Director. The policy mentioned that all foreign employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and a post-arrival programme will be conducted once arrive for three months. The estate maintained its specific procedure / flowchart for employment of foreign workers. The procedure has been implemented for any employment related to foreign workers. The company implemented no contractor substitution and no discrimination against the foreign workers. Besides, the company also comply with Minimum Wage Order Malaysia and provided orientation to the workers to brief them on the language, safety, regulations in Malaysia and culture. Decent housing was provided to the foreign workers.
6.7 The unit of certification ensures	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible	YES	Estate Manager were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Occupational Safety Health (OSH) Committee has been established together. The Manager subsequently assigned the duties of ESH

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Clause	Indicators	Comply Yes/No	Findings
that the working environment under its control is safe and without undue risk to health.	person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.		coordinator to the Assistant Manager for the downline implementation of ESH practices in the estate. All identified committees were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been reviewed during the conduct of audit.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	<p>Accident and Emergency procedure was available in the SSOP. Among of procedure of ERP Document, such as Accidents &amp; Dangerous Occurrences Notification, Physical Injury, Chemical Spillage, Fire Outbreak, Control and Prevention of COVID 19 Infection. ERP Teams &amp; ER Procedures were formed for all the identified incidences. The organization chart for the ERP team was established and displayed for information of the employees. Important telephone contact numbers were also provided therein.</p> <p>Site inspection at harvesting operation, spraying operation, general workers, chemical &amp; fertilizers store for the estate, noted on evidence that first aid kit is available at all works place with complete contents and no medication with expired date. The stock of first aid box is regularly check and refill, when necessary, via outsider pharmacy.</p> <p>Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury records were recorded using Lost Time Injury (LTI) board and monthly accident key performance indicator. A quarterly review of accident cases had been carried out during the quarterly OSH committee meeting.</p>
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	YES	<p>Records of PPE issued, and acknowledgement of receipt are maintained individually for all category of workers at BKSB. Sighted common PPE issued included face masks respirators, goggles, safety shoes, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat. All workers were provided with appropriate PPE where the cost is borne by the management. Interviews conducted during the site visit at the estate showed understanding and approval from the workers that the management bares the cost of all PPEs and the workers are entitled to valid PPE, the importance of using required PPE at all times during work and proper storage and disposal methods of PPE.</p> <p>Training and briefings on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered to. Training for employees is conducted from time to time based on needs through various methods such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, 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. 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.</p>
6.7.4 All workers are provided with medical	YES	Medical care and accident insurance is provided to all employees, both Local and Foreign	

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Clause	Indicators	Comply Yes/No	Findings
	care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.		workers under Employees' Social Security Act 1969 (Act 4). Sighted latest months' payment April 2023 made to SOCSO on Form 8A for foreign and local workers at the estate was available for reviewed.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury records were recorded using Lost Time Injury (LTI) board and monthly accident key performance indicator. A quarterly review of accident cases had been carried out during the quarterly OSH committee meeting. Form JKKP 8 for 2022 was submitted to DOSH timely in Jan 2023. Accident statistics were being maintained in a satisfactory manner and periodically reviewed.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. For bagworm control the program includes the planting of beneficial plants. Records of beneficial plants such as Cassia cobennensis, Tunera subulata and Antigonon Leptopus were available and showed to be extensively planted in the estate. The BKSB has also established a Beneficial Plant Garden where they have propagated and planted the beneficial plants extensively where pictures and records were available for verification. Evidence of program implementation can be demonstrated and available. Based on pest and disease monitoring, there is no pest attack since January – December 2022.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There were no species referenced in the Global Invasive Species database and CABI.org within the BKSB.
	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 gov. authorities.	YES	No record of using fire as pest control in the BKSB, verification by interview and site verification.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of pesticides applied is available in the Agricultural Policy Oil Palm, Section 5.0: Weeding Management and Section 8.0: Pest and Diseases. The use of pesticide is specific to the targeted pest, weed and disease. Justification takes consideration to minimize effect on non-target species.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	BKSB had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, cost books. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	Based on chemical register in May 2023 and site visit, no prophylactic use of pesticides used in both estates.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	Not applicable because BKSB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	Not applicable because BKSB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	
	7.2.5b Why there is no other alternative which can be used.	YES	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	



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Clause	Indicators	Comply Yes/No	Findings
	7.2.5d What is the process to limit the negative impacts of the application.	YES	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance 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>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149).</p> <ul style="list-style-type: none"> <li>a) Records of purchase, storage and use were maintained.</li> <li>b) All store buildings were equipped with exhaust fans with the door was secured.</li> <li>c) Only authorized personnel are assigned to handle the chemicals.</li> <li>d) All the chemicals were segregated in the store accordingly.</li> <li>e) Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures.</li> </ul>
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	<p>In BKSB, 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 MSDS. The chemical and fertiliser stores (with cemented floors and roofing) are locked &amp; handled only by authorised personnel i.e. storekeeper. The stores in the estate were ventilated with no chemical smell during the inspection. All the chemicals were arranged/segregated according to the type. The fertilizers were well stacked. The stores are equipped with showers, wash area and a PPE storage area. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available at the estate. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. All information regarding the chemicals and its usage, hazards, trade and generic names were available in both English &amp; in most cases, Bahasa Malaysia and understood by workers. The SDS for concerned pesticides used, were available in both English and in most cases, Bahasa Malaysia. Relevant information of the agrochemical used by estate workers, largely</p>

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Clause	Indicators	Comply Yes/No	Findings
			via morning muster and the use of Safety Pictorial poster, were conveyed and understood by all workers interviewed during the spraying activities and fertilizer application. It was also verified in the training records that training in chemical handling especially to the sprayers, had been conducted with the aim of disseminating the correct information and ensuring understanding regarding the usage and hazards of the agrochemicals.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	It was found that scheduled waste generated at the Estate stored not more than 180 days. The last disposal was made in Jan 2023 and all the disposal was made by DOE licensed contractor. The inventory (5 <sup>th</sup> Schedule) was up to date and tally with the physical stock at the storage area. Verified 5 <sup>th</sup> Schedule was updated and reported using online consignment note was carried out accordingly. Latest submission to DOE in May 2023.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying was not practiced by BKSB. There was no evidence to show that aerial spraying was carried out. During site visit at Block H7 was confirmed only circle spraying and selective spraying was practices at CU.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	All workers involved with pesticides undergone the medical surveillance at Klinik Ung Lahad Datu. From the result, all workers fit to handle chemical. It was found 3 employees has presence of underlying condition related to high blood pressure, elevated liver enzymes, and anaemia. Action taken by CU by monitoring BP and conducted blood test in March 2023. The results were negative and workers in good condition and healthy
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	Pregnant and breast-feeding women are not allowed to work with pesticides and hazardous chemicals in BKSB. There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in the estate. 6 females interviewed were aware that pregnant and breast-feeding women should not handle chemicals. During the monthly check-up by the VMO, pregnancy status is remarked and if of any cases the worker will be withdrawn from spraying duties.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Domestic waste from the housing area is well managed and all domestic wastes are disposed at landfill sited in the estate area. Sighted the there is no practice of open fires within BKSB. Monitoring is done weekly in both domestic waste collection areas and in landfill sites.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
socially responsible manner.	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Standard Operating Procedure Scheduled Waste Disposal has been established. The documentation and identification of all waste products such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material. Disposal of empty pesticide containers 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 visit at BKSB, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at BKSB have been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	The BKSB continued to use and implement SOP for each of the processes. A brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP; Safe and Standard Operating Procedures (SSOP) and, Agricultural Policy Oil Palm. BKSB operations were guided through the manuals and SOP. The procedures as documented in the Agricultural Policy Oil Palm were disseminated to the staff/workers through morning briefings and training. The documents included all operations in the estate from seedlings in nursery to planting of young palms and plantation upkeep. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment. BKSB continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of soil fertility is guided by the organization SOPs. The process of the fertilizer application follows a flow chart Fertilizer application, which was of utmost importance for maintenance of soil commencing from an agronomist/PA visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire requirement in the field identified.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Periodic tissue and soil sampling were carried out in the estate to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided an indication of soil health and monitors the changes in the organic carbon and total nitrogen. Leaf and soil nutrient analysis are commonly used in the

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
			diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conducted for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years' intervals.
	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	BKSB had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field. No EFB application was applied in FY 2022 and 2023.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards and field cost book. Records of programs and applications of fertilisers were made available to auditors. Review of the records revealed that the actual fertilizers applied in FY2023 were in line with the program.
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in BKSB. As per the Soil Maps, the soil series were Gumpal, Kinabatangan, Kretam, Rumidi and Weston.
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	No replanting until the year 2026 based on replanting program provided. Based on slope map dated in Jan 2020 prepared by HSP Agronomy Department, there was no steep terrain (greater than 25°) in BKSB.
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	Based on the audit findings, it was confirmed that there were no new planting or new development of areas at BKSB. Hence, there was no need for soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation was required.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	Based on the audit findings, it was confirmed that there were no new planting or new development of areas at BKSB. Hence, there was no need for soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation was required.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil	YES	There were no marginal and fragile soil in the BKSB.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
plans and operations.	management plan for best practices.		
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	BKSB had a management strategy for palm oil cultivation, taking into account the soil surveys and topographic information in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information was provided and reviewed by the auditors.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	Not applicable. Based on soil map dated 04/12/2018, prepared by HSP Agronomy Department and site visit, there was no peat soil in the BKSB.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	Not applicable. Based on soil map dated in Dec 2018, prepared by HSP Agronomy Department and site visit, there was no peat soil in the BKSB.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	Not applicable. Based on soil map dated Dec 2018, prepared by HSP Agronomy Department and site visit, there was no peat soil in the BKSB.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before	YES	

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Clause	Indicators	Comply Yes/No	Findings
	<p>reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
	<p>7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p>	YES	<p>Not applicable. Based on soil map dated Dec 2018, prepared by HSP Agronomy Department and site visit, there was no peat soil in the BKSB.</p>
	<p>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.</p>	YES	
7.8 Practices maintain the quality and	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 dated Feb 2023 is confined to only BKSB 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

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
availability of surface and groundwater.	sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:		utilize water at processing, domestic purposes and wastewater management. All of these aspects are included with monitoring, mitigation (if required), implementation and prevention or minimize pollution of these plan. Identified physical system in management of BKSB: <ul style="list-style-type: none"> <li>▪ Treated water quality standard</li> <li>▪ Baseline data for water quality and frequency quality standard</li> <li>▪ Contingency plans during dry season</li> <li>▪ Flow meter monitoring</li> </ul>
	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 BKSB does not restrict access to clean water or contribute to pollution of water used by communities. The continued availability of water sources and to avoid negative impacts on other users in the catchment or rivers, the BKSB carried out water samplings from downstream to upstream. Based on the water sampling report, 4 water sampling points were selected from Sg. Pinang and Sg. Intan. The water quality has been assessed by accredited laboratory, and based on the result, water quality monitoring is generally within Class IIB of NWQSM at all monitoring points.
	7.8.1b Workers have adequate access to clean water.	YES	As verified at BKSB facilities for workers and through interview with workers, all workers 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 accredited laboratory 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).	YES	The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. There are 2 riparian zones identified in the BKSB, there are Sg. Intan and Sg. Pinang. BKSB has enhance the awareness to protected, including maintaining and restoring appropriate riparian and other buffer zones through annual training programmed.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially BOD, is regularly monitored.	YES	Not applicable.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Not applicable.

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7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	Sighted "Fossil Fuel Management Plan" had been developed and reviewed in Jan 2023. The plan only focuses on diesel usage by FFB Transport and use of fertilizers, genset operation, and workers transportation. Sighted environmental impact and mitigation measure has been identified and documented accordingly. Consumption of diesel was monitored on monthly basis.																																																																			
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 Bukit Kretam Sdn. Bhd. had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends via email to RSPO and CC to auditor in June 2023. The input data FY2022 has been verified and checked. The input data as per below:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Unit</th> <th>Value</th> </tr> </thead> <tbody> <tr> <td>Oil Palm Planted On Mineral Soil</td> <td>Ha</td> <td>1288.59</td> </tr> <tr> <td>Oil Palm Planted On Peat</td> <td>Ha</td> <td>0.00</td> </tr> <tr> <td>Total Oil Palm Planted Area</td> <td>Ha</td> <td>1288.59</td> </tr> <tr> <td>Conservation Area (Forested)</td> <td>Ha</td> <td>0.00</td> </tr> <tr> <td>Conservation Area (Non-Forested)</td> <td>Ha</td> <td>0.00</td> </tr> <tr> <td>FFB Supplied To This Mill</td> <td>Mt</td> <td>15879.88</td> </tr> <tr> <td>FFB Produced By This Estate/Pantation</td> <td>Mt</td> <td>15879.88</td> </tr> <tr> <td>FFB Production Per Hectarage</td> <td>Mt/Ha</td> <td>12.32</td> </tr> </tbody> </table> <p>Plantation / field emission</p> <table border="1"> <thead> <tr> <th>ription</th> <th>Total emission (tCO2e)</th> <th>tCO2e/ha</th> <th>tCO2e/t FFB</th> <th>total</th> </tr> </thead> <tbody> <tr> <td>Land Conversion</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Crop Sequestration</td> <td>-12063.44</td> <td>-9.36</td> <td>-0.76</td> <td>-12063.44</td> </tr> <tr> <td>*CO2 Emissions from Fertiliser</td> <td>322.37</td> <td>0.25</td> <td>0.02</td> <td>322.37</td> </tr> <tr> <td>N2O Emissions from Peat</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>N2O Emissions from Fertiliser</td> <td>484.93</td> <td>0.38</td> <td>0.03</td> <td>484.93</td> </tr> <tr> <td>Fuel Consumption</td> <td>774.81</td> <td>0.60</td> <td>0.05</td> <td>774.81</td> </tr> <tr> <td>Peat Oxidation</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>	Description	Unit	Value	Oil Palm Planted On Mineral Soil	Ha	1288.59	Oil Palm Planted On Peat	Ha	0.00	Total Oil Palm Planted Area	Ha	1288.59	Conservation Area (Forested)	Ha	0.00	Conservation Area (Non-Forested)	Ha	0.00	FFB Supplied To This Mill	Mt	15879.88	FFB Produced By This Estate/Pantation	Mt	15879.88	FFB Production Per Hectarage	Mt/Ha	12.32	ription	Total emission (tCO2e)	tCO2e/ha	tCO2e/t FFB	total	Land Conversion	0	0	0	0	Crop Sequestration	-12063.44	-9.36	-0.76	-12063.44	*CO2 Emissions from Fertiliser	322.37	0.25	0.02	322.37	N2O Emissions from Peat	0.00	0.00	0.00	0.00	N2O Emissions from Fertiliser	484.93	0.38	0.03	484.93	Fuel Consumption	774.81	0.60	0.05	774.81	Peat Oxidation	0.00	0.00	0.00	0.00
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Clause	Indicators	Comply Yes/No	Findings				
			Sequestration in Conservation area	0.00	0.00	0.00	0.00
			<b>TOTAL</b>	<b>-10481.33</b>	<b>-8.13</b>	<b>-0.66</b>	<b>-10481.33</b>
			*Includes transport and manufacture emissions from mineral fertilizers and emissions from urea *This only includes N2O emissions from mineral fertiliser application and peat soil. The N2O emissions from organic fertiliser application is not included here and can only be displayed in the final summary.				
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditors has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Bukit Kretam Sdn. Bhd. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.				
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	The Environmental Impact Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N <sub>2</sub> O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place.				
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	During the site visit there was no new planting or replanting at BKSB.				
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Estate has established fire prevention and control measures as per procedure SSOP "Pelan Tindakan Menghadapi Kebakaran" sighted a training has been conducted by estate manager to employees and mandore in Feb 2023.				
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Engagement with adjacent stakeholders on fire during external stakeholders' consultation meeting.				
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land	YES	A historic Land Use Change Analysis (LUCA) analysis had been carried out for BKSB Estate with the report titled 'Land Use Change Analysis Review Report for Bukit Kretam Sdn Bhd' dated January 2020 presented. LUCA is a requirement for BKSB Estate because new planting was carried out after November 2005. The LUCA concluded that the Final Compensation Liability was nil, and no compensation was to be penalised on BKSB. This was because BKSB had carried out the new planting prior to BKSB becoming a member of the RSPO (membership started in February 2020). The initial RSPO membership was from February 2020 until Jan 2022 and renewal upon				

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
<p>(HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>	<p>clearing, in accordance with the RSPO LUCA guidance document.</p>		<p>expiry.</p>
	<p>7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:</p>	<p>YES</p>	<p>The “HCV-HCSA Assessment Report of BKSB” was made available to the auditor. It was noted that the assessment was completed in Jan 2019. The latest review was in March 2023. The HCV-HCSA report was reviewed/amended using the HCS Approach Toolkit Module 1, 2, 3 &amp; 4 Version 2.0. Noted that the results showed that there was no HCS forest identified in the estate. The assessment also found there was no identified RTE at Bukit Kretam Estate. Nevertheless, BKSB had identified the river buffer zone for Sg. Pinang and Sg Intan in the Estate as HVC 4 areas which are to be maintained and conserved (a total area of 6.20 ha). The Assessor had also verified that BKSB Estate was adjacent to Trusan Kinabatangan forest reserve and Kulamba Wildlife reserve. There was no new land clearing after 15 November 2018.</p>
	<p>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.</p>		
	<p>7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>		
	<p>7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider</p>	<p>YES</p>	<p>BKSB CU has established HCV action plan for BKSB titled “Management Action Plans and Continuous Action Plan’ in March 2023. The estate planned to maintain the riparian reserve by:</p> <ul style="list-style-type: none"> <li>• Prohibiting the cutting down of the tree at the area,</li> <li>• Prohibiting manuring and spraying operation at the riparian reserve area</li> <li>• Workers are constantly informed not to encroach into the riparian reserve and disturb the area</li> <li>• Periodic visit to the riparian reserve to monitor any illegal activities</li> </ul> <p>And also to maintain or enhance measures adjacent with Trusan Kinabatangan FR and Kulamba Wildlife Reserve by:</p> <ul style="list-style-type: none"> <li>• Prohibition workers entrance to this area</li> <li>• Signboard are erected at the boundary</li> <li>• Constantly briefed workers regarding RTE</li> <li>• Prohibition of logging at the estate boundary</li> </ul>

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Clause	Indicators	Comply Yes/No	Findings
	landscape level considerations (where these are identified).		<ul style="list-style-type: none"> <li>Prohibition of illegal hunting</li> </ul> Periodic monitoring in place. Training on HCV and RTE protection for internal and external stakeholders was planned and implemented.
	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	The only community located adjacent to BKSB estate is Kg Sri Ganda. Consultation with the Head of JKKK Kg Sri Ganda confirmed no land issues or FPIC between villagers and BKSB CU. Hence, 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 with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	Bukit Kretam CU continued to discourage any illegal or inappropriate hunting, fishing or collecting activities.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Bukit Kretam Sdn. Bhd. 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 Sg. Pinang and Sg Intan.
	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	YES	Not applicable since there is no new land clearing since 15 November 2018.

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Clause	Indicators	Comply Yes/No	Findings
	November 2018, the Remediation and Compensation Procedure (RaCP) applies.		

**RSPO Certifications Systems for P&C and RISS, Nov 2020 – NOT APPLICABLE**

Clause	Indicators	Comply Yes/No	Findings	
5.5.2 Time-bound plan  A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	NA	Not applicable. BKSB didn't have other mills or estates within its company.
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	NA	Not applicable.
	(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	NA	Not applicable.

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		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);		
	(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.	NA	Not applicable.
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	NA	Not applicable.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	NA	Not applicable.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO	NA	Not applicable.

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		P&C criterion 4.2;		
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	NA	Not applicable.
	(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,	NA	Not applicable.
		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		<ul style="list-style-type: none"> <li>A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;</li> </ul>		
		<ul style="list-style-type: none"> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>	NA	Not applicable.
		<ul style="list-style-type: none"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>	NA	Not applicable.
		<ul style="list-style-type: none"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection,</li> </ul>	NA	Not applicable.

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		assessing the risk of any non-compliance with the requirements.		
	(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.	NA	Not applicable.
	(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.	NA	Not applicable.

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<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators	NA	Not applicable.
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**ATTACHMENT 4**

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

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Root Cause &amp; Corrective Action Taken by the CU</b>	<b>Verification Statement by Auditors</b>
6.1.5 DA 01 2022	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 BKSB was not in place specifically on opportunities and improvements for women.</p> <p>Objective evidence: The gender committee in BKSB was not in place specifically on opportunities and improvements for women. Based on latest minutes meeting, there was no discussion about opportunities and improvements for women. Moreover, there was no dedicated budget provided to the committee to execute the opportunities and improvements for women.</p>	<p>The root cause: The PIC of Bukit Kretam did not understand the intend of RSPO requirement on gender committee opportunities and improvements for women.</p> <p>Correction: Gender committee has included 'non-working women' representative in committee meeting.</p> <p>Corrective action: Company Executive Director has verbally agreed to support the women committee in the estate especially 'non-working women' that want to start activities that can improve their family income. There will be funds allocated for women gender committee in the next Annual Budget.</p>	<p>The root cause has been accepted. Auditor has verified the evidence of minutes meeting submitted by Bukit Kretam. Noted on the appointment of non-working woman representative and the allocated budget by the Management for Gender committee activities and programs.</p> <p><b>Status: Closed</b></p>
DA 02 2023	Major	<p>Requirement: 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.</p> <p>Finding: Employment contracts and related documents detailing payments and conditions of employment such as deductions, holiday entitlement and payment of wages were not in compliance with national legal requirements.</p>	<p>The root cause:</p> <ul style="list-style-type: none"> <li>i) Workers' compensation on annual leave was not properly documented as there is no specific SOP has been developed for Vacation Leave application.</li> <li>ii) Lapse in monitoring permit expiration and lack of knowledge on legal requirement – Sec 113 that need the workers consent form.</li> <li>iii) As this is a small grower, there is no specific SOP on Payment of wages and PIC also did not understand of the legal requirements</li> </ul>	<p>The root cause accepted. Auditor has verified the evidence of SOP Vacation Leave application dated 1/07/2023 and evidence of training has been conducted to the workers on 3/7/23. The auditor also reviewed the evidence of JTK new permit, which is valid until July 2025, and letter of consent from workers for deduction. At the same time, the auditor has also sighted the evidence of the new SOP of Payment of Wages dated 1/7/23 and the training carried out on 12/7/23.</p>

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		<p>Objective evidence: Based on interview session with sampled workers and verification of pay slip March 2023, April 2023 and May 2023, found that:</p> <ol style="list-style-type: none"> <li>1) No evidence of annual leave payment been paid to the entitled worker – Section 104D Annual leave</li> <li>2) Salary deduction for electricity, estate club fund, petrol/parts and passport were implemented without approval from Labour Department and concerned letter from workers. The permit expired on 07/03/2023. – Section 113 Lawful deductions</li> <li>3) The salary in June 2023 was paid more than seven days after the closing account subjected late approval from top management – 108 Payment of wages</li> </ol>	<p>Correction:</p> <ol style="list-style-type: none"> <li>i) Establish the Standard Operating Procedure on workers Vacation Leave Application.</li> <li>ii) The estate has obtained workers consent to perform deduction from their salary. The estate has also received their latest Workers Deduction Permit from JTK.</li> <li>iii) The Estate developed the SOP of Payment of Wages for workers and the estate has ensured that the workers' wages were released before 7th day after account closing date. For July 2023, payday was on the 6th, while for August 2023, payday was done on the 5th.</li> </ol> <p>Corrective action:</p> <ol style="list-style-type: none"> <li>i) Briefed the established SOP to workers on 03.07.2023.</li> <li>ii) The workers have been briefed regarding Workers Deduction on 12.06.2023.</li> <li>iii) The SOP on Payment of Wages to Workers has been briefed to all estate personnel on 10.07.2023.</li> </ol>	<p><b>Status: Closed</b></p>
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**ATTACHMENT 5**

**STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED**

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Verification by Assessor</b>										
6.7.3  DA 01 2022	Major	<p>Finding: The unit of certification ineffective to ensure the working environment under its control is safe and without undue risk to health.</p> <p>Objective evidence: Site inspection at Lot 30 A7, sighted 2 harvesters did not use appropriate personal protective equipment (PPE) i.e. safety helmet and cotton gloves (as per endorsement in HIRARC) to cover all potentially hazardous harvesting operations. Furthermore, emergency eyewash and shower was not available at workshop area as per CHRA recommendation dated 04/07/2019.</p>	<p>Based on interview and site inspection (block H7), sighted sanitation facilities for those applying pesticides were available near to chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area. Clothing lockers are provided for mill and estate workers to change their street clothing to work clothing and vice versa at the end of their work shift.</p> <p>During site inspection estate workshop, most of the moving part and rotating machinery were installed with machine guarding and properly covered. The set of oxygen and acetylene cylinders in the workshop available with “flash back arrestors”. The emergency shower and PPE were provided free of charge for workers.</p> <p>Training and briefings on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered to. Training for employees is conducted from time to time based on needs through various methods such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, 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. 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</p> <p>These training records are maintained in a separate book and were sighted during the audit. Site visit made as follows;</p> <table border="1" data-bbox="1205 1077 1845 1244"> <thead> <tr> <th>Date</th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td>10/02/2023</td> <td>Spraying and PPE</td> </tr> <tr> <td>14/02/2023</td> <td>Manuring</td> </tr> <tr> <td>10/02/2023</td> <td>Chemical mixing &amp; triple rinsing</td> </tr> <tr> <td>23/02/2023</td> <td>Rat baiting</td> </tr> </tbody> </table> <p>Thus, previous NCR was satisfactory closed</p>	Date	Activities	10/02/2023	Spraying and PPE	14/02/2023	Manuring	10/02/2023	Chemical mixing & triple rinsing	23/02/2023	Rat baiting
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			<b>Status: Closed</b>
3.4.3 MAR 01 2022	Major	<p>Finding: Social and environmental management and monitoring plan is not reviewed and updated in a participatory way.</p> <p>Objective evidence: Based on SIA, management action plans and continuous improvement plans dated February 2022, there was several issues not update in the documents such as:</p> <ol style="list-style-type: none"> <li>1. Education facilities especially on primary school / HUMANA / CLC for Indonesians/Filipino children's aged 7-16 years old in BKSB estate.</li> <li>2. Health facilities i.e. Hospital Assistant / Estate Dresser in the estate. Currently estate used medical practitioner from Klinik Ung which is approximately 90-100km.</li> <li>3. Updating the status of providing mosque/surau which was updated on July 2021.</li> </ol>	<p>Based on previous findings highlighted was updated and rectified in the SIA Management Action Plan dated 25/03/2023:</p> <ol style="list-style-type: none"> <li>1) Estate School: BKSB has entered an agreement with HUMANA Child Society Sabah on 17/03/2023. The HUMANA has been operational since 10/04/2023. HUMANA has assigned Mrs. Kasmirah Binti Yahya as teacher.</li> <li>2) Medical Treatment: Private clinic (Clinic Ung) visiting BKSB for medical checkup. The clinic also provides OHD medical practitioner for checking spraying and manuring workers. A clinic helper has been employed as clinic helper and planned to send her to sit for EHA exam after 2 years of services as per JKNS requirements.</li> <li>3) Place of Worship: Currently there are no mosque/surau available. The estate has submitted surau proposal to top management in February 2023. The construction of surau has been verbally approved by the director. The estate planned to allocate budget for surau in 2024 annual budget. The construction of the surau is expected to commence in 2024/2025.</li> </ol> <p><b>Status: Closed</b></p>
6.2.3 MAR 02 2022	Major	<p>Finding: There was contravene with legal labour requirement for Minimum Wages Order Amendment 2020 for several workers sampled in BKSB.</p> <p>Objective evidence: Minimum wages for several workers i.e. employee no 0889P (Jan 2022), 0759P (Jan 2021), 0207P (Jan 2021, July 2021, Dec 2021, Mac 2022), 0477P (Dec 2021, Jan 2022, Mac 2022) is not according to the Minimum Wages Order (Amendment 2020) which below RM 1,100 without justification from management.</p>	<p>Based on interview sampled female workers (especially mother), estate dresser, and verification of payslip, confirmed that workers with medical certificates are given a paid medical leave, and female workers are given 2 months paid maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit.</p> <p>Samples of payslips (March 2023, April 2023 and May 2023) were sighted and verified that all sampled workers as per evidence under indicator 6.2.1 are being paid in accordance with the requirements stipulated under the Minimum Wages Order 2022 which is RM1,500. The unproductive or daily target was not achieved by workers, the estate management already carried out mechanism such as substitute the work and counselling to the workers. The managements always ensure that workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW). Therefore, previous Major NCR MAR 02 2023 was satisfactory to close.</p> <p><b>Status: Closed</b></p>
7.4.4	Minor	Finding: Records of fertiliser inputs was inadequate.	Sighted the latest agronomy and fertilizer recommendation report dated

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DA 02 2022		Objective evidence: There is no agronomic report or breakdown on fertilizer recommendations FY2022 i.e. fertilizer dosage, type of fertilizers, etc. based on foliar sampling result dated 09/04/2021.	10/11/22 there is breakdown on fertilizer recommendations FY2023 i.e. fertilizer dosage, type of fertilizers, etc. in the page 'Budget Recommendation for The Year 2023, Manuring Schedule (1) – Individual Fields, Thus, Past Minor NCR DA 02 2022 was closed.  <b>Status: Closed</b>
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**ATTACHMENT 6 – Timebound Plan – Not applicable**