SIRIM	Buildin Mente	RIM QAS INTERN g 4, SIRIM Comp ri, Section 2, 40 Ma RSPO PUBLIC S	olex, No. 1 ,Pers 700 Shah Alam laysia.	siaran Dato' , Selangor,	File Ref. : EB05000001		
PARENT COMP RSPO MEMBEI	PANY : BOUSTE RSHIP No. : 1-00 THE CERTIFICA	NILAI SDN. BHD. AD PLANTATIOI 12-04-000-00 ATION UNIT (MIL ation, list additio	NS BERHAD L AND THE SU	PPLY BASE):			
Certification	Mill and Supply	/ GPS L	ocation		Location		
Unit	Base	Latitude	Longitude	KM 70 Labuby			
	Sg Jernih POM	03º 21' 42" N	103º 06 <sup>°</sup> 27" E	26650 Pekan, Pa	aya Gambang – Segamat, Ahang.		
Sungai Jernih	Sg Jernih Estate	03 <sup>0</sup> 20 <sup>°</sup> 17" N	103 <sup>0</sup> 05 <sup>°</sup> 59" E		aya Gambang – Segamat,		
Certification Unit	Bebar Estate	03º 08 <sup>°</sup> 4" N	103º 20 <sup>°</sup> 17" E		aya Gambang – Segamat,		
	Tabung Tentera - Terengganu Estate	04 <sup>0</sup> 12 <sup>'</sup> 10 <sup>"</sup> N	103º 13' 59" E	KM 61, Jln Jabor Terengganu.	–Jerangau, 24050 Kemaman,		
					15 auditor days tification Audit		
STANDARD : N	IYNI 2019 FOR F	SPO PRINCIPLE	E & CRITERIA	2018			
SCOPE OF CEI Preserved Supp		roduction of Sust	ainable Crude F	Palm Oil and Palr	n Kernel Using Identity		
VALIDITY OF R	SPO CERTIFIC	ATE : 12/9/2021	to 11/9/2026 (F	RSPO-PC 00121)	)		
The following a	ttachments forr	n part of this rep	oort:				
Non-conformity	Non-conformity Report(s) List of additional site(s)						
Report by Audi	t Team Leader		<u>Acknowled</u>	gement by Clier	nt's Representative		
Name :	ROHAZIMI MA		Name	: MITAH LIMF	PU		
Signature : Raganha			Signature	ling			
Date :	23/10/2023		Date	29/10/2023			

# SUMMARY OF AUDITS

	Recertification Audit						
On-site audit date	:	23rd - 25th August 2021 (Remote)No. of auditor days:24th - 27th January 2022 (Onsite)			15 auditor days		
Audit team	:	Dzulfiqar	Azmi (LA),	Rozaimee Ab Rahi	man, Rahayu Zulkifli		
No. of major NCR	:	1	Indicator	: 6.5.1		Closing date: 18/04/2022	
No. of minor NCR	:	3	Indicator	2.1.2, 2.2.2, 6.5.4			
Indicate by ticking the stakeholders interviewed	:	Employee	es	Settlers	Villagers / Local communities	Suppliers	
during the on-site audit		٦	V				
		Contract	workers	NGOs	Govt. agency	Independent growers	
		٦	V				
		Indigenou	us people	Contractor	Others (P	lease specify)	
		٦	V				
Supply base sampled	:	Sungai Je	ernih Estate	e, Bebar Estate, Tal	bung Tentera Terengga	anu Estate	
Changes since the last audit	:		of planted surveillanc		T Estate immature ha 🤅	$ \mathcal{D} $ 56.90 ha, missed out in	
Justification of audit		Total allo	cation of a	uditor days for Sg. J	lernih CU were:		
planning		• Remote Audit = 3 days for remote of documents reviews safety and health, environment, mill/estate best practices, GHG verification and for supply chain certification systems).					
	<ul> <li>Onsite Audit = 12 days for verification onsite of implantations safety and health, environment, good agriculture best practices, GHG verification and for supply chain certification systems).</li> </ul>						
Name of peer reviewer		Prof. Eme	eritus Dr. Ja	alani Sukaimi			
Report approved by	:	Kamini So	ooriamoort	hy	Approval date: 1	3/5/2022	
Annual Surveillance Audit 1							

Annual Surveillance Audit 1								
On-site audit date	:	25-29 JULY 2022			No. of auditor days :	17		
Audit team	:	Rozaimee Ab F	Rahm	an, Dzulfiqar Azmi,	Mohd Ab Raof Asis, Isr	nail Adnan		
No. of major NCR	:	2 Indic	cator:	6.2.4, 6.7.1		Closing date: 28/10/2022		
No. of minor NCR	:	- Indic	cator	:-				
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations		Settlers	Villagers / Local communities	Suppliers		
		Х			х			
		Contract worke	ers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders		
		Х			-			
		Indigenous peo	ple	Contractors	Others (Please specify	y)		
		Х		Х				
Supply base sampled	:	Sungai Jernih Estate, Bebar Estate, Tabung Tentera Terengganu Estate				nu Estate		
Changes since the last audit	:	Planted area – construction of harvesting path						
Justification of audit planning	:	17 days for verification onsite of implantations social, RSPO metric template safety and health, environment, good agriculture best practices, mill best practice GHG verification and for supply chain certification systems).						
Report approved by	:	Kamini Soorian	noortl	hy	Approval date : 2/	11/2022		

		Α	nnual	Surveillance Audi	it 2	
On-site audit date	:	24-27/9/2023			No. of auditor days :	15 Auditor days
Audit team	:	LA – Rohazimi Mat Nawi A-Mohd Zulfakar Kamaruzzaman,Dzulfiqar Azmi, Rozaimee Ab Rahman & Ng Siew Theng				
No. of major NCR	:		licator	: 7.8.2		Closing date: 20/10/2023
No. of minor NCR	:	3 Ind	licator	: 7.3.2, 3.7.2 & 2.2.2	2	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations		Settlers	Villagers / Local communities	Suppliers
C C		Х			Х	
		Contract work	kers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		Х				
		Indigenous pe	eople	Contractor	Others (Please speci	fy)
		Х		Х		
Supply base sampled	:	Sungai Jernih	Estat	e, Bebar Estate, Ta	bung Tentera Terengg	anu Estate
Changes since the last audit	:	Certified area changes which involve Ladang Sungai Jernih.				
Justification of audit planning	:	15 days for verification onsite of implantations social, RSPO metric template safety and health, environment, good agriculture best practices, mill best practice GHG verification and for supply chain certification systems.				
Name of peer reviewer	:	NA				
Report approved by	:	Kamini Sooria	Kamini Sooriamoorthy Approval date : 23/10/2023			

TABLE 1								
	RA	ASA 1	ASA 2	ASA 3	ASA 4			
Projection Period	July 2021 to June 2022	July 2022 to June 2023	July 2023 to June 2024					
Certified FFB Processed (MT)	128,600.00	123,700.00	137,548.00					
Production of Certified CPO (MT)	29,578.00	26,754.23	31,636.04					
Production of Certified PK (MT)	4,758.00	4,420.26	4,814.18					
Certified Areas (Ha)	6,847.00	6,847.00	*6,880.50					
Planted Areas (Ha)	6,491.10	6,491.10	6,491.10					
Production Areas (Ha)	6,435.70	6,435.70	6,435.70					
HCV Areas / Conservation Areas (Ha)	51.82	51.82	51.82					
REMARKS	6847.00 ha to 688 to include back 33	During this 2023 ASA1 Audit, Sungai Jernih CU has been changed their Certified Area from 6847.00 ha to 6880.503 ha to follow the actual land title as per stated in the Grant. The reason to include back 33.5033 is due to before this, in 2012 the government has acquired the land for Tun Razak Highway. However, the Government decided to not use the land and give back to Sungai Jernih CU						

# SUMMARY OF INFORMATION

# TABLE 2

	PO	РК				
Last years certified volume (MT)	26,754.23	4,420.26				
Last years actual certified sold (MT)	23,167.15	4,004.89				
Last years actual sold under other schemes (MT)	0	0				
Last years sold conventional (MT)	0	0				
Last year actual sold CSPO credits (where applicable)	0	0				
New year certified volume (MT)	31,636.04	4,814.18				

Tabl	e of contents	Page
1.0	AUDIT PROCESS	6
	1.1 Certification body	6
	1.2 Qualification of audit team	6
	1.3 Audit methodology	7
	1.4 Stakeholder consultation	7
	1.5 Audit plan	9
	1.6 Date of next audit	9
2.0	SCOPE OF CERTIFICATION AUDIT	9
	2.1 Description of the certification unit	9
	2.2 Description of the Supply Base (including planting profile)	9
	2.3 Organization Information / Contact Person(s)	11
3.0	AUDIT FINDINGS	11
	3.1 Changes to certified products in accordance to the production of the previous year	11
	3.2 Progress and changes in time bound plan	11
	3.3. Other changes (e.g. organizational structure, new contact person, addresses, etc.)	12
	3.4 Status of previous non-conformities * (refer to Attachment 5)	12
	3.5 Complaint received from stakeholder (if any)	13
4.0	DETAILS OF NON-CONFORMITY REPORT	13
	4.1 For P&C (refer to Attachment 3)	13
	4.2 For SC (refer to Attachment 3 – Supply Chain Requirements for Mills)	13
5.0	AUDIT CONCLUSION	13
6.0	RECOMMENDATION	14
	List of Attachment	
	Attachment 1 · Man of CLL	15

Attachment 1	:	Map of CU	15
Attachment 2	:	RSPO Audit Plan	17
Attachment 3		RSPO P&C Audit Checklist and Findings	23
Attachment 4	:	Details of Non-conformities and Corrective Actions Taken	82
Attachment 5	:	Status of Non-conformities Previously Identified	85
Attachment 6	:	Time-bound Plan	87

#### 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
Rohazimi Mat Nawi	Lead Auditor / Environment and Legal compliance	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various companies having served in Palm Oil Mill. He was qualified in the auditing line with experienced in Sustainability, QMS, EMS, OHSMS and Supply Chain audit.
Mohd Zulfakar Kamaruzzaman	Auditor / Social external & HCV	Holds a B.Sc. Forestry. He had several years of working experience in oil palm operation. He is a qualified RSPO P&C, MSPO and RSPO Supply Chain Lead Auditor.
Carol Ng Siew Theng	Auditor / Social and workers welfare	She holds a B.Sc. Biotechnology & B.Sc. Environmental Management - Monash University and completed lead auditor training courses in RSPO P&C, RSPO SCCS, OHSAS18001:2007, ISO14001, RBA Code and VAP, and completed auditor courses in SA8000, MSPO, ISCC EU and PLUS, amfori BSCI, WRAP, PSCI and SMETA standards. She has over 14 years' experience as an auditor/lead auditor in RSPO, RBA, SMETA and other social compliance.
Rozaimee Ab. Rahman	Auditor / SCCS Mill, Metric Template, TBP, GHG	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Dzulfiqar Azmi	Auditor / GAP / Safety	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 trained as an RSPO Lead Auditor.

### 1.3 Audit methodology

The audit covered the One palm oil mill and three of its supply base. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The 3 supply base covered during the audit are Sg Jernih Estate, Bebar Estate and Tabung Tentera Terengganu Estate The audit included an on-site audit to the estates, mill and settlers' 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 (local / foreign / Orang Asli workers / male & female)	Interviewed check roll workers at the estates (locals and foreigners). All estate workers confirmed that they are being paid a monthly wage in accordance with minimum wage, and receive their wages before the 7th of the month. All workers are offered housing facilities, but some local workers prefet to live in their own houses. The houses are comfortable with electricity and potable water. Contracts were signed prior to employment and the contents were explained to them. They confirmed that there is no discrimination, and they are giver equal opportunities irrespective of nationality and gender Other benefits received include medical facilities for them and their dependants. Foreign workers informed that they keep their own passports and are provided with lockers at their homes to store their lockers. Safety and social awareness briefings are giver regularly, and they are aware of the complaint's procedure calculation of wages, safety protocols, etc. Also interviewed were union representatives and gender committee members. NUPW representatives interviewed confirmed that they are free to organize or attend NUPW meetings. So far there has been no issues of concern. Gender committee representatives to create awareness among workers especially female workers on gender issues and prevention of sexual harassment and abuse. No such cases were reported at all estates.
2) Settlers	NA
3) Villagers / Local communities (including women representatives, displaced communities)	Interviewed relevant stakeholders such as villager representatives from Kg. Jenang Baru (Ladang Tabung Tentera) and Orang Asli Jakun from Kg Dungun, Kg Runchang (Sg. Jernih Estate & Sg. Jernih POM). No negative feedback.
4) Suppliers	Suppliers i.e. Goh Tiam Hock Enterprise, Perusahaan Seri Jaya, AHL Electrical & Engineering and KMTTK Enterprise, were interviewed and they confirmed that payments are received within one month of invoice. They are also aware of the complaint channel. There are no issues with the estates and mill. They receive invitations to attend stakeholder meetings but sometimes cannot attend.
5) Contract workers (local / foreign / Orang Asli workers / male & female)	No contract workers are engaged at Tabung Tentera Terengganu estate (Ladang Tabung Tentera Terengganu or LTTT), or Sungai Jernih estate. 2 contract workers for Bebar estate under contractor ELS Sdn. Bhd. who work as an FFB lorry driver and tractor driver respectively were interviewed and informed that they are not entitled to a designated rest

	day in a week, overtime pay, paid annual leave, or paid sick leave. If estate crop production is high, workers are required to work on a daily basis without any day off in a week. Upor further review of employment contracts of these workers Minor NCR CNST01 2023 was raised.
6) Local & national NGOs	NA
7) Government agencies / Statutory bodies	NA
8) Independent growers / Smallholders	NA
9) Indigenous people	Interviewed relevant stakeholders such as village representatives from Kg. Jenang Baru (Ladang Tabung Tentera), Orang Asli Jakun from Kg Dungun, Kg Runchang (Sg. Jernih Estate & Sg. Jernih POM). No negative feedback
10) Contractor	Spoke to Sri Renik Enterprise, Indah Bumi Contractor Greenwin Enterprise, Manna Enterprise and Abu Bakar Syee Alyallatas and these contractors provide harvesting and loading services to all the estates. The contractors confirmed that they are aware of their obligations under the contract (ensuring workers have valid passports and work permits payment of wages by the 7 <sup>th</sup> of every month, SOCSC protection for workers, etc). Contractors also confirmed that there are no adverse issues with the estates. They are invited to attend online stakeholder meeting and are briefer of the company policies and procedures. Payments are received within agreed timeframe.
11) Previous land owner (if any)	NA
12) Others (please specify)	Sundry shop operator at Bebar Estate is already aware of the need to obtain permit to sell LPG. It is not allowed to se LPG without authorization/permit from KPDNHEP. Canteen operators at Bebar Estate and Sg Jernih Estate had acquired business license, attend food handling training and get vaccinated and medically examined by a registered medical practitioner.

#### 1.5 Audit plan : Refer to Attachment 2

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

# 2.0 SCOPE OF CERTIFICATION AUDIT

#### 2.1 Description of the certification unit

The Sungai Jernih Production Unit (hereafter referred to as SJPU) is a Certification Unit (CU) under the Boustead Rimba Nilai Sdn. Bhd. which is one of the subsidiaries of Boustead Plantation Berhad. Sungai Jernih CU comprises of 1 palm oil mill and 3 oil palm plantations (Sungai Jernih Estate, Bebar Estate and Tabung Terengganu Estate) located in the East Coast of Malaysia.

The CU was certified to RSPO P&C MYNI 2014 on 12 September 2011 by another Certification Body. The certification was transferred to SIRIM on 23 May 2016.

Sg Jernih Palm Oil Mill (SJPOM) was commissioned in 1992. The palm oil mill commenced operations with a processing capacity of 30 metric tonnes of fresh fruit bunches (FFB) per hour.

Sungai Jernih POM currently had the ISO 9001:2015 certification by SIRIM QAS International Sdn. Bhd.

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

The FFB sourced from company owned estates that were certified. Details of the FFB contribution from each source to the Sg. Jernih POM are shown in the following tables:

#### Table 1: Actual FFB production by the supply base for the reporting period July 2022- June 2023

CU own estates	FFB Cor	FFB Contribution			
CO OWN estates	Tonnes	Percentage (%)	Certifying CB		
Sg Jernih Estate	46,669.34	40.66	SIRIM QAS International		
Bebar Estate	44,496.08	46.21	SIRIM QAS International		
LTT Estate	12,007.78	11.44	SIRIM QAS International		
Chamek Estate	241.90	0.23	BSI Services Malaysia		
Telok Sengat Estate	1,454.71	1.39	BSI Services Malaysia		
Kulai Young Estate	78.66	0.07	BSI Services Malaysia		
Grand Total	104,948.47	100.00			

# Table 2: Projected FFB production by the supply base for the next reporting period July 2023 to June 2024

CU own estates	FFB Con	FFB Contribution		
Coownestates	Tonnes	Percentage (%)	Certifying CB	
Sg Jernih Estate	54,900.00	39.91	SIRIM QAS International	
Bebar Estate	58,100.00	42.24	SIRIM QAS International	
LTT Estate	24,550.00	17.85	SIRIM QAS International	
Grand Total	137,548.00	100.00		

# Table 3: Actual FFB received and CPO & PK dispatch by Sungai Jernih POM for period from July 2022- June 2023

RSPO Supply Chain Model : Identity Preserved	Total (MT)	
FFB Received	104,948.47	
FFB Processed	104,948.47	
CPO Production	23,592.75	
PK Production	4,106.40	
CPO delivered as RSPO certified	23,167.15	
CPO delivered under other schemes (MT)	0	
CPO delivered as non-RSPO certified	0	
PK delivered as RSPO certified	4,004.89	
PK delivered under other schemes (MT)	0	
PK delivered as non-RSPO certified	0	
CPO/PK sold as credits	0	

# Table 4: Projected FFB received and CPO & PK dispatch by Sg Jernih POM of next reporting period July 2023 to June 2024

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	137,548.00
FFB Processed	137,548.00
CPO Production	31,636.04
PK Production	4,814.18

#### Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Sg. Jernih Estate	2,571.60	2,729.20
Bebar Estate	2,271.20	2,340.60
Tabung Tentera, Terengganu Estate	1,648.30	1,810.70
Total	6,491.10	6,880.50

# Table 6 Planting profile Planting profile for Estates under Sungai Jernih CU

<u>Estate</u>	<u>Year of</u> planting	<u>Planting</u> <u>Cycle</u>	<u>Mature</u> <u>&gt;3 years</u> (Ha)	<u>Immature</u> <u>&lt; 3</u> years(Ha)	<u>Planted</u> <u>area</u>	<u>% of</u> <u>planted</u> <u>area mature</u>	<u>% of</u> <u>planted</u> <u>area</u> <u>immature</u>
	2007	2 <sup>nd</sup>	214.50	-	214.50	8.00	-
	2008	2 <sup>nd</sup>	377.80	-	377.80	15.00	-
Sg	2009	2 <sup>nd</sup>	387.70	-	387.70	15.00	-
Jernih Estate	2010	2 <sup>nd</sup>	398.20	-	398.20	15.00	-
Estate	2011	2 <sup>nd</sup>	401.70	-	401.70	16.00	-
	2012	2 <sup>nd</sup>	400.70	-	400.70	16.00	-
	2013	2 <sup>nd</sup>	391.00	-	391.00	15.00	-
	Total		2,571.60	-	2,571.60	100.00	-
	2005	2 <sup>nd</sup>	260.80	-	260.80	11.4	-
L	2006	2 <sup>nd</sup>	246 00	-	246.00	10.8	-
Bebar Estate	2007	2 <sup>nd</sup>	252.90	-	252.90	11.1	-
Louie	2008	2 <sup>nd</sup>	341.30	-	341.30	15.0	-
	2009	2 <sup>nd</sup>	365.50	-	365.50	16.0	-

Page 10 of 92

Grand Total			6,435.70	64.70	6,491.10	96.24	3.76
Total			1,592.90	55.40	1,648.30	96.64	3.36
	2019	2 <sup>nd</sup>	-	55.40	55.40	-	3.36
ganu Estate	2009	2 <sup>nd</sup>	128.20	-	128.20	7.78	-
Tereng	2008	2 <sup>nd</sup>	148.30	-	148.30	9.00	-
LTT	2004	2 <sup>nd</sup>	146.80	-	146.80	8.91	-
	2003	2 <sup>nd</sup>	375.70	-	375.70	22.79	-
	2002	2 <sup>nd</sup>	389.30	-	389.30	23.62	-
	2001	2 <sup>nd</sup>	404.60	-	404.60	24.55	-
	Total		2,271.20		2,271.20	99.6	0.4
	2018	2 <sup>nd</sup>	30.10		30.10	1.3	-
	2014	2 <sup>nd</sup>	38.40	-	38.40	1.7	-
	2012	2 <sup>nd</sup>	149.10	-	149.10	6.5	-
	2011	2 <sup>nd</sup>	293.40	-	293.40	12.9	-
	2010	2 <sup>nd</sup>	293.70	-	293.70	12.9	-

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

The details of the contact person are as below:

Name	:	Shaikh Zamani Shaikh Saaid
Position	:	Head of Business Unit
Address	:	Sungai Jernih Business Unit,
		Wakil Pos Paloh Hinai,
		Paloh Hinai, 26650 Pekan, Pahang.
Phone no.	:	09-522 0651(O) / 013-922 4189(M)
Fax no.	:	-
Email	:	zamani@bplant.com.my

# 3.0 AUDIT FINDINGS

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

No changes.

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

i.	Have all the estates under the	parent company	v been certified?
••			

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

Boustead Plantations Berhad is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details provided in the Time Bound Plan described in Attachment 6.

ii. Are there any changes to the organization's time bound plan?

Yes No

Yes

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

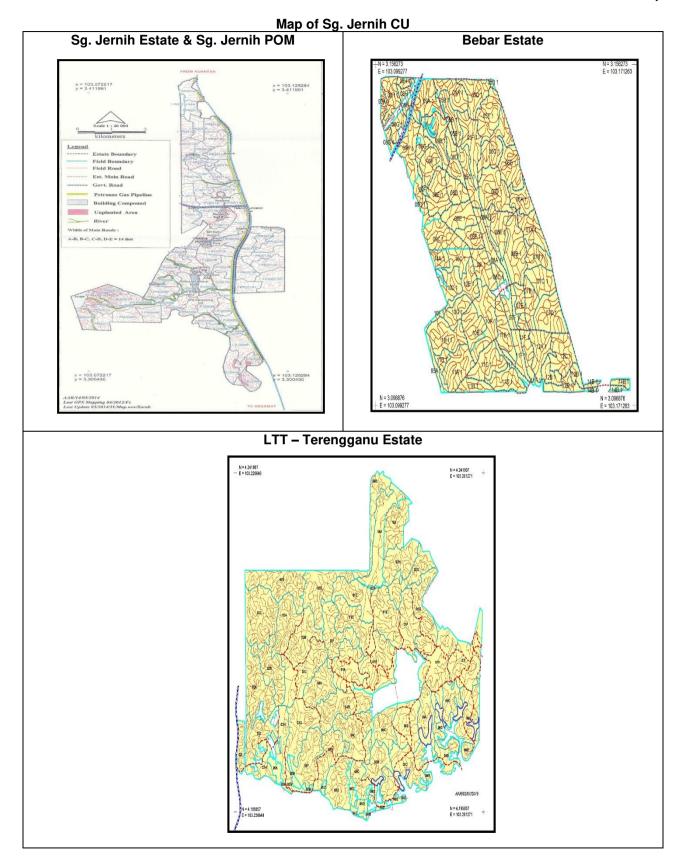
No

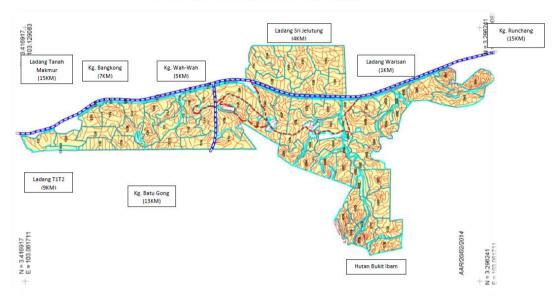
iii.	Are there associated smallholders (including scheme smallholders) in the CU
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its Yes No certification?
	If no, please state reasons
iv.	Any new acquisition which has replaced primary forests or HCV areas
3.3	Other changes (e.g. organizational structure, new contact person, addresses, etc.)
	No change
3.4	Status of previous non-conformities * Closed Not closed* * If not closed, minor non conformity will be upgraded to major non conformity

3.5.	Complaint received from stakeholder (if any) No complaint received during the audit.					
4.0	DETAILS OF NON-CONFORMITY REPORT					
4.1	For P&C (Details checklist refer to Attachment 3) :					
	Total no. of minor NCR(s)	List:3	(RMN 02,NSK 01 & NSK 02)			
	Total no. of major NCR(s)	List : 1	(RMN 01)			
4.2	For SC (Details checklist refer to	Attachment 3	3) :			
	Total no. of minor NCR(s)	List : -				
	Total no. of major NCR(s)	List :-				
5.0		C requiremer	n has established and maintained its management hts of the standard and demonstrated the ability of the rion & requirements.			

6.0	RECOMMENDATION							
0.0								
	No NCR recorded. Recommended to continue certification.							
			CR(s) recorded. Corrective action arried out in the next audit.	plan has been accepted. Verific	ation of the NCR(s)			
			linor NCRs raised in the audit whic raded to major NCRs .	ch are not addressed in the sub	osequent audit shall			
			NCR(s) recorded. Evidence of imp d and accepted by the audit team.					
		Recomr	nended to continue certification.					
		provide	NCR(s) recorded. Evidence of imp d but not fully accepted by the aud put within 90 days of the audit. Rec	it team. NCR(s) have no	t been satisfactorily			
			<i>Najor NCRs which are not addre</i> te being withdrawn.	ssed within a further 90 days	shall result in the			
7.0	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.							
Aud	it Team Le	ader :	Rohazimi Mat Nawi	Calquerand	20/10/2023			
			(Name)	(Signature)	(Date)			

# Attachment 1 - Map





ESTATE MAP AND SURROUNDING NEIGHBOUR

# Attachment 2 – Audit Plan

#### 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.

Date of assessment

24-27/7/2023

Site of assessment

- 1.Sungai Jernih Palm Oil Mill
- 2. Sungai Jernih Estate
- 3. Bebar Estate
- 4. Tabung Tentera Terengganu Estate

#### Reference Standard :

- 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, March2018
- b. RSPO Certification System Documents Nov 2020
- c. Company's audit criteria including Company's Manual/Procedures

#### Assessment Team

Trainee Lead Assessor	:Rohazimi Mat Nawi (RMN) – (Environment)
Auditor	:Mohd Zulfakar Kamaruzaman (MZK) (External Social, HCV)
	Rozaimee Ab Rahman – ( SC , GHG , TBP , Metric Template)
	Dzulfiqar Azmi – (Social internal Mill, Safety)
	Carol NST – (Social Internal estate)

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

### 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 andevaluation of records.

#### **Audit Findings**

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

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

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

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

The RSPO 2018 Principles and Criteria (P&C) Metrics Template outlines a set of strategic outcomebased 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: July 22 to June 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 (if any)
- c) Reporting time frame for all other social and environmental data: Jan 2022-Dec 2022

The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021. For audits conducted during the transition period from 1 June to 31 July 2021, members are encouraged to use the updated version but are also allowed to use the previous version (version 1.0). All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).

#### **Confidentiality Requirements**

SIRIM QAS International shall not disclose any information concerning the company regarding all mattersarising 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.

As below

:

2

5

2

:

#### Working Language Reporting

3		
a)	Language	
b)	Format	

c) Expected date of issue

English and Bahasa Malaysia

English Verbal and written 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of thisaudit.

# **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

Assessment Programme Details

Day 1: 24	July 2022 (Monday) – Sungai Jernih POM

Time		Activities / areas	to be visited		Auditee
9.00am	Opening Meeting – Audit team introduction a (Decided by Management)	nd briefing on assessment objectives, scope,	methodology, criteria and programmes by S	IRIM QAS Audit Team Leader.: venue:	Management
9.30am	Organization Representative - Briefing on RSP plan, ac	tions taken to address previous audit finding	s. Logistics discussion to the sites to be visite		Representative
10.00am	RMN (POM)	To assign each audit team members -			
	<ul> <li>Coverage of assessment: P1, P2, P3, P4, P6, P7:</li> <li>Laws and regulations</li> <li>Waste management including disposal site</li> <li>Aspects/impacts of mill management</li> <li>Controlled/open burning</li> <li>Pollution mitigating plans</li> <li>River system and Effluent Treatment/Discharge</li> <li>Management and disposal of waste including pesticides containers</li> <li>Training and skill development programs</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> <li>Facilities at workplace</li> <li>GHG assessment</li> <li>Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> </ul>	<ul> <li>DZUL (POM)</li> <li>Coverage of assessment: P1, P2, P3, P4, P6, P7:</li> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Workers Issues &amp; welfare</li> <li>Occupational safety &amp; health practice witness activities at site</li> <li>Hazard identification and Risk Management</li> <li>Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.</li> </ul>	MZK (POM) Coverage of assessment: P1, P2, P3, P4, P6, P7: Land titles user rights Mill Boundary, adjacent and neighbouring land use Stakeholder consultation with affected communities surrounding the CU Interview with contractors, supplier, etc Consultation with relevant government agencies Training and skill development programs Mill best practices Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.	RAR (POM)         Site visit and assessment on Supply         Chain Implementation including the:         • Model used       • General Chain of Custody         • System Requirements       • for the supply chain         • Documented procedures       • Purchasing and goods in         • Outsourcing activity       • Sales and goods out         • Processing       • Records keeping         • Registration       • Training         • Claims       • Claims	Guide(s) for each auditor
1.00pm		LUNCH BREAK / ZU	JHUR PRAYER		All
2.00pm		Continue assessm			
4.30 - 5.00pm	Au	dit team discussion / Debrief meeting with c	lient on issues (if any) / End of Day 1 audit		All
9.00 – 9.30pm		Discussion on por	tential NCRs		Audit team only

Time		Ac	tivities / areas to be visited			Auditee		
9.00am	Overvi	ew of current activities at Supply base sit	es. To assign each audit team members –	site and the P&C require	ments	Respective Manager		
9.30am	To assign each audit team members – site and the P&C requirements							
9.50dill	i o assign each audit team members – site and the P&C requirements							
	RMN	DZUL	MZK	RAR (POM)	CAROL	each auditor		
	Coverage of assessment: P1, P2, P3, P4, P6, P7:	Coverage of assessment: P1, P2, P3, P4, P6, P7:	Coverage of assessment: P1, P2, P3, P4, P6, P7:	<ul> <li>Refer MSPO SC audit Plan</li> </ul>	Coverage of assessment: P1, P2, P3, P4, P6, P7:			
	<ul> <li>Laws and regulations</li> <li>Waste management including disposal site</li> <li>Aspects/impacts of mill management</li> <li>Controlled/open burning</li> <li>Pollution mitigating plans</li> <li>River system and Effluent Treatment/Discharge</li> <li>Management and disposal of waste including pesticides containers</li> <li>Training and skill development programs</li> <li>Waste &amp; chemical management</li> <li>Facilities at workplace</li> <li>Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, effluent treatment plant, chemical nas scheduled waste stores, workshop, landfill area &amp; etc)</li> </ul>	<ul> <li>Hazard identification and Risk Management</li> <li>Occupational safety &amp; health practice witness activities at site</li> <li>Interview with workers, safety committee and contractors</li> <li>Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>New planting</li> <li>Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.</li> </ul>	<ul> <li>Land titles user rights</li> <li>Mill Boundary, adjacent and neighbouring land use</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with contractors, supplier, etc</li> <li>Consultation with relevant government agencies</li> <li>Training and skill development programs</li> <li>HCV/RTE and action plan</li> </ul> Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.		<ul> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Workers Issues &amp; welfare</li> </ul> Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.			
1.00pm		LUN	ICH BREAK / ZUHUR PRAYER			All		
2.00pm			nue assessment at POM/Estate					
4.30 - 5.00pm		Audit team discussion / Debrief	meeting with client on issues (if any) / En	d of Day 2 audit		All		
9.00 – 10.00pm		Discuss	ion on finalization of draft NCRs			Audit team only		

# Day 2: 25 July 2022 (Tuesday) – Ladang Tabung Tentera Terangganu

Time			Activities / areas to be visited			Auditee		
9.00am	Over	view of current activities at Supply bas	e sites. To assign each audit team members	- site and the P&C requirements		Respective Manager		
9.30am								
9.30am		To assign each aud	dit team members – site and the P&C require	ements		Guide(s) for each		
	RMN	DZUL	MZK	RAR	CAROL	auditor		
	Coverage of assessment: P1, P2, P3, P4, P6, P7: Laws and regulations Waste management including disposal site Aspects/impacts of mill management Controlled/open burning Pollution mitigating plans River system and Effluent Treatment/Discharge Management and disposal of waste including pesticides containers Training and skill development programs Waste & chemical management Facilities at workplace Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, effluent treatment plant,chemical nas scheduled waste stores, workshop, landfill area & etc)	Coverage of assessment: P1, P2, P3, P4, P6, P7: Hazard identification and Risk Management Occupational safety & health practice witness activities at site Interview with workers, safety committee and contractors Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) EFB mulching, POME application Plantation on hilly/swampy area IPM implementation, training and safe use of agro-chemicals. New planting Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.	Coverage of assessment: P1, P2, P3, P4, P6, P7: Land titles user rights Mill Boundary, adjacent and neighbouring land use Stakeholder consultation with affected communities surrounding the CU Interview with contractors, supplier, etc Consultation with relevant government agencies Training and skill development programs Mill best practices Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.	Coverage of assessment: P1, P2, P3, P4, P6, P7: Time bound plan and uncertified management units GHG assessment & metric template verification	Coverage of assessment: P1, P2, P3, P4, P6, P7: Social aspects - SIA, management plan & implementation, workers' quarters. Interview with gender committee, worker representative, etc Linesite inspection Complaints and grievances Workers Issues & welfare Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.			
1.00pm	LUNCH BREAK / ZUHUR PRAYER							
2.00pm			ontinue assessment at POM/Estate					
4.30 - 5.00pm		Audit team discussion / Deb	prief meeting with client on issues (if any) / E	nd of Day 3 audit		All		
9.00 – 10.00pm		Dis	cussion on finalization of draft NCRs			Audit team only		

#### Day 4: 27 July 2022 (Thursday) – Sungai Jernih Estate

Time			Activities / areas to be visited			Auditee	
9.00am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements						
9.30am	To assign each audit team members – site and the P&C requirements						
	RMN DZUL		MZK	RAR	CAROL	each auditor	
	<ul> <li>Coverage of assessment: P1, P2, P3, P4, P6, P7:</li> <li>Laws and regulations</li> <li>Waste management including disposal site</li> <li>Aspects/impacts of mill management</li> <li>Controlled/open burning</li> <li>Pollution mitigating plans</li> <li>River system and Effluent Treatment/Discharge</li> <li>Management and disposal of waste including pesticides containers</li> <li>Training and skill development programs</li> <li>Waste &amp; chemical management</li> <li>Facilities at workplace</li> <li>Other area identified during the assessment including site visits</li> <li>Facilities at workplace (water treatment plant, effluent treatment plant, chemical nas scheduled waste stores, workshop, landfill area &amp; etc)</li> </ul>	<ul> <li>Coverage of assessment: P1, P2, P3, P4, P6, P7:</li> <li>Hazard identification and Risk Management</li> <li>Occupational safety &amp; health practice witness activities at site</li> <li>Interview with workers, safety committee and contractors</li> <li>Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agrochemicals.</li> <li>New planting</li> <li>Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.</li> </ul>	<ul> <li>Coverage of assessment: P1, P2, P3, P4, P6, P7:</li> <li>Land titles user rights</li> <li>Mill Boundary, adjacent and neighbouring land use</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with contractors, supplier, etc</li> <li>Consultation with relevant government agencies</li> <li>Training and skill development programs</li> <li>Mill best practices</li> </ul> Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.	<ul> <li>Coverage of assessment: P1, P2, P3, P4, P6, P7:</li> <li>Time bound plan and uncertified management units</li> <li>GHG assessment &amp; metric template verification</li> </ul>	<ul> <li>Coverage of assessment: P1, P2, P3, P4, P6, P7:</li> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Workers Issues &amp; welfare</li> </ul> Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.		
1.00pm		·	LUNCH BREAK / ZUHUR PRAYER	•	•	All	
2.00pm			ontinue assessment at POM/Estate				
4.30 - 5.00pm			Audit team discussion			All	
5.00PM		Closing meeting – venue at (decide by man	nagement), Presentation of audit findings, p	ositive comment, Question & answer		Audit team only	

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	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	Yes	The Sungai Jernih CU continued to implement the procedure for responding to any communication as outlined in their Estate/Mill Quality Management System documents. The records of communication were identified and maintained in different files depending on the stakeholder. Among the records reviewed were correspondences with the authorities and employees. The CU uses the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Boustead Plantation website at http://www.bousteadplantations.com.mv/home.html
Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	Information are available both in Bahasa Malaysia and English and accessible to the relevant stakeholders through correspondence and request as sighted in the 'Borang Aduan' "Communication Record Book" and "Communication File" as well as correspondence sighted at Sungai Jernih POM, Sungai Jernih Estate, LTT Terengganu Estate, Bebar Estate by the Auditor. The Boustead Plantation website address is available in English at http://www.bousteadplantations.com.my/overview.html
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	The Sungai Jernih CU has identified personnel responsible for complaints. Records of communication (classified as internal and external) were identified and maintained in different files, depending on the stakeholders. Among the records reviewed were correspondences with the authorities, local communities and employees.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	Sungai Jernih CU has established procedures, flowcharts and forms that describe and facilitated the mechanism to be taken for consultation and communication with the stakeholders (external or internal) as follows: External Communication Procedure, Prosedur Komunikasi Luaran dan Dalaman, Borang Komunikasi Luaran dan Dalaman, Borang Gangguan Seksual, Rekod Komunikasi, Stakeholder Engagement/Negotiation, Consultation Procedure for Internal and External Stakeholder, etc. These procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders (workforce and external) through Internal and External Stakeholders' meeting held in 2023.

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 current stakeholder lists for all units within Sg Jernih CU were made available to the auditors during the audit and updated as of June 2023. Each stakeholder list contains all relevant stakeholders and details of their nominated representatives. These stakeholders include suppliers, contractors, service providers, transporters, government agencies such as Dept of Wildlife and National Parks, Labour Department, JAKOA, Immigration Dept, Dept of Safety and Health, Indonesian Consulate, Bangladeshi High Commission, schools, local communities such as surrounding villages, and workers representative i.e., gender committee/union rep.
1.2 The unit of certification commits to ethical conduct in all business operations and	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Yes	A Policy for ethical conduct is available known as the company's Anti-Corruption Policy. Based on interviews with sampled contractors including manpower service providers, evidence is available that the Anti-Corruption Policy are being implemented. The requirement to comply with this Policy is also included in contracts signed with third parties. The Policy was also explained to external stakeholders during stakeholder meetings.
transactions.	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	In addition, Boustead Plantation Berhad (BPB) also has a Vendor Code of Ethics & Conduct which has been developed to outline the standards of behaviour required by Boustead Plantation Berhad vendors which includes expectation to uphold human rights. The Vendor COBC applies to all its suppliers, consultants, agents, contractor's/service providers who have direct dealings with the Group.

Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.

Clause	Indicators	Comply Yes/No	Findings
2.1	2.1.1 (C) The unit of certification complies	Yes	The unit of certification had shown compliance with applicable legal requirements.
There is compliance	with applicable legal requirements.		
with all applicable local, national and ratified international laws and regulations.	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	Sustainability Department Executive who is based in Headquarter is responsible to track any changes to the Acts and Regulations. This was done through communicating with the publisher of the documents. This mechanism was outlined in its procedure. The updating of the legal register was carried out on a periodical basis. Any change in the legal register is communicated to the respective CUs.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Yes	Boundary markers clearly visible & demarcated by using drainage and pegging. PTT - Sighted the boundary markers clearly visible located at block PM 2002C with TDM Plantation, PM 2002D with Felda Sebentang Tayor, and PM 2002G with Kg Pasir Gajah. Bebar Estate – The boundary markers clearly visible located at block PR 2011B1, PR2011D 1 with Felda Merchong, PM 1989B with Felda Prosper Juasa Plantation, and

Page 24 of 92

Clause	Indicators	Comply Yes/No	Findings
			PM PR2012B with Dara Lam Soon Plantation. Sg Jernih Estate – The boundary markers clearly visible located at block PR2013B PR 2013C with Ladang Sri Jelutong, and PJ2012K, PJ2011C with LKPP Ladang T1T2.
2.2 All contractors	2.2.1 A list of contracted parties is maintained.	Yes	A list of contracted parties is maintained in the stakeholder list of each operating unit within Sg Jernih CU.
providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	No	There is evidence that agreements with third parties contain clauses on meeting applicable requirements. Each contract has clauses related to compliance with the laws related to labour laws, child labour, anti-trafficking, smuggling of migrants and OSHA requirements. Based on interviews with sampled workers, field observations and documents reviewed (e.g., workers' passports, work permit, employment contract, pay slips), evidence was available that these can be demonstrated by third parties. However, there was evidence that due diligence of contract workers under contractor ELS Sdn. Bhd., which provides FFB transport services to Bebar Estate is not effective, as these contract workers are not entitled to a designated rest day in a week, overtime pay, paid annual leave, paid sick leave or paid medical expenses. Therefore, Minor NCR CNST01 was raised.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Yes	All contracts signed with contractors contain an addendum on compliance with all legal requirements related to employment laws, which would include laws related to employment of children and young persons, trafficked and forced labour. The contracts sampled were as per Indicator 2.2.2 above. Among the contractual terms include requirements for contractors to ensure workers are legalised, have valid passports and work permits, insurance coverage, no recruitment of child labour, no forced labour and no human trafficking.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	<ul> <li>2.3.1 (C) For all directly sourced FFB, the mill requires:</li> <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>	Yes	Fresh Fruit Bunches are supplied from Boustead Plantation Berhad owned estates which are certified to RSPO. Sungai Jernih POM is also an Identity Preserved Mill. All Information on geo-location of FFB origins, evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, one or more supporting documents for claims, Valid MPOB license, can be found accordingly.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	Yes	Fresh Fruit Bunches are supplied from Boustead Plantation Berhad owned estates which are certified to RSPO. Sungai Jernih POM also is an Identity Preserved Mill. Thus, there is not indirectly Sourced FFB used.

# 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.	<ul> <li>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.</li> <li>3.1.2 An annual replanting programme projected for a minimum of five years with</li> </ul>	Yes	Sg. Jernih CU has established and implemented its commitment towards long term sustainability and improvements through a "4 YEARS PLANNING HORIZON". The 4 Years Planning Horizon shows a business plan for the year 2023 to 2026 where the throughput (FFB, CPO), Area statement & Yield, Cost and Capital Expenditure is projected. The business plan shows the commitments of estates and POM towards better management of resources to increase productivity while reducing the cost of expenditure. The Sg. Jernih CU has a yearly budget prepared by the management and approved by top management that indicates the business plan on an annual basis. This annual budget specifies the details of the expenditures through better and more sustainable management. Sg. Jernih CU had a Long-Range Replanting Program up to 2028. The program was reviewed annually. Record sighted during the conduct of audit.
	yearly review, is available. 3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	Management review meeting dated 17/03/2023 (combine RSPO SC and RSPO MYNI 2019, MSPO and MSPO SCCS) attended by Head BU, Sustainability Head and Teams and all the estate/mill managers.         Among of the agenda were discussed such as:         • Minutes /action of previous meeting         • RSPO SCCS status         • Policy, manual and procedure status <b>Review input</b> • Results of internal audit         • Preventive & corrective action status         • Customer feedback         • Follow up action from previous management review         • Changes affecting policy         • Process performance & product conformity <b>Review output</b> • Improvement of effectiveness of the management system and its process         • Resources needs
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	Yes	Each estate and the mill have prepared a Social Impact Management and Mitigation Plan based on the company's Social Impact Assessment (SIA) conducted by Wild Asia in year 2010 which is updated annually to include progress of all improvement actions taken. Some of the identified impacts and similar ongoing long term improvement actions listed at each estate and/or the mill (where applicable) last updated in July 2023. Evidence of implementation of the long-term Social Impact Management and Mitigation Plans implemented by each site was confirmed from documents review of workers' pay slips, site visit and

Clause	Indicators	Comply Yes/No	Findings
develops and implements action plans that allow demonstrable			workers interviews. In addition, based on feedback received during internal and external stakeholder meetings, each site develops an additional Social Action Plan to address new concerns or issues raised by stakeholders.
continuous improvement in key operations.	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	Yes	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template before the audit started. The auditor already verified and checked the data and figure given was tele with their database system. Apart from that, reporting time frame for this Sg Jernih CU was verified.
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	<ul> <li>Sg. Jernih CU has developed and documented several manuals for its use. Among them were:</li> <li>Standard Operating Procedure (SOP) that provide guidelines to staff members in respect of certain major aspects of Estate and Mill operations.</li> <li>Oil Palm Circulars (OPC) that provides guidelines Oil Palm from land clearing &amp; planting to despatch of FFB.</li> <li>Safe Work Procedure for operations.</li> <li>OSHA Manual, Occupational Safety and Health Guidelines.</li> <li>Procedure for the training entitled Sustainability Guidelines: Training</li> </ul>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	Yes	Among the mechanisms to check consistent implementation of procedures include conducting of internal audits. Internal audits were carried out by the Sustainability Team of Boustead Plantation Berhad.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	The implementation of SOP is monitored daily by the field staff and Assistant Managers with an overall overview by the Managers. The monitoring is done via supervision and records maintenance. The estates among others maintained the following records - work program / Field cost books, Bin cards, Harvesting Intervals, Monthly Estate Report and Account, Monthly Operations, monthly rainfall, pest and diseases monthly return, agrochemical monthly consumption, harvesting details i.e., daily inspection report - yield improvement program, summary of machinery running hours, harvesting records detailing the number of bunches harvested, quantity of loose fruit collected by each harvester, Monthly FFB production, etc.
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	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 were no new plantings in Sg. Jernih CU. Environmental Aspect and Impact (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations. Thus, this indicator is not applicable. During initial certification stage, the company engaged an independent consultant, Wild Asia, to conduct a Social Impact Assessment (SIA) report dated 14 July 2010 entitled 'Addressing the Social Dimensions of Oil Palm Developments in Boustead Plantations' which was reviewed during the audit. The SIA covers all the three estates and mills within the business unit. Among the areas assessed included wages and decent living wage, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations. Sungai Jernih POM had maintained Environmental Impact Assessment and been documented with latest review in March 2022 to addressed on the ESP impact. Methods of establishment of this document based on consultation with the mill management and site visit. From the records, among identified operations such as Palm Oil Mill Effluent, Boiler, EFB dumping area, machineries, Processing activities, chemical

Clause	Indicators	Comply Yes/No	Findings
regularly updated in ongoing operations.			store, workshop, and Genset. All estates had maintained Environmental Impact Assessment and been documented with latest review in January 2023. From the records, among identified operations such as harvesting, P&D, chemical handling and storage.
	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	At the POM, specific impacts identified include smoke emissions, noise levels, POME and EFB management. Data was collected and analyzed for compliance with relevant regulations and further actions needed were documented and implemented. There are no significant changes from the current EIA established practice. Due to no changes identified in the mill operation, therefore no timetable for any change is required. During the mill visit, the EIA was used as guide and no discrepancy found. The person in charge and the control required were properly recorded in the management plan. For all estates, the assessment was to evaluate and analyze the operations impact on soil, water, and air associated with the organization activities. The EAI review process had included stakeholders' consultation with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighboring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting. The SIA was conducted in consultation with all significant stakeholders, namely internal employees, local communities, neighboring estates, nearby schools, relevant government agencies, contractors, suppliers, etc. A Social Impacts Management and Mitigation Plan was developed for each estate and the mill based on feedback received during the stakeholder consultation meetings.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	The monitoring plans are being reviewed and updated on an annual basis. Evidence was available that the monitoring plans are devised based upon consultations conducted with relevant stakeholders. These inputs were obtained from internal and external stakeholder meetings, from gender committee meetings, and complaints received. Sighted during the audit were monitoring plans for each unit FY2023. The plan contains a table identifying plans for mitigation of negative impacts, identification of person-in-charge, and timeframe for implementation.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	Yes	<ul> <li>BPB has developed Human Resources &amp; Administration Workforce Management Unit Procedure:</li> <li>Recruitment and Employment of Local Worker</li> <li>Quota Application (Peninsular Region)</li> <li>Job Order (Peninsular Region)</li> <li>Work Permit Renewal (Peninsular Region)</li> <li>Check-Out Memo (Peninsular Region)</li> <li>The recruitment process was clearly stated in the procedure where the recruitment was based on age, medical fitness and etc. There is no discrimination based on religion, gender, nationality, during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc.</li> <li>BPB have implemented Group Sustainability Policy Statement signed by Chief Executive Officer, where the management is committed to contributing to a better society includes respecting, upholding &amp; no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities.</li> </ul>

Page 28 of 92

Clause	Indicators	Comply Yes/No	Findings
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	Based on the review of workers' personal files and interviews conducted, evidence was available that employment records were maintained, and employment procedures implemented. These documents included application form, interview records, medical test results, copies of identification document (passport, IC), employment contracts and letters of offer. For local workers, application forms, employment interview assessment forms, medical check-up reports and employment contracts were sighted for newly recruited employees. A copy of the identification card was kept as a record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement at the places nearby the villages. For foreign workers managed by Human Resources & Administration Workforce Management Unit. BPB have committed to the policy of no recruitment fees. Fees for levy, medical examinations (FOMEMA), visa on arrival, visa endorsement, immigration security clearance, immigration service fee, PLKS (Pas Lawatan Kerja Sementara) fee, and travel from point of departure to designated estates are all included.
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 hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Sg. Jernih CU have conducted the risk assessment on all its operations as well as determining their control measures. The HIRARC was reviewed at minimum once a year if accident occur or changes in operations. The mill had conducted risk assessment on all its operations as well as determining their control measures annually. Risk assessment on activities such as boiler, grading, loading ramp, sterilizer, digester & press, clarification, Biogas, ESP System etc. have been carried out and control measures determined. On overall performance, OSH administrative controls implementation as well as engineering control equipment was found adequate during the assessment. The estates had conducted risk assessment on all its operation as well as determining their control measures annually. Risk assessment on all its operation as well as determining their control period adequate during the assessment.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people are monitored.	Yes	Safety and Health Policy for Boustead Plantation Berhad has been established for new revision and endorsed by the Chief Executive Director. The policy had been communicated to all levels of the organization through morning briefings and also being displayed prominently in Bahasa Malaysia and English on notice boards at mill and estate office and Muster Ground. During interviews with the foreign/local workers and staff during the site visit estate field operation, workshop, office compound, workshop, laboratory, engine room, boiler house revealed that the employees had been briefed and understood the policy. At Sg. Jernih CU on the OHS management plan has established for 2023 to addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, treatment of illness/injury during the job, use of PPE, OSH Committee meetings, noise risk assessment, LEV inspection, vehicle and machineries programme inspection, etc. Generally, the OSH plans were acceptable.

Clause	Indicators	Comply Yes/No	Findings
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	Yes	A Formal training program which covers all aspects of RSPO P&C was available for year 2023. The Program was established based on training needs identification. Regular assessments of the effectiveness training continued conducted by the CU management. Training plan for 2023 had been established with target month/dates for the training identified, reviewed during the conduct of audit.
	3.7.2 Records of training are maintained, where appropriate, on an individual basis.	No	Even though training conducted was evident, it was found that there were no records available of induction training to estate workers at Sg. Jernih estate hired within past 2 – 4 months, and newly hired workers are not aware of the company sustainability policies, anonymous grievance mechanism and policy on protection of water courses. Therefore, Minor NCR CNST02 was raised.
	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	RSPO (SCCS) training was provided to all personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at the Sg Jernih POM in Feb & July 2023, trained by Mill Engineer and attended by PIC such as sampling operator, effluent operator, lab operator, AP, weighbridge operator, assistant engineer, and CPO & PK transporters.

# SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module - A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/ estates that are certified against the RSPO P&C, or against a Group Certification Scheme Cert. for the CPO mills is necessary to verify the volumes and source of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the only MB Module is applicable.	Yes	Sg Jernih POM received only certified FFB from Sg Jernih Estate, LTT Terengganu Estate, and Bebar Estate and Certified diversion FFB from others CU i.e., Chamek Estate, Telok Sengat Estate, and Kulai Young Estate. Thus, Sg Jernih POM has qualified for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. Refer to Table 3 of this report for relevant production data.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.2	Mass balance Module A mill 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.	Yes	Not Applicable since Sg Jernih POM is IP Mill.
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	Yes	Projection data was available as per below and was reported in the Table 4 of this report for relevant production data.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	Yes	Commodity: Palm Oil RSPO Membership Number: 1-0012-04-000-00 Type of Business: Oil mill License Status: Active Supply Chain Model: Identity Preserved

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<ul> <li>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:</li> <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. 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>	Yes	The Supply Chain and traceability Procedure, was sighted and found all elements of the RSPO Supply Chain standard were covered which included: 1.0 purpose 2.0 scope 3.0 abbreviation and definitions 4.0 procedures / instruction manual - 4.1 requirements for supply chain management -4.1.1 sustainability policy -4.1.2 management presentative -4.1.3 roles and responsibility -4.1.4 record keeping -4.1.5 internal audit -4.1.6 management review 4.2 resource management -4.2.1 competency and training 4.3 traceability procedures -4.3.1 delivery of FFB -4.3.2 delivery of CPO & PK 4.4 Supply chain models -4.4.1 IP or SG -4.4.2 MB

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
			<ul> <li>4.5 reclassification of mill supply chain</li> <li>4.6 material accounting system (continuous accounting)</li> <li>4.7 outsourced activities</li> <li>4.8 claims</li> <li>4.9 complaint and grievances</li> <li>4.10 registration of transactions</li> <li>Sg Jernih POM has implemented Clause 4.3 – traceability procedures for receiving and processing certified and non-certified FFBs. Sg Jernih POM has received certified FFB from owned plantations such as LTT Terengganu Estate, Bebar Estate, Sg Jernih Estate and Certified diversion FFB from others CU i.e., Chamek Estate, Telok Sengat Estate, and Kulai Young Estate</li> </ul>
3.8.6	<ul> <li>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</li> <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 org.</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 org. shall be able to maintain the internal audit records and reports.</li> </ul>	Yes	As described under para The Supply Chain and traceability Procedure was issue on Jan 2022 – Internal Audit Procedure, which is follow the RSPO Supply Chain Certification Standard and requirements. An audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard requirements and covered mass balance module requirements. RSPO supply chain internal audit was conducted in March 2023. Audit Attendance sheet, audit plan, and audit notes were sighted by auditor. Management review meeting was carried out in March 2023 (combine RSPO SC and RSPO MYNI 2019, MSPO and MSPO SCCS).

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Yes	The Weighbridge Clerk checked and verified the consignment notes issued by the supplying estates for the in-coming RSPO and non-RSPO FFBs. SJPOM still kept copies of the FFB Consignment Notes or FFB Delivery Notes issued by the certified supplying estates. Randomly selected FFB delivery notes/dispatch tickets for RSPO-certified FFBs issued by the supplying estates on the in-coming FFBs were verified. It was found that all delivery notes/dispatch tickets had indicated the estate's RSPO Certificate number, the name of the supplying estate and the quantity (weight in Kg) of the FFBs. It has been checked and verified that there was no overproduction of certified tonnage.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<ul> <li>Sales and Goods Out</li> <li>The supplying mill shall ensure that the following minimum information for</li> <li>RSPO certified products is made</li> <li>available in document form. The</li> <li>information shall be complete and can</li> <li>be presented either on a single-</li> <li>documents or across a range of</li> <li>documents issued for RSPO certified</li> <li>oil palm products (for example, delivery</li> <li>notes, shipping documentation and</li> <li>specification documentation): a) The</li> <li>name and address of buyer;</li> <li>b) The name and address of the seller</li> <li>c) The leading or shipment/delivery</li> <li>date;</li> <li>d) The date on which the documents</li> <li>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>	Yes	Documented procedures related to sales and goods out were sighted and found adequate. The supplying mill has followed the minimum information for RSPO certified product, and this has been confirm accordingly.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<ul> <li>Outsourcing Activities</li> <li>(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.</li> <li>(ii) The mill shall ensure the following: <ul> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has na 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.</li> </ul> </li> <li>c) The mill shall furthermore ensure (e.g. through contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractor, systems, and all information, when this is announced in advance.</li> </ul>	Yes	SJPOM outsource transportation of certified product (CPO & CPK) to end buyer. It has been confirmed that there is contract document between SJPOM and the transporters) stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Yes	List of contractors, specifically the transporter which is involved in the physical handling of certified materials had been well maintained through the stakeholder listing dated June 2023. Among the details maintained are name, contact no. as well as address of the contractor.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Yes	No new contractors were used and will be used in the future for the processing or production of RSPO certified materials. Nonetheless, the PIC was aware of the need to inform CB on those new contractors prior to next audit.
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. 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	Yes	SJPOM was found to have maintained accurate, complete, up-to-date and accessible records and reports pertaining to their traceability/ supply chain system implementation. Retention times for all record were maintained for 3 years as per procedure The Supply Chain and traceability Procedure.
	held in stock. iii ) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real- time basis.	Yes	SJPOM was found to have record and balance all details of RSPO certified FFB, CPO & PK on real time basis.
	<ul> <li>iv) For Mass Balance Module, the mill:</li> <li>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.</li> <li>b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to</li> </ul>	Yes	Not applicable since POM used IP model

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).		
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	Yes	Sg Jernih POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on a daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Yes	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm products, including during transport and storage to strive for 100% separation.	Yes	Marketing Department personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer. They have updated the system based on input provided by SJPOM (e.g. of input Projected & Actual FFB Processed template, Mass Balancing Records for Oil Mills (continuous accounting system), daily production summary report, monthly production summary report etc.)
3.8.16	<ul> <li>Registration of Transactions</li> <li>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</li> </ul>	Yes	Marketing Department personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer. They shall update the system based on input provided by SJPOM (e.g., of input Projected & Actual FFB Processed template, Mass Balancing Records for Oil Mills (continuous), daily production summary report, monthly production summary report etc.)

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul> <li>more than three months after</li> <li>dispatch with the dispatch date</li> <li>being the Bill of Lading or the</li> <li>dispatch documentation date.</li> <li>ii) Remove: RSPO certified volumes</li> <li>sold under different scheme or as</li> <li>conventional, or in case of</li> <li>underproduction, loss or damage</li> <li>shall be removed in the RSPO IT</li> <li>platform</li> </ul>		
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	Yes	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. SJPOM does not use RSPO corporate logo as well as trademark logo.

Principle 4: Respect community and human rights and deliver benefits Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	Yes	Boustead Plantations Berhad established a Human Rights Policy. This Policy respects not just human rights, but also states that the Company would not be complicit in human rights infringement and prohibits retaliation against Human Rights Defenders. This Policy is documented and displayed on the main notice boards and disseminated to workers during muster briefings.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	There is no evidence of any use of violence or the instigation of violence within Sg Jernih CU. This was further verified during interviews held with the workers and external stakeholders such as contractors, suppliers, local communities and Orang Asli villagers.

Clause	Indicators	Comply Yes/No	Findings
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Yes	Boustead has its 'Policy and Procedure - Grievance Procedure' for implementation. Nevertheless, each Estate and Mill within the Sg Jernih Certification Unit has its own complaints and grievance procedure known as <i>Prosedur Aduan ke Pihak Atasan</i> . This procedure is disclosed during internal and external stakeholder meetings held at each unit and displayed on the main notice boards. The procedure is applicable to all workers for all types of complaints and grievances including sexual harassment. The procedure is accompanied by a flowchart which shows the flow of complaints received and the days (timeframe) within which action should be taken. Based on the procedure, evidence is available that the system allows for effective and timely resolution of grievances. The procedure also assures that all complainants and Human Rights Defenders, whistleblowers and spokespersons would not be intimidated or face any risk of reprisals.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Yes	The procedure is displayed at all main notice boards and explained during muster briefings to workers and to external stakeholders during external stakeholder meetings. For illiterate parties, the procedure was explained verbally and if necessary, with the help of a translator. Interviews conducted with workers confirmed their understanding of the complaints and grievance procedure.
	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	It was evident that the complainants are kept aware of the status of action taken following each complaint. This was further verified from interviews with workers. No complaints from external stakeholders have been identified.
	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	It was verified during the audit that the conflict resolution mechanism for Boustead Plantation Berhad does contain options for aggrieved parties to access independent legal and technical advice. It also provides for the option for aggrieved parties to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Yes	The contribution to community development for all units within Sg Jernih CU is the employment of prisoners on parole in preparation for their assimilation into the community upon prison release. These prisoners on parole receive the same benefits and wages as others doing the same work. Additionally, the CU also employ and offer job opportunities for local communities including the indigenous communities (Orang Asli) from the nearby settlements. Contributions to schools, mosque, food donation, etc., were reviewed during audit.

Clause	Indicators	Comply Yes/No	Findings
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	Yes	It has been verified that Boustead Sungai Jernih bought the land of Sungai Jernih and Bebar estate from LKPP on 16 April 1994, as Country Lease ( <i>Pajakan Negeri</i> ). It was previously owned by Pahang state Government, and it was given to LKPP as one of Government Link Companies. Boustead bought the land from LKPP. Interviews with Orang Asli from Kg Jenang Baru, Kg Dungun, Kg Runchang and Kg Wah Wah confirmed that they do not have any issue on that. The land titles were for planting either oil palm or agricultural crops for economic value. For LTT Terengganu, the Land was owned by Terengganu Government and bought by <i>Persatuan Bekas Perajurit Malaysia (PERWIRA)</i> in 1990. After that PERWIRA changed their name to <i>Tabung Angkatan Tentera Terengganu</i> and then merged with Boustead in 1991 and the Estate has been managed by Boustead until now. Interviews with Villagers from Kg Jenang Baru and Felda Seberang Tayor, confirmed that, there is no issue regarding Land title at LTT Terengganu Estate. It has been confirmed that Boustead has the right to use the land which is legitimately owned by their company. Evidence of legal ownership of the land including history of land tenure was verified during this audit. Each estate was provided with legal use of the land through a Country Lease signed by the Director of Lands and Surveys of Pahang and Terengganu following the payment of premium.
	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 Sungai Jernih CU from 1990-1994. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	Yes	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these	Yes	

Clause	Indicators	Comply Yes/No	Findings
	decisions were taken. 4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Yes	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Sungai Jernih CU from 1990-1994. All the related documentation regarding the land acquisition was kept in Boustead 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 estates. Hence, there was no map showing the legal, customary, or user right of other users since 1990-1994.
	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 Sungai Jernih CU
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Yes	
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	

Clause	Indicators	Comply Yes/No	Findings
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 Sungai Jernih CU and land title, there were no new plantings established on local peoples' land. It has been verified that the land is legitimately owned by Sungai Jernih CU from 1990-1994. The audit team had confirmed that there were no land issues related to previous owners.
where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two- way process of consultation and negotiation.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Boustead Sungai Jernih from 1990-1994. All the related documentation regarding the land acquisition was kept in Boustead HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non- coercive and entered into voluntarily and carried out prior to new operations.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Boustead Sungai Jernih since 1990-1994. All the related documentation regarding the land acquisition was kept in Boustead HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Boustead Sungai Jernih from 1990-1994. All the related documentation regarding the land acquisition was kept in Boustead HQ Office, Kuala Lumpur and the copy in the estate was verified

Clause	Indicators	Comply Yes/No	Findings
	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.		by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Yes	
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	Yes	No new lands were acquired for plantation and mills after 15/11/2018 at Boustead Sungai Jernih CU as verified during this Audit. The current operation area including mill and estates was as per stated in the land title
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables	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 Prosedur Penentuan Hak Pemilikan Tanah / Procedure in resolving land conflict'. The CU had also developed a SOP - Fair Compensation in order to handle any issues related with compensation. In accordance with the 'Prosedur Penentuan Hak Pemilikan Tanah' and SOP - Fair Compensation, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Boustead Head Office. The procedure which was sighted stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.

Clause	Indicators	Comply Yes/No	Findings
indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Yes	In accordance with the <i>'Prosedur Penentuan Hak Pemilikan Tanah'</i> and SOP - Fair Compensation, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. Nevertheless, , there was no issue/case related to compensation (this indicator) as verified by audit team during consultation with staff and workers at mill and visited estates. There was also no compensation issue with local communities and Indigenous people.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	Yes	There were no scheme small holdings at Sungai Jernih CU. The Fresh Fruit Bunches are supplied from Boustead owned estates which are certified to RSPO.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Yes	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the ' <i>Prosedur Penentuan Hak Pemilikan Tanah</i> ' and SOP - Fair Compensation. In accordance with the ' <i>Prosedur Penentuan Hak Pemilikan Tanah</i> ' and SOP - Fair Compensation, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Boustead Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation is in place and documented and made available to affected parties.	Yes	It has been confirmed that there was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighboring estate. The audit team has also interviewed relevant stakeholders such as the village representatives
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Yes	It has been verified that the land is legitimately owned by Boustead Sungai Jernih from 1990-1994. All the related documentation regarding the land acquisition was kept in Boustead HQ Office, Kuala Lumpur and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

Clause	Indicators	Comply Yes/No	Findings
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	It has been verified that the land is legitimately owned by Boustead Sungai Jernih from 1990-1994. All the related documentation regarding the land acquisition was kept in Boustead HQ Office, Kuala Lumpur 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 through appropriate conflict resolution mechanisms.	Yes	Land conflict is not present in the area of the Sg Jernih certification unit. The audit team has also interviewed relevant stakeholders such as the villager representatives from Kg. Jenang Baru (Ladang Tabung Tentera), Orang Asli Jakun from Kg Dungun, Kg Runchang and Kg Wah Wah (Sg. Jernih Estate & Sg. Jernih POM). From the interviews, it can be concluded that there was no evidence of any land dispute at Sungai Jernih CU.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs.	Yes	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. The audit team has also interviewed relevant stakeholders such as the villager representatives from Kg. Jenang Baru (Ladang Tabung Tentera), Orang Asli Jakun from Kg Dungun, Kg Runchang and Kg Wah Wah (Sg. Jernih Estate & Sg. Jernih POM). From the interviews, it can be concluded that there was no evidence of any land dispute at Sungai Jernih CU.
	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 villager representatives from Kg. Jenang Baru (Ladang Tabung Tentera), Orang Asli Jakun from Kg Dungun, Kg Runchang and Kg Wah Wah (Sg. Jernih Estate & Sg. Jernih POM). From the interviews, it can be concluded that there was no evidence of any land dispute at Sungai Jernih CU.

**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	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	For Sungai Jernih POM, being an Identity Preserved Mill, Sungai Jernih Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Sungai Jernih supply base. Therefore, this indicator is not applicable.
fairly and transparently with all smallholders (Independent and	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	For Sungai Jernih POM, being an Identity Preserved Mill, Sungai Jernih Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Sungai Jernih supply base. Therefore, this indicator is not applicable.
Scheme) and other local businesses.	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	For Sungai Jernih POM, being an Identity Preserved Mill, Sungai Jernih Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Sungai Jernih supply base. Therefore, this indicator is not applicable.
	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	There is no Evidence is available that all parties, including women and independent representative organizations 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 due to Fresh Fruit Bunches were supplied from Boustead Plantation Berhad owned estates, which is Sungai Jernih Estate. Bebar Estate and LTT Terengganu Estate. So far, there have been no third-party FFBs sent to the mill.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	Fresh Fruit Bunches were supplied from Boustead Plantation Berhad owned estates, which is Sungai Jernih Estate. Bebar Estate and LTT Terengganu Estate. So far, there have been no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	Interviews conducted with contractors and suppliers, representatives confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing Equipment in SJPOM has been calibrated in yearly basis using Metrology Corporation Malaysia Sdn Bhd.

Clause	Indicators	Comply Yes/No	Findings
	5.1.8 The unit of certification supports Independent Smallholders with cert, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	Yes	Boustead Plantation 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.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Yes	A grievance mechanism which respects anonymity and protects complainants is in place at the Sungai Jernih CU as per the Procedure for External Communication, SOP <i>Carta</i> <i>Aliran Pengendalian Isu Sosial and Boustead Policy and Procedure – Grievance</i> <i>Procedure.</i> To date there is no complaint/grievance from stakeholders.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Yes	For Sungai Jernih POM, being an Identity Preserved Mill, Sungai Jernih Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Sungai Jernih supply base. However, CU has conduct annually programme to supports Smallholders with certification, and sustainability practices such as good agriculture practices, environmental management, safety, etc. Sighted that latest Stakeholder meeting to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	Yes	<ul> <li>The CU has conduct annually programme to supports Smallholders with certification, and sustainability practices such as good agriculture practices, environmental management, safety, etc. Sighted that latest Stakeholder meeting to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification. Among of support to improve smallholder surrounding CU such as <ol> <li>Jobs opportunity for both male and female Orang Asli villagers was provided indirectly by Sg Jernih CU through appointment of Orang Asli workers by contractors for loose fruits collection and Harvesting. Also, direct employment by the mill and plantation.</li> </ol> </li> <li>Sg Jernih CU had continued to provide programme, road repairs/Maintenance etc</li> </ul>
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	For Sungai Jernih POM, being an Identity Preserved Mill, Sungai Jernih Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Sungai Jernih supply base. Therefore, this indicator is not applicable.
	5.2.4 (C) Evidence exists that the unit of	Yes	For Sungai Jernih POM, being an Identity Preserved Mill, Sungai Jernih Palm Oil Mill

Clause	Indicators	Comply Yes/No	Findings
	certification trains Scheme Smallholders on pesticide handling.		does not purchase FFB from smallholders, and no smallholders are in Sungai Jernih supply base. There was no specific training on pesticide handling, but the CU has conduct annually programme to supports Smallholders with certification, and sustainability practices such as good agriculture practices, environmental management, safety, etc. Sighted that latest Stakeholder meeting to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	For Sungai Jernih POM, being an Identity Preserved Mill, Sungai Jernih Palm Oil Mill does not purchase FFB from smallholders, and no smallholders are in Sungai Jernih supply base. Therefore, this indicator is not applicable.

**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 m/ship, political affiliation or age.	Yes	BPB has implemented the Group Sustainability Policy Statement signed by Chief Executive Officer. The policy was be guided by the commitments spelt out in the para 2.2 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. BPB 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.
	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	Based on documentation review which included employment contracts, workers' pay slips, interviews with sampled local workers at POM, there was no evidence of any forms of discrimination in any of the POM. Employment contracts and payslips revealed that local workers receive the same rate of pay, housing allocation and are able to enjoy the same benefits such as medical coverage, use of amenities, etc. No foreign workers were employed by the POM @ 100% local. While for estates, based on documentation review which included employment contracts, workers' pay slips, interviews with workers and field observations, there was no evidence of any forms of discrimination in any of the operating units within Sg Jernih BU. Employment contracts and payslips revealed that foreign and local workers receive the same rate of pay for equal work, similar housing allocation and are able to enjoy the same benefits such as medical coverage, use of amenities, etc. The foreign workers interviewed also confirmed that there was no payment of any recruitment fees.

Clause	Indicators	Comply Yes/No	Findings
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Yes	The recruitment process was clearly stated in the procedure where the recruitment was based on age, medical fitness and etc. There is no discrimination based on religion, gender, nationality etc during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. Meanwhile, promotion processes are available for the local & foreign workers in the Limits of Authorities (LOA). BPB have implemented Group Sustainability Policy Statement signed by Chief Executive Officer, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities.
	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	From interviews with female workers, local female employees do not undergo any pregnancy testing before or during employment. Only female foreign workers are required to undergo pregnancy testing prior to employment and periodically as part of the Foreign Workers Medical Examination (FOMEMA) which is the local legal requirement for hiring of foreign workers. For local women who are pregnant, they are required to report this to the management and where they are identified to be working in a high-risk area such as in handling of chemicals, they will be temporarily transferred to other work.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Yes	Bebar Estate estate and LTTT estate under the Sungai Jernih BU has established its own gender committee while Sungai Jernih mill and estate have a combined gender committee. Sighted during the audit were organization charts of each gender committee comprising primarily of female employees and have been set up to identify and address issues of concern such as sexual harassment, violence, abuse and reproductive rights. There were no grievances or report regarding sexual harassment or domestic violence at all sites, as confirmed from meeting minutes of gender committee meetings and interviews of gender committee representatives.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	BPB has implemented the Group Sustainability Policy Statement signed by the Chief Executive Officer. The policy was guided by the commitments spelt out under respect human rights 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 all job scope. 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	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national	Yes	For the Sg. Jernih CU documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Labour laws, union and/or other collective agreements detailing payments and other conditions, were made available in the languages understood by the workers and explained to them by a management during induction.

Page 50 of 92

Clause	Indicators	Comply Yes/No	Findings
at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	languages (English or Bahasa Malaysia) and explained to them in language they understand.		For mill, each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO, EIS, electricity), net salary, annual leave and medical leave taken, etc. Samples of payslips for samples worker were sighted and verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order 2022. All estate workers have received copies of employment contracts in their own language, i.e., Malay language for local and Indonesian workers and Bengali for Bangladesh workers, as confirmed from review of at sampled worker employments contracts from each estate for both local and foreign workers and through interviews with all sampled workers. Wages and benefits allocated in employment contracts are consistent with monthly updates received from the Malayan Agricultural Producers Association (MAPA)/ National Union of Plantation Workers (NUPW).
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	Yes	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 Employment Act 1955, Minimum Wages Order 2022, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement. 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. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.
	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	The Sg. Jernih CU has complied with legal requirements and Collective Agreement under MAPA/NUPW Agreement on MAPA/NUPW Palm Oil Mill Employees Agreement 2019. The agreement shall be deemed to have come into force with effect from 1 <sup>st</sup> January 2019 and shall remain in force for a continuous period of three (3) years.
	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.	Yes	All operating units within Sg Jernih BU provide housing to all its workers for free. This includes all workers by third party contractors, as well as workers on parole. Each house has 3 rooms and based on interviews with workers, maximum occupation during the audit was 3 occupants per house. All houses have their own sanitation facilities, electricity and water supplies. Other welfare amenities available at the workers' housing include playing fields, futsal court, creche, grocery shops and <i>surau</i> , water dispenser, etc. Based on field observations during the audit and interviews conducted with the workers, the houses and basic amenities were being provided in a satisfactory manner and the houses are in a relatively good state of

Clause	Indicators	Comply Yes/No		Findings	
	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.		are able to seek medical tree Visiting Medical Officer once also review cases at the clin All the above as per the requ Accommodations and Amenit	eatment there free of charge. a fortnight. During these for ic, and follow the Health Ass uirements of the Employees' ies Act 1990.	as well as contractors' workers The clinics are visited by the rtnightly visits, the VMO would istants for line site inspections. Minimum Standard of Housing,
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	made to improve workers' ac food canteen sundry shops t	ccess to adequate, sufficient a o operate near the workers' I monitoring being done to ensu	onstrate that efforts have been and affordable food by allowing nousing or near the Mill. There ure prices of items sold are not
	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.	Yes	benefits for their workers. T transport to work, sports an	he calculation included costs	e prevailing wages and in-kind s of housing, electricity, water, tion, childcare and healthcare. ollows:
	<ul> <li>PROCEDURAL NOTE:</li> <li>A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place.</li> <li>The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</li> <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</li> </ul>		Sungai Jernih Mill Total prevailing wages <u>LTT Terengganu Estate</u> Total prevailing wages <u>Bebar Estate</u> Total prevailing wages <u>Sungai Jernih Estate</u> Total prevailing wages	Local worker (RM) 2326.50 Local worker (RM) 3145.68 Local worker (RM) RM2,308.00 Local worker (RM) RM3295.00	Foreign worker (RM) No foreign worker Foreign worker (RM) 3053.62 Foreign worker (RM) RM2057.00 Foreign worker (RM) RM2695.00

Clause	Indicators	Comply Yes/No	Findings
	<ul> <li>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> <li>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.</li> <li>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.</li> </ul>	Yes	All the estates and mill employ full-time employees, and based on records reviewed and interviews conducted, there are no casual, temporary and day labour employed within all the certification units.
6.3 The unit of cert 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 assoc. and collective	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 statement recognizing freedom of association and the right to collective bargaining is available in a policy entitled as BPB Sustainability Policy. It is written in both English and Malay language and explained to the workers in languages they understood during Policy trainings. Interviews conducted with the workers confirmed their understanding. Some workers are members of the National Union of Plantation Workers (NUPW) while some staff are members of the All-Malayan Estates Staff Union (AMESU) on voluntary basis.
bargaining are restricted under law, the employer facilitates parallel means of independent and free	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	All meeting minutes held between the management team and workers' representatives of each operating unit within the Sg Jernih BU were documented and reviewed during the audit. The workers' representatives were appointed based upon the collective consent of the workers they represent. This was confirmed by the workers during audit interviews.
assoc. and bargaining for all such personnel.	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or assoc., or other freely elected representatives for all workers incl. migrant and contract workers.	Yes	Based on minutes of meetings, correspondences between Boustead Plantation Berhad and NUPW Pahang Branch, and interviews held with Union representatives, evidence was available that management does not interfere with the formation or operation of workers' union and representatives.

Clause	Indicators	Comply Yes/No	Findings
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Yes	The company has BPB Sustainability Policy which states the company's commitment to eliminate the use of child labour, practice no child exploitation and comply with the Children and Young Person Employment (Amendment) Act 2019. The policy is communicated to all employees in policy briefings and external stakeholders during external stakeholder meetings while agreements with contractors and suppliers include the restriction against child labour. Records of policy briefings conducted to internal and external stakeholder meetings including meeting minutes, attendance lists and photos were sighted during the conduct of audit.
	<ul> <li>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.</li> <li>6.4.3 (C) Young persons may be employed only for non- hazardous work, with</li> </ul>	Yes Yes	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout the certification unit. Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen the age of the workers when they applied for the job and review of identification documents of sampled workers to show no child or young persons are employed. Visit to the linesite and field also did not reveal any persons under 18 years old working. There was no evidence that any young persons were employed at the certification unit as evidenced from documentation review, field observations and interviews.
	protective restrictions in place for that work. 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's sustainability policy including prohibition of use of child labour is communicated to all employees in policy briefings and external stakeholders during external stakeholder meetings while agreements with contractors and suppliers include the restriction against of child labour. Records of policy briefings conducted to internal and external stakeholder meetings including meeting minutes, attendance lists and photos were sighted during the audit.
6.5 There is no harassment or abuse in the workplace, and	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 company has established "Policy and Procedures – Managing Sexual Harassment in the Workplace. The policy communicated to all internal and external stakeholders on an annual basis as confirmed from policy training records and interviews with employees and contract workers.
reproductive rights are protected.	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	Yes	The company has BPB Sustainability Policy which states the company's commitment to respect women's right to family planning, as well as the right to sexual and reproductive health as long as it does not violate the provisions of the law. The Policy is displayed on the main notice boards and explained to workers during muster briefings. The policy communicated to all internal and external stakeholders on an annual basis as confirmed from policy training records and interviews with employees and contract workers.

Clause	Indicators	Comply Yes/No	Findings
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	Yes	The company has a process for assessing needs of new mothers as seen from completed new mother consultation and assessment forms. Sampled forms were sighted for Bebar Estate which had one new mother in the past one year, while Sg. Jernih estate completed assessments for 2 new mothers in the past one year. All new mothers underwent medical checks at the respective estate clinics, and none were identified to be performing hazardous work which may affect the infants.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Yes	Grievance procedure states the company's grievance mechanism for internal and external stakeholders which states that "The company gives full assurance that the complainant will be protected and will not be threatened or disclosure of the complainant's information to the parties involved". The grievance mechanism is communicated to workers during muster calls and policy briefings as well as during internal and external stakeholder meetings.
6.6 No forms of forced or trafficked labour are used.	<ul> <li>6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited:</li> <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	From interviews with estates local and foreign workers, they informed that the company does not retain their identity documents. Foreign workers keep their own passports and are provided with lockers by the company to store their passports and personal belongings. There is no evidence found of contract substitution, involuntary overtime, debt bondage or withholding of wages. Workers who return to their home country for vacation leave are not charged any deposit. Foreign workers who are under 2-year contract with the company are permitted to terminate their contract early in case of family issues or other emergencies in their home country without any penalty charged to them. All workers at Bebar Estate and newly hired workers of LTTT (who joined within the past one year) informed that they were not charged any recruitment fees to join the company.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	The company's Sustainability Policy by the Chief Executive Officer states the company's commitment to Respect the Rights of All Employees including to implement responsible recruitment practices by preventing and eliminating any use of forced labour, child labour and human trafficking in accordance with ILO conventions. The policy applies to both local and foreign workers. The company is also in the progress of developing an SOP on Recruitment and Employment of Migrant Workers including how to ensure no recruitment fees are charged to workers. Although the procedure is not yet formally approved by management, the company is already taking measures to monitor recruitment agents of

Page 55 of 92

Clause	Indicators	Comply Yes/No	Findings
			foreign workers to ensure they do not charge any recruitment fees. It is confirmed by recently hired foreign workers that they were not charged any recruitment fees to join the company.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	Yes	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the Assistant Manager for the downline implementation of OSH practices in the estates and mill. All identified committees were officially given a letter for such an appointment. There is a structure to differentiate between representatives of employer and representatives. Moreover, the representatives of employees on the safety and health committee were able to represent the various sections of a place of work. Based on minutes also sighted, very less participation of employee's representative which contradict with safety committee appointed. OSH Committee meetings are held once in three months. Review of the minutes of the meeting was carried out 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	Procedures for accidents and emergencies have been established. There is formation of ERP Team & ERP for all the identified incidences. Besides that, the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They include emergencies relating to earthquake, fire, chemical spillage, flood, animal attack/poison, COVID 19 and accident at workplace. During site inspection at estate, it was sighted Emergency Response Plan was available at Chemical Store, Workshop, Office, Workers Housing, etc. During interviews with workers, it was noted that all workers understand ERP. Fire drill training was conducted to all estates to create awareness and ERP to all workers. The POM has their own first aider and be trained by third party consultant. The certificate of competency first aided valid for 3 years. First aid training was conducted annually. Master list of first aid box of all estate and POM which is available at the office was checked and verified. Observed that, first aid box is well provided for all the field mandores whose involved in harvesting, manuring, spraying works, etc. The content of the first box which is held by harvesting, manuring and spraying mandore was verified. The contents such as bandage, gauze, triangular bandage, cotton wool, plaster, handy plaster, flavin lotion, antiseptic cream, surgical gloves and scissors were well equipped. The stock of first aid box is regularly checked and refill, when necessary, by estate Hospital Assistant. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed on notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and Government Clinic were also included. Accident statistics were being maintained in a satisfactory manner and periodically reviewed.

Clause	Indicators	Comply Yes/No	Findings
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	Yes	All staff and workers such as the storekeepers, mill workers/operators, harvesters and sprayers/manurers were continuously trained in safe working practices including SSOP for PPE related to their job function. PPE were given to workers based on HIRARC and SSOP recommendations appropriate for the job position or hazardous operation undertaken. During field inspection at Mill Workstation, Harvesting Operation, Manuring Operation, Circle Spraying Operation, sighted they were seen to wearing PPE such as face masks respirators, goggles, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and safety helmet/straw hat, to cover all potentially hazardous operations. The condition of each PPE item and their validity lifespan were found good. Records of PPE issued, and acknowledgement of receipt are maintained individually for all category of workers at mill and estates. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as work at height and in confined space. All workers were provided with appropriate PPE where the cost is borne by the management.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	Yes	Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4). Sighted the monthly payment contribution made to SOCSO on Form 8A for foreign and local workers at the POM and estates was available for reviewed.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	Occupational injuries are recorded using Lost Time Accident (LTA) metrics via monthly data of estate safety performance. Sighted the Sg. Jernih CU has maintained and updated the LTA Summary by monthly basis. For accidents records 2022, The CU managed to submit the JKKP 8 form to DOSH before 31/01/2023.

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	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	Yes	<ul> <li>IPM plans at Sg. Jernih CU was implemented and monitored to ensure effective pest control. The objectives are:</li> <li>Minimise or possibly elimination of significant threats caused by pests to the palms growth health and safety of workers, staff and the public in general</li> <li>Prevention or minimize of loss or damage to palms and yield by pests</li> <li>Increase flora and fauna in the estate environment</li> <li>To ensure effective monitoring and early warning of pest incidence in the plantings</li> <li>To achieve insects biological equilibrium as possibly can.</li> </ul>

Clause	Indicators	Comply Yes/No			Find	ings			
Integrated Pest Management (IPM) techniques.	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	and C	Plan to prevent and monitor the spread of species referenced in the Global Invasive Species Database and CABI.org (if any). This is not practiced in the visited estate. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.					
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Yes	It was	It was identified that there is no use of fire for the pest control at the estates.					
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	Yes	<ul> <li>Yes Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in; <ul> <li>a) SOP - O.P.C.No.01b / 01c,</li> <li>b) SOP - O.P.C No 02a / 04b / 04c,</li> <li>c) SOP - O.P.C No 04f / 04g / 05b.</li> </ul> </li> <li>The Manual had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. All the Estates had maintained chemical registers and were updated periodically. The registers were updated in January 2023.</li> <li>The chemical used in the estates as captured from the chemical register among others as listed below.</li> </ul>					ge (intended ical registers listed below.	
			No.	Chemical name	Class	-	Chemical name	Class	
			1	Glyphosate isopropylamine		6	Cypermethrin		
			2	Sodium chlorate		7	Triclopyr butoxy e/ester		
			3	Glufosinate ammonium		8	Canyon 20G	IV	
			4	Triclopyr butoxy		9	Amine 2.4 D	II	
			5	Metsulfuron methy 20% w/w	111	10	Bayfolan	III	
				stification of agrochemicals use			Palm circulars OPC.		
			No.	Reference		Title			
			2		nagement in ol in oil palm	oli paim			
			3		nent of Rhino	ceros Be	etles		
			4		f leaf eating c				
	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	<ul> <li>The estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.</li> <li>a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used</li> </ul>						

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

Clause	Indicators	Comply Yes/No	Findings
	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	Sg. Jernih CU had records showing that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. Pesticide applications were guided by Oil Palm Circular (OPC), Safe Work Procedure (SWP), CHRA and by SDS supplied by the manufacturer. The SWP/OPC/CHRA had included a chemical register list, which indicates the purpose of usage (intended target), hazards signage, trade and generic names. The SOP procedure also had written justifications.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	In Sg. Jernih CU, all pesticides were stored in accordance with the legal requirement, in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations as well as recommendation by manufacturer as per applicable SDS. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e. storekeeper. The stores in the estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/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 estates. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities were continually implemented for empty pesticide containers. The activities were carried out at a concrete pond of 3 levels. Empty pesticide containers observed were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health.
			All information regarding the chemicals and its usage, hazards, trade and generic names were available in both English & in most cases, Bahasa Malaysia and understood by workers. The SDS for concerned pesticides used, were available in both English and in most cases, Bahasa Malaysia.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	With the exception that some empty agrochemical containers were recycled for premixing pesticides for onward delivery to field, the rest of the empty chemical containers were triple rinsed, pierced and stored in the schedule waste store. Empty chemical container classified as SW 409 and disposed to DOE's license contractor.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires	Yes	Aerial spraying of pesticides is not a practice in Sg. Jernih CU. There was no evidence to show that such a method being used in all estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site inspection.

Clause	Indicators	Comply Yes/No	Findings
	prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.		
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	Specific annual medical surveillance for pesticide operators and documented action to treat related health conditions was demonstrated by Sg. Jernih CU. From the results, all workers fit to handle chemical.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	Yes	Medical screening for woman workers involved in chemical handling and application was conducted on a monthly basis. The latest medical screening conducted indicated none were found pregnant. During the site visit the female chemical handlers and manurer were interviewed and they mentioned that they are not pregnant no breastfeeding. Sg. Jernih POM and their supply bases do not have persons under the age of 18 working in the premises.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Yes	The SJPOM had established and maintained Waste Management Plan and updated for financial year 2023/2024. Sighted waste been identified were scheduled waste and recycled waste. Among the action plan been identified were storage & disposal of scheduled waste by licensed collector, reuse of ESP ash to increase soil nutrients collected by estate and recycled EFB to estate for mulching purpose. All estates had established and maintained Waste Management Plan and updated for year 2023. Sighted waste been identified were organic waste such as palms fronds, recyclable waste, toxic waste such as scheduled waste, and mixed waste such as domestic waste.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	No	Standard Operating Procedure Scheduled Waste Disposal of empty pesticide containers was carried out as per established procedures. However, for Bebar Estate, the organization had identified SW 305 & SW 409 in the E-swiss system but no identification for used oil filter and medical waste. Inventory been updated by the person in charge and sighted for January, April, May and June 2023 with latest balance SW305 and SW409 are tally with stock at scheduled waste store. Latest disposal on 27/1/2023 collected by Cenviro Recycling and Recovery Sdn Bhd for SW305 & SW409. However sighted balance stock for SW 409 held was more than 180 days. All these above noncompliance been highlighted as Minor NCR RMN 02.
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	During site visit at Sg Jernih CU, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Sg Jernih CU have been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	Yes	<ul> <li>Sg. Jernih CU continued to implement the good agriculture practices as contained in SOPs, to manage soil fertility, to optimise yield and minimise environmental impacts. The SPOs were in the Oil Palm Circular Manual (O.P.C.).</li> <li>Maintenance of soil fertility was guided by its OPC in a related chapter: <ul> <li>OPC Chapter 01a – Establishment and Maintenance of Legume Covers</li> <li>OPC Chapter 03b – Manuring Application</li> </ul> </li> </ul>

Clause	Indicators	Comply Yes/No	Findings				
sustained yield.			OPC Chapter 08b – Mulching – Revised Dec 1994 Fertilizers application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the Applied Agricultural Resources Sdn Bhd. Annual fertilizer recommendations were made based on annual foliar sampling. Fertilizer application program was monitored using program sheets, bin cards, Field Cost book and Fertilizer Quality Assessment by Applied Agricultural Resources Sdn Bhd.				
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	It was evident that the periodic foliar and soil sampling were carried out by the Applied Agricultural Resources Sdn. Bhd. (AAR) and its result formed part of the basis for the fertilizers input recommendation. Periodic tissue and soil sampling were carried out to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg, Ca & B.				
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of EFB, POME, palm residues and optimal use of inorganic fertilizers.	Yes	All estates continued to have a nutrient recycling strategy in place. Palm fronds were stacked and left to decompose in the fields and EFB applied. EFB was applied at 40 tons /Ha/year in single layers in plots between palms. Only Sg. Jernih Estate applied the EFB. Records of application and maps were made available to auditors for the EFB applications.				
	7.4.4 Records of fertilizer inputs are maintained.	Yes	All 3 Estates continued to maintain records of fertiliser inputs. Records of programs and applications of fertilisers were made available to auditors. Records showed that the main fertiliser programmed apply in 2023 were AABN20M, AS, BRP, Fertibor, KS, MOP, OPCom50B for mature palm and AABN20 for immature palm. The estates continued to monitor their fertilizer inputs as recommended by their agronomist from Applied Agricultural Resources Sdn. Bhd. (AAR). The records of the fertiliser inputs were maintained in the Fertilizer Application Record Books and the Bin Card.				
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes					
			1Batu AnamX2Batu LapanX3Changkat LobakX4DurianXX5KemahangX				
			6LA (Clayey)X7Padang BesarX8PagiX9PohoiX10Serdang – BungorX				
			11BeserahX12Beserah LateriticX13Local AlluviumX14MalaccaX15MasaiX				
			16     Pelepah     X       17     Rengam     X				

Clause	Indicators	Comply Yes/No	Findings
			18       Sogomana       X         19       Tavy       X       X         20       Jempol       X       X         21       Kedah       X       X         22       Lintang       X       X         23       Malau - Serdang       X       X         24       Nami       X       X         25       Pak Bong       X       X         26       Rasau       X       X         There were no problematic soils (e.g. podzols and acid sulphate soils) on Sg. Jernih CU. The estates maintained the following maps and documents for proof of recognized legal rights. Documents were sighted and verified.
	7.5.2 No replanting on steep slopes (above 25 degress) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	Auditors had verified through checking the <u>www.globalforestwatch.com</u> , Google Maps, Estate Maps and also through site visit to the sampled estates, it is confirmed that there were no new planting or new development of areas at Boustead Sg. Jernih CU.
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	Auditors had verified through checking the <u>www.globalforestwatch.com</u> , Google Maps, Estate Maps and also through site visit to the sampled estates, it is confirmed that there were no new planting or new development of areas at Boustead Sg. Jernih CU.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Yes	All estates in Sg. Jernih CU, to demonstrate the long-term suitability of land for palm oil cultivation, had conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain. As mentioned under indicator 7.5.1 soil maps dated 01/12/2015 and slope classification maps dated 04/01/2016 prepared by the AAR and updated in 2018 were made available. This was to take into account in plans and operations. On Sg. Jernih Estate the Soil Map by Applied Agricultural Resources Sdn. Bhd. Periodic foliar and soil sampling were carried out by the Applied Agricultural Resources Sdn. Bhd. (AAR) and its result formed part of the basis for the fertilizers input recommendation. Foliar samplings and Soil samplings, which is conducted together, were carried out at all estates.
plans and operations.	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	Yes	This is not applicable as there is no marginal and fragile soils in the 3 estates visited, as supported by the soil maps of respective estates. No marginal and fragile soil areas were observed during the visit.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	All estates had used soil and topographic maps prepared by AAR to plan their drainage roads and other infrastructures.

Clause	Indicators	Comply Yes/No	Findings
7.7	7.7.1 (C) There is no new planting on peat	Yes	This is not applicable as there is no peat soil in all estates, as supported by the soil maps of respective
No new planting on peat, regardless of	regardless of depth after 15 Nov 2018 in		estates. No peat areas were observed during the visit.
depth after 15	existing and new development areas.	Yes	This is not applicable on them is no post and in all extented on supported by the soil many of respective
November 2018 and	7.7.2 Areas of peat within the managed areas are inventoried, documented and	res	This is not applicable as there is no peat soil in all estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
all peatlands are	reported (effective from 15 Nov 2018) to		estates. No peat areas were observed during the visit.
managed	RSPO Secretariat. PROCEDURAL NOTE:		
responsibly.	Maps and other documentation of peat		
	soils are provided, prepared and shared in		
	line with RSPO Peat land Working Group		
	audit guidance.		
	7.7.3 (C) Subsidence of peat is monitored,	Yes	
	documented and minimised.		
	7.7.4 (C) A documented water and ground	Yes	
	cover management programme is in place.		
	7.7.5 (C) For plantations planted on peat,	Yes	
	drainability assessments are conducted		
	following the RSPO Drainability		
	Assessment Proc, or other RSPO		
	recognized methods, at least 5 years prior to replanting. The assessment result is		
	used to set the timeframe for future		
	replanting, as well as for phasing out of oil		
	palm cultivation at least 40 years, or two		
	cycles, whichever is greater, before		
	reaching the natural gravity drainability limit		
	for peat. When oil palm is phased out, it ii		
	is replaced with crops suitable for a higher		
	water table (paludiculture) or rehabilitated		
	with natural vegetation. This is subject to		
	transitional (5 years: 2019 to 2025)		
	arrangement stated in the Drainability		
	Assessment Procedure. Within 12 months		
	initial implementation period, company		
	could submit other alternate meth. to be		
	considered by RSPO for recognition.		

Clause	Indicators	Comply Yes/No	Findings
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	Yes	This is not applicable as there is no peat soil in all estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
	7.7.7 (C) All areas of unplanted and set- aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	Yes	This is not applicable as there is no peat soil in all estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	Yes	The CU has implemented a water management action plan and latest reviewed on January 2023. The plan was developed to maintain the quality and availability of natural water courses. Generally, the plan was established to focus on minimizing waste and pollution prevention of water sources. Among the action plans are rainwater harvesting, monitoring of pipeline leakage, and establishment of buffer zones at rivers and other water bodies. All operating unit water source supplied from government such as Syarikat Air Terengganu (SATU) and Perbadanan Air Pahang (PAIP).
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. In order to continued availability of water sources and contribute to pollution of water used by communities have been concluded and monitored by water sampling by estates management. The frequency water sampling was carried out on an annual basis. Water quality has been monitored by an external laboratory from FGV Palm Industries Sdn. Bhd. 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 Sg. Jernih CU facilities for workers and through interview with workers, all workers have obtained adequate access to treated clean water. All operating unit water source from government such as Syarikat Air Terengganu (SATU) and Perbadanan Air Pahang (PAIP).
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and	No	At Sg. Jernih Estate buffer zones were maintained at Sungai Temiang & Sungai Air Jernih according to BMP & DID regulation and signage and palm marking was established for preventive measure to

Clause	Indicators	Comply Yes/No	Findings				
	restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).		protect for chemicals activities at buffer zones area. Sighted during site visit at Ladang Tabung Tenter Terengganu (LTTT), traces of selective spray at buffer zone in block 03H which further verified fror records book and interview with staff in charge for the field, the spray activity has been conducted o 27-28/06/2023. Hence Major NCR RMN 01 has been raised. Mill effluent is treated, and the organization had submitted quarterly report in compliance with national regulations.				
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	Yes					
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	Processed water is obtained from water catchments near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored monthly.				
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	<ul> <li>The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitor and documented. Record on energy consumption for both renewable and non-renewable sources we kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled comparison and control for future improvement. Among the plan for improving fossil fuel are: <ul> <li>Closely monitored operation of tractors</li> <li>Minimise the electricity usage at workers housing</li> <li>Replace light bulb with energy saving bulb</li> <li>To switch off and unplug all the electrical equipment after used</li> <li>Minimise the lubricant oil usage through using small tractor for FFB evacuation</li> </ul> </li> <li>There is no genset operator applied at all operating unit. Mostly electricity supplied at operating unit Tenaga National Berhad (TNB) except for Sg Jernih POM and Sg Jernih estate via mill turbine both Sg. Jernih CU showed evident that they are compiling the data by monthly basis and document in further action to improve on their efficiency of using the renewable and non-renewable energy.</li> </ul>				
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	Description       tCO2e/tProduct         CPO       1.14         PK       1.14				

Clause	Indicators	Comply Yes/No			Findi	ngs		
			Land Use			На		
			OP Planted on Mineral Sc	pil	8	158.10	-	
			OP Planted on Peat Soil			0.00	-	
			Total oil palm planted area	a	8	158.10		
			Conservation (forested)			0.00		
			Conservation (non-foreste	ed)		51.82		
			Milling extraction rate:				-	
			OER	22	.04	7		
			KER	3.	85	-1		
			Mill Emission Emission source		tCO2e	t	CO2e/tFFB	
			POME		21125.1		0.19	
			Fuel consumption		357.		0.0	
			Grid electricity utilisation		499.	07	0.00	
			Credits					
			Export of excess electricity	y to housing &	0.	00	0.00	
			Sale of PKS			00	0.00	
			Sale of EFB			00	0.00	
			Total		21981.	81	0.20	
			Plantation / field emission					
					C	wn		
			Emission sources	tCO		2e/ha	tCO2e/FFB	
			Land Conversion CO2 Emissions from Fertili		43.47 30.82	9.50 0.56	0.56	
			N2O Emissions from Peat		0.00	0.00	0.03	
			N2O Emissions from Fertili		36.67	0.00	0.03	
			Fuel Consumption	3	66.32	0.06	0.00	
			Peat Oxidation		0.00	0.00	0.00	
			Sinks					
			Crop Sequestration		29.80	-9.00	-0.53	
			Conservation Sequestratio	101	0.00 <b>47.48</b>	0.00 <b>1.56</b>	0.00	
			TOTAL	101	41.40		<b>0.09</b> Page 67 of 92	

Page 67 of 92

Clause	Indicators	Comply Yes/No	Findings
	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	There was no new development or new planting at Sg Jernih Cu. It was confirmed through site visits and hectarage statements. Auditors also have verified through checking through www.globalforestwatch.com, Google Maps, and Estate Maps to all estates. Based on the audit findings, it was confirmed that no land clearing at Sg. Jernih CU since Nov 2005.
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Yes	All waste products and sources of pollution identified and documented through "Continuous Improvement & Management Plan (environment) for the Year 2023/24" that applicable for both mill and estate. The management plan has also identified source of pollution, possible waste/pollution, effected environment, prevention, mitigation and enhancement. Other sources of pollutions are also listed such as from effluent discharge, boiler emission, leachate of EFB, storage of oil & lubricants, maintenance or vehicles at workshop and waste management. Based on the site visit were found that all the operating units under Sungai Jernih CU had implemented and control the identified pollutants.
7.11 Fire is not used for	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	Yes	There was no land preparation in Sg. Jernih CU by burning ever since Boustead Plantations Berhad practice zero burning as per the policy in SOP clearing methods.
preparing land and is prevented in the managed area.	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	Sungai Jernih CU had maintained Emergency response plan include to react during fire accident.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	During the site visit was confirmed all the relevant stakeholders were engaged by CU during stakeholder meeting in June 2022 with attended by nearby villagers and plantation. Based on the meeting minutes, highlighted on the fire prevention and control measures been engages with adjacent stakeholders.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS)	<ul> <li>7.12.1 (C) Land clearing since November</li> <li>2005 has not damaged primary forest or any area required to protect or enhance</li> <li>HCVs. Land clearing since 15 November</li> <li>2018 has not damaged HCVs or HCS forests.</li> <li>A historic Land Use Change Analysis</li> <li>(LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</li> </ul>	Yes	Auditors have verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing had occurred at Sg. Jernih CU since Nov 2005.
forest. HCVs and HCS forests in the managed area are	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	Yes	The report "A Rapid High Conservation Value Assessment of Sg Jernih Business Unit (Peninsular Malaysia) Identification of High Conservation Values" is available. The study was conducted by Wild Asia (Malaysia) and the report was completed in August 2010. The study had covered all the High

Clause	Indicators	Comply Yes/No	Findings
identified and protected or enhanced.	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO- approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	Yes	Conservation Value (HCV) within and adjacent to the Sg Jernih CU. The HCV assessment had identified the rare, threatened, and endangered species (RTEs) for the estates (Sg Jernih, Bebar, and LTT Terengganu) including the HCV management and action plan. In general, Sg Jernih CU had identified 2 potential HCV, Bukit Ibam Forest Reserve, Bukit Musoh Forest and Southeast Pahang Peat Swamp in the Sg Jernih and Bebar Estate for conservation and management and no HCV identified at LTTT estate but there is a forested area present in the estate which is a state land (former ex-mining area/quarry). Verified records stated that HCV area resulted in
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV- HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	Yes	overall amount as 51.82 Ha for Sg Jernih CU.
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	Yes	The identification and assessment of HCV habitats or protected areas was done prior to the main assessment. A Rapid High Conservation Value Assessment of Sg Jernih Business Unit (Peninsular Malaysia) Identification of High Conservation Values" prepared by Wild Asia, dated August 2010 was available and sighted during the audit. The assessment had identified the HCV landscapes and biodiversity of Sg Jernih Certification Unit for the 3 estates (Sg Jernih, Bebar and LTTT). Based on the assessment conducted, the audit team notes that the consultant has concluded "due to the increase in public certification, increased job opportunities and new road access in and out villages, most of the surrounding forests are deemed as secondary sourced of income, food source and medicine. And another one, aside from farming as a form of sustenance and sourcing wood for sale, villagers also consider the land sacred as there is a burial plot located in their rubber plantation, they wish to keep their land as a heritage to be passed down to future generations".
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 Nov 2018, peatland and other conservation areas, there is no reduction of these rights without evidence	Yes	There were no local communities living near Sg Jernih CU. The nearest community (including Orang Asli village) was located more than 5 km from the CU's boundaries. So, this indicator was not applicable with this CU.

Clause	Indicators	Comply Yes/No	Findings			
	of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.					
	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	A training programme for the year 2023 was available at All estates. Sighted the "HCV Training" were conducted to workers, mandore and Estate Security. Awareness training like morning briefing has also been conducted by the Assistant Manager of Sg Jernih. LTT Terengganu Estate and Bebar Estate to all workers (sprayer, manuring, harvester, maintenance). An appropriate disciplinary measure was instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. The policy and procedure have been developed for disciplinary measures titled ' <i>Polisi Aktiviti Pemburuan Hidupan Liar</i> ' and ' <i>Prosedur Pemburuan Hidupan Liar</i> '. It was also recommended that workers of the POM were provided training on RTE awareness since the workers are residing in the Estate's premises			
	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	Sg Jernih CU is committed to discourage any illegal or inappropriate hunting or collecting activities. Evidence was seen during the site review that signage to prohibit hunting was erected at Riparian Zone and border. The estates have also hired guards to patrol and check for illegal hunting and to prevent elephants going into the estate and also controlling the illegal activities. The estates also monitor the illegal hunting by recording the incident in the 'Hunting incident Record'/High Conservation Value (HCV) Record for the year 2023.			
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	Yes	Auditors has verified through checking with www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates that no land clearing at Sg. Jernih CU had occurred since Nov 2005			
	AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS					
No specific clause – Information related to Orang Asli / Indigenous People:	To include details on Orang Asli 1.To report the name of their kampung and placement (penempatan). No. of the residents of Orang Asli. 2.Where they are located (radius within 5km from the CU). Check the estate map and estate boundary on neighboring Orang Asli villages.	Yes	<ol> <li>Kampung Jenang Baru (more than 10 households)</li> <li>Village located more than 5 km from Sg Jernih Estate boundary</li> <li>Originally they are from Sawah Batu but they migrated to stay in their ancestor land.</li> <li>The company already identified them since long time and always updated their representative in the Stakeholder List</li> </ol>			

<ul> <li>3. Verify the stakeholders list on neighboring Orang Asli community with the CU.</li> <li>4. Stakeholder's consultation with Orang Asli communities has been com participatorily conducted on 4/6/2022. Sighted SIA Management Action Plan social issues that have been participatorily identified by the CU with the Ora social issues that have been participatorily identified by the CU with the Ora contain measures for mitigating negative social impacts or enhancing positive social issues affecting stakeholders and neighbouring community, no issues and recommended mitigation action.</li> <li>5. Verify if any of estate activities may affected the Orang Asli through consultation with auditor. Get the information from head of village (local &amp; Orang Asli) how they started the village (origin,</li> <li>4. Stakeholder's consultation with Orang Asli communities has been com participatorily conducted on 4/6/2022. Sighted SIA Management Action Plan social issues that have been participatorily identified by the CU with the Ora contain measures for mitigating negative social impacts or enhancing positive Social issues affecting stakeholders and neighbouring community, no monitoring of grievance were included in the Plan. However, no social issue Jenang Baru was noted.</li> <li>5. Children basic education is at SK Kota Perdana and secondary educat Muadzam</li> <li>6. There is no FPIC issue found for Sg Jernih CU from Kampung Jenang Baru</li> </ul>	
<ul> <li>and to resparation from other orang asile villages to built of PFO Exect to the function. The CU had provided emplay and the arg arge, to do source, supply of clean water, where they work, and education for their children.</li> <li>6. Evidence of FPIC had been implemented by the CU and consent given by the Orang Asil.</li> <li>7. The CSR to Kampung included food donation. The CU had provided emplays the CU and consent given by the Orang Asil.</li> <li>8. Medical treatment were provided FOC by Sg Jernih CU's Clinic also as I Villagers can also go to the Mother and Child Clinic at Kota Perdana and N for medical treatment.</li> <li>9. There is no issue related to Perhilitan and Forestry Department with Orang Asil.</li> <li>9. Provide the specific names of Orang Asil representatives sampled during every audit.</li> <li>1. Located about 5 km from the boundary of Sg Jernih Estate</li> <li>2. Originally from Kampung Sawa Batu</li> <li>1. Located about 5 km from the boundary of Sg Jernih Estate</li> <li>2. Originally from Kampung Sawa Batu</li> <li>3. Uillage provided with electricity and seen comparicipatority conducted on 4/6/2022. Sighted SIA Management Actio contains social issues affecting stakeholders and neighbor maintenance and monitoring of grievance were included in the Plan. H issue affecting to Kg Wah Wah was noted.</li> <li>6. The CU had provided mine to orang Asil villagers either direct or nearce were included in the Plan. H issue affecting to Kg Wah Wah was noted.</li> <li>6. The CU had provided mine to orang Asil villagers either direct or nearce were included in the Plan. H issue affecting to Kg Wah Wah was noted.</li> <li>6. The CU had provided mine to orang Asil villagers either direct or nearce were included in the Plan. H issue affecting to Kg Wah Wah was noted.</li> </ul>	an for 2022 contains brang Asli. The Plan itive social impacts. maintenance and ssue affecting to Kg cation is in Bandar ployment to Orang ss to the village was s CSR contribution. Muadzam Hospital Asli from Kampung re, forage of forest comprehensively and ction Plan for 2022 CU with the Orang pacts or enhancing bouring community, However, no social or indirectly through

Clause	Indicators	Comply Yes/No	Findings
			<ol> <li>There is no FPIC issue found for Sg Jernih CU from Kampung Wah Wah</li> <li>The CSR to Kampung Padang included donation and employment.</li> <li>Medical treatment were provided FOC by Sg Jernih CU Clinic as CSR contribution. They can also go to the Mother and Child Clinic at Kota Perdana and the Muadzam Hospital for medical treatment.</li> <li>There is no issue related to Perhilitan and Forestry Department with Orang Asli at Kampung Wah Wah.</li> <li>Grave sites were located outside of Sg Jernih CU area.</li> <li>Representative of Kampung Wah Wah interviewed was Sidi a/l Serendah</li> </ol>
			Kampung Dungun (20 families)
			<ol> <li>Located at the boundary of South Estate and surrounded by Ladang PSK, Ladang Juasa and Ladang Boustead Bebar</li> <li>Village under the administration of JKKK Kampung Sawah Batu</li> <li>Originally from Kampung Sawah Batu</li> <li>Livelihood of the villagers are agriculture, forage of forest products, works in the durian plantation outside the village and some are employed by the Oil palm plantations near the village</li> <li>Village not provided with electricity and treated water by the Government</li> <li>Some houses built by compassionate NGO.</li> <li>Stakeholder's consultation with Orang Asli communities has been comprehensively and participatorily conducted on 4/6/2022. Sighted SIA Management Action Plan for 2022 contains social issues that have been participatorily identified by the CU with the Orang Asli. The Plan contain measures for mitigating negative social impacts or enhancing positive social impacts. Social issues affecting stakeholders and neighbouring community, maintenance and monitoring of grievance were included in the Plan. However, no social issue affecting to Kg Dungun was noted.</li> <li>There is no FPIC issue found for Sg Jernih CU from Kampung Dungun</li> <li>The CSR to Kampung Dungun included donation and employment for villagers. Access to the Kampung was facilitated by the CU by installing a 'boom gate'. Treated water was also provided by the CU upon request during village's drought crisis.</li> <li>Children basic education is at SK Bandar Dua and secondary education is in Bandar Muadzam</li> <li>The CU had provided employment to Orang Asli villagers either direct or indirectly through plantation contractors.</li> <li>Medical treatments were provided FOC by Sg Jernih CU Clinic as CSR contribution. They can also go to the Mother and Child Clinic at Kota Perdana and the Muadzam Hospital for medical treatment.</li> </ol>

Clause	Indicators	Comply Yes/No	Findings
			13. There is no issue related to Perhilitan and Forestry Department with Orang Asli at Kampung Dungun
			14. Grave sites were located outside of Sg Jernih CU area
			15. Representative of Kampung Dungun interviewed was Ludin a/I Tiyok
			Kampung Runchang (more than 100 families)
			1. Located more than 10 km from the Sg Jernih Estate boundary and Bebar Estate
			2. Village under the administration of JKKK Kampung Runchang
			3. Livelihood of the villagers are agriculture, forage of forest products, works in the durian plantation outside the village and some are employed by the Oil palm plantations near the
			village 4. Village provided with electricity and treated water by the Government
			5. Stakeholder's consultation with Orang Asli communities has been comprehensively and
			participatorily conducted on 4/6/2022. Sighted SIA Management Action Plan for 2022
			contains social issues that have been participatorily identified by the CU with the Orang
			Asli. The Plan contain measures for mitigating negative social impacts or enhancing
			positive social impacts. Social issues affecting stakeholders and neighbouring community, maintenance and monitoring of grievance were included in the Plan. However, no social
			issue affecting to Kg Runchang was noted.
			6. There is no FPIC issue found for Sg Jernih CU from Kampung Runchang
			7. The CSR to Kampung Dungun included donation and employment for villagers. Access to
			the Kampung was facilitated by the CU by installing a 'boom gate'. 8. The CU had provided employment to Orang Asli villagers either direct or indirectly through
			plantation contractors.
			9. Medical treatment were provided FOC by Sg Jernih CU Clinic as CSR contribution. They
			can also go to the Mother and Child Clinic at Kota Perdana and the Muadzam Hospital for medical treatment.
			10. There is no issue related to Perhilitan and Forestry Department with Orang Asli at Kampung Runchang
			11. Children basic education is at SK Bandar Dua and secondary education is in Bandar
			Muadzam
			12. Grave sites were located outside of Sg Jernih CU area
			13. Representative of Kampung Runchang interviewed was Hapizan a/I Hamzah
	Common social issues on Orang Asli	Yes	1. There is no issue of accessibility for Orang Asli from their village to the estate and/or
	1.Accessibility for Orang Asli from their village to		roaming area at Sg Jernih CU. Access to the Kampung Jenang Baru, Kg Runchang, Kg
	the estate and/or roaming area. 2.Protection of cemetery of Orang Asli which		Wah Wah and Kg Dungun was facilitated by Sg Jernih CU through gate opening, 'guard
	2.1 TOLECTION OF CEMELETY OF CHAING ASIL WINCH		house' and guard. Access to the Kampung Dungun was facilitated by the CU by installing

Clause	Indicators	Comply Yes/No	Findings
	<ul> <li>located within the estate.</li> <li>3.Opportunity for employment – male &amp; female.</li> <li>4.Do they understand the employment procedures and agreement?</li> <li>5.Are their employment contract complying with the RSPO P&amp;C MYNI 2019?</li> <li>6.Did they receive appropriate trainings &amp; briefings and other necessities (PPE) to work as other local/foreign workers?</li> <li>7.Replanting activity that may affected the Orang Asli community.</li> <li>8.Accessibility for clean water from nearby river or water scarcity.</li> <li>9.Hunting of wild boar/monkey/fish/birds within estate area or at the estate boundary.</li> <li>10.Education for the Orang Asli children.</li> </ul>		<ul> <li>a 'boom gate'. Orang Asli access to the HS Ibam was not through Sg Jernih plantation. Interviewed Orang Asli representatives acknowledged that forest roaming and access for their livelihood are currently of least importance to their livelihood.</li> <li>Cemetery for Kampung Jenang Baru, Kg Runchang, Kg Wah Wah and Kg Dungun are sited outside the Sg Jernih CU plantations.</li> <li>Sg Jernih CU has appointed Harvesting contractors which in turn provided indirect employment for the Orang Asli from the four(4) villages. Both male and female were employed by the contractors. The CU had also provided direct employment to the Orang Asli (as Driver in the Plantation for example).</li> <li>Interviewed Orang Asli workers understood the employment procedures and agreement.</li> <li>Reviewed employment contract complied with the RSPO P&amp;C MYNI 2019</li> <li>Orang Asli employees of the contractors received appropriate trainings &amp; briefings and other necessities (PPE) to work as other local/foreign workers.</li> <li>No replanting currently at Sg Jernih CU Plantations.</li> <li>All Orang Asli villages have access to clean water. Kampung Dungun have access to clean water from nearby rivers.</li> <li>No hunting was carried out by Orang Asli communities within Sg Jernih CU area or at estate boundary. This is due to scarcity of boar/monkey/fish and birds within the estates. The Orang Asli preferred to hunt in the Ibam Forest Reserve where they have access.</li> <li>Primary education for children of the Orang Asli villages are at the SK Bandar Dua and SK Kota Perdana while their secondary education are in Bandar Muadzam.</li> </ul>
	What CU needs to do to address the issues           1.FPIC with the affected Orang Asli communities on the estate operation.           2.Annual external stakeholder consultation with Orang Asli representative.           3.Stakeholder consultation with the community had been conducted during initial SIA assessment.           4.Review social action plan with participatory of affected Orang Asli.           5.Brief and circulate grievances/ disputes mechanism/procedure.           6.To offer job opportunity to Orang Asli – male & female.           7.Protection of Orang Asli sacred area or grave.           8.CSR to Orang Asli - grass cutting, LF collection, nursery, road/bridge maintenance, food donation, transport services for Orang Asli	Yes	<ol> <li>No FPIC issues with the Orang Asli communities at Sg Jernih CU. This is confirmed by the representatives of Kampung Jenang Baru, Kg Runchang, Kg Dungun and Kg Wah Wah interviewed during the audit.</li> <li>Stakeholder's consultation with Orang Asli communities has been comprehensively and participatorily conducted on 4/6/2022. Sighted SIA Management Action Plan for 2022 at all Estates contains social issues that have been participatorily identified by the CU with the Orang Asli. The Plan contain measures for mitigating negative social impacts or enhancing positive social impacts. Social issues affecting stakeholders and neighbouring community, maintenance and monitoring of grievance were included in the Plan. However, no social issue affecting to Kg Dungun was noted.</li> <li>A stakeholder consultation with Orang Asli community was initially done during initial SIA assessment.</li> <li>The updated Social Action Plan (2022) for all Estates had included participatory feedback from the Orang Asli communities (refer to Orang Asli village requests and resolution during Stakeholder's meeting)</li> <li>The Orang Asli communities had been given briefing on grievance/dispute mechanism through stakeholders' consultation on 4/6/2022</li> </ol>

Clause	Indicators	Comply Yes/No	Findings
	children to go to school, etc.		<ol> <li>Jobs opportunity for both male and female Orang Asli villagers was provided indirectly by Sg Jernih CU through appointment of Orang Asli workers by contractors for loosefruits collection and Harvesting. Also direct employment by the mill and plantation.</li> <li>No Orang Asli villages sacred place and cemeteries located within Sg Jernih CU Plantation.</li> <li>Sg Jernih CU had continued to provide CSR to Orang Asli communities as evidenced by donations, road repairs/Maintenance etc</li> </ol>

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

Clause	Indicators	Comply Yes/No	Findings
5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	For the time-bound plan, Boustead Plantations Berhad has committed to ensure all their certification unit (CU) to be certified within 5 years i.e. year 2019 to 2024. Samples TBP as per below: <u>Tawai Business Unit -2021-2023</u> New Acquisition in 2018 and 2019, the planning to certified in 2021. However, due to the pandemic Covid-19, the company needs to postpone to 2023, apart from that the company plans to certify another 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2022. <u>Kanowit Business Unit-2021-2024</u> The company has put out a Request for Proposal (RFP) for all assets in Sarawak. The process for disposal is in progress and waiting for a potential buyer. <u>Loagan Bunut Business Unit 2021-2024</u> The company has put out a Request for Proposal (RFP) for all assets in Sarawak. The process for disposal is in progress and waiting for a potential buyer. Sighted the submission of "RSPO TBP Revision Template to RSPO and it has been approved by RSPO.

	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	There are twelve (12) CU highlighted in the time-bound plan and the certification progress consistent with that in the time-bound plan. The progress details as provided in the TBP in Attachment 6. For another 4 CUs i.e. Lepan Kabu / Sugut / Loagan Bunut / Pertama / Kanowit and Tawai, the Sustainability Section team has conducted the periodic internal audit accordingly.
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time- bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	There was revision of the time-bound plan being updated on 28/03/2023. Details as per attachment 6. This is due to newly acquired properties i.e. Tawai CU in Telupid Sabah in 2019 from Sit Seng & Sons Realty Sdn Bhd. As per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	Yes	Boustead Plantations have deviations for certifying uncertified units from the years 2021 to 2023 and 2024. The RSPO Time Bound Plan Revision Template was submitted to RSPO secretariat approved on date 28/03/2023. The new TBP revision was endorsed by RSPO.
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 <sup>st</sup> January 2010 shall comply with the RSPO New	Yes	Verification through <u>www.globalforestwatch.com</u> , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed.

Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;		It is confirmed that land conflict was recolved through EDIO processes
Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	Yes	It is confirmed that land conflict was resolved through FPIC processes which facilitates compliance with requirement of RSPO, accordance to: •Criteria 4.4 – on adequate participation and negotiated agreements (Sighted PMC minutes of meeting) •Criteria 4.6 – on land acquisition whereby the right to use the land is demonstrated. (Refer Memorandum of Consent (MOC) between NCR Landowners & LCDA (as Managing Agent), (Refer Joint Venture Agreement (JVA) between Boustead Plantation Berhad, BPB and Pelita Holding Sdn Bhd (PHSB) to develop land into oil palm plantation) •Criteria 4.7 – on mutual agreement for identifying people entitled to compensation is in place. •Criteria 4.8 – on the condition of land use as per land title to show evidence that necessary action has been taken to resolve the conflict with relevant parties. These were reviewed - MRRS: Q-021053- 05/2012; Q-02-105405/2012; Q-01-282-06/2012. (Refer www.kehakiman.gov.my/judgment/file/Q-02-1053-052012) and application no. 08(f)-449-09/2014(Q) Appellate Jurisdiction); The management of BPKSB have conforms & respect all parties by adopting FPIC to protects community rights and investors from risks. In addition, those mechanism is part of best practice standards and requirement of RSPO. There was also Series of External Audit through MSPO Certification on their uncertified unit being made: a) Teluk Sengat Estate (19-22/11/2021) b) Lapan Kabu Estate (21-22/10/2021) c) Rimba Nilai (Sugut) CU (10-15/03/2022) d) Tawai CU (14-18/06/2021) e) Loagan Bunut & Kanowit CU (11-15/11/2021) The audit was conducted against MSPO P&C and MSPO Partial
		Certification Requirements.

1		
	<ul> <li>Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2;</li> </ul>	<ul> <li>Yes A series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above.</li> <li>a) The audit was conducted against RSPO P&amp;C and RSPO Partial Certification Requirements.</li> <li>b) There was no case of labour dispute reported in the internal audit report.</li> </ul>
		The management also has established grievances, complaints, and disputes mechanism which is open to all affected parties and ensures anonymity of complainant. There is "Carta Organisasi Panel Aduan" (Panel of Complaint Committee) to handle complaints or grievance, including related to gender issues.
		The management had taken prudent action by conduct engagement and recommended action plans to: a) Improved communication and engagement (PMC Meeting-With present of LCDA, Land Survey, BPKSB
		<ul><li>b) Personnel, BEA), MCCM Meeting, Estate Management Meeting)</li><li>c) Review communication and consultation as well as complaint and grievance procedures.</li></ul>
		Trained staff and create awareness among stakeholder on the Procedures (RSPO UBU Internal Assessment)
	(d) Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	<ul> <li>Yes A series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above.</li> <li>a) The audit was conducted against RSPO P&amp;C and RSPO Partial Certification Requirements.</li> <li>b) Several issues of legal non-compliance reported in the internal audit report such as lapses in scheduled waste management, and it's being solved progressively.</li> </ul>
		The management also has established a list on "Legal and Other Requirement Register" There are 15 sections of requirements subscribed to the Plantations & Mills operation. Among the requirements stated are: Occupational Safety and Health Act, 1994; Factory and Machinery Act, 1967; Minimum Wages Order 2020; Employees' Minimum Standards of Housing, Accommodations and Amenities Act, 1990 (Amendment 2019); etc. The management has in place a license & permits register which captures all applicable local & national legal requirements such as:

			MPOB Licenses (menjual dan mengalih FFB). KPDNKK Permit Barang Kawalan Berjadual for Diesel.
(e)	<ul> <li>The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:</li> <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>	Yes	<ul> <li>Based on statement in (a) to (d) above, the CU has assessed the condition of their uncertified unit and has stated full commitment to comply with all relevant requirements as specified above.</li> <li>a) Sighted the series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit as conducted and reported accordingly. The audit was conducted against RSPO P&amp;C and RSPO Partial Certification Requirements.</li> <li>b) Evidence of audit attendance list, audit checklist &amp; report were made available to auditor as supporting evidence.</li> <li>c) Verification through www.globalforestwatch.com, GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting, and no new development of area was observed.</li> <li>d) With this, it can be concluded that the positive assurance made was justified.</li> </ul>
	Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.		
	Desktop study e.g. web check on relevant complaints		
	<ul> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non- compliance with the requirements.</li> </ul>		
(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	Yes	As of this audit, Boustead Plantation Berhad is still on track and follows the requirement of uncertified requirement units, Further information can be obtained from Boustead ACOP. The details of the Time Bound Plan are described as per attachment 6. BPB is progressively undergoing the

	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.		RSPO Certification process towards 100% RSPO certification of estates/ mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	Yes	As above

5.6.6 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.	No additional indicators	Yes	Boustead owned the land (brought from the Government) as mentioned in 4.4.1 of these checklists. Based on the interviews and this audit finding, it has been confirmed that there was no such case concerning the rights of local communities and indigenous people at Sg Jernih CU.
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.			
The CB shall keep track of which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.			

# **ATTACHMENT 4**

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

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
RMN 01 7.8.2	Major	Requirement: 7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). Finding: The organization not adequately protected buffer zones as per 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' Objective evidence: Sighted during site visit at Ladang Tabung Tentera Terengganu (LTTT), traces of selective spray at buffer zone in block 03H which further verified from records book the spray activity has been conducted on 27-28/06/2023.	Root cause: The understanding of employee in charge during the spraying activity near block 03H slightly deviates from the company procedure. Corrective Action: 1) An awareness training session and comprehensive explanation regarding the importance of conserving and protecting the buffer zone were conducted on 7th August 2023, specifically targeting herbicide sprayer. The training minutes and explanation are provided as attachments. 2) The repainting of the faded river buffer zone markers was carried out on 7th August 2023. Kindly refer to the attachments for further details. 3) Internal Memo on "LARANGAN SEBARANG AKTIVITI MERACUN RUMPAI DAN AKTIVITI PERTANIAN DI KAWASAN ZON PENAMPAN SUNGAI (BUFFER ZONE)".	Root causes identified were appropriate to prevent recurrence. Sighted training attendant for employee responsible for block 03H regarding Zon penampan Sungai dated 7/8/2023. Photo on marking oil palm tree at buffer zone area was sighted. Issuance of notice of restriction activity at buffer zone dated 1/8/2023 committed by estate manager. Yearly program on maintaining the buffer zone area for year 2023 and 2024 established. All the actions are adequate to prevent the recurrence. Status: Closed
RMN 02 7.3.2	Minor	Requirement: 7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. The procedure, SSD/02/SW-02 dated 3/1/2023 stipulated management of scheduled waste to comply with the requirements of the Environmental Quality (Scheduled Waste) Regulations 2005. Finding: Disposal of scheduled waste was not in accordance with company procedure.	Root cause: a. Training on scheduled waste code classification to person in-charge was not included in the training program. b. No monitoring on the scheduled waste inventory was done Corrective Action: a. Include training on scheduled waste code classification in training program and conduct the training to the person in-	Root cause identified accepted. The effectiveness of the corrective action will be verified in the next audit. Status: Open

		<ul> <li>Objective evidence:</li> <li>Found at Bebar estate as per below: <ul> <li>a. No identification for used oil filter and medical waste and been notified to DOE in the E-Swiss system.</li> <li>b. Storage of SW 409 exceeded 180 days. (Date of generation in December 2022).</li> </ul> </li> </ul>	charge b. Monitor scheduled wastes inventory to ensure all scheduled waste are disposed in timely manner	
CNST 01 2.2.2	Minor	<ul> <li>Requirement: 2.2.2 Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.</li> <li>Finding: Due diligence of legal compliance of contractors is conducted by the company's HQ, however there is evidence that due diligence of contract workers under contractor ELS Sdn. Bhd., which provides FFB transport services to Bebar Estate is not effective, as these contract workers are not entitled to a designated rest day in a week, overtime pay, paid annual leave, paid sick leave or paid medical expenses.</li> <li>Objective evidence: <ol> <li>One (1) FFB transport lorry driver and one (1) tractor driver under ELS Sdn. Bhd. were both interviewed separately and informed that they are not entitled to a designated rest day in a week, overtime pay, paid annual leave, or paid sick leave. If estate crop production is high, workers are required to work on a daily basis without any day off in a week.</li> </ol> </li> <li>Review of employment contracts of contract workers under ELS Sdn. Bhd. showed that weekly working hours are not stated, there is no allocation for paid annual leave or sick leave, clause B3(b) states that workers are not entitled to overtime pay and clause B6 of the contracts state that workers are not entitled to paid sick leave or paid medical expenses.</li> </ul>	Root cause: The contractors did not fully understand the Employment Act 1955 requirement. Corrective Action: To conduct a meeting with ELS Sdn Bhd and explain the legal and standard requirement.	Root cause identified accepted. Estate had conducted a meeting with ELS Sdn Bhd dated 9/8/2023 on related highlighted matters. (Sighted meeting minutes) The effectiveness of the corrective action will be verified in the next audit. Status: Open
CNST 02 3.7.2	Minor	Requirement: 3.7.2 stipulated that records of training are maintained. Finding: No records available of induction training to estate workers at Sg. Jernih estate hired within past 2 – 4 months, and newly hired workers are not aware of the company sustainability policies, anonymous grievance mechanism and policy on protection of water courses.	Root cause: The training programmes established did not consider new recruitment employees, which affects new employees whose attend after the specific training been conducted.	Root cause identified accepted. The effectiveness of the corrective action will be verified in next audit. Status: Open

Page 83 of 92

	O a mar a thur A a thank	
Objective evidence:	Corrective Action:	
1) 7 manuring workers interviewed at Sg. Jernih estate		
(of which 3 workers started employment in the past 4	conduct reconsider new recruitments and	
days while 4 started employment within the past 2 – 4	policy briefing during morning muster.	
months) informed that they are not aware of the		
company's sustainability policies, anonymous		
grievance mechanism (including location of		
suggestion box and complaints forms) and policy on		
protection of water courses. Manuring workers did not		
know that they are not allowed to apply fertilizer at		
river riparian buffer zones.		
2) Last record of policy trainings conducted for workers		
viewed on site are dated 14 January 2023, with no		
record of induction and policy trainings conducted for		
workers hired after this date although management		
informed that induction trainings for new workers		
were conducted by their HQ.		

## **ATTACHMENT 5**

# STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification Statement by Auditors
DA 01 2022 6.2.4 (C)	Major	<ul> <li>Finding: The CU did not provide adequate housing and sanitation facilities according to National laws, or their absence the ILO Guidance on Workers' Housing Recommendation No. 115.</li> <li>Workers' Minimum Standards of Housing and Amenities Act 1990 – Section 6 (1) (c), Section 23 (1) (b)</li> <li>ILO Guidance on Workers' Housing Recommendation No. 115 - Health and safety</li> <li>Objective evidence:</li> <li>During site inspection at housing area (LTTT Estate and Bebar Estate), observed that:</li> <li>1) All housings were not kept in good state of painted to present a satisfactory appearance.</li> <li>2) Few housings without mosquito netting due to broken.</li> <li>3) Few monsoons drain design is not permanent and not concreate floor.</li> <li>Concreate monsoon drain/parameter design was not kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water</li> </ul>	Currently, as initiative to comply with the legal requirement, Bebar Estate has initiate to carried out the installation of mosquito netting for 10-unit workers quarters. The works estimated to be completed at the end of October 2022. Attached is 5 Years OWA Improvement Plan 2023 – 2027 and image of work progress CU also has established 5-year planning for construction of monsoon drain (2023-2027). Currently, as initiative to comply with the legal requirement, Bebar Estate has initiate to carried out the construction of monsoon drain to channel out excess water at workers quarters. The works estimated to be completed in the mid of November 2022. Todate,

DA 02 Major	Finding:	Auditor have verified evidences attached of:
6.7.1 (C)	<ul> <li>Sg. Jernih POM did not complied with Occupational Safety And Health (Safety And Health Committee) Regulations 1996: Regulation 8 Adequate employee representation. Regulation 13 Investigation into any accident, etc. – Subsection 3</li> <li>Objective evidence: Sample OSH Committee minutes meeting at Sg. Jernih POM sighted: <ul> <li>There is no structure to differentiate between representatives of employee and representatives of employees. Besides that, there is no method to determine absence of the representative. Furthermore, the representatives of employees in a safety and health committee were not able to represent the various sections of a place of work such as sterilization station, threshing station, pressing station, workshop, etc. Based on minutes also sighted, very less participation of employee's representative which contradict with safety committee appointed.</li> </ul> </li> <li>There is no investigation report any accident, near-miss accident, dangerous occurrence, occupational poisoning, or occupational disease which has occurred at the place of work were discussed in the minutes meeting.</li> </ul>	<ol> <li>Mill has enhanced further on current OSH Committee with the latest appointment of employee representatives from various work stations.</li> <li>Mill will continuously develop appropriate method to determine the attendance of representative by establishing attendance checklist.</li> <li>Mill has enhanced on the OSH meeting participation of employees' representative by creating a MEMO on OSH meeting including with the latest chairman, secretary, employer representative and employee representative.</li> <li>CU has discuss with all committee member of any accident happen as per NADOPOD regulation in established format for OSH meeting. Sighted latest meeting on date 11/10/2022 and details the agenda as per below:         <ul> <li>Ucapan Pengerusi.</li> <li>Semakan &amp; Pengesahan Minit Mesyuarat 29 Jun 2021.</li> <li>Pegumuman dan Taklimat Berkenaan Tugas-tugas Wakil Pekerja dan Wakil Majikan.</li> <li>Kajian Berkenaan Kemalangan di Tempat Kerja.</li> <li>Laporan Pemeriksaan Tempat Kerja.</li> <li>Hal-hal Berbangkit.</li> <li>Penutup</li> </ul> </li> </ol>

#### ATTACHMENT 6 – Timebound Plan [Received 28/03/2023]

Name of the Mills and Supply Bases	Country	Location Address	Certification Status (Certified / Not certified)	Actual Certification Year			
Sungai Jernih Palm Oil Mill	Malaysia	KM 70, Lebuhraya Gambang – Segamat, 26650 Pekan, Pahang Darul Makmur, Malaysia	Certified	2011			
Sungai Jernih	Malaysia	KM 70, Lebuhraya Gambang – Segamat, 26650 Pekan, Pahang Darul Makmur, Malaysia	Certified	2011			
Bebar	Malaysia	KM 87, Lebuhraya Gambang – Segamat, 26700 Muadzam Shah, Pahang Darul Makmur, Malaysia	Certified	2011			
Tabung Tentera Terengganu	Malaysia	KM 61, Jln Jabor–Jerangau, 24050 Kemaman, Terengganu Darul Iman , Malaysia	Certified	2011			
Trong Palm Oil Mill	Malaysia	KM 24, Trong/Bruas, 34800 Trong, Taiping, Perak, Malaysia	Certified	2017			
Taiping Rubber Plantations (TRP)	Malaysia	Batu 14, Jalan Taiping – Beruas, 34800 Trong, Perak, Malaysia	Certified	2017			
Malaya	Malaysia	Malaya Estate, 34100 Selama, Perak, Malaysia	Certified	2017			
Bukit Mertajam	Malaysia	Bukit Mertajam Estate, 09009 Kulim, Kedah, Malaysia	Certified	2017			
Stothard	Malaysia	Stothard Estate, 09300 Kuala Ketil, Kedah, Malaysia	Certified	2017			
Kuala Muda	Malaysia	Lot 20, 21, 49, 581, 1759, 1818, 2052, 2537, 8065, Lot 8145, Sungai Petani, 08009 Kuala Muda, Kedah, Malaysia	Certified	2017			
Batu Pekaka	Malaysia	Batu Pekaka Estate, 09300 Kuala Ketil, Kedah, Malaysia	2017				
Telok Sengat Palm Oil Mill	Malaysia	Telok Sengat, 81900 Kota Tinggi, Johor, Malaysia					
Telok Sengat	Malaysia	Telok Sengat, 81900 Kota Tinggi, Johor, Malaysia	Certified	2019			

# Certified Management Unit

Chamek	Malaysia	Jalan Paloh, 86009 Kluang, Johor,	Certified	2019		
		Malaysia				
Kulai Young	Malaysia	Jalan Sedenak, 81000 Kulai, Johor,	Certified	2019		
		Malaysia				
Segaria Palm Oil Mill	Malaysia	91308 Semporna,	Certified	2018		
		Sabah, Malaysia				
Segaria	Malaysia	91308 Semporna,	Certified	2018		
		Sabah, Malaysia				
Segamaha Palm Oil Mill	Malaysia	Lot CL 115343336, 91114, Lahad Datu, Sabah.	Certified	2019		
Sungai Segamaha	Malaysia	KM 50.5, Jalan Lahad Datu-Sandakan Off Road 30 KM,	Certified	2019		
		Kampung Paris 2, 91114, Lahad Datu, Sabah, Malaysia				
Bukit Segamaha	Malaysia	KM 50.5, Jalan Lahad Datu-Sandakan, Kampung Paris 2, 91114,	Certified	2019		
		Lahad Datu, Sabah, Malaysia				
G&G	Malaysia	KM 50.5, Jalan Lahad Datu-Sandakan, Off Road 40 KM,	Certified	2019		
		Kampung Paris 2, 91114, Lahad Datu, Sabah, Malaysia				
Tabung Tentera Sabah	Malaysia	KM 50.5 Jalan Lahad Datu-Sandakan Off 16km, Kampung Paris	Certified	2019		
		2, 91114, Lahad Datu, Sabah.				
Nak Palm Oil Mill	Malaysia	Mile 3 off 19 Mile, Labuk Road, 90009 Sandakan Sabah	Certified	2016		
Nak	Malaysia	Mile 19, 27KM Labuk Road, 90009 Sandakan, Sabah	Certified	2016		
Sutera	Malaysia	Off Mile 45, 68 KM Lahad Datu Road, Sandakan, 90009 Sabah.	atu Road, Sandakan, 90009 Sabah. Certified 2016			
Resort	Malaysia	Km 100 Sandakan Road, 90009 Sandakan, Sabah.	Certified	2016		

Uncertified Man	agement	Unit
-----------------	---------	------

Name of the Unit of		Name of the Mills	Location	Certification Status		<b>REVISION OF THE TBP</b> (Only applicable when revision is made)	
Certification (UoC)	Country	and Supply Bases	Address	(Certified / Not certified)	Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC
Lepan Kabu	Malaysia	Lepan Kabu	Km 88.8, Jln Kota Bharu — Gua Musang, 18000 Pahi, Kuala Krai, Kelantan	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Eldred Bekoh	Malaysia	Eldred	K/B No 102 86500 Bekok, Segamat, Johor.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Eldred Bekoh	Malaysia	Bekoh	K/B 505 Bekoh Estate 84900 Tangkak Johor	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.

Rimba Nilai Business Unit	Malaysia	Rimba Nilai Palm Oil Mill	90100 Sugut, Sabah.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Rimba Nilai Business Unit	Malaysia	Sungai Sungai 1	90100 Sugut, Sabah.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Rimba Nilai Business Unit	Malaysia	Sungai Sungai 2	90100 Sugut, Sabah.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Rimba Nilai Business Unit	Malaysia	Sungai Sungai 3	90100 Sugut, Sabah.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Rimba Nilai Business Unit	Malaysia	Lembah Paitan	90100 Sugut, Sabah.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.

Rimba Nilai Business Unit	Malaysia	Kawananan	90100 Sugut, Sabah.	Not Certified	Yes	2023	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped. The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.
Tawai	Malaysia	Tawai Palm Oil Mill	KM 75, Telupid- Beluran Road, Locked Bag No.69, 89100, Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Tawai 1	KM 75, Telupid- Beluran Road, Locked Bag No.69, 89100, Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Tawai 2	KM 75, Telupid- Beluran Road, Locked Bag No.69, 89100, Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Pertama	KM 113, Jalan Telupid – Sandakan 89300 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Sapa Payau	KM 108, Jln. Telupid – Sandakan89320 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Ruku Ruku	Km108, Jln. Telupid – Sandakan 89320 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.

Tawai	Malaysia	Lokan	89320 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.
Tawai	Malaysia	Lokan Baru	89320 Telupid, Sabah.	Not Certified	Yes	2024	The Company plans to postpone the certification for Tawai to 2024 due to plans to certify 1 business unit consisting of 1 mill and 5 supply base and 3 estates without mill in 2023.