



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

**File Ref. : EH04760001**

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : JEROCO PLANTATIONS SDN. BHD. – JEROCO PALM OIL MILL 1**

**PARENT COMPANY : HAP SENG PLANTATIONS HOLDINGS BERHAD**

**RSPO MEMBERSHIP No.: 1-0098-11-000-00**

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Jeroco 1	Jeroco Palm Oil Mill 1	N 5°25'52.002"	E 118°25'02.005"	Off KM 50, Jalan Jeroco, 91109 Lahad Datu, Sabah, Malaysia
	Batangan Estate	N 5°24'43.704"	E 118°26'59.803"	
	Lutong Estate	N 5°21'55.601"	E 118°26'26.201"	
	Lokan Estate	N 5°25'51.800"	E 118°22'57.804"	
	Lungmanis Estate	N 5°28'46.304"	E 118°24'11.301"	

**MAP :** See Attachment

**AUDIT DATE :** 17, 18, 20 & 21 JULY 2023

**DURATION :** 19 auditor days

**TYPE OF AUDIT :**

☐

Annual Surveillance Audit  
No. x

☒

Recertification Audit

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

**SCOPE OF CERTIFICATION :** Production of Sustainable Crude Palm Oil and Palm Kernel Using Identity Preserved Supply Chain Model

**VALIDITY OF RSPO CERTIFICATE :** 27/09/2018- 26/09/2023 [extended to 26/12/2023]

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

Non-conformity Report(s)

☐

List of additional site(s)

☐

**Report by Audit Team Leader**

Name : **MOHD ZULFAKAR KAMARUZAMAN**  
Signature :   
Date : **8/11/2023 (PUBLIC SUMMARY)  
17/10/2023 (FINAL REPORT)**

**Acknowledgement by Client's Representative**

Name : **KEE KEE W CHONG**  
Signature :   
Date : **9.11.2023**

## SUMMARY OF AUDITS

Annual Surveillance Audit 4				
On-site audit date	:	18th – 22nd July 2022	No. of auditor days:	19 Auditor Days
Audit team	:	Dzulfiqar Azmi (LA), Rozaimiee Ab Rahman, Mohd Zulfakar Kamaruzaman, Mohd Norddin Abd. Jalil		
No. of major NCR	:	3	Indicator: 3.3.1, 3.4.3, 7.8.2	Closing date: 19/10/2022
No. of minor NCR	:	2	Indicator: 1.1.5, 6.5.3	
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
	:	✓	N/A	N/A
	:	Contract workers	NGOs	Govt. agency
	:	N/A	N/A	N/A
	:	Indigenous people	Contractor	Others (Please specify)
	:	N/A	N/A	
Supply base sampled	:			
Justification of audit planning	:	Total allocation of auditor days for Jeroco 1 CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Estate = 15 days overall for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Changes since the last audit	:	No changes		
Report approved by	:	Kamini Sooriamoorthy		Date: 26/10/2022

Stage 2 audit / Recertification audit				
On-site audit date	:	17, 18, 20 & 21 July 2023	No. of auditor days :	19
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Dzulfiqar Azmi, Rohazimi Mat Nawi, Selvasingam T. Kandiah, Nor Ezani Ahmad.		
No. of major NCR	:	2	Indicator: DA 01 2023, NEA 01 2023	Closing date : 18/10/2023
No. of minor NCR	:	3	Indicator : NEA 02 2023, RMN 01, RMN 02	
Indicate the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
	:	X	N/A	N/A
	:	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	:	N/A	N/A	X
	:	Indigenous people	Contractor	Others (Please specify)
	:	N/A	X	N/A
Supply base sampled	:	POM, BATANGAN ESTATE, LUTONG ESTATE, LOKAN ESTATE, LUNGMANIS ESTATE		
Justification of audit planning	:	Total allocation of auditor days for Jeroco 1 CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Estate = 15 days overall for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Name of peer reviewer	:	Harso Yuli Antena		
Report approved by	:	Kamini Sooriamoorthy		Approval date : 8/11/2023

## SUMMARY OF INFORMATION

**TABLE 1**

	STAGE 2/ RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period / Reporting Period*	July 2023 to June 2024				July 2022 to June 2023
Certified FFB Processed (MT)	229,325.00				221,106.00
Production of Certified CPO (MT)	52,650.00				47,088.00
Production of Certified PK (MT)	11,900.00				10,612.00
Certified Areas (Ha)	11,436.67				11,436.67
Planted Areas (Ha)	10,380.00				10,380.00
Production Areas (Ha)	9,713.00				9,713.00
HCV Areas / Conservation Areas (Ha)	386.34				386.34
REMARKS	-				

**TABLE 2**

	PO	PK
Last years certified volume (MT)	75,392.00	17,156.06
Last years actual certified sold (MT)	59,254.80	11,835.56
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)	52,650.00	11,900.00

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## 1.0 AUDIT PROCESS

### 1.1 Certification Body

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

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

### 1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar Kamaruzaman	Lead Auditor / Social (External), Supply Chain & HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He had a certificate of Lead Assessor in ISO 9001, OHS 45001, ISO 4001 and qualified social Auditor under RSPO Training. He also attend DLW training in 2022 and worker welfare training in 2021 which is conducted by RSPO. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Dzulfiqar Azmi	Auditor / Environment, GHG	Holds a B. Sc. in Agriculture from Universiti Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is RSPO Lead Auditor since Oct. 2020.
Rohazimi Mat Nawi	Auditor / Safety, TBP, Metrics Template	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill more than 5 years. He was qualified in the auditing line with experienced in Sustainability (MSPO), QMS, EMS, OHSMS and RSPO/MSPO Supply Chain audit.
Nor Ezani Ahmad	Auditor / Social (Internal)	Possessed B.Sc. Conservation Biology and master's in science (Advancement of Biodiversity) from Universiti Malaysia Sabah with total more than 4 years of working experience in the in the oil palm operation. She had 3 years of auditing experience in the oil palm operation including auditing in HCVF and social issues. She is a qualified Lead Auditor for RSPO P&C, MSPO and ISO.
Selvasingam T. Kandiah	Auditor/ Good Agricultural Practices	Holds a B. Sc. (Hons) in Agriculture. He had worked as a planter for more than 30 years with Kumpulan Guthrie Berhad before retiring including in Liberia. He is a qualified auditor for RSPO P&C & MSPO.

### 1.3 Audit methodology

The audit covered the Jeroco 1 palm oil mill and 4 (Batangan Estate, Lutong Estate, Lokan Estate & Lungmanis Estate) 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 Jeroco 1 CU supply base covered during the audit are Batangan Estate, Lutong Estate, Lokan Estate & Lungmanis 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

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 11/7/2023. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). As of to date and during the Recertification assessment, No comment/complaint received by the CB.

In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below. This is including all public comments received during the Recertification audit.

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<ul style="list-style-type: none"><li>▪ The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</li><li>▪ All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer.</li><li>▪ They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime.</li><li>▪ They have been getting salaries above RM1,500 since May 2023 since the implementation of the Minimum Wages Order (amendmend 2022).</li><li>▪ Salaries were paid before the 7<sup>th</sup> of every month.</li><li>▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment.</li><li>▪ No discrimination between migrant workers and local workers, between male and female workers.</li><li>▪ Comfortable housing with water and electricity provided.</li><li>▪ Have access to affordable food from the canteen/sundry shops within the estate/mill premises.</li><li>▪ Entitled to free medical facilities at the estate clinic.</li><li>▪ Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects.</li><li>▪ They knew the types of work offered at mill &amp; estate when they were in their own countries.</li><li>▪ All migrant workers keep their own passports.</li><li>▪ Overall, no NC's related to the employment conditions.</li></ul>

	2) Settlers	<ul style="list-style-type: none"> <li>Not applicable. There are no settlers within Jeroco 1 CU</li> </ul>
	3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> <li>Not applicable. There are no villagers within Jeroco 1 CU</li> </ul>
	4) Suppliers	<ul style="list-style-type: none"> <li>Jeroco 1 CU and supplier contract were signed by both parties. Suppliers would be contacted to supply hardware items as and when the need arises. This happens approximately once in two months for suppliers.</li> <li>Fair dealings with the units in Jeroco 1 CU.</li> <li>Payments are made within 1 months of invoice.</li> </ul>
	5) Contract workers (local / migrant / Orang Asli workers / male & female)	<ul style="list-style-type: none"> <li>No contractors workers been employed.</li> </ul>
	6) Local & national NGOs	<ul style="list-style-type: none"> <li>No issues were raised by local and national NGOs</li> </ul>
	7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> <li>No issues were raised by Government agencies / Statutory bodies.</li> </ul>
	8) Independent growers / Smallholders	<ul style="list-style-type: none"> <li>Hap Seng give support to surrounding smallholders and growers by given them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification. Until to date surrounding smallholder who are RSPO certified is Spark Glory, Harus Abadi, and LKM Trading. Currently on progress for RSPO and MSPO certification is Lebijaya, Khoo Chin Hung, Bukit Kretam and LPC Plantation.</li> </ul>
	9) Indigenous people	<ul style="list-style-type: none"> <li>Not applicable. There are no indigenous people living within or in vicinity of Jeroco 1 CU.</li> </ul>
	10) Contractor	<ul style="list-style-type: none"> <li>No contractors been hired.</li> </ul>
	11) Previous land owner (if any)	<ul style="list-style-type: none"> <li>The right to use the land at Jeroco 1 CU can be demonstrated and not disputed by any party. Auditor had sighted that there were clear land ownership documents. Land titles were available in documents. The original copies of the documents were kept in Plantation Central Office (PCO), Sg. Segama. Copies of land titles for all estates were sighted. All the estates were under the jurisdiction of Kinabatangan District. Review of the land titles show that the requirements that the land title for all the estates namely for cultivation of an agricultural crop of economic value have been complied with.</li> </ul>
	12) Others (please specify)	<ul style="list-style-type: none"> <li>No issues so far.</li> </ul>
1.5 Audit plan : Refer to Attachment 2		
1.6	Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit. (For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate)	

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

Jeroco Palm Oil Mill 1 certification unit (hereafter refer to JPOM1 CU) is one of the business units under the Hap Seng Plantations Holdings Berhad (HSPHB). Located at Off 50 KM, Jalan Jeroco, Lahad Datu, Sabah, Malaysia, the CU consists of one mill i.e., Jeroco Palm Oil Mill 1 (JPOM1) and 4 supply bases i.e., Batangan, Lutong, Lokan and Lungmanis Estates.

Jeroco 1 CU is surrounded by neighboring oil palm stakeholders and forest reserve, this can be shown in the CU's map and consultations with relevant stakeholders. There were no local communities nearby. Most of the local communities are within the Tomanggong Group of Estate and Sungai Segama Group of Estate.

The JPOM1 has a processing capacity of 60 metric tonnes of fresh fruit bunches (FFB) per hour. The mill only receives and processes crops from HSPHB's certified supply bases. The CU has other management system certification schemes such as HACCP, ISCC and MSPO.

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

The FFB sourced fully from company owned estates that are certified. Details of the FFB contribution from each source to the Jeroco 1 Palm Oil Mill were as follow:

**Table 1: Actual FFB production by the supply base for the last reporting period (July 2022 to June 2023)**

Supply Based	FFB Production		Certifying CB
	Tons	Percentage (%)	
Batangan	83,965.45	28.80	SIRIM
Lutong	46,114.44	15.82	SIRIM
Lokan	39,380.25	13.51	SIRIM
Lungmanis	16,589.34	5.69	SIRIM
<b>HSP Sister Estates</b>	<b>Tons</b>	<b>Percentage (%)</b>	<b>Certifying CB</b>
Kapis	41,805.82	14.34	SIRIM
Tomanggong	2,372.46	0.81	SIRIM
Tagas	11,049.16	3.79	SIRIM
Tampilit	699.85	0.24	SIRIM
Litang	29,695.78	10.18	SIRIM
Wecan	13,295.44	4.56	SIRIM
Bukit Mas	3,493.62	1.20	TÜV Rheinland
Sungai Segama	2,113.79	0.72	TÜV Rheinland
Apas Claremont	838.74	0.29	TÜV Rheinland
Hap Seng Properties	71.44	0.02	TÜV Rheinland
Ladang Kawa	90.74	0.03	TÜV Rheinland
<b>Total</b>	<b>291,576.32</b>	<b>100%</b>	

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

Supply Based	FFB Contribution		Certifying CB
	Total Mt	Percentage (%)	
Batangan	89,246.00	38.92	SIRIM
Lutong	56,175.00	24.50	SIRIM
Lokan	63,342.00	27.62	SIRIM



Lungmanis	20,562.00	8.96	SIRIM
<b>Grand Total</b>	<b>229,325.00</b>	<b>100%</b>	

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

<b>RSPO Supply Chain Model: IP</b>	<b>Total (MT)</b>
FFB Received	291,576.32
FFB Processed	291,576.32
CPO Production	61,148.80
PK Production	11,935.08
CPO delivered as RSPO certified	59,254.80
CPO delivered under other schemes (MT) – ISCC	0
PK delivered as RSPO certified	11,835.56
PK delivered under other schemes (MT)	0
PK delivered as non-RSPO certified	0
Credits traded thru Book & Claim	0

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

	<b>Total (MT)</b>
FFB Received	229,325.00
FFB Processed	229,325.00
CPO Production	52,650.00
PK Production	11,900.00
CPO delivered as <del>Mass Balance</del> / IP	52,650.00
PK delivered as <del>Mass Balance</del> / IP	11,900.00

**Table 5 Planted and certified area of the Jeroco 1 CU**

<b>Estate</b>	<b>Planted (ha)</b>	<b>Certified (ha)</b>
Batangan Estate	3,394.00	3,632.88
Lutong Estate	2,194.00	2,448.40
Lokan Estate	2,837.00	3,155.39
Lungmanis Estate	1,955.00	2,200.00
<b>Total</b>	<b>10,380.00</b>	<b>11,436.67</b>

**Table 6 Planting profile for Jeroco 1 CU**

<b>Estate</b>	<b>Year of planting</b>	<b>Planting Cycle</b>	<b>Mature &gt;3 years (Ha)</b>	<b>Immature &lt; 3 years(Ha)</b>	<b>Planted area</b>	<b>% of planted area mature</b>	<b>% of planted area immature</b>
Batangan Estate	2004	2nd	450.00	0.00	450.00		
	2006	2nd	388.00	0.00	388.00		
	2008	2nd	151.00	0.00	151.00		
	2009	2nd	148.00	0.00	148.00		
	2010	2nd	280.00	0.00	280.00		
	2011	2nd	682.00	0.00	682.00		
	2012	2nd	458.00	0.00	458.00		
	2013	2nd	406.00	0.00	406.00		
	2014	2nd	151.00	0.00	151.00		
	2015	2nd	280.00	0.00	280.00		


<b>Total Batangan Estate</b>			<b>3,394.00</b>	<b>0.00</b>	<b>3,394.00</b>	<b>100.00</b>	<b>0.00</b>
Lutong Estate	1999	1st	157.00	0.00	157.00		
	2004	1st	42.00	0.00	42.00		
	2006	2nd	456.00	0.00	456.00		
	2007	2nd	159.00	0.00	159.00		
	2011	2nd	157.00	0.00	157.00		
	2012	2nd	146.00	0.00	146.00		
	2013	2nd	306.00	0.00	306.00		
	2014	2nd	318.00	0.00	318.00		
	2015	2nd	303.00	0.00	303.00		
	2017	2nd	150.00	0.00	150.00		
<b>Total Lutong Estate</b>			<b>2,194.00</b>	<b>0.00</b>	<b>2,194.00</b>	<b>100.00</b>	<b>0.00</b>
Lokan Estate	1998	1st	439.00	0.00	439.00		
	1999	1st	1,309.00	0.00	1,309.00		
	2014	2nd	244.00	0.00	244.00		
	2015	2nd	149.00	0.00	149.00		
	2016	2nd	296.00	0.00	296.00		
	2017	2nd	0.00	161.00	161.00		
	2018	2nd	0.00	239.00	239.00		
<b>Total Lokan Estate</b>			<b>2,437.00</b>	<b>400.00</b>	<b>2,837.00</b>	<b>85.90</b>	<b>14.10</b>
Lungmanis Estate	1995	1st	765.00	0.00	765.00		
	1996	1st	923.00	0.00	923.00		
	2018	2nd	0.00	267.00	267.00		
<b>Total</b>			<b>1688.00</b>	<b>267.00</b>	<b>1,955.00</b>	<b>86.34</b>	<b>13.66</b>
<b>Sub Total</b>			<b>9,713.00</b>	<b>667.00</b>	<b>10,380.00</b>	<b>93.57</b>	<b>6.43</b>

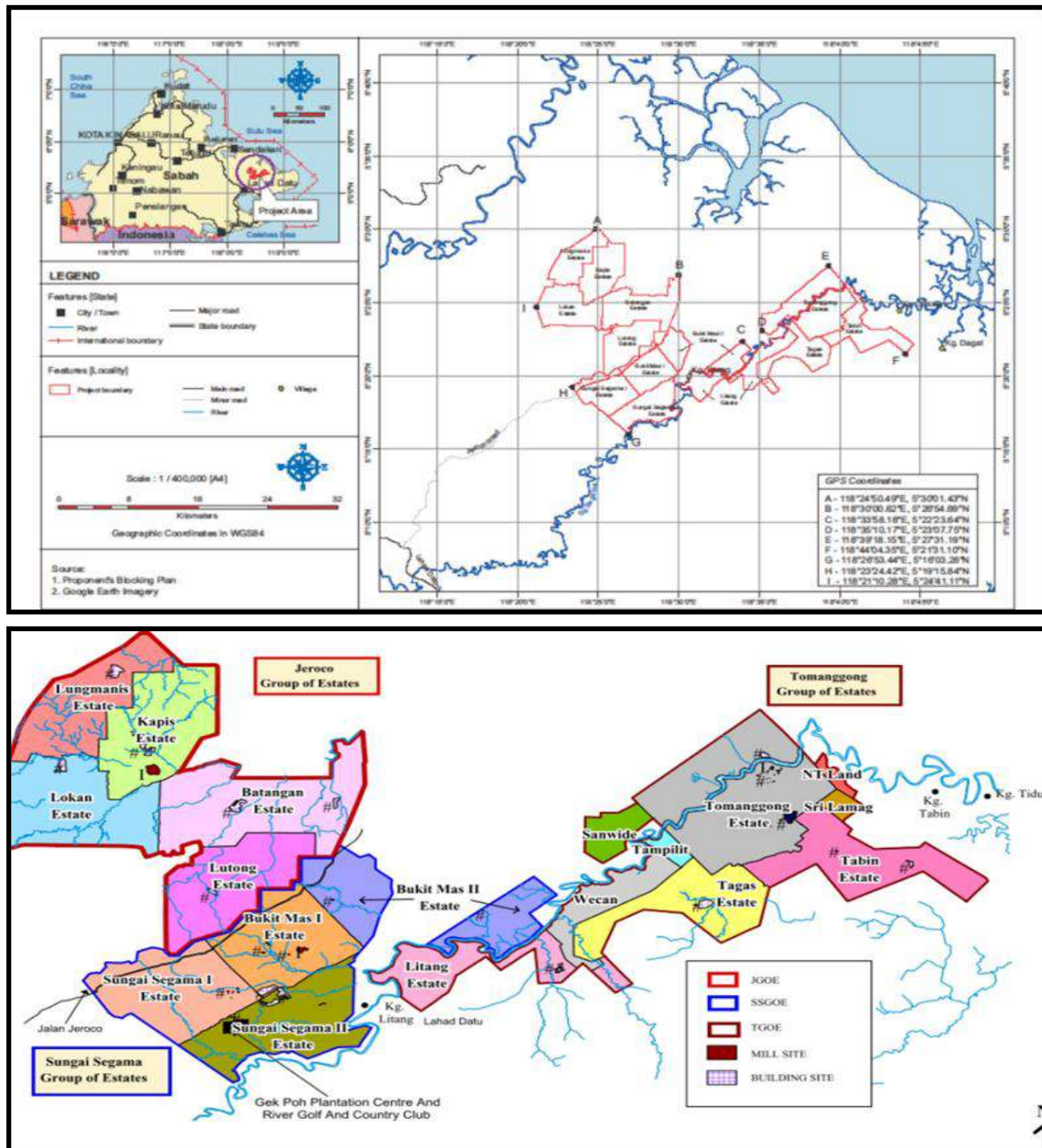
### 2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Mr. Kee Keow Chong
Position	:	General Manager - Agronomy
Address	:	Hap Seng Plantations Holdings Berhad C/O: Hap Seng Fertilizers Sdn Bhd, Batu 2, Jalan Kastam Baru, 91119 Lahad Datu, Sabah, Malaysia.
Phone no.	:	+6089 278183, +6089 278138
Fax no.	:	+6089 278168/186
Email	:	keekc@hapseng.com

<b>3.0 AUDIT FINDINGS</b>	
3.1	<p>Changes to certified products in accordance to the production of the previous year</p> <p><u>There was no change to the certified products since last assessment.</u></p>
3.2	<p>Progress and changes in time bound plan (Refer to Attachment 6 for the time bound plan)</p> <p>i. Have all the estates under the parent company been certified? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If no, comments on the organization's compliance with the RSPO partial certification rules :  <u>Hap Seng Plantations is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details provided in the Attachment 6</u></p> <p>ii. Are there any changes to the organization's time bound plan? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?  <u>Refer NCR RMN 02. The revised TBP has been approved by RSPO on 21/09/2023.</u></p> <p>iii. Are there associated smallholders (including scheme smallholders) in the CU <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please state reasons _____</p> <p>iv. Any new acquisition which has replaced primary forests or HCV areas <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
3.3	<p>Other changes (e.g. organizational structure, new contact person, addresses, etc.)</p> <p><u>No changes so far.</u></p>
3.4	<p>Status of previous non-conformities * <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Not closed*</p> <p>* If not closed, minor non conformity will be upgraded to major non conformity</p>
3.5.	<p>Complaint received from stakeholder (if any)</p> <p>No Complaint received</p>

<b>4.0 DETAILS OF NON-CONFORMITY REPORT</b>			
4.1	For P&C (Details checklist refer to Attachment 3) :		
	Total no. of minor NCR(s)	List : 3	RMN 01 (3.3.3), NEA 02 2023 (3.4.2), RMN 02 (5.5.2 Time-bound plan)
	Total no. of major NCR(s)	List : 2	NEA 01 2023 (6.2.1), DA 01 2023 (6.7.3)
4.2	For SC (Details checklist refer to Attachment 3) :		
	Total no. of minor NCR(s)	List :	
	Total no. of major NCR(s)	List :	
<b>5.0 AUDIT CONCLUSION</b>			
The audit team concludes that the organization has / <del>has not</del> * established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.			
<b>6.0 RECOMMENDATION</b>			
<div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;"> <input type="checkbox"/>  <input checked="" type="checkbox"/>  <input checked="" type="checkbox"/>  <input checked="" type="checkbox"/>  <input type="checkbox"/> </div> <div> <p>No NCR recorded. Recommended to continue certification.</p> <p>Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.</p> <p><i>Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs.</i></p> <p>Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.</p> <p>Recommended to continue certification.</p> <p>Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.</p> <p><i>Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.</i></p> </div> </div>			
<b>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 &amp; C CERTIFICATION.</b>			
Audit Team Leader :		MOHD ZULFAKAR KAMARUZAMAN _____ (Name)	<div style="text-align: center;">         _____        (Signature)     </div>
		<div style="text-align: center;"> <b>17/10/2023</b>        _____        (Date)     </div>	

Map of Jeroco 1 CU

## RSPO RECERTIFICATION AUDIT PLAN

### 1. Objectives

The objectives of the audit are as follows:

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

2. **Date of assessment** : 17th – 21st July 2023

3. **Site of assessment** : JEROCO 1 CERTIFICATION UNIT:  
 1) JEROCO 1 POM  
 2) BATANGAN ESTATE  
 3) LUTONG ESTATE  
 4) LOKAN ESTATE  
 5) LUNGMANIS ESTATE

### 4. Reference Standard:

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

### 5. Assessment Team

Lead Auditor : Mohd Zulfakar Kamaruzaman (SCCS, Social – External and Internal at Mill only, GAP at Lutong Estate Only)

Auditor :  
 1) Dzulfikar Azmi (Safety and Environment Estate)  
 2) Nor Ezani Ahmad (Social – Internal and External Estate Only, HCV)  
 3) Rohazimi Mat Nawi (Safety and Environment Mill only, Metrics Template, GHG, TBP)  
 4) Selvasingam T. Kandiah (GAP, Safety Estate)

Observer : -.

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

### 7. Audit Method

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

### 8. Audit Findings

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

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

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

## 9. Confidentiality Requirements

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

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

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

## 11. Reporting

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

## 12. Facilities Required

- a. Room for discussion
- b. Relevant document and record
- c. Personnel protective equipment if required
- d. Photocopy facilities
- e. A guide for each group

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

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

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

- a) Reporting time frames for economic data are:
  - i. Calendar year (January to December): January 2022 to December 2022, and
  - ii. 12-month period counting up to two months before audit month: **Apr 2022 to May 2023**
- b) Reporting time frames for demographic data:
  - i. For mill and estate workers: as of 31 December 2022
  - ii. For smallholders and outgrowers: January 2022 to December 2022
- c) Reporting time frame for all other social and environmental data:
  - i. January 2022 to December 2022

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

14. **Assessment Programme Details** : As below

## RSPO PUBLIC SUMMARY

Date / Time	Coverage of assessment / Activity / Site	MZK	DA	RMN	STK	NEA
Day 1-17/7/23 8.30am – 9.00am	<p>Opening Meeting – Venue: <b>PCO</b></p> <ul style="list-style-type: none"> <li>Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes</li> <li>Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, actions taken to address previous audit findings.</li> </ul>	/	/	/	NA	/
9.00am – 12.30pm	<p><b>Site observation to Lutong Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b></p> <ul style="list-style-type: none"> <li>Verification of basic information estate/Metric templates</li> <li>Confirmation of time bound plan &amp; review of partial certification</li> <li>Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Occupational safety &amp; health aspects , chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the estate</li> <li>Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>Land titles user rights</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>GHG Calculation <ul style="list-style-type: none"> <li>New planting</li> </ul> </li> </ul>	NA	/	NA	NA	/



## RSPO PUBLIC SUMMARY

9.00am – 12.30pm	<b>Site observation to Jeroco POM 1</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>Occupational safety &amp; health aspects , chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>Land titles user rights</li> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,</li> <li>New planting</li> <li>Occupational safety &amp; health aspects, chemical management</li> <li>Interview with workers, contractors etc.</li> </ul> Environmental management, waste & chemical management	/	NA	/	NA	NA
12.30pm – 1.30pm	Lunch Break	/	/	/	NA	/
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	NA	/
<b>Date / Time</b>	<b>Coverage of assessment / Activity / Site</b>	<b>MZK</b>	<b>DA</b>	<b>RMN</b>	<b>STK</b>	<b>NEA</b>
Day 2– 18/7/23 8.30am – 12.30pm	<b>Site observation to Jeroco POM 1</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>Occupational safety &amp; health aspects , chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>Land titles user rights</li> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,</li> <li>RSPO Supply Chain</li> <li>New planting</li> <li>Occupational safety &amp; health aspects, chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> </ul>	/	NA	/	NA	NA

## RSPO PUBLIC SUMMARY

8.30am – 12.30pm	<b>Site observation to Lungmanis Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> </ul> New planting	NA	/	NA	/	/
12.30pm – 1.30pm	Lunch Break	/	/	/	/	/
1.30pm – 5.00pm	<ul style="list-style-type: none"> <li>• Continue assessment at respective sites</li> </ul>	/	/	/	/	/
<b>Date / Time</b>	<b>• Coverage of assessment / Activity / Site</b>	<b>MZK</b>	<b>DA</b>	<b>RMN</b>	<b>STK</b>	<b>NEA</b>
Day 3 – 20/7/23 8.30am – 12.30pm	<b>Site observation to Batangan Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> </ul>	NA	/	NA	/	/

## RSPO PUBLIC SUMMARY

	<ul style="list-style-type: none"> <li>New planting</li> </ul>					
8.30am – 12.30pm	<b>Site observation to Jeroco POM 1</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>Occupational safety &amp; health aspects , chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>Land titles user rights</li> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,</li> <li>RSPO Supply Chain</li> <li>New planting</li> <li>Occupational safety &amp; health aspects, chemical management</li> <li>Interview with workers, contractors etc.</li> </ul> Environmental management, waste & chemical management	/	NA	/	NA	NA
12.30pm – 1.30pm	<ul style="list-style-type: none"> <li>Lunch Break</li> </ul>	/	/	/	/	/
1.30pm – 5.00pm	<ul style="list-style-type: none"> <li>Continue assessment at respective sites</li> </ul>	/	/	/	/	/
<b>Date / Time</b>	<b>Coverage of assessment / Activity / Site</b>	<b>MZK</b>	<b>DA</b>	<b>RMN</b>	<b>STK</b>	<b>NEA</b>
Day 4 – 21/7/23 8.30am – 12.30pm	<b>Site observation to Lokan Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>Verification of basic information estate/Metric templates</li> <li>Confirmation of time bound plan &amp; review of partial certification</li> <li>Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Occupational safety &amp; health aspects , chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the estate</li> <li>Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>Land titles user rights</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>GHG Calculation</li> <li>New planting</li> </ul>	NA	/	NA	/	/

## RSPO PUBLIC SUMMARY

8.30am – 12.30pm	<b>Site observation to Lutong Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> <li>• New planting</li> </ul>	/	NA	/	NA	NA
12.30pm – 1.30 pm	Lunch Break (Friday Prayer)	/	/	/	/	/
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	/	/
2.30pm –4.00pm	• Audit Team Discussion	/	/	/	/	/
4.00pm – 5.00pm	<b>Closing meeting</b>	/	/	/	/	/

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

## RSPO PUBLIC SUMMARY

Attachment 3

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

#### **Principle 1: Behave ethically and transparently.**

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Jeroco 1 CU is committed to provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making by upon request. There was procedure available on communication as evidenced in Jeroco 1 CU entitled “ <i>Prosedur Memohon Maklumat Syarikat</i> ” (Request for Information Procedure). The procedure involved internal and external consultation. The procedure provided a form to be filled in by any stakeholder who has an interest in requesting any information pertaining to Principle 1. Nonetheless, the method of requesting information was not limited to filling out the form alone. It was also described in the procedure that other means of request such as verbal or in writing, would also be entertained.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The CU continued to use the internet for disseminating public information, using appropriate language. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Hap Seng Plantations Holdings Berhad website at <a href="http://www.hapsengplantation.com">http://www.hapsengplantation.com</a>
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The estates and mill maintain records of communication and consultation with external and internal parties. These include communication with DOSH, Labour Department, Immigration Department, Department of Environment, suppliers and their own workers. Comments by DOSH and DOE on mill and estate operation were recorded in the respective DOSH and DOE inspection book. It was noted during this surveillance audit that there were no requests for information from the authority and stakeholders with regards to the agriculture practice, environment, and safety and health requirements. There was no request of information especially on social related issue since last year audit as verified through ‘Rekod Permohonan Maklumat’ at Jeroco 1 POM and all estates. Jeroco 1 CU had continued to maintain a comprehensive system with respect to this criterion. Request Form for their stakeholders or other interested party who had viewed / obtained document related to RSPO and Record of Visitation by government agencies such as MPOB, DOE and DOSH were maintained.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by Hap Seng Plantations for the estates and mill maintained to be followed and available at the audited sites. Consultation and communications procedures for Jeroco 1 CU is documented in the <i>Stakeholders</i>

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	explained to all relevant stakeholders by nominated representative.		<i>Consultation Procedure – Group Level &amp; Estate/Mill Level.</i> This document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estates and mill followed the procedures and manuals developed by the company. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	The stakeholder lists for Jeroco 1 CU were all available and sighted during the surveillance audit, inclusive internal and external stakeholder.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	A policy committing to integrity and ethics has been established by HSPHB named <i>Anti-Bribery and Corruption Policy (ABC Policy)</i> signed by its Executive. The policy was communicated to all workers via morning muster briefing at Jeroco 1 POM and estates. The ABC Policy applied via contract agreement under article (16) to all its suppliers, consultants, agents, contractor's/service providers who have direct dealings with the Group.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	The company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. The contractors and vendors signed the ABC Policy where they complied with the ABC and other law and regulation. The overall ethical business practice was regularly monitored through the internal audit conducted by the HSP Sustainability Team and Consolidated Berhad (HQ Department). Based on the ABC Policy, it explains where to get guidance, raising a concern or reporting a violation. This is being brief to the worker during morning muster and internal/external stakeholder meeting.

## RSPO PUBLIC SUMMARY

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

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.		Based on evidence, Jeroco CU complies with applicable legal requirements 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	Jeroco 1 CU has documented the List of Legal Register – Estates & Mills, covering all the necessary regulatory requirements. A list of applicable legal and other requirements was made available during the assessment. The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring compliance with the legal requirements that were applicable to them. Changes to the law and regulation are monitored by the Sustainability Team. Various sources were referred in obtaining information about the updates of legal requirements.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 4 estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/Boundary stones along the legal boundaries between was visibly available.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	All contractors providing operational services and supplying labour in Jeroco 1 CU has comply with legal requirements. Sighted the list has been included in the stakeholder list and was updated in May 2023.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	Each contract issued to suppliers and contractors contain a clause requiring compliance with legal requirements. The contracts contain a provision that the contractor shall comply with the provisions of the relevant Acts, regulations and by-laws. Legal due diligence is carried out by the Contracts Department at PCO on all FFB suppliers and third-party contractors including recruitment agencies and others. This include obtaining the contractors' registered company names and addresses, contact numbers, evidence of company registration, details of contractors' principle activities, authorised and paid-up capital, list of shareholders, board of directors, bank details, financial auditors, and current trading/business licences.
	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	There was no third party FFB that has been sent to the Jeroco1 POM. However, the review of supplier has specific clauses on meeting applicable legal requirements as verified through contract agreement and addendum. The agreements ending on 31st December 2022 have been renewed on an annual basis. Stated in the agreement, the tenancy will automatically renew on a yearly basis unless terminated by either party by giving 3 months' notice in writing.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins.</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul>	YES	All FFBs are supplied from Jeroco 1 CU owned estates which are certified to RSPO. There is no third-party FFB sent to the JPOM1. Thus, this Indicator was not applicable to Jeroco 1 CU
	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	All FFBs are supplied from Jeroco 1 CU owned estates which are certified to RSPO. There is no third-party FFB sent to JPOM1. Thus, this Indicator was not applicable to Jeroco 1 CU.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	<p>The Jeroco 1 CU continued to make commitment to long-term economic and financial viability. The annual budgets for 2023 to 2028 which included Capital and Operating Expenditures in addition to FFB yield/Ha, OER and CPO were sighted. The budget provisions cover activities for machinery and plant upkeep, expenditure for mature and immature oil palm upkeep, harvesting and evacuation, welfare, capital expenditure and RSPO compliance. The estate possessed a minimum of 5 years business plans. The estate budget components comprised of the following elements among others.</p> <ul style="list-style-type: none"> <li>- upkeep, cultivation, harvesting &amp; evacuation,</li> <li>- Welfare, RSP/MSPO compliance, etc.</li> <li>- Crop projection, cost of production, yield statistics and performance, age profile</li> <li>- Mature and immature cost/ha and cost/mt FFB.</li> <li>- Management expenses / professional fees / building / compound</li> <li>- Water and power / security/labour mobilization.</li> <li>- CAPEX Building/plant machinery/office equipment/motor vehicle attachments</li> <li>- water supply/Infrastructure.</li> </ul> <p>The business plan is prepared by the respective Managers and verified by the General</p>



## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			Managers for onward approval by the Chief Executive - Group Plantations.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	The replanting programs were documented in the “ <i>Replanting Programme J1GOE 2022-2026</i> ”. The latest revision being in accordance with a memo dated Aug 2021 issued by the General Manager of Agronomy.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	Jeroco 1 CU continued to hold management reviews at planned intervals to discuss on issues related to sustainability such as Jeroco 1 CU meeting (mill and its supply bases), Estate meeting (estates within Jeroco 1 CU ) and operation meeting (estate manager and estate key personnel) for effective implementation of RSPO.
3.2 The unit of cert. regularly monitors and reviews their economic, social and env. performance and dev. and impl. action plans that allow demo continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	Plans and impact assessments relating to social and environmental impacts were available. The Jeroco 2 CU have conducted social assessment titled ‘Social Impact Assessment, Management Action Plans and Continuous Improvement Plans’ and environmental assessment titled ‘Environmental Impact Assessment Management Action Plans and Continuous Improvement Plans’. The SIA and action plan, for Jeroco Group of estates and Jeroco CU were updated in July 2023. The updated plan above had each of the issues identified for each of the operating unit.
	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 RSPO metrics template was submitted to auditors and was verified accordingly and accurately reported.
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	Both mill and estate operations are guided by the Group’s Manuals and SOP. The mill processing guidelines and standards are detailed via the SOP which was updated accordingly. Content therein comprising of the following process/activities among others. <ul style="list-style-type: none"> <li>- Reception / ramp / grading</li> <li>- Sterilization / threshing / pressing</li> <li>- Oil room / kernel extraction</li> <li>- Incinerator / CPO CPK dispatch</li> <li>- Engine Room</li> <li>- Electrical / Workshop</li> <li>- Vehicle</li> <li>- Boiler Station</li> <li>- POME Treatment Plant / Water Treatment Plant</li> <li>- Effluent pond management</li> <li>- ESP Boiler</li> </ul>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Jeroco 1 Cu continued to have a mechanism to check consistent implementation of procedures is in place. The implementation of SOPs is monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			monitoring is made via supervision and records maintenance. The estates among others maintained the following records of implementation i.e., work program / Field cost books, bin cards, 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 harvesters, Monthly FFB production, etc.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	NO	Relevant records on implementation and monitoring by both the estates and the Mill are being maintained. All the records were kept for a minimum period of 12 months. The JPOM 1 had established workplace inspection programmes on monthly basis and accordance to the related regulations. The workplace inspection had been confirmed by interview conducted by mill safety committee. Based on the workplace inspection records sighted in Sept & Dec 2022 and Mar & June 2023, however no records available for Biogas plant, Lab, Incinerator, Effluent treatment plant, diesel skid tank area and manual lifting activities as per highlighted in Minor NCR RMN 01.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	Jeroco POM 1 had maintained Environmental Impact Assessment and been documented with latest review in June 2023. 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 store, workshop, Genset, Biogas and etc. Based on the interview, there is no change to the mill since last audit and this document comprehensive cover all the activities. There was no new planting in Jeroco 1 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 not applicable.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	NO	For Jeroco 1 CU, the SIA and EIA reports separated. Environmental Impact Assessment (EIA), Management Action Plans and Continuous Improvement Plans which cover upstream activities such as FFB reception until downstream processes were sighted during assessment. Last reviewed in June 2023 by Agronomy Department (Sustainability Team). For all estates, the assessment was to evaluate and analyze the operations impact on soil, water, and air associated with the organization activities. The EIA review process had included stakeholders' consultation with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done 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. At the POM, specific impacts identified include biogas, smoke emissions, noise levels, POME and EFB management. Data was collected and analyzed for compliance with

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			<p>relevant regulations and further actions needed to be 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. At the Estates, field activities that includes fertilizing, spraying, transportation of FFB, garbage disposal, landfill management, road maintenance, wildlife and land conservation activities. The mitigation measures were continued to be implemented to minimize the negative impacts.</p> <p>At the POM, specific impacts identified include biogas, smoke emissions, noise levels, POME and EFB management. Data was collected and analyzed for compliance with relevant regulations and further actions needed to be 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.</p> <p>The Social Impact Assessment (SIA), Management Action Plans and Continuous Improvement Plans Report for Jeroco 1 CU's estates and mill was prepared by the Agronomy Department (Sustainability Team) with revision. The SIA report presented the estates and mill's background information, labour policies, grievance procedures (internal, external landowner issues), sexual harassment policies, facilities and amenities offered by the estates and POM, and the social impact assessment procedures and results. The report includes both positive and negative impact and its recommendation. However, the revision did not sufficiently cover social issues and did not develop with participation of affected parties. Details as follows:</p> <ol style="list-style-type: none"> <li>Based on interview, the workers normally cash out their salary at nearest sundry shop with certain charges imposed by the sundry shop owner. This was also confirmed during a phone interview with the shop owner.</li> <li>During the site visit, sighted security personnel were stationed at main road near junction. However, there is no assessment conducted to determine the suitability of working conditions as there is no shed to protect them from rain or sun.</li> <li>There are no specific meeting minutes between worker's representatives and employer to ensure two-way communication with regards to the workers' welfare, living and working conditions.</li> <li>Hap Seng Plantations Holdings Berhad commits to respect and recognize human rights as stipulated in the Sustainable Agricultural Policy clause 3.2 (ii) stated "There will not be any restrictions on the workers' freedom of movement during their free time". However, during interviews with workers, they mentioned that their freedom of</li> </ol>

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			<p>movement after their working hours is quite restricted. Gate pass approval by top management (Field Conductor, Assistant Manager and Manager) is always required at least 5 days prior leaving the premise except in case of emergency.</p> <p>e) Based on interview, workers stated their difficulties to access to the nearest town due to unavailability of transportation and felt isolated from outside world.</p> <p>Therefore, a Minor non-conformance NEA 02 2023 has been raised under this indicator.</p>
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	<p>Significant environmental aspects and impact mitigation methods were implemented from EIA. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The EIA assessments had included the identification of aspects and impacts resulting from the Estate operations. A timetable with responsibilities for mitigation and monitoring was reviewed and updated as necessary. The CU had appointed a specific person in charge (PIC) responsible for taking actions on each of the mitigation measures with specific time intervals.</p> <p>Auditor has verified the latest groups stakeholder's consultation meetings have been conducted with participation of affected parties such as relevant parties such as MPOA, DOE, DOSH, EPD-Sandakan, IPD Lahad Datu, Kedai Ah Lok, MK Nexus, Suruhanjaya Tenaga. FFB suppliers, contractors, mill's part suppliers, neighboring estate, Humana, SK Jeroco, Sabah Forestry Department, PDRM, Wildlife Department and Immigration Department and worker's representative. Evidence of the above stakeholder consultation conducted is available and the stakeholder feedback was recorded in the EIA and SIA plan. The latest SIA also has included replanting activities. So far, no negative impact issues related to social have been highlighted during stakeholders' meetings. Jeroco 1 POM had established environmental and monitoring plan.</p> <p>The Social Impact Assessment (SIA), Management Action Plans and Continuous Improvement Plans are being reviewed and updated on an annual basis at Jeroco 1 CU. The revision accounts inputs externally mainly from external stakeholder meetings such as from Government agencies, neighboring estates, local communities, suppliers, and contractors. The SIA review process too involved respective Managers, Assistants and Sustainability Team with internal stakeholders such as workers representative, religious leaders, ethnic leaders, minutes from JCC meeting and Gender Representatives. It was verified that the latest groups stakeholder's consultation meeting was conducted in May 2023. The meetings have been conducted with participation of relevant affected parties such as MPOA, DOE, DOSH, EPD-Sandakan, IPD Lahad Datu, neighboring estate, Humana, SK Jeroco, Sabah Forestry Department, PDRM, Wildlife Department and Immigration Department and worker's representative. Evidence of the above stakeholder consultation conducted is available and the stakeholder feedback were recorded</p>

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			accordingly. Thus far, there are no negative issues related to social have been highlighted during stakeholders meeting.
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	Employment procedures which include recruitment, selection and hiring are contained in a document entitled Standard Operating Procedure – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (Local & Foreign), to include recruitment workers via walk in process” or/and via “agent/quota basis. For matters related to termination of employment and retirement, these are contained in employment contracts.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Employment procedures which include recruitment, selection and hiring are contained in a document entitled Standard Operating Procedure – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (Local & Foreign), to include recruitment workers via walk in process” or/and via “agent/quota basis. For matters related to termination of employment and retirement, these are contained in employment contracts. Clause C of the employment contract states that the retirement age for workers is 60. These documents are available to workers and their representatives. For Jeroco 1 CU, there is no recruitment agency that has been appointed. All foreign and local workers recruited by walk in basis.
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 estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records were verified during the assessment. HIRARC is subject for a review in event of the following. a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents HIRARC for the mill established with latest review made annually the recent being in June 2023 in relation to accident case happen at Boiler station. The policy had been communicated to all levels of the organization through briefings and also displayed prominently in <i>Bahasa Malaysia and English</i> on notice boards at mill and estate office and muster ground. All operations had been risk assessed to identify H&S issues. Mitigation plans and procedures were documented in the HIRARC document and implemented.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people are monitored.	YES	Occupational health and safety (OHS) 2023 management plan for Jeroco 1 CU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans FY 2023 were acceptable. Safety executive was carried out safety requirements checking via Internal Audit. Other than that,

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			the workplace inspection was done monthly to ensure all H&S plan was done effectively.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	Formal training programmes for FY 2022/2023 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Jeroco 1 CU. A training needs identification matrix has been established with target dates for the training to be conducted, and methods.
	3.7.2 Records of training are maintained, where appropriate, on an individual basis.	YES	Jeroco 1 CU trained their staff, workers and records of training were kept in the RSPO training file. The records included information a) title of the training b) name and signature of the attendees c) name of the trainer, d) Time and venue.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Training on Supply Chain requirements has been conducted in March 2023. The training has been conducted by Assistant mill engineer to AP, weighbridge operator, accountant clerk, lab operator and Transporter. The intention on this training was to create awareness on understanding on supply chain requirement.

## RSPO PUBLIC SUMMARY

### SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	<p>Identity Preserved Module</p> <p>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&amp;C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.</p>	YES	Jeroco 1 Palm Oil Mill (JPOM1) sourced for their FFB only from estates under the same CU which involve, Batangan Estate, Lutong Estate, Lokan Estate, and Lung Manis Estate. Divert crop from other certification units (Bukit Mas estate, Sungai Segama Estate, and Ladang Kawa Estate -Sungai Segama Group of Estate, Litang Estate, Tagas Estate, Tomanggong Estate).
3.8.2	<p>Mass balance Module</p> <p>A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3<sup>rd</sup> party certified supply base.</p>	YES	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	YES	Mill had registered through RSPO IT Platform with Member ID - Jeroco Plantations Sdn Bhd – Jeroco Palm Oil Mill 1. Details of actual tonnage produced were provided in Table 4 of this report.
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	YES	<p>The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information was:</p> <p>Name: Jeroco Plantations Sdn Bhd – Jeroco Palm Oil Mill 1</p> <p>Member Category: Oil Mil</p> <p>Core product: Palm Oil</p> <p>Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.</p>
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all</p>	YES	Jeroco 1 POM had used their documented procedure title ' <i>Standard operating procedures for Supply Chain SOP/COC/001</i> '. The procedure is complete and up to date covering the implementation of all the elements of the supply chain model requirements including

## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>- Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>- Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>- Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</li> <li>- The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>		<p>receiving and processing certified and non-certified FFBs. Since this is MB mill, there is no problem regarding noncertified FFB.</p>
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b) Effectively implements and maintains the standard requirements within its organisation.</li> <li>c) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</li> </ul>	YES	<p>As described under para 8.4 '<i>Standard operating procedures for Supply Chain SOP/COC/001</i>', JPOM1 refers to flow Chart Internal Audit System which follow the RSPO Supply Chain Certification Standard requirements. An audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2020 requirements.</p> <p>RSPO internal audit was conducted in April 2023 by an internal team. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor. Management review meeting has been conducted in May 2023 (combine RSPO, RSPO SCCS and MSPO). RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved.</p> <ul style="list-style-type: none"> <li>• Previous meeting – was highlighted (to improve format of MR)</li> <li>• Changes – There are no significant changes accept transfer of Assistant Manager.</li> <li>• Recommendation for improvement – improve the established system</li> </ul>



## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	<p>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. There was no overproduction of certified FFBs during the period under review. No NCP/ NCD recorded since last audit.</p>
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ol style="list-style-type: none"> <li>a) The name and address of buyer;</li> <li>a) The name and address of the seller</li> <li>b) The leading or shipment/delivery date;</li> <li>c) The date on which the documents were issued;</li> <li>d) RSPO certificate number;</li> <li>e) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>f) The quantity of the products delivered;</li> <li>g) Any related transport documentation</li> <li>h) A unique identification number</li> </ol>	YES	<p>The procedure in handling of sales and delivery was sighted and found adequate. Sales activities are usually handled by Hap Seng Plantation Shipping Department (HQ) on behalf of Jeroco 1 POM.</p> <p>A sample deliveries document was sighted during the audit, and it was found all related information were adequate. Jeroco 1 POM's RSPO certificate number and product name together with model used were stated in the delivery documents.</p>
3.8.9	<p>Outsourcing Activities</p> <ol style="list-style-type: none"> <li>a) 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</li> </ol>	YES	<p>There is a contract document between Jeroco 1 POM and the transporters. But there is another attachment There is a clause regarding Supply chain in the 'Addendum to the CPO Transportation Agreement' of agreement stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>The RSPO Supply Chain procedure has been described on Para 13.0 Outsource Contractor. Sighted latest briefing or training regarding documented control system conducted.</p>

## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>Certification.</p> <p>b) The mill shall ensure the following:</p> <p>c) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>d) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>e) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>f) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>		
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	The list of contractors, specifically the transporter which is involved in the physical handling of certified materials, had been well maintained through the stakeholder listing. 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 conducting 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	There is 1 new contractor appointed for the physical handling of RSPO certified oil palm products. JPOM 1 has notify SIRIM QAS prior to conduct Recertification audit.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO SCCS requirements.	YES	The relevant record pertaining to RSPO SCCS within JPOM1 was found to be updated accordingly and easily accessible during the audit.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	
	i) 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	RSPO Records for Oil Mills had been updated by relevant personnel and had included the receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK. Their WB.net system also being referred for real-time transaction details as well as daily/ monthly summary of their material movements (FFB, CPO, PK, others).
	ii) For Mass Balance Module, the mill: a) shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by 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.	YES	Not available CU used IP model.
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	Jeroco POM1 processes all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER).  These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g., Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	Processing - For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage	YES	JPOM1 shall only receive the RSPO certified FFB which are from Jeroco 1 CU own estates. Monitoring records titled as "J1POM FFB Received" has recorded the tonnage of certified FFB and other relevant process details. Verified through the weighing system (weighbridge system) and random sample of weighbridge tickets, being found that no external FFB intake occurred, hence no downgrade required. Consecutively, it is confirmed

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	to strive for 100% separation.		that RSPO certified oil palm product is from the certified sources. As for transport, dedicated tankers had been allocated by service provider to prevent cross contamination.
3.8.16	<p>Registration of Transactions</p> <p>d) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>e) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>	YES	Sales activities are handled by Hap Seng Commodities Trading Department (HQ) on behalf of Jeroco 1 POM. The Personnel updated the RSPO IT platform system upon confirmed contract. No remove as no certified volumes sold as conventional or as in different scheme.
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 SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork e.g., PK billing, CPO billing, JPOM1 weighbridge advice ticket and JPOM1 palm kernel/ CPO delivery note. JPOM1 apply RSPO trademark with license and, adhered to the minimum requirement in term of the corporate communications rules as well as Annex 1 (RSPO trademark usage and guidance) of the RSPO Rules on Market Communications and Claims 2019).

## RSPO PUBLIC SUMMARY

### **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	The policies demonstrate commitment to respect, support and protect international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistle blowers, complainants and community spokespersons. Besides that, the commitments to respect and uphold the rights of all workers including contract, temporary and migrant workers in accordance to the International Labour Organization's core convention and the United Nation Guiding Principles on Business and Human Rights (where prohibit retaliation of grievance informer). The policy was communicated to all levels of the workforce via morning muster, JCC meeting, gender committee meeting and OSH meeting.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As at time of audit, it was confirmed that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.
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	An agreed and documented system which deals with complaints and grievances is available and documented as Complaint and also a procedure named " Mekanisme Melindungi Pengadu Terhadap Tatacara Tidak Wajar (Whistleblower)" to protect the complainants. This SOP is to ensure that the company has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. The company is committed to an open and transparent approach to resolve outstanding grievances with the involvement of affected stakeholders. The company will annually review the procedure and consult with stakeholders during the stakeholder meeting to ensure continued effectiveness. The CU has aligned the Grievance Procedure with the UN Guiding Principles on business and human rights for effective nonjudicial grievance mechanism. This SOP is applicable to all parties who deal with the company who may have complaints and grievances. The procedure also states that complainants' anonymity would be respected and protected if requested.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Based on interviews with internal and external stakeholders, found the system was understood by the affected parties, including illiterate parties. The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through morning muster/briefing, JCC, gender committee and external stakeholder consultation meeting. For foreign workers, the procedure was explained during initial report for duty with assistance of translators.

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Clause	Indicators	Comply Yes/No	Findings
	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	The CU has implemented an internal and external complaint book to record any complaints from stakeholders. All requests were responded back to grievance parties within the agreed timeframe as acknowledged in the records. Among the internal stakeholder complaints was sighted mainly for amenities fixing. For external stakeholders, there has been no complaint received so far. All the mechanism of complaint and grievance procedure was communicated via morning muster/briefing, JCC meeting, gender committee and annual external stakeholders' consultation.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The system used by the Jeroco 1 CU in resolving disputes and grievances exists in the procedure called 'Prosedur Melapor Aduan dan Permasalahan' and 'Grievances Procedure – Appendix 1' for staffs and workers. The Mill and Estates within Jeroco 1 CU each has its own Internal Complaint Form/Book and External Communication/Complaint Form/Book available. The Internal Complaint Books are mostly for employees to lodge complaint pertaining to their houses. The external stakeholder complaint record/book reviewed did not show complaints against the CU. Sighted the grievance procedure has already include an ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.
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	Contributions to community development that are based on the results of consultation with local communities with Jeroco Group of Estate (JGOE) are demonstrated such as: I. Water supply to School SK Jeroco II. Fixing wiring in SK Jeroco School III. Upgrading classroom in SK Jeroco IV. Water Supply to Humana School in Jeroco V. Transportation for workers. VI. Replacement of school furniture at HUMANA. VII. Contribution of 6 units air-conditioning and ceiling fan to PDRM Kinabatangan. On top of that, Hap Seng Management also makes a commitment towards sustainability, by providing free consultations to their surrounding smallholders to certify with RSPO and MSPO and the result was success.
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	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through an FPIC process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	The right to use the land at Jeroco 1 CU can be demonstrated and not disputed by any party. The auditor had sighted that there were clear land ownership documents. Land titles were available in documents. The original copies of the documents, however, were kept in Plantation Central Office (PCO), Sg. Segama. Copies of land titles for all estates were sighted. All the estates were under the jurisdiction of Kinabatangan District. Review of the land titles show that the requirements that the land title for all the estates namely for cultivation of an agricultural crop of economic value have been complied with.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
consent.	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 Jeroco 1 CU since 1980. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders such as the IOI Plantations, Morissem 2 Plantation (IOI), Amalania Estate. From the interviews, it can be concluded that there was no evidence of any land dispute at Jeroco 1 CU.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status 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	YES	As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since 1 January 1980. All the related documentation regarding the land acquisition was kept in Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate.

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Clause	Indicators	Comply Yes/No	Findings
	participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).		
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	There was no land encumbered by customary rights or dispute from any stakeholder at the CU, it was confirmed through interviewed relevant stakeholder. There were no local communities living in or neighbouring Jeroco 1 CU, hence, no evidence of any land dispute involving local communities and FPIC.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views	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 Jeroco 1 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 Jeroco 1 CU. The audit team had confirmed that there were no land issues related to previous owners and this was confirmed through an interview with relevant stakeholder. Documents showing identification and assessment of demonstrable legal, customary and user rights are not applicable.
	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	YES	As reported in 4.4.1 of this checklist, Jeroco 1 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.



## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
through their own representative institutions.	access to independent advice through a documented, long-term and two-way process of consultation and negotiation.		
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new ops.	YES	As reported in 4.4.1 of this checklist, Jeroco 1 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. There were also no local communities living in or neighbouring Jeroco 2 CU, hence, no evidence of any land dispute involving local communities and FPIC. This Indicator is not applicable.
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	As reported in 4.4.1 of this checklist, Jeroco 1 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. There was also no local communities living in or neighbouring Jeroco 2 CU, hence, no evidence of any land dispute involving local communities and FPIC. This Indicator is not applicable.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	As reported in 4.4.1 of this checklist, Jeroco 1 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 1 CU since 1 January 1980. All the related documentation regarding the land acquisition was kept in the Plantation Central Office, and the copy in the estate was verified by the auditor. Thus, there were no issues regarding land with villagers, local community and neighboring estate.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	There were no new lands acquired for plantation and mills after 15 November 2018. The current operation area includes mill and estates as per stated in the land title.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Land Dispute Management [Clause B (2)] and Sustainable Agriculture Policy. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Plantation Advisory Department, particularly the Group Compliance Department at the Kuala Lumpur Head Office. The procedure stipulates the involvement of the respective estate management, professional consultants as the land surveyors with reference to relevant authorities such land authority and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Land Dispute Management [Clause B (2)].In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Plantation Advisory Department particularly the Group Compliance Department at the Kuala Lumpur Head Office. The procedure stipulates the involvement of the respective estate management, professional consultants as the land surveyors with reference to relevant authorities such land authority and the affected parties in the negotiation procedures.
	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 Jeroco 1 CU. The Fresh Fruit Bunches are supplied from owned estates which are certified to RSPO.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There were no scheme small holdings at Jeroco 1 CU. The Fresh Fruit Bunches are supplied from owned estates which are certified to RSPO.
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	In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Plantation Advisory Department particularly the Group Compliance Department at the Kuala Lumpur Head Office. The procedure stipulates the involvement of the respective estate management, professional consultant as the land surveyors with reference to relevant authorities such land authority and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community due to no local communities within Jeroco 1 CU. Furthermore, the surrounding of Jeroco 1 CU is owned by IOI Plantations, Morissem 2 Plantation (IOI), Amalan Estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	It has been verified that the land has been legitimately owned by Jeroco 1 CU since 1 January 1980. All the related documentation regarding the land acquisition was kept in the Plantation Central Office, and the copy in the estate was verified by the auditor.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	As reported in 4.4.1 of this checklist, Jeroco 1 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholders such IOI Plantations, Morissem 2 Plantation (IOI), Amalan Estate.

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Clause	Indicators	Comply Yes/No	Findings
	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	As reported in 4.4.1 of this checklist, Jeroco 1 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholders such IOI Plantations, Morissem 2 Plantation (IOI), Amalania Estate.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs. (Indicators 4.4.2, 4.4.3 and 4.4.4).	YES	As reported in 4.4.1 of this checklist, Jeroco 1 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholders such IOI Plantations, Morissem 2 Plantation (IOI), Amalania Estate.
	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	As reported in 4.4.1 of this checklist, Jeroco 1 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholders such IOI Plantations, Morissem 2 Plantation (IOI), Amalania Estate.

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

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	Fresh Fruit Bunches were supplied from Jeroco 1 CU owned estates of Lokan, Lungmanis, Batangan and Lutong which are certified to RSPO Using the Identity Preserved Supply Chain Model. There were no third-party FFB's sent to the mill. Thus, no contract involved with smallholder.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	
	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	
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	Consultation with contractors and suppliers' representatives confirmed they understand their rights and obligations under the contract. There was no third-party FFB sent to the mil, 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	These contractors interviewed confirmed that payments are made in a timely manner, namely within 14 days of invoice.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Jeroco POM 1 (JPOM1) has been calibrated on yearly basis.
	5.1.8 The unit of certification supports Independent Smallholders with	YES	Hap Seng Management supports Independent Smallholders with certification. They also consulted with interested smallholders (irrespective of type) including women or other

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Clause	Indicators	Comply Yes/No	Findings
	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.		partners in their supply base and already assess their needs for support to improve their livelihoods and their interest in RSPO certification. However Surrounding smallholders and growers are against the idea of ICS they want to certify independently. Hap Seng gives support to surrounding smallholders and growers by giving them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification. Until to date the surrounding smallholders who are RSPO certified is Spark Glory, Harus Abadi, LKM Trading, Bukit Kretam and Lebijaya. Currently on progress for RSPO and MSPO certification is, Khoo Chin Hung, and LPC plantation.
	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	There is a document namely 'Procedure for reporting complaints and grievances (Prosedur Melapor Aduan dan Permasalahan)' and 'Grievances Procedure – Appendix 1' for staffs and workers and also company has developed procedure named " Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)" to protect the complainants. The procedure contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.
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	Hap Seng Management supports Independent Smallholders with certification. They also consulted with interested smallholders (irrespective of type) including women or other partners in their supply base and already assess their needs for support to improve their livelihoods and their interest in RSPO certification. However Surrounding smallholders and growers are against the idea of ICS they want to certify independently.
	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	Hap Seng Plantations already develops and implements smallholder support programs to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies. Hap Seng gives support to surrounding smallholders and growers by giving them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification. Until to date the surrounding smallholders who are RSPO certified are Spark Glory, Harus Abadi, LKM Trading, Bukit Kretam and Lebijaya. Currently on progress for RSPO and MSPO certification is, Khoo Chin Hung, and LPC plantation.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Hap Seng gives support to surrounding smallholders and growers to promote legality of their FFB production by giving them Free Consultation, Free Assessment, and anything related to RSPO and MSPO certification.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	Reviewed the training on Pesticide handlings has been given to surrounding Smallholder and Small grower.
	5.2.5 The unit of certification regularly reviews and publicly reports on the	YES	Currently Hap Seng Plantations Management has created a system to trace their stakeholders around their estate. Hap Seng Plantations also regularly reviews and

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Clause	Indicators	Comply Yes/No	Findings
	progress of the smallholder support programme.		publicly reports on the progress of the smallholder support program as seen in the Hap Seng Plantation Holdings Berhad 2022 ACOP report. As of to date, surrounding smallholders who are RSPO certified are Spark Glory, Harus Abadi, LKM Trading, Bukit Kretam and Lebijaya. Currently on progress for RSPO and MSPO certification is, Khoo Chin Hung, and LPC plantation.

### **Principle 6: Respect workers' rights and conditions**

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	The Equal Opportunity Policy is publicly available in the estates and POM. The policy statements emphasize worker information, recruitment and selection, training, employee development, based on business needs, terms of service and records of service. It also states that all employees should be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. This policy is posted on notice boards in Bahasa Malaysia and English for the understanding of the public and workers. Briefing of the policy to all workers was conducted via morning muster and explained during the induction course for the newly arrived workers.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	No employee has been discriminated against. This is evident from sampled employment contracts where all workers, (male, female, foreign, local) signed the same employment contract. Workers interviewed also confirmed that they face no form of discrimination. Foreign workers and local workers receive similar pay rate, stay in the same house, and enjoy similar medical benefits as their local counterparts. Interviews also revealed that there is no discrimination on any bases in the estates/mill.
	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	As stipulated in the <i>SOP – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (local &amp; Foreign)</i> , to include recruitment workers via walk in process" or/and via "agent/quota basis, the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs. There is no discrimination based on religion, gender, nationality etc., during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessities etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and JCC meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.
	6.1.4 Pregnancy testing is not conducted as a discriminatory	YES	There was no evidence that pregnancy tests are being conducted as a discrimination measures. As confirmed by records and interviews conducted with estate medical assistant, pregnancy tests were

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Clause	Indicators	Comply Yes/No	Findings
	measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.		done monthly on female workers who handled chemicals such as sprayer and manurers. This is to avoid harmful chemical exposure to their fetus. Once a worker is confirmed pregnant, she would be reassigned to another job which is not chemical related.
	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	The gender committees throughout the Jeroco 1 CU are known as the 'Persatuan Wanita'. Membership comprises female employees and the employees' wives. Based on interviews of the committee members and review of meeting minutes, the Committees main activities are to provide awareness to its members on issues of concern as well as opportunities and improvements for women. These relate to sexual harassment, domestic and other forms of abuse, children's health, creche hygiene, no sick children at the creche, childrens' immunization and education, as well as women's reproductive rights, maternity benefits and leave entitlement.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	HSPHB has defined wages for each job scopes which is reviewed annually as per "Increase of Daily Rated and Piece Rate Payments to Meet Minimum Wage Requirements. For estate's work, wages are typical on piece rate basis for harvesting (paid by tonne of FFB and rate varies depending on year of planting), FFB loaders (paid by tonne), spraying and slashing (paid by hectare/manday), manuring (paid by hectare/manday), pest census and control (paid by hectare/manday), frond stacking (paid by frond/manday) and so on. The rates are in accordance with the Minimum Wage Order 2022. Wages for different workers may be higher depending on experience and years of service, position, and technical nature of the job scope. Comparisons were made of sampled employment contracts and payslips for local, Indonesia and Philippine workers. Evidence is available that sampled workers receive equal pay for equal work regardless of gender, nationalities etc..
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	NO	<p>Pay and conditions are documented and made available during the audit. These are contained in the workers' payslips and employment contracts. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during an interview with management. Pay slips for estates and POM workers show breakdown for all work done such as allowances/incentives received, deductions, no. of days worked, any overtime hours performed. It was also verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages (Amendment) Order 2022 and the Sabah Labour Ordinance.</p> <p>The pay slip contains the following information: employee name, employee number, month of pay, work description, (normal work, overtime pay, piece-rate work, public holiday pays, company contributions such as SOCSO, EIS (for Malaysians), KSWP (for Malaysians) and deductions such as passport/electricity, average daily rate, total income for the month, total deductions, net pay.</p> <p>Noted that there was insufficient evidence that documentation of pay, and conditions are explained to workers in a language they understand. Employment contract, passport, work permit and pay slips of workers were sampled during the audit. Interviews were also conducted among workers. However, it was noted that the pay slip was in English. The interview conducted with workers revealed that they did not understand the content of their pay and conditions. Therefore, a Major</p>



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Clause	Indicators	Comply Yes/No	Findings
			non-conformance NEA 01 2023 has been raised under this indicator.
	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	The employment contracts signed between the management and their employees contain employment and payment terms and provisions covering place of work, commencement date, types of salary (daily-rated/piece-rated), wages, overtime pay, work on rest day, designated public holidays, paid medical leave, paid maternity leave, payment of Employment Provident Fund (EPF) for local workers, SOCSO and Employment Insurance Scheme (EIS) benefits, retirement age, repatriation cost, reasons for termination by either party, mutual termination clause and notice period. The employment contracts were prepared in Malay which is a language generally understood by the local and foreign workers from Indonesian and/or Philippines. Conditions of pay such as the agreed working hours, overtime pay, work on rest day pay are also contained in the employment contracts. Sample employment contracts at all audited estates verified to be valid and current, duly signed and witnessed and confirmed to contain all terms and conditions according to legal requirement. Pay slips provided to workers give accurate information on compensation for all work performed.
	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	Jeroco 1 CU has demonstrated compliance to Sabah Labour Ordinance. There is evidence of regular working hours and average of 6 days in a week. Stipulated in Clause 10 of their employment contracts was agreed working hours which is 8 hours per day including break or 8 hours work in a spread of 10 hours including break. Overtime hours and rate payable within the legal confines by the Sabah Labour Ordinance and this were evident through sample payslips. Workers with medical certificates are given a paid medical leave, entitled to annual leave. Female employees are entitled to 60 days paid maternity leave. This was verified from the workers employment contract, payslips, punch card, check-roll book and interviews with the workers themselves. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit. Salary deductions were only made for statutory deductions such as SOCSO, EPF and EIS. Non statutory deductions are made for new passports and passports for dependents renewal and water/electricity. Such non statutory deductions were upon receipt of written permits from the labour office.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used.	YES	Evidence is available that the Jeroco 1 CU provides adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free. Each house has between 2 to 3 rooms and accommodates between 2 to 5 workers. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation. Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall. There is evidence that housing inspections are being carried out once a week based on housing inspection records. Records of housing inspections were sighted and available. Water and electricity are also provided, and the bills are shared among occupants and deducted from their wages (max RM10 per house). The upkeep (sanitation) for JPOM1 and all estates worker quarters visited were observed in good

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings																																			
	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.		maintained. Perimeter drains are clear of any blockages. The Jeroco 1 CU provided with treated water by water treatment plant and water sampling test was carried out monthly for drinking water for human consumption. Central medical facilities are provided at Batangan Estate and managed by Medical Assistant and Hospital Assistant. Records of weekly visits by the visiting medical officer (VMO) from Klinik Chong Tawau were also sighted. Fortnightly visit by VMO (as opposed to the current fortnightly visits) as this would enable the VMO to attend to patients more frequently at the estate clinic. Free medical treatment is provided to all workers and their dependents.																																			
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Jeroco 1 CU was able to demonstrate that efforts are made to improve workers' access to adequate, sufficient and affordable food. JPOM 1 and all estates have their own canteen/grocery store which sells items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within the expiry dates. Prices of certain basic items are monitored regularly by the management.																																			
	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.  PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: <ul style="list-style-type: none"><li>• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li><li>• There is annual progress on the implementation of living wages</li><li>• Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the</li></ul>	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2022. Jeroco 1 CU had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The breakdown of the prevailing wages calculation as follows: <table><tr><td>JPOM 1</td><td colspan="2">Foreign Worker (RM)</td><td colspan="2">Local Worker (RM)</td></tr><tr><td>Total prevailing wage</td><td colspan="2">2741.22</td><td colspan="2">2656.37</td></tr></table> <table><tr><td rowspan="3">Total Value of Prevailing Wage</td><td colspan="2">Batangan Estate</td><td colspan="2">Lungmanis Estate</td><td colspan="2">Lutong Estate</td><td colspan="2">Lokan Estate</td></tr><tr><td>Local Worker (RM)</td><td>Foreign Worker (RM)</td><td>Local Worker (RM)</td><td>Foreign Worker (RM)</td><td>Local Worker (RM)</td><td>Foreign Worker (RM)</td><td>Local Worker (RM)</td><td>Foreign Worker (RM)</td></tr><tr><td>2668.27</td><td>2679.63</td><td>2384.99</td><td>4403.03</td><td>1436.45</td><td>1718.48</td><td>2665.27</td><td>2286.46</td></tr></table> <p>The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.</p>	JPOM 1	Foreign Worker (RM)		Local Worker (RM)		Total prevailing wage	2741.22		2656.37		Total Value of Prevailing Wage	Batangan Estate		Lungmanis Estate		Lutong Estate		Lokan Estate		Local Worker (RM)	Foreign Worker (RM)	Local Worker (RM)	Foreign Worker (RM)	Local Worker (RM)	Foreign Worker (RM)	Local Worker (RM)	Foreign Worker (RM)	2668.27	2679.63	2384.99	4403.03	1436.45	1718.48	2665.27	2286.46
JPOM 1	Foreign Worker (RM)		Local Worker (RM)																																			
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	Local Worker (RM)	Foreign Worker (RM)	Local Worker (RM)	Foreign Worker (RM)	Local Worker (RM)	Foreign Worker (RM)	Local Worker (RM)	Foreign Worker (RM)																														
	2668.27	2679.63	2384.99	4403.03	1436.45	1718.48	2665.27	2286.46																														

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Clause	Indicators	Comply Yes/No	Findings
	<p>gradual implementation of the living wage payment.</p> <ul style="list-style-type: none"> <li>The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation</li> </ul> <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesian and Philippine. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department. There is no casual, temporary or day labour employed.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are	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 Policy on Freedom of Association and Right to Collective Bargaining dated 01/03/2019 is available in bilingual (Malay and English). The policy is posted at the Jeroco 1 POM and all estates notice board and information wall. Interviews with workers they are aware of their workers' representatives.
	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	There are no trade unions at Jeroco 1 CU, but the workers' welfare and social committees known as Joint Consultative Committee (JCC) have been established at every unit. The committee comprise management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers. The interval meeting was carried out at least once a year. Main reason to gather the information such as feedback from the workers in terms of Social, Safety, Environmental, Welfare issues, etc. All the feedback was highlighted in the minutes meeting and SIA action plan.

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Clause	Indicators	Comply Yes/No	Findings
restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			As confirmed with the workers' representatives, the meeting minutes are made readily available to employees upon request. However, the JCC can be further improve by having specific discussion with regards to the workers' welfare, living and working conditions as describe in 3.4.2.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Workers' representatives that sit in the Joint Consultative Committee (JCC) have been independently and freely elected by the workers themselves. No evidence of any management interference was observed.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	Jeroco 1 CU subscribes to the Child Labour Policy and Sustainable Agriculture Policy. The Policy states that it would not tolerate the use of child or forced labour, nor exploitation of children in any of its global operations and facilities. This SOP also details out the remediation action to be taken should a child is found working. This includes awareness trainings for all employees and contractors, schools should encourage and motivate children to attend school, parents to be advised and warned verbally on the spot not to allow children to assist them, and the child to be sent home or to an appropriate child-care facility.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	The minimum hiring age of 18 years old is clearly stated in SOP for Recruitment, Selection, Hiring, Termination, Retirement & Promotion of Workers (Local & Foreign. Stakeholder interview and documentation verified on the Employee Master List verified that all the workers employed were above 18 years old. During the site visit also confirmed that no child labour work in the Jeroco 1 CU. Documented age screening verification procedure were also available.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Based on documents sighed, interviews and observations, there was no evidence that the Estates and the Mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' particulars and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.

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Clause	Indicators	Comply Yes/No	Findings
	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	Child labour policy was established and implemented where the company shall not use any child labour. The policy was displayed at the notice board outside the office. Sighted also training for child labour Policy has been conducted through morning briefing. The contractors have signed on the contract agreement where under addendum agreement clause (3), the contractor shall ensure no child underage of 18 are employed.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	Jeroco 1 CU have displayed policy on sexual harassment titled " <i>Sexual Harassment, Violence and Abuse Policy</i> " and "Flow Chart – Reporting Sexual Harassment (Worker)" at the office notice board. The guidelines emphasize that sexual harassment is a threat to basic human rights and offenders will be punished accordingly, including termination from work. The policy and procedure have been communicated to all the women and men workers during morning muster/briefing, gender committee and JCC. During interview with general/mill workers, field workers, harvesters from Indonesia and Philippines revealed that they understood the policy and the procedure.
	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	A policy to protect women reproductive rights titled 'Policy on Reproductive Rights' was made available at Jeroco 1 CU. The Policy gives the employees the right to decide freely and responsibly of their planning to have children, and to make decisions concerning reproduction free of discrimination, coercion and violence.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	Assessment to new mothers prior or after delivery has been conducted accordingly. The assessment conducted where among requested during the assessment were assistance of transportation to go to outside's clinic. Although the assessment includes the mother's needs for designated room to breastfeed or store milk, there is no request at such as new mothers can easily go to their homes or creche to breastfeed or store milk.
	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	<p>The CU have developed a grievance mechanism, which respects anonymity and protects complainants is established under:</p> <ul style="list-style-type: none"> <li>• Safe and Standard Operating Procedure for Sexual Harassment, Stakeholder Consultation Procedure – Group Level &amp; Estate/Mill Level,</li> <li>• Grievance Procedure (Internal &amp; External),</li> <li>• Request for Information Procedure,</li> <li>• Procedure Whistleblower.</li> </ul> <p>All the mechanism are implemented and communicated via Morning Muster, JCC Meeting and Gender Committee.</p>
6.6 No forms of forced	6.6.1 (C) All workers have entered into employment voluntarily, and the	YES	Based on documentation review, interviews conducted with workers of various work scope both at the estate and mill, and observations made, there is no evidence that workers are in forced

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
or trafficked labour are used.	<p>following are prohibited:</p> <ul style="list-style-type: none"> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> <li>Penalty to the workers for termination of employment</li> <li>Debt bondage</li> <li>Withholding of wages</li> </ul>		<p>employment. Details as follows:</p> <p><b>Retention of documents:</b> All foreign workers interviewed confirmed that they keep their own passports. This is an implementation of the commitment in No Forced or Bonded Labour of the HSPHB Sustainable Agriculture Policy, which states that the Company commits to not withhold workers' passports, identification cards or other travel documents. Verified during interview, workers kept their own passport with them at home except during work permit renewal process during which worker's passports are kept by the company up to 3 months as the passports need to be sent to immigration department for work permit approval. During this time, a copy of passport will be provided to workers.</p> <p><b>Charging for recruitment fee:</b> Workers do not pay any recruitment fee as there is no recruitment agent involved. Workers employed are those who came on a walk-in basis. The foreign workers interviewed also confirmed that they did not pay any recruitment fee.</p> <p><b>Contract substitution:</b> There is no evidence of contract substitution based on interviews conducted with the workers. They were aware of what their jobs would be before joining the company.</p> <p><b>Involuntary overtime:</b> Based on interviews conducted, there is no evidence of involuntary overtime.</p> <p><b>Lack of freedom of workers to resign:</b> There is no evidence observed of workers being prohibited from resigning. Should a worker wish to terminate their employment before their contract expires, they need to submit a letter of resignation and serve the notice period stipulated in their contract agreement.</p> <p><b>Penalty to workers for termination of employment:</b> Clause 6 of the employment contracts provide for mutual termination. The employment contract does not mention any penalty payment. This was also confirmed with workers that no penalty will be imposed for premature termination of the employment contract.</p> <p><b>Debt bondage:</b> Based on interviews with workers, there is no evidence of any form of debt bondage.</p> <p><b>Withholding of wages:</b> Based on interviews, review of the employment contracts and workers' pay slips, there is no evidence of any wages being withheld from the workers.</p>
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	<p>A special labour policy for employment of foreign workers has been addressed in the "<i>Labour Policy for Foreign Workers</i>", dated 15/04/2019. The policy mentioned that all employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and a post arrival programme will be conducted once arrived for three months. The CU maintained its specific procedure / flowchart for employment of foreign workers titled 'Sourcing Process for Foreign Workers'. The procedure has been implemented for any employment related with foreign workers.</p> <p>Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. A</p>

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits, etc. For Jeroco 1 CU, there is no recruitment agency that has been appointed. All foreign and local workers recruited by walk in basis.
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 the duties of OSH coordinator to the Assistant Manager for the downline implementation of OSH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. OSH Committee meetings are held once in three months. Review of the minutes of the meeting: OSH Committee meetings confirmed that among the agenda discussed, included the following: <ul style="list-style-type: none"> <li>▪ Passing of previous minutes and arising matters.</li> <li>▪ Concerns of all parties about health, safety and welfare</li> <li>▪ Accident report (Monthly Data of Mill/Estate Safety Performance)</li> <li>▪ Workplace inspection</li> <li>▪ Safety report and programme</li> <li>▪ COVID 19 issues / matters</li> </ul>
	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	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. All estates have their own first aider and be trained by competency consultant from Persatuan Bulan Sabit Merah Malaysia (Daerah Sandakan). First aid training was conducted annually. Master list of first aid box of all estate 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 first box which is held by harvesting, manuring and spraying mandore was verified. The content such as bandage, gauze, triangular bandage, cotton wool, plaster, handy plaster, flavin lotion, antiseptic cream, surgical gloves and scissor were well equipped. The stock of first aid box is regularly check 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 at 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. Accident/injury record were recorded using Lost Time Accident (LTA) metrics. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE),	NO	The mill and estates issued PPE to its employees for their protection at workplace. Records of PPE

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Clause	Indicators	Comply Yes/No	Findings
	which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		<p>issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire &amp; PPE. Acknowledgement of receipt was recorded. Based on the HIRARC carried out at the estates and mill the PPE types for the various activities have been identified and implemented. Personal protective equipment (PPE) distribution system was ineffective at below estate and worker did not use appropriate PPE at the place of work to cover all potentially hazardous operations.</p> <p><b><i>Lungmanis Estate</i></b>  <u>Worker 1 (W1) – 10 years serviced and latest recruitment on 09/12/2022</u>            1) Based on site inspection and interview with owner at Sundry Shop, confirmed the PPE such as black rubber boot, black lowcut rubber shoe (kasut bowling), cotton glove, etc. was purchased by workers via debt payment.            2) Based on PPE distribution record, sighted the last issued for yellow wellington boots and cotton glove for W1 on 25/09/2017. Moreover, no distribution of straw hat sighted in the PPE distribution record.            3) The W1 also did not wear appropriate PPE such as rubber boot according to SSOP and HIRARC. During site inspection sighted the W1 using black lowcut rubber shoe (kasut bowling) when performing her work.</p> <p><u>Worker 2 (W2) – 10 years serviced and the latest recruitment on 28/03/2023 at Lungmanis Estate</u>            1) Based on PPE distribution record, no evidence of yellow wellington boot been provided to the W2.</p> <p><b><i>Lokan Estate</i></b>            Lacking mechanism to check consistent implementation for PPE distribution system. Based on interview with 10 sampled harvesters, they claimed that the durability of the yellow wellington boot usually only lasted for 2 to 3 months as per claimed by the workers. They claimed also by using yellow wellington boot while performing their works. However, based on PPE distribution records for 4 (workers worked since 2015) from 10 sampled harvesters, the distribution of yellow wellington boots was issued latest on 25/05/2023 and previous issued on 24/01/2022. From the records between 24/01/2022 to 25/05/2023 (1.6 years duration of distribution), the distribution of yellow wellington boots was not reflected with the worker's interview statements.</p> <p>As a result, Major NCR DA 01 2023 was raised.</p>
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred	YES	Both the Estates and Mill in the Jeroco 1 CU uses SOCSO for the coverage for the local and foreign workers. The insurance coverage has ceased effective 2018 following the Government directive on the coverage.



## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.		
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any are reviewed during safety meetings.

## RSPO PUBLIC SUMMARY

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	Jeroco 1 CU continued to implement Integrated Pest Management (IPM) in 4 estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the HSPHB Oil Palm Agriculture Policy (OPAP) - Chapter 10 - Pest and Diseases Management. The IPM program among others includes pest and diseases management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. The IPM technique includes the management of: a) The main pests in the estates which are rats by calendar baiting at 2 campaigns per year. Rat baiting campaigns are immediately made when the damage of crop by rats is above threshold. b) Rhinoceros beetles are by using pheromone traps. c) Other pests such as bagworms and nettle caterpillars which are occasionally encountered are by using beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> which will also help to minimize the use of pesticides. All the estates carried out the census of pests and diseases on a monthly basis and the Pests and Diseases Report (Early Warning System) indicates the result of the census.
	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	The company personnel are aware of the Global Invasive Species List and CABI.org. There are no invasive species listed in the Global Invasive Species list. The Sustainable team is responsible for ensuring that no invasive species spreads in the estate.
	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	The SOP for pest control is stipulated in OPAP 10 titled Pests and Diseases Management. Fire is not used in any circumstances. The Zero Burning Policy is clearly stated in the Sustainable Agriculture Policy dated 15 August 2019. There was no evidence to show that fire had been used for pests. This was confirmed during the interviews with workers and staff. Furthermore, there had been no serious pest attack that warranted the use of fire to control.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Jeroco 1 CU continued to use agrochemicals based on HSPHB Oil Palm Agriculture Policy (OPAP) Chapter 10 - Pest and Diseases Management and Safe & Standard Operating Procedure / Accounting/Administrative Procedure (AAP) manual where written justifications of all pesticides used had been provided for various fields operations. The Manual has included a chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease and the correct dosage of agrochemicals to be used. All chemicals usage were based on the "need to do basis" to enhance field operations. It was found that no Class I chemicals had been used. The procedures also covered the use of PPE when handling these chemicals.

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Clause	Indicators	Comply Yes/No	Findings																																				
environment.			<p>The Estates had maintained chemical registers and were updated periodically. The chemical used in the estates among others as listed below;</p> <table><tr><th></th><th>Chemical name</th><th>Class</th><th></th><th>Chemical name</th><th>Class</th></tr><tr><td>1</td><td>Glyphosate isopropylamine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Methamidophos</td><td>IA</td><td>7</td><td>Tric butoxy ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>2,4-D Amine</td><td>II</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Brodifacoum</td><td>IV</td></tr><tr><td>5</td><td>Metsulfuron methy 20%</td><td>III</td><td>10</td><td>Carbofuran</td><td>II</td></tr></table>		Chemical name	Class		Chemical name	Class	1	Glyphosate isopropylamine	III	6	Cypermethrin	III	2	Methamidophos	IA	7	Tric butoxy ester	III	3	Glufosinate ammonium	III	8	2,4-D Amine	II	4	Triclopyr butoxy	III	9	Brodifacoum	IV	5	Metsulfuron methy 20%	III	10	Carbofuran	II
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			<p>The justification of agrochemicals use is available in the Oil Palm circulars, SOP, and Manuals to justify the usage of certain chemicals for respective treatment. The justification is also described in the agronomist report.</p>																																				
	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	<p>All 4 Estates in Jeroco 1 CU continued to maintain 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) applied per ha.</p> <p>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 were available and verified.</p> <p>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.</p> <p>c) No illegal agrochemicals (stated by local and international laws) in particular no paraquat were used in their estates.</p> <p>d) The 4 estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.</p> <p>Variation of chemical usage is attributed to sizes of immature areas, rainfall pattern and the regeneration growth of weeds in different type of soil series. Explanatory notes for the usage variation were provided in the assessment. Records of pesticides used were available for verification.</p>																																				
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	<p>All estates continued to minimise the usage of agrochemicals by implementing IPM plan. Blanket spraying was not practised by this CU and soft grasses and Nephrolepis are maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the HSPHB Oil Palm Agriculture Policy (OPAP)- Chapter 10 - Pests and Diseases Management.</p> <p>Weeds, Circle and Paths are sprayed only when necessary and as per program.</p> <p>As part of the IPM plans, management of all estates had established nectariferous beneficial plants (<i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> and <i>Turnera subulata</i>) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. During the visit it was observed a number of beneficial plants had been planted and had plants ready for planting in the nursery.</p>																																				

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings																																				
	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 justified in HSPHB Oil Palm Agriculture Policy (OPAP) Chapter 10 - Pests and Diseases Management for estates operations. Jeroco 1 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, it was noted that all pesticides used are of Class II, Class III & Class IV. The Class 1A chemical, Methamidophos (Enforce) in all Estates was packed individually and kept in a locked separate room with proper ventilation.																																				
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	All estates in Jeroco 1 CU continued to use only pesticides which are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. The review of the chemical register concluded that all pesticides used were of class III & class IV. The use of paraquat had been prohibited in all HSPHB estates. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions had been used. Records verified, of pesticides issued/used revealed no Class 1A or 1B had been used. The Estates had maintained chemical registers and were updated periodically. The registers were updated as listed below; <table><tr><th></th><th>Chemical name</th><th>Class</th><th></th><th>Chemical name</th><th>Class</th></tr><tr><td>1</td><td>Glyphosate isopropylamine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr><tr><td>2</td><td>Methamidophos</td><td>IA</td><td>7</td><td>Tric butoxy ester</td><td>III</td></tr><tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>2,4-D Amine</td><td>II</td></tr><tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Brodifacoum</td><td>IV</td></tr><tr><td>5</td><td>Metsulfuron methy 20%</td><td>III</td><td>10</td><td>Carbofuran</td><td>II</td></tr></table>		Chemical name	Class		Chemical name	Class	1	Glyphosate isopropylamine	III	6	Cypermethrin	III	2	Methamidophos	IA	7	Tric butoxy ester	III	3	Glufosinate ammonium	III	8	2,4-D Amine	II	4	Triclopyr butoxy	III	9	Brodifacoum	IV	5	Metsulfuron methy 20%	III	10	Carbofuran	II
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	7.2.5a Judgment of the threat and verify why this is a major threat.	NA	As mentioned above in 7.2.5. of this check list and based on audit findings, 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 and no paraquat had been used																																				
7.2.5b Why there is no other alternative which can be used.																																							
7.2.5c Which process was applied to verify why there is no other less hazardous alternative.																																							
7.2.5d What is the process to limit the negative impacts of the application.																																							
7.2.5e Estimation of the timescale																																							

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	of the application and steps taken to limit application to the specific outbreak.		
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the 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	Jeroco 1 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 HSPHB's OPAP manual, CHRA and by SDS supplied by the manufacturer. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Training including refresher sessions were provided to the workers involved in such activities to ensure a continued understanding of chemicals / hazard. The training included the safety aspects and usage of PPE when handling pesticides. All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance & replacement records were verified by the auditors.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	In Jeroco 1 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 MSDS. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e. storekeeper. The stores in the estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segreated according to the type. The fertilizers were well stacked. The stores are equipped with showers, wash area and a PPE storage area. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available at the estates. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities 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.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	The documentation and identification of all waste products such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material e.g., EFB and POME. Scheduled wastes identified included used batteries (SW102), hydraulic oil (SW305), spent lubricant oil (SW306), used chemical containers/drums (SW409), fertilizers bag (SW410), chemical wastes (SW429) and laboratory wastes (SW430). Scheduled waste was stored at centralized scheduled waste store in Jeroco Central workshop. Disposal of empty

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			pesticide containers was carried out as per established procedures. Proper storage areas were identified for the storage of the recycled waste at the estates and mill. Empty pesticides containers were triple rinsed, holes punched and stored separately in the SW store. Thereafter disposal arrangement will follow accordingly as per procedure in HSP SOP - Scheduled Wastes (Hazardous Waste). Presently all SW are dispatched to licensed buyer. No containers being used for other purpose in the estates with the exception that some empty chemical containers were recycled for premixing pesticides for onward delivery to field.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying of pesticides is not a practice in Jeroco 1 CU. There was no evidence to show that such a method being used in the 4 Estates. This was also supported through interviews with executives, field staffs and workers. No such activities were witnessed during the site/field visit.
	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 was documented action to treat related health conditions was demonstrated. Medical surveillance has been carried out by Chong Clinic, Dr Sim Yong Sing( Dosh reg no: HQ/11/doc/00/223) on 16/06/2023 for 20 sprayers/manurer, 1 Store Attendant and 1 Water Treatment operatorath 3 <sup>rd</sup> party clinic. All were found fit to handle chemicals.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	All the estates and mill in the CU complied with procedure and guidelines provided in the <i>Polisi Pengendalian Racun Perosak Bertoksik Tinggi in SOP Penyemburan Racun Rumpai ref no HSPSB/SSOP/5-22</i> whereby <i>no work with pesticides is given to pregnant or breast-feeding women. Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i> ). The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible	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 CU had established and maintained their Waste Management Plan. Among the sources of waste been identified were Solid waste including domestic and Scheduled waste, liquid waste including POME. Among the action be taken proper scheduled waste management, installation of septic tank and domestic waste weekly collected and disposed at landfill area.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
manner.	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Proper disposal of waste material such as domestic waste and schedule waste, according to procedures Safe & standard operating procedure (scheduled waste) & SOP land fill area, has been disposed through DOE contractor and land fill areas. During interview with employees and executive can demonstrated and understanding related to the procedures.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During the site visit no evidence of open fire has been used to burn all the waste. It was sighted that all the domestic waste has been disposed at designated area located far from waterways and housing complexes.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Jeroco 1 CU practised the maintenance of long-term soil fertility by annual application of fertilizers based on periodic tissue/leaf sampling and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and some EFB application, water management and by maintaining soft weeds within interlines. Maintaining soil fertility was guided by its HSPHB's OPAP manual in a few chapters. These SOPs are implemented and monitored. The monitoring of daily implementation of SOPs by estate workers is done by the field conductors, Estate Assistant Managers and Estate Managers. Periodic visits by the agronomists serve as an additional monitoring to ensure that the SOPs have been well implemented and correctly monitored by the estate management. Fertilizer application, which was of paramount importance for maintenance of soil fertility, was carried out based on the recommendation made by the agronomist from the Agronomy Department. Annual fertilizer recommendations were made based on annual tissue/leaf sampling carried out accordingly. The recommendation by the Agronomist were also available during the inspection and the application of fertilizers had been carried out as recommended and scheduled.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	All 4 Estates in Jeroco 1 Cu continued to carry out Periodic tissue and soil sampling. Periodic tissue/leaf and soil sampling were carried out in Jeroco 1 CU to monitor changes in the nutrient status of the palms. Form the annual tissue/leaf sampling for the nutrients N, P, K, Mg, Ca & B, the test results formed the basis for the fertilizers input recommendation to maintain and improve soil fertility. Soil analysis for the entire CU was made in phases on a 20% basis of an estate to complete a 5-year cycle to monitor changes in nutrient status pH, N, Exchangeable Cation of K, Ca, & Mg, C.E.C, Total & available P, and Org C. Results of the foliar and soil analysis are taken into account by the agronomists for formulating Fertiliser Recommendation. There was no obvious change of soil chemical properties as compared to previous years.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	There is a nutrient recycling programme in place on all 4 Estates in Jeroco 1 CU Empty Fruit Bunch (EFB), Bunch Ash and Belt Press Solids (BPS) produced by the mill are applied in the field. Records of application are duly retained by the estate. EFB is applied at rate of 35-70 mt/ha subject to Agronomist recommendations. Immature area at rate of 25 mt/ha. BPS is applied at dosage of 15 kg /palm. Records showed the following application had been complete: <ul style="list-style-type: none"> <li>• <b>EFB –</b> Lungmanis Estate In 2022, 2,480.00 mt over 71.00 Ha and as at June 2023, 527.00 mt</li> </ul>

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			<p>over 15.00 Ha. Batangan Estate – Nil Lokan Estate In 2022, 1,190.00 mt over 34.00 Ha and as at June 2023, 366.38 mt over 10.45 Ha.</p> <ul style="list-style-type: none"> <li>• <b>BPS –</b> Lungmanis Estate - Nil Batangan Estate In 2022, 1,218.58 mt over 586.00 Ha and as at June 2023, 98.24 mt over 356 Ha. Lokan Estate In 2022, 406.18 mt over 220.00 Ha and as at June 2023, Nil.</li> <li>• <b>Bunch Ash –</b> Lungmanis Estate In 2022, 53.73 mt over 128.00 Ha and as at June 2023, 6.86 mt over 122.00 Ha. Batangan Estate In 2022, 204.08 mt over 635.00 Ha and as at June 2023, 104.90 mt over 238.00 Ha. Lokan Estate In 2022, 150.81 mt over 361.00 Ha and as at June 2023, 31.63 mt over 105.00 Ha.</li> </ul>
	7.4.4 Records of fertiliser inputs are maintained.	YES	Jeroco 1 CU continued to monitor their fertilizer inputs as recommended by their agronomist , who visited the estates and made recommendations in their reports. Fertiliser application programs were monitored using records like reconciliation of fertiliser application schedule, program sheets, bin cards, field cost book and manuring audits through GAP Progress Report. The main fertilizer recommended for 2023 for Batangan Estate, Lokan Estate, Lungmanis Estate and Lutong Estate were NK Mixture (NK), Ammonium Sulphate (SOA), Muriate of Potash (MOP), Kieserite (KIE), Rock Phosphate (RP), Bunch Ash (BA) and High Grade Fertilizer Borate (HGFB), Empty Fruit Bunches (EFB) and Belt Press Solid (BPS) while for immature areas were guided by OPAP Chapter 11 and the main fertilizer recommended were Mix 44, NK Mixture (NK), Ammonium Sulphate (AS), Muriate of Potash (MOP), Kieserite (KIE), Rock Phosphate (ERP), and High Grade Fertilizer Borate (HGFB). Records of programs and applications of fertilisers were made available to auditors. From the review of the records, it was noted that the actual fertilizer application for 2021 and 2022 was in line with the recommendation.
7.5 Practices minimise and control erosion and	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Jeroco 1 CU. As per the Soil Maps, the soil series were as follows:



## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings																																																														
degradation of soils.			<table><tr><th>Batangan Estate</th><th>Lungmanis Estate</th><th>Lokan Estate</th><th>Lutong Estate</th></tr><tr><td>Kretam</td><td>Lungmanis</td><td>Rumidi</td><td>Kretam</td></tr><tr><td>Kinabatangan</td><td>Kretam</td><td>Kretam</td><td></td></tr><tr><td>Lungmanis</td><td>Lokan</td><td>Lokan</td><td></td></tr><tr><td>Rumidi</td><td></td><td></td><td></td></tr></table> <p>The topography details are as follows. Figures in % otherwise stated</p> <table><tr><th></th><th>topography</th><th>Lutong</th><th>Lokan</th><th>Lungmanis</th><th>Batangan</th></tr><tr><td>1</td><td>0-5</td><td>85.95</td><td>89.65</td><td>91.48</td><td>92.30</td></tr><tr><td>2</td><td>6-10</td><td>12.26</td><td>9.52</td><td>6.80</td><td>6.00</td></tr><tr><td>3</td><td>11-15</td><td>1.47</td><td>0.63</td><td>1.13</td><td>1.00</td></tr><tr><td>4</td><td>16-25</td><td>0.23</td><td>0.51</td><td>0.43</td><td>0.70</td></tr><tr><td>5</td><td>&gt;25</td><td>0.14</td><td>0.09</td><td>0.16</td><td>-</td></tr><tr><td></td><td>Total</td><td>100</td><td>100</td><td>100</td><td>100</td></tr></table>	Batangan Estate	Lungmanis Estate	Lokan Estate	Lutong Estate	Kretam	Lungmanis	Rumidi	Kretam	Kinabatangan	Kretam	Kretam		Lungmanis	Lokan	Lokan		Rumidi					topography	Lutong	Lokan	Lungmanis	Batangan	1	0-5	85.95	89.65	91.48	92.30	2	6-10	12.26	9.52	6.80	6.00	3	11-15	1.47	0.63	1.13	1.00	4	16-25	0.23	0.51	0.43	0.70	5	>25	0.14	0.09	0.16	-		Total	100	100	100	100
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7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	There is no replanting on steep terrains on all 4 Estates in Jeroco 1 CU. This was verified during the field visits. However, it was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas.																																																															
7.5.3 There is no new planting of oil palm on steep terrain.	YES	There was no New Planting observed in all 4 Estates in Jeroco 1 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	Soil and Slope maps are taken into account in plans and operations of estates to ensure long term suitability of land for palm oil cultivation. Maps are used to identify areas that are inappropriate for planting such as slope maps to indicate steep terrain. There are no new plantings carried out in all the estates visited. Jeroco 1 CU had a management strategy for palm oil cultivation, taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Jeroco 1 CU.																																																														
	7.6.2 Extensive planting on marginal and fragile soils, is	NA	This is not applicable to all 4 Estates in Jeroco 1 CU as there are no new plantings as mentioned in indicator 7.5.3.																																																														

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
plans and operations.	avoided, or, if necessary, done in accordance with the soil management plan for best practices.		
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	NA	This is not applicable to all 4 Estates in Jeroco 1 CU as there is no new plantings as mentioned in indicator 7.5.3.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	NA	As per the soil maps prepared by Agronomy Department of Hap Seng Plantation Holdings Berhad detailing their soil profile including marginal and fragile soils, there is no Peat Soil in all 4 Estates. This was also confirmed during Field visits and by interviewed Executives, Staff and Workers.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	NA	As per the soil maps prepared by Agronomy Department of Hap Seng Plantation Holdings Berhad detailing their soil profile including marginal and fragile soils, there is no Peat Soil in all 4 Estates. This was also confirmed during Field visits and by interviewed Executives, Staff and Workers.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	NA	As per the soil maps prepared by Agronomy Department of Hap Seng Plantation Holdings Berhad detailing their soil profile including marginal and fragile soils, there is no Peat Soil in all 4 Estates.
	7.7.4 (C) A documented water and ground cover management programme is in place.	NA	
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five	NA	

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	<p>years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	NA	As per the soil maps prepared by Agronomy Department of Hap Seng Plantation Holdings Berhad detailing their soil profile including marginal and fragile soils, there is no Peat Soil in all 4 Estates.
	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	NA	

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	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.		
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 water management plan is confined to only Jeroco Group of Estates engulfing the plans from nursery to fresh fruit processing. This report also includes domestic water use with the after effect of water use to the surrounding environment. The plans cover the process of water abstraction, shortage, utilization in cultivation, chemical and natural treatments to utilize water at processing, domestic purposes and wastewater management. All these aspects are included with monitoring, mitigation (if required), implementation and prevention or minimize pollution. The Water Management Plan was periodically reviewed by Sustainability Executive of HSPHB.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	The continued availability of water sources and to avoid negative impacts on other users in the catchment has been concluded in the Environmental Compliance Report (ECR). Based on the result, water quality monitoring is generally within Class IIB of NWQS at all monitoring points.
	7.8.1b Workers have adequate access to clean water.	YES	The organization did not restrict access to clean water.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	During site inspection at all estates riparian reserve and immature area field 2022 at Lungmanis Estate, sighted water courses and wetlands were fully protected, including maintaining and restoring appropriate riparian and other buffer zones. In addition, observed best practices was implemented according with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially BOD, is regularly monitored.	YES	Mill effluent is treated, and the organization submitted quarterly report in compliance with national regulations. The discharge result was within the limit.

## RSPO PUBLIC SUMMARY

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	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Processed water is obtained from water catchments near the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on a monthly basis.																																									
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<p>The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Among the plan for improving fossil fuel are:</p> <ul style="list-style-type: none"><li>▪ Regular servicing of the generator set for smooth running of engine and prevent excessive GHG emissions</li><li>▪ Estate/mill has set up a schedule the usage of fuels and monitor it at 3 times per week basis</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	<p>The CU used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. The input data for 2022 was verified and the following were determined:</p> <table><tr><td>Description</td><td>tCO<sub>2</sub>e/tProduct</td></tr><tr><td>CPO</td><td>0.65</td></tr><tr><td>PK</td><td>0.65</td></tr></table> <table><tr><td>Land Use</td><td>Ha</td></tr><tr><td>OP Planted Area</td><td>29,651.70</td></tr><tr><td>OP Planted on Peat</td><td>0.00</td></tr><tr><td>Conservation (forested)</td><td>386.34</td></tr><tr><td>Conservation (non-forested)</td><td>558.39</td></tr></table> <p>Milling extraction rate:</p> <table><tr><td>OER</td><td>20.61</td></tr><tr><td>KER</td><td>4.15</td></tr></table> <p>Mill Emission</p> <table><tr><td colspan="3">Own Crop</td></tr><tr><td>Emission source</td><td>tCO<sub>2</sub>e</td><td>tCO<sub>2</sub>e/tFFB</td></tr><tr><td>POME</td><td>5236.60</td><td>0.02</td></tr><tr><td>Fuel consumption</td><td>759.09</td><td>0.01</td></tr><tr><td>Grid electricity utilisation</td><td>0.00</td><td>0.00</td></tr><tr><td>Credits</td><td></td><td></td></tr><tr><td>Export of excess electricity to housing &amp;</td><td>0.00</td><td>0.00</td></tr></table>	Description	tCO <sub>2</sub> e/tProduct	CPO	0.65	PK	0.65	Land Use	Ha	OP Planted Area	29,651.70	OP Planted on Peat	0.00	Conservation (forested)	386.34	Conservation (non-forested)	558.39	OER	20.61	KER	4.15	Own Crop			Emission source	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	POME	5236.60	0.02	Fuel consumption	759.09	0.01	Grid electricity utilisation	0.00	0.00	Credits			Export of excess electricity to housing &	0.00	0.00
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Jeroco 1 CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																																																																
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records which covers estates and mill activities / operation. ' <i>Pollution Identification Environmental Improvement Action Plan</i> ' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were: Jeroco 1 Palm Oil Mill conducted boiler stack sampling for each of the boiler stacks. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). Data from the stack is connected online to DOE's office. Boiler smoke emission data are																																																																

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Clause	Indicators	Comply Yes/No	Findings
			<p>within the DOE limit.</p> <p>The Environmental Impact Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N<sub>2</sub>O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. Jeroco 2 CU also plan to reduce GHG via Biogas plant at JPOM 1 to capture Methane gas generated from the Effluent Treatment Plant to generate biogas engine to produce electricity for mill and domestic use. Based on the assessment of all polluting activities as of the Environment Impact Assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate. Based on the stack sampling report by independent consultant, the mill complied with the regulated limit. Currently, TPOM in progress implementing Electrostatic Precipitators (ESP) System and targeted for commissioning in December 2022.</p>
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	During the site visit at Lungmanis Estate Replanting, was sighted land preparation was not prepared by burning. All palms have been chipped and left for decomposed.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Jeroco 1 CU had established fire prevention and control measures for the areas under its direct management. Accident and emergency procedures were available in adherence to the Hap Seng Plantations Holdings Berhad's policy on ' <i>Fire Emergency Response</i> ' Plan. Each estate had a standard procedure for emergencies situation. There was formation of ERP Team & ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information to the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by Agronomy Department and amended to tailor to the situation differences in the estates and mills.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	All the estates had conducted JCC meeting and invited all adjacent stakeholders and internals stakeholder including neighboring Estates for fire prevention and control measures.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in	YES	The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There were no land clearing activities made since November 2005 within Jeroco 1 CU nor had damaged any forest to protect or enhance the HCV.

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Clause	Indicators	Comply Yes/No	Findings
Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	accordance with the RSPO LUCA guidance document.		
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	<p>Jeroco 1 CU has conducted HCV Assessment available in report "Potential High Conservation Value Area Assessment Report in Lutong Estate, Batangan Estate, Lokan Estate, Lungmanis Estate and Jeroco Palm Oil Mill 1 (JGOE 1)". This report was prepared by the Sustainability Executive and was made available during the surveillance audit. The report was completed on 31<sup>st</sup> October 2012 and updated on 18 July 2018. It was further reviewed on 27 June 2023.</p> <p>The report has identified all the HCV areas within and adjacent to the Jeroco 1 CU, as well as rare, threatened and endangered species (RTEs) for Lutong, Lungmanis, Batangan, and Lokan Estates. The management and action plans for the HCV areas has been Included in the report. The report has also identified 8 potential HCV areas with a total area of 386.34Ha.</p>
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan 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	YES	<p>The HCV Report of Jeroco 1 CU has identified a potential RTE species along Sg Kretam at Batangan Estate, namely crocodiles. Crocodile is listed as Endangered in the IUCN Red List. Measures taken to maintain/enhance this species as stated in the HCV Action Plan include monthly monitoring, maintain riparian reserve, prohibiting against cutting down trees, spraying, periodic visit to monitor illegal activities, awareness briefings to the workforce during muster on the prohibition against hunting, spraying and manuring within buffer zones.</p> <p>Visits are also being conducted to HCV sites to check on indiscriminate spraying, monitor for illegal activities, monitor housing area for any capture of protected wildlife, and continuation of buffer zone maintenance.</p> <p>The SOU has established and reviewed the action plan and monitoring programme for HCVs area after consultation with relevant stakeholders. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action.</p>



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Clause	Indicators	Comply Yes/No	Findings
	management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		<p>There were no major changes to the integrated management plan, except awareness training, and continuous monitoring for HCVs area.</p> <p>Each estate has established HCV action plan for their specific HCV identified in their area entitled 'Potential HCV areas Management Action Plans'. HCV action plan established among others are:</p> <ul style="list-style-type: none"> <li>• Prohibiting the cutting down of the tree at the area,</li> <li>• Prohibiting of manuring and spraying operation at the riparian reserve area</li> <li>• Workers are constantly informed not to encroach into the riparian reserve and disturb the area</li> <li>• Periodic visit to the riparian reserve to monitor any illegal activities</li> <li>• Prohibit workers from entering forest reserve</li> <li>• Prohibit indiscriminate spraying at the area</li> <li>• Prohibit of logging at the estate boundary</li> <li>• Prohibit of illegal hunting</li> <li>• Prohibiting workers entering cemetery area without permissions</li> <li>• Prohibiting workers disturbing mud volcano area</li> <li>• Monthly monitoring at forest reserve boundary</li> <li>• Continue support effort NGO</li> </ul>
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	There are no local communities living adjacent to or nearby Jeroco 1 CU. Thus, this indicator was not applicable.
	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.	YES	Jeroco 1 CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Observed during site visit, signage to prohibit hunting, fishing and pesticide spraying within buffer area at the HCV Area is available. It was noted that CCTV was placed at strategic area surrounding the estate to control everything including any illegal activities. The CCTV is in operation 24hours. The list of RTE species found in the Jeroco 1 CU has made available in HCV Report [Table 4]. Jeroco 1 CU subscribes to Rare Threatened & Endangered Species Policy. Disciplinary measures would be taken if any of their staff or workers found to capture, harm, collect or kill the RTE species.

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Clause	Indicators	Comply Yes/No	Findings
	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.		Progress of implementation of the HCV Management Plan FY2023 for Jeroco 1 CU were reviewed and verified on the ground.
	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	The Jeroco 1 CU will notify the relevant authorities immediately if any individual or workers for the company is found to capture, harm, collect or kill these species or if found any activities to capture, harm, collect or kill RTE species, the estates will make a report to the Wildlife Department immediately. This is in-line with Policy on Rare, Threatened & Endangered Species Policy [clause 4]. There is evidence that monitoring of HCV are being conducted by all the Estates under Jeroco 1 CU on a monthly basis.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Auditors has verified through checking through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Jeroco 1 CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

## RSPO PUBLIC SUMMARY

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

Clause	Indicators		Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods require approval by the RSPO Secretariat.	NO	The timebound plan to achieve 100% RSPO proposed to be extended to 2025 (ACOP 2021) after seek advice from RSPO Compensation Section/Integrity Unit on 11 April 2022 since the organization still have 3 estates undergoing compensation procedure. For ACOP 2022 sighted the submission on 15/5/2023 to RSPO secretariat. The Company has held a meeting with the RSPO Compensation Section/Integrity Unit on 11 April 2022 to discuss on the Concept Note (Northbank Estate/Tabin Estate) and LUCA (Pelipikan Estate) with the comments be provided by the RSPO Compensation Panel (RSPO CP). However, no approval obtained from RSPO Secretariat on the deviations of TBP as per Minor NCR RMN 02.
	(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	Based on the ACOP 2021, verified that the time bound plan appropriate covered all the management unit.
	(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	YES	The details of the Time Bound Plan are described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.

## RSPO PUBLIC SUMMARY

		chamber of commerce (or eq);		
	(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	Refer Minor NCR RMN 02.
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	<p>Assessment of compliance to RSPO Partial Certification Requirements was conducted in Northbank and Tabin Estate on 01-04/08/2022 and for Pelipikan Estate on 01-03/03/2023. From the assessment, the status of the uncertified management unit was summarized as follows:</p> <p><u>Northbank and Tabin Estate</u></p> <p>a) HCV Assessment at Northbank and Tabin Estate has been conducted in year 2013 and completed the report on 20 November 2013.</p> <p>b) The Company has held a meeting with the RSPO Compensation Section/Integrity Unit on 11 April 2022 to discuss on the Concept Note (Northbank Estate/Tabin Estate) with the comments be provided by the RSPO Compensation Panel (RSPO CP).</p> <p><u>Pelipikan Estate</u></p> <p>a) Based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest Sdn. Bhd.) there were no clearance of primary forest at Pelipikan Estate. However, there were land clearing made on May 2006, September 2010 and February 2011. Whereas clearing was made without HCV assessment. HSP received the reviewer's comment on the LUCA assessment and latest replied on 18/01/2023.</p>
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	YES	<p>Assessment of compliance to RSPO Partial Certification Requirements was conducted in Northbank and Tabin Estate on 01-04/08/2022 and for Pelipikan Estate on 01-03/03/2023. From the assessment, the status of the uncertified management unit was summarized as follows:</p> <p><u>Northbank and Tabin Estate</u></p> <p>There is no land conflict in Northbank and Tabin estate. Land title is available. Other matters pertaining to land conflict in HSP can refer to Hap Seng Plantations 2019 Annual Report page 136 item 24(b).</p>

## RSPO PUBLIC SUMMARY

				<p><u>Pelipikan Estate</u> Land conflict was resolved with the affected and relevant parties. Please refer Hap Seng Plantations 2018 Annual Report – refer page 269 (c)</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	YES	<p>Assessment of compliance to RSPO Partial Certification Requirements was conducted in Northbank and Tabin Estate on 01-04/08/2022 and for Pelipikan Estate on 01-03/03/2023. From the assessment, the status of the uncertified management unit was summarized as follows:</p> <p><u>Northbank and Tabin Estate</u> JCC meeting with stakeholder which include local communities was conducted on 11/08/2023 and 23/8/2022. The result of the meeting had no significant negative impact by the local community.</p> <p><u>Pelipikan Estate</u> There was no labour dispute reported during JCC with stakeholder meeting conducted on 03/05/2023. Overall, no negative impacts.</p>

## RSPO PUBLIC SUMMARY

### ATTACHMENT 4

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

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.3.3 RMN 01	Minor	<p>Requirement: 3.3.3 Records of monitoring and any actions taken are maintained and available.</p> <p>Finding: The record of monitoring of workplace inspection was not available for all mill activities.</p> <p>Objective evidence: At Jeroco 1 POM, the monthly workplace inspection conducted, and records are available however no records available for Biogas plant, Lab, Incinerator, Effluent treatment plant, diesel skid tank area and manual lifting activities.</p>	<p>Root cause: The Workplace inspection has covered all the area of critical area in the mill, but the PIC was not aware that all the critical area such Biogas plant, Lab, Incinerator, Effluent treatment plant, diesel skid tank area, and manual lifting activities in need to include in the workplace inspection as the old method doesn't include in the form of Inspection</p> <p>Correction: The certification unit will include the Biogas plant, Lab, Incinerator, Effluent treatment plant, diesel skid tank area, and manual lifting activities in the workplace inspection and will do the inspection before the next Safety Meeting.</p> <p>Corrective action: The certification unit will review the workplace inspection on a yearly basis and will check with the Agronomy Department (Sustainability Team) if there are any changes.</p>	<p>The root cause has addressed the issue happen, Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.</p> <p><b>Status: Open</b></p>
3.4.2 NEA 02 2023	Minor	<p>Requirement: 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.</p> <p>Finding: Insufficient evidence that Social Impact Assessment (SIA) has been developed with participation of affected parties.</p>	<p>Root cause: There is a new PIC appointed after the last one is resigned; this is resulted lack of Knowledge of new PIC to include/cover the social issues in the Social Impact Assessment (SIA). There is also wrong method use by the Certification unit before this, which is cover only the representative workers and did not distribute form</p>	<p>The root cause has addressed the issue happen during transition of New PIC, and assessor has accepted the Root cause. Corrective action plan has been reviewed and deemed to be satisfactory to address Minor Nonconformity. Evidence of the CAP will be verified during next</p>

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		<p>Objective evidence: The Social Impact Assessment (SIA) Management Action Plans and Continuous Improvement Plan for Jeroco Group of Estate was latest reviewed on 10th July 2023. However, the revision did not sufficiently cover social issues and did not develop with participation of affected parties. Details as follows:</p> <p>a) Based on interview, the workers normally cash out their salary at nearest sundry shop with certain charges imposed by the sundry shop owner. This was also confirmed during phone interview with the shop owner.</p> <p>b) During site visit, sighted security was stationed at main road near junction. However, there is no assessment conducted to determine the suitability of working condition as there is no shed to protect them from rain or sun.</p> <p>c) There are no specific meeting minutes between worker's representatives and employer to ensure two-way communication with regards to the workers welfare, living and working conditions.</p> <p>d) Hap Seng Plantations Berhad commit to respect and recognize human rights as stipulated in the Sustainable Agricultural Policy clause 3.2 (ii) stated "There will not be any restrictions on the workers' freedom of movement during their free time". However, during interview with workers, they mentioned that their freedom of movement after their working hours are quite restricted. Gate pass approval by top management (Field Conductor, Assistant Manager and Manager) is always required at least 5 days prior leaving the premise except in case of emergency.</p> <p>e) Based on interview, workers stated their difficulties to access to the nearest town due to unavailability of transportation and felt isolated from outside world.</p>	<p>feedback/interview form to the workers.</p> <p>Correction:</p> <ol style="list-style-type: none"> <li>The Certification Unit will ensure to meets the requirements of SIA for every social issues regarding the worker's needs and to make sure the suitability of working condition.</li> <li>The Certification Unit will conduct JCC Meeting among workers in order to identify the workers issues and participation of affected parties in the SIA.</li> </ol> <p>Corrective action:</p> <ol style="list-style-type: none"> <li>The Sustainability Team to ensure cross-check the social issues for participation of affected parties from feedback/interview form and to ensure the Certification Unit meet the worker's needs.</li> <li>Sustainability Team will cover/include the social issues with participation of affected parties in the Social Impact Assessment</li> </ol>	<p>assessment.</p> <p><b>Status: Open</b></p>
6.2.1 NEA 01 2023	Major	<p>Requirement: 6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>Finding: Insufficient evidence that documentation of pay and conditions are explained to them in language they understand.</p>	<p>Root cause: Training has been given to the workers, However, no further monitoring of understanding among workers about the content of their pay and the conditions on their payslips.</p> <p>Correction: The Certification Unit has conducted</p>	<p>The root cause addressed the loophole in the training, which is monitoring of training after given. Auditor has received evidence that training related to Pay slip has been conducted on 09/08/2023, and evidence training related material, auditor also received sample of form monitoring Training by the RSPO</p>

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		<p>Objective evidence: Employment contract, passport, working permit and payslips of workers were sample during the audit. Interview were also conducted among workers. However, it was noted that he payslip was in English. Interview conducted with workers revealed that they did not understand the content of their pay and conditions.</p>	<p>training on (09/08/2023), regarding the content of their pay and conditions in their payslips, and the certification unit has provided the payslips in Bahasa Malaysia at the notice board. (Attachment 1)</p> <p>Corrective action: The Certification Unit will ensure the availability of content pay and conditions in Bahasa Malaysia, and the RSPO Officer will cross-check the workers understanding of the content of their pay and conditions in their payslips by monthly basis.</p>	<p>Officer. All of this evidence is sufficient to close this NCR.</p> <p><b>Status: Closed</b></p>
6.7.3 DA 01 2023	Major	<p>Requirement: 6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>Finding: Worker did not use appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations.</p> <p>Objective evidence: Lungmanis Estate Worker 1 (W1) – 10 years serviced and latest recruitment on 09/12/2022 1) Based on site inspection and interview with owner at Sundry Shop, confirmed the PPE such as black rubber boot, black lowcut rubber shoe (kasut bowling), cotton glove, etc. was purchased by workers via debt payment. 2) Based on PPE distribution record, sighted the last issued for yellow wellington boots and cotton glove for W1 on 25/09/2017. Moreover, no distribution of straw hat sighted in the PPE distribution record.</p>	<p>The root cause: 1. No monitoring conducted by Estate Management to ensure W1 and Worker W2 has been provided adequate PPE as per required in HIRARC as well ensuring workers to wear PPE provided by estate management during performing their work. 2. PPE Replacement Training to worker was insufficient and resulted low understanding on the PPE replacement procedure as well the PPE Requirement as per required in HIRARC.</p> <p>Correction: 1. Daily PPE checklist (Attachment 2) will be performed by Estate management by daily basis during Muster Ground to monitor and ensure all workers has been provided PPE as per required in HIRARC and to identify workers PPE that require for replacement such as damage PPE before they start performing their task. 2. Training of PPE replacement procedure &amp; PPE requirement as per</p>	<p>The root cause has exactly addressed the loophole in the system related to PPE which is no monitoring of PPE given and training efficiency monitoring was not enough. Auditor also has verified the evidence given such as Daily PPE checklist, Records of Training of PPE and Yearly Training Plan. Auditor found that the evidence is enough to close this NCR.</p> <p><b>Status: Closed</b></p>



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		<p>3) The W1 also did not wear appropriate PPE such as rubber boot according to SSOP and HIRARC. During site inspection sighted the W1 using black lowcut rubber shoe (kasut bowling) when performing her work.</p> <p>Worker 2 (W2) – 10 years serviced and the latest recruitment on 28/03/2023 at Lungmanis Estate</p> <p>1) Based on PPE distribution record, no evidence of yellow wellington boot been provided to the W2. Lokan Estate</p> <p>Lacking mechanism to check consistent implementation for PPE distribution system. Based on interview with 10 sampled harvesters, they claimed that the durability of the yellow wellington boot usually only lasted for 2 to 3 months as per claimed by the workers. They claimed also by using yellow wellington boot while performing their works. However, based on PPE distribution records for 4 (workers worked since 2015) from 10 sampled harvesters, the distribution of yellow wellington boots was issued latest on 25/05/2023 and previous issued on 24/01/2022. From the records between 24/01/2022 to 25/05/2023 (1.6 years duration of distribution), the distribution of yellow wellington boots was not reflected with the worker's interview statements.</p>	<p>HIRARC will be conducted among Estate Worker to ensure workers understand the procedure of distribution of the PPE as well, the PPE requirement of specific job task as per required in HIRARC. (Attachment 1)</p> <p>Corrective action:</p> <ol style="list-style-type: none"> <li>1. Monthly Checking by RSPO officer to ensure the Daily PPE checklist implementation by Estate Management is in order.</li> <li>2. Including the Training of PPE replacement procedure &amp; PPE requirement as per HIRARC in the Yearly Training program.</li> </ol>	
5.5.2 (a) RMN 02	Minor	<p>Requirement: 5.5.2 Time-bound plan stipulated: A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p> <p>(a) Any deviations from these maximum periods requires approval by the RSPO Secretariat.</p> <p>Finding: The organization deviation did not had approval by the RSPO Secretariat.</p> <p>Objective evidence: The extension TBP for uncertified management units to year 2025 sighted during the audit did not obtain any approval from RSPO Secretariat.</p>	<p>Root cause: The Certification Unit misunderstood that submission yearly basis of Annual Communication on Progress (ACOP) to RSPO had complied with the requisition of approval from RSPO Secretariat for extension time-bound plan for uncertified management units. Furthermore, the Certification Unit did not receive email from RSPO on the RSPO announcement for Time Bound Plan Revision.</p> <p>Correction: The Certification Unit has immediately submitted the Time-Bound Plan template to RSPO Secretariat for approval extension time-bound plan for uncertified management units with follow-up evidence.</p>	<p>The root cause has addressed the issue, and the corrective action plan has been reviewed and deemed to be satisfactory to address the Nonconformity. It has been verified that revised TBP has been approved by RSPO on 21/09/2023.</p> <p>Evidence of the CAP will be verified during next assessment.</p> <p><b>Status: Open</b></p>

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			<p>Corrective action:</p> <p>The Certification Unit will yearly monitor the time-bound plan for uncertified management unit and will request approval to RSPO Secretariat earlier 1 year before maximum periods.</p>	
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## RSPO PUBLIC SUMMARY

### ATTACHMENT 5

#### STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
MZK 01 2022  3.3.1 (C)	Major	<p>Finding: Standard Operating Procedures (SOP) for the unit of certification was not in line with current RSPO P&amp;C MYNI e.g.:</p> <ul style="list-style-type: none"> <li>I. SOP Employment for recruiting foreign workers via walk in process was not documented and available.</li> <li>II. SOP Employment for recruiting foreign workers via agent/quota basis was not clear to ensure zero recruitment fees</li> </ul> <p>Objective evidence: Review of documents found there are migrant workers from Indonesia and Philippines that apply for work at the CU i.e. individual with passport and individual without passport. However, the recruitment procedures for these migrant workers titled 'Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (local &amp; Foreign) dated 31/05/2020 did not clearly describe the recruiting procedure for foreign workers via "walk in process" or/and via "agent/quota basis". The procedure also did not clearly outline the mechanism to ensure 'recruitment fees' are not forced on migrant workers employed by the CU.</p>	<p>Employment procedures which include recruitment, selection and hiring are contained in a document entitled Standard Operating Procedure – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (Local &amp; Foreign), dated 31/05/2020 and revised on 16th August 2022, to include recruitment workers via walk in process" or/and via "agent/quota basis. For matters related to termination of employment and retirement, these are contained in employment contracts. Clause C of the employment contract states that the retirement age for workers is 60. These documents are available to workers and their representatives Thus, Past NCR was successfully closed.</p>
DA 02 2022  3.4.3 (C)	Major	<p>Finding: The social management and monitoring plan was not fully implemented and reviewed in a participatory way.</p> <p>Objective evidence: SIA addendum for replanting activities was not effectively conducted. The stakeholder involvement was only limited to workers. Only 1 workers union representative and 8 harvesters were assessed. Inadequate involvement of workers such as non-union workers, dependence, gender, races, job scopes and etc. Gathering of negative and positive impact was conducted during morning master call. Additionally, no consultation with neighbouring plantation from IOI Plantation (Morisem Estate and Leepang Estate). Furthermore, stakeholder consultation method was not effective. Only two sessions of consultation i.e. groups stakeholders consultation dated 27/04/2021 and JCC Meeting (Lungmanis Estate) dated 23/06/2022 was conducted. The</p>	<p>Auditor has verified the latest groups stakeholder's consultation meeting on 18/05/2023 via online meeting and JCC Meeting dated 22/06/2023 (LTG), 21/06/2023 (LMS), 19/06/2023 (BTG) and 16/06/2023 (LKN). The meetings have been conducted with participation of affected parties such as relevant parties such as MPOA, DOE, DOSH, EPD-Sandakan, IPD Lahad Datu, Kedai Ah Lok, MK Nexus, Suruhanjaya Tenaga. FFB suppliers, contractors, mill's part suppliers, neighboring estate, Humana, SK Jeroco, Sabah Forestry Department, PDRM, Wildlife Department and Immigration Department and worker's representative. Evidence of the above stakeholder consultation conducted is available and the stakeholder feedback were recorded in the EIA and SIA plan. The latest SIA also has included replanting activities Thus, Major NCR DA 02 2022 was closed.</p>

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		meeting was likely a stakeholders meeting. From the minutes of meeting, there were no specific issues related to revising of SIA Management Plan such as discussion about main activities such as replanting. The minutes of meeting only captured awareness on RSPO and MSPO and open issues with guidance to specific topic needed to be addressed.	
MN 01 2022  7.8.2 (C)	Major	<p>Finding: Water courses and wetlands was not protected, including maintaining and restoring appropriate riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>Objective evidence: During site inspections at Lungmanis Estate (Replanting Area Field 2022), sighted blanket of chemical spraying activities was carried out close to the water edge at the artificial drainage and waterways that directly channel to riparian reserve.</p>	During site inspection at all estates riparian reserve and immature area field 2022 at Lungmanis Estate, sighted water courses and wetlands were fully protected, including maintaining and restoring appropriate riparian and other buffer zones. In addition, observed best practices were implemented according with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). As a result, previous Major NCR DA 02 2022 was satisfactory closed.
DA 01 2022  1.1.5	Minor	<p>Finding: Stakeholder list incomplete.</p> <p>Objective evidence: There is no internal stakeholder listed in the stakeholder list at Jeroco 1 CU such as workers leader, women leader, religion head, ethnic leader etc. this group is the biggest affected group by the CU operations.</p>	<p>The stakeholder lists for Jeroco 1 CU were all available and sighted during the surveillance audit. The lists were updated on 4 May 2023, including the following</p> <ul style="list-style-type: none"> <li>a) Relevant government agencies such as MPOB, Department of Immigration, Sabah Forestry Department, Sabah Wildlife Department, Department of Environment, Sabah Labour Department, Department of Safety and Health</li> <li>b) Indonesian consulate, Philippines Embassy,</li> <li>c) Neighbouring schools, HUMANA school,</li> <li>d) Neighbouring estates (IOI Plantations, LPC plantations, Spark Glory Sdn Bhd, First Raintree Sdn Bhd &amp; Harus Abadi Sdn Bhd, Bukit Kretam Sdn Bhd), Lebijaya Sdn Bhd</li> <li>e) NGOs (HUMANA, WWF-Malaysia),</li> <li>f) Suppliers and contractors (Bumi Jaya Kontraktor, Millivest Sdn Bhd, Thien Engineering, Greentrend Builder Sdn Bhd, S&amp;S Steel Engineering Works Sdn Bhd, Uni-Vessel Engineering (L/D) Sdn Bhd, CH Bearing &amp; Hardware Sdn Bhd, MP Machinery Sdn Bhd, Sanda Power Electric Sdn Bhd, Hap Seng Fertilizer, Poly Electrical Sdn Bhd</li> <li>g) Clinic (Klinik Chong), hospitals,</li> <li>h) FFB suppliers and consultants (Chemsain Konsultant Sdn Bhd, REHPRO Scientific Sdn Bhd, Ultus Venture(M) Sdn Bhd )</li> </ul> <p>Sighted during this RA Assessment the stakeholder list has been included workers leader, women leader, religion head, ethnic leader in the list thus, Past Minor NCR DA 01 2022 was successfully Close.</p>

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DA 03 2022  6.5.3	Minor	<p>Finding: Management yet to assess the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>Objective evidence: There are no evidence of records needs of new mothers' assessment at Jeroco 1 CU.</p>	<p>Assessment to new mothers prior or after delivery has been conducted accordingly. Verified the assessment form conducted at Batangan Estate for newly delivered mother dated 07.06.2023. The assessment conducted among requested during the assessment were assistance of transportation to go to outside's clinic. Although the assessment includes the mother's needs for designated room to breastfeed or store milk, there is no request at such as new mothers can easily go to their homes or creche to breastfeed or store milk. Thus Past Minor NCR was successfully closed.</p>
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## RSPO PUBLIC SUMMARY

### ATTACHMENT 6 – Timebound Plan

#### HAP SENG PLANTATIONS HOLDINGS BERHAD TIME BOUND PLAN ON RSPO CERTIFICATION

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification
				Latitude	Longitude			
Hap Seng Plantations (River Estates) Sdn Bhd – Sg Segama Group of Estate	Malaysia	Bukit Mas Palm Oil Mill	Locked Bag No.05, 91109 Lahad Datu, Sabah	5°20'14.281"N	118°28'25.104"E	N/A	Certified	
Bukit Mas Palm Oil Mill	Malaysia	Sungai Segama Estate		5°19'02.421"N	118°27'47.331"E	5,174.00	Certified	
	Malaysia	Bukit Mas Estate		5°19'01.928"N	118°27'46.294"E	4,733.00	Certified	
	Malaysia	Kawa Estate		4° 21' 52.222"N	118° 2' 18.679"E	1,276.19	Certified	
Jeroco Plantation Sdn Bhd	Malaysia	Jeroco Palm Oil Mill 1	Locked Bag No.05, 91109 Lahad Datu Sabah	5° 25'52.002"N	118°25'02.005"E	N/A	Certified	
Jeroco Palm Oil Mill 1	Malaysia	Lokan Estate		5° 25' 51.800" N	118°22'57.804"E	3,155.39	Certified	
	Malaysia	Lutong Estate		5° 21' 55.601" N	118°26'26.201"E	2,448.40	Certified	
	Malaysia	Lungmanis Estate		5° 28' 46.304" N	118°24'11.301 E	2,200.00	Certified	
	Malaysia	Batangan Estate		5° 24' 43.704" N	118°26'59.803"E	3,632.88	Certified	
Jeroco Plantation Sdn Bhd	Malaysia	Jeroco Palm Oil Mill 2	Locked Bag No.05, 91109 Lahad Datu Sabah	5° 25' 52.002" N	118°25'02.005"E	N/A	Certified	
Jeroco Palm Oil Mill 2	Malaysia	Kapis Estate		5° 26' 34.303" N	118°24'51.001"E	2,681.00	Certified	

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<i>Hap Seng Plantations (River Estates) Sdn Bhd – Tomanggong Group of Estates</i>	<i>Malaysia</i>	<i>Tomanggong Palm Oil Mill</i>	<i>Locked Bag No.05,</i>	<i>5°25' 38.3" N</i>	<i>118°39' 33.5" E</i>	<i>N/A</i>	<i>Certified</i>	
	<i>Malaysia</i>	<i>Tomanggong Estate</i>		<i>5°24' 01.9" N</i>	<i>11 8°39' 51.7" E</i>	<i>2,654.80</i>	<i>Certified</i>	
	<i>Malaysia</i>	<i>Litang Estate</i>	<i>91109 Lahad Datu Sabah</i>	<i>5°19' 31.6" N</i>	<i>118°34' 28.3"E</i>	<i>2,648.62</i>	<i>Certified</i>	
	<i>Malaysia</i>	<i>Tagas Estate</i>		<i>5°21' 47.3" N</i>	<i>118°38' 14.2"E</i>	<i>2,212.33</i>	<i>Certified</i>	
<i>Pelipikan Estate</i>	<i>Malaysia</i>	<i>NOT APPLICABLE – No mills at Pelipikan Estate</i>	<i>Locked Bag No.30  89109, Kota Marudu, Sabah</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	
	<i>Malaysia</i>	<i>Pelipikan Estate</i>		<i>6°21'37.600"N</i>	<i>116°48'04.900"E</i>	<i>2,091.61</i>	<i>Not Certified</i>	<i>2025</i>
<i>Hap Seng Plantations Tomanggong Group of Estates</i>	<i>Malaysia</i>	<i>Tabin Estate</i>	<i>Kinabatangan District</i>	<i>5°22'47.204"N</i>	<i>118°42'16.700"E</i>	<i>2,235.3000</i>	<i>Not Certified</i>	<i>2025</i>
	<i>Malaysia</i>	<i>Northbank Estate</i>		<i>5°26'06.605"N</i>	<i>118°39'16.700"E</i>	<i>2,578.9100</i>	<i>Not Certified</i>	<i>2025</i>

**Note:**

1. It has been confirmed during the audit that Shalimar Estate and Batang Berjuntai, which is located in Selangor is under Euro Asia Brand Holding Company (Euro Asia). Euro Asia who certified to MSPO, belongs to Hap Seng Properties Sdn Bhd (HS Properties). HS Properties is one of subsidiaries of Hap Seng Consolidated Bhd. (Hap Seng Consolidated.)
2. As of now, neither Hap Seng Consolidated nor HS Properties are registered as RSPO members.
3. There is no management control between HS Properties & Hap Seng Plantations Holdings Berhad (HS Plantations), (two different companies with two CEOs). But both companies are subsidiaries to Hap Seng Consolidated.
4. In terms of RSPO certification process, HS Plantations is registered as RSPO member. The above TBP is parked under HS Plantations.
5. Following the RSPO Membership Rules 2020, [Clause 5.2.6 (ii) a],
  - Hap Seng Consolidated is a parent company but not an RSPO member, but one of its related entities holds
  - RSPO membership i.e. HS Plantations.
  - Only HS Plantations is an RSPO member.
  - Hap Seng Consolidated is not involved in activities related to the palm oil supply chain.
  - Corporate Group Membership is not applicable to Hap Seng Consolidated.
6. There is Revision of TBP at Pelipikan Estate, Tabin and Northbank Estate, However, the Revision was not updated to the RSPO. As a result, NCR RMN 02 was raised against 5.5.2 (a) indicator and it has been verified that the revised TBP has been approved by RSPO on 21/09/2023.

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### ATTACHMENT 7 – Stakeholder listing (Stage 2/Recertification only)

GOVERNMENT AGENCIES					
No	Department/ Company Name	Contact Person	Address & Email	Contact Number	Remarks
1	Malaysian Palm Oil Association (MPOA) Sandakan	Tn. Hj A.R Azmeer Bin Shamsuddin	Malaysian Palm Oil Association (MPOA)-Sabah(Wisma Hap Seng,KM, 2.7 Jalan Leila,Sandakan,Sabah, Malaysia Email add : <a href="mailto:mpoa.Sabah@email.com">mpoa.Sabah@email.com</a>	Tel. No. 089-615863	
2	Malaysian Palm Oil Board (MPOB)	Syahril Amri Bin Amrun  Muhammad Faizal Bin Ambo Sudin	Pejabat MPOB Cawangan Kinabatangan, Block F, Lot12, Tingkat 1 Bangunan Perkasa Realty Sdn Bhd, 90200 Kinabatangan, 90200 Bukit Garam, Sabah, Malaysia.	H/P No. 089-551 386/88 Fax No. 089-551 387	
3	Malaysian Palm Oil Board (MPOB)	Dr. Faizah Mohd Syariff	Lembaga Minyak Sawit Malaysia (MPOB), Wisma Sawit, Lot 6, 556, Jalan Perbandaran, 47301 Kelana Jaya, Selangor Darul Ehsan. E-mail address: <a href="mailto:Norfedileh@mpob.gov.my">Norfedileh@mpob.gov.my</a>	H/P No. 03-78022851 Fax No. 03-780322303-78033533	
4	Department Of Environment (Kota Kinabalu)	Amirul bin Aripin (Pengarah)	Jabatan Alam Sekitar Sabah, Aras 4, Blok A, Kompleks Pentadbiran kerajaan Persekutuan Sabah, Jalan UMS-Sulaman, Likas,88450 Kota Kinabalu Sabah. E-mail address: <a href="mailto:Florenciado@gov.my">Florenciado@gov.my</a>	Tel:088-488171/172 ext 244 Fax No. 088-488177	
5	Environmental Protection Department (Sandakan)	1. Aliudin @ Din Atat @ Mohd Arsyid	Jabatan Alam Sekitar Negeri Sabah, Cawangan Sandakan, Tingkat 2, Wisma Saban,Lot 1&2, Megah Light Industrial Estate, 9000 Sandakan, Sabah	Tel No. 089-674653 Email : <a href="mailto:aliudin@doe.gov.my">aliudin@doe.gov.my</a>	
6	Environment protection Department	Vitalis Moduying (Pengarah)	Environment Protection, Wisma Budaya 1-3 Floor, Tungku Abdul Rahman Road, Locked Bag 2078, 88999 Kota Kinabalu, Sabah, Malaysia E-mail address: <a href="mailto:ipas@s.gov.my">ipas@s.gov.my</a>	Tel No. 088-283283 Fax : 088-239046	
7	Ibu Pejabat Imigresen (Kota Kinabalu)	Tuan Noor Alam Khan Bin A. Wahid Khan	Pejabat Imigresen Negeri Sabah, Aras 1-4,Block B, Kompleks Pentadbiran kerajaan Persekutuan, Jalan UMS, 88300 Kota Kinabalu, Sabah	Tel No. 088-488700 Fax No. 088-488800	
8	Ibu Pejabat Polis Kontinjen Sabah (Kota Kinabalu)	DSP Mohammad Bin Taib (Bahagian Pentadbiran) 016-8036628	Ibu Pejabat Polis Kontinjen Sabah, Pol is Di Raja Malaysia, Beg Berkunci No2062, 88560 Kota Kinabalu, Sabah E-mail address: <a href="mailto:cpo.sabah@rmp.gov.my">cpo.sabah@rmp.gov.my</a>	Tel No. 088-253555 Fax No. 088-240475 Tel. 088-454125 – Cik Suria (Bagian Perlesenan)	
9	Ibu Pejabat Polis Daerah Lahad Datu	ACP Tn.Nasri Bin Mansor	Ketua Polis Daerah, Ibu Pejabat Daerah, Peti Surat 60133, Poskod 91100, Lahad Datu, Sabah <a href="mailto:kpdlahadatu@rmp.gov.my">kpdlahadatu@rmp.gov.my</a>	Tel. No. 089-881255 Fax No. 089-882633	
10	Ibu Pejabat Polis Daerah, Kinabatangan, Sandakan	Supt. Zulbaharin Bin Hj. Ismail	Ketua Polis Daerah, Ibu Pejabat Polis Daerah, W.D.T No. 17, 90200 Kinabatangan. Email address: <a href="mailto:kpdkkinabatangan@rmp.gov.my">kpdkkinabatangan@rmp.gov.my</a>	Tel No. 089-561890/089-561891/089-561443 Fax No. 089561559	
11	Jabatan Tenaga Kerja Lahad Datu	Puan Asriyah Abdul Hafid	Bangunan Lembaga Koko Malaysia, MDLD 3988, Lot 103, Tkt Bawah dan 1, Peti Surat 60181, Fajar Centre, Jalan Segama, 91120, Lahad Datu Sabah. <a href="mailto:Pblldatu@mohr.gov.my">Pblldatu@mohr.gov.my</a>	Tel No. 089-881 623 Fax No. 089-880623	
12	Pejabat Tenaga Kerja Kota Kinabatangan	En. Zarul Afiq bin Rosmi/En. Berry bin Husen/En. Suriono bin Sudirman	Pejabat Tenaga Kerja, Lot 5 & 6 Blok E, Bangunan Perkasa Reality, Jalan Majlis Daerah, WDT 120, 90200 Kota Kinabatangan, Sabah. <a href="mailto:itkbkktgn@mohr.gov.com">itkbkktgn@mohr.gov.com</a> My	Tel. No. 089-561967 Fax No. 089-561027	
13	Ibu Pejabat Tenaga Kerja Sabah	En. Mohsen Bin Ali	Jabatan Tenaga Kerja Sabah (Ibu Pejabat) Tingkat 1, Block C & D, Bangunan KWSP, Peti Surat 14557, 88852 Kota Kinabalu. Email: <a href="mailto:itknsabah@mohr.gov.my">itknsabah@mohr.gov.my</a>	Tel. No. 088-238755 Fax No. 088-242445	



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14	Suruhanjaya Tenaga	En. Mohd Yusul Bin Yusof (Pengarah Suruhanjaya Tenaga, kawasan pantai timur)	Pejabat Kawasan (Pantai Timur Negeri Sabah), Tingkat 3, Wisma Saban, KM 12, Jalan Labuk, WDT No. 25,90500 Sandakan, Sabah.	Tel. No. 089-666694 Fax No. 089-660279	
15	Pejabat Kementerian Perdagangan Dalam Negeri Dan Hal Ehwal Pengguna Negeri Sabah. Cawangan Lahad Datu	En. Salman	Tingkat 1, 2, & 3 MDLD. 4505, Lot 65, Blok J, Bandar Wilayah Jalan Bunga Raya, Peti Surat 61201, 91121 LAHAD DATU.	Tel. 089-886090/091/092/887 Fax. 089-886099 Web: <a href="http://www.kpdnhep.gov.my">www.kpdnhep.gov.my</a>	
16	Department of Safety and Health (Kota Kinabalu)	En. Zukifli Bin Yahaya	Jabatan Keselamatan dan Kesihatan Pekerjaan Sabah/W.Labuan (Kementerian Sumber Manusia), Tingkat 1, Sayap Kanan, Wisma Perkeso, No. 11, Lorong Sempelang, P.O. Box 60, 88858 Tanjung Aru, Kota Kinabalu, Sabah. Email: <a href="mailto:jkkpsb@mohr.gov.my">jkkpsb@mohr.gov.my</a> Email: <a href="mailto:zukifli_y@mohr.gov.my">zukifli_y@mohr.gov.my</a>	Tel: 088-235855/ 230855-253576	
17	Department of Safety and Health (Cawangan Sandakan)	Pn.Siti Hawa Binti Sadek	Jabatan Keselamatan dan Kesihatan Pekerjaan Sandakan Email : <a href="mailto:sithawasadek@mohr.gov.my">sithawasadek@mohr.gov.my</a>	Tel : 010-4474631 <u>Tel:089-672059</u>	
18	Jabatan Bomba dan Penyelamat Lahad Datu	En. Sumsoa Bin Rashid	Balai Bomba dan Penyelamat, Jalan Tengah Nipah, Peti Surat 60, 91118 Lahad Datu, Sabah	Tel. No. 089-884444/994 Fax No. 089-884244	
19	Lahad Datu Wildlife Department	Mr. Sylvester Saimin	No 8125, lot 1, blok 10, singa point, peti surat 61224, 91121 Lahad Datu.	Tel. No. 089-863736	
20	Lahad Datu Forestry Department	Datuk Hussin Sukiman	Kota Kinabalu District Forest Office, WDT No.14 Bukit Garam 90200, Kota Kinabalu, Sabah.	Tel. No 089-242500	
21	Pejabat Kesihatan Kawasan Kinabatangan		Kinabatangan, Sabah.	Tel : 089-561975 (am) 089-562628	
22	S.K Jeroco	En. Hamid bin Abdulajim	SK Jeroco, Peti Surat 61371,91122 Lahad Datu, Sabah Email : <a href="mailto:xb3143@moe.edu.my">xb3143@moe.edu.my</a>	H/P No. 011-10566221	

23	S.K Amalania	En. Mustaffa Maruf	S.K Amalania, Peti Surat 61059, 91119 Lahad Datu, Sabah	013-8598267	
24	S.K Litang	Mr. Gusmit Hj. Ning	S.K Litang, WDT 22,90200 Kota Kinabatangan, Sandakan, Sabah	H/P No. 013-8930552	
25	S.K Tomanggong	En. Haje Pisel	S.K Tomanggong, Locked Bag No.5, Lahad Datu, Sabah	H/P No. 019-8002300	
26	S.K Tidung	En. Rozie Bin Asmat	S.K Tidung Tabin, WDT 22, 90200 Kinabatangan	H/P No.	
27	Kepala Perwakilan RI, Tawau	Pn. Heni Hamidah	TB 690 - TB 693, Lot 1 - Lot 8, Taman Megah Jaya, KM 8 Jalan Tiku, 91000, Tawau, Sabah	Tel: 089-772052/752969 Fax: 089-765930	
28	Philippine Embassy, Kuala Lumpur, Malaysia	Bernard Bonina Social Welfare Attache	No.1 Changkat Kia Peng, 50450, Kuala Lumpur, Malaysia	Tel: +(6023) 21484233	

### NEIGHBOURING ESTATES

No.	Department/Company Name	Contact person	Address	Contact Number	Remarks
29	Kementerian Perdagangan Dalam Negeri, Koperasi dan Kepenggunaan (KPDNKK)	Budiman bin Muhd Hassan	Mld 9076 Banglo Lot 2 Ipeak Business Centre Dam Road Lahad Datu, 91100 Lahad Datu	Tel : 089-886090	
30	Jabatan Pengairan dan Saliran Sandakan	Ir Chung Chan Mgee	3rd Floor, Bangunan Urusetia P.o Box 1198, 90713 Sandakan Sabah	Tel : 089-667764	
31	First Raintree Sdn. Bhd	Mr. Tey Ah Bu	MDLD 0763, 1st Floor, Block C, Ming Huat Light Industrial, Dam Road, Lahad Datu, Sabah	Tel. No. 089-886919 Fax No. 089-886920 H/P No. 013-8722817	
32	Bukit Kretam Sdn. Bhd.	Mr. Yeoh Eng Hooi	Lot 30, MDLD 0711, Jalan Bahagia 1, Taman Bahagia, 91100 Lahad Datu, Sabah	Tel. No. 089-881322 Fax No. 089-882322	
33	Sangi Enterprise Sdn. Bhd. & Casem Sdn. Bhd	Mr. Chan Wai Man	PO Box 60142, 91111 Lahad Datu, Sabah	H/P No. 016-8262986 Fax No. 089-881091	
34	Chua Soon Lee	Mr. Chua Soon Lee	MDLD 4877, Taman Good View, 91100 Lahad Datu, Sabah	H/P No. 019-8072223	
35	Lebijaya Sdn. Bhd.	Mr. Chang King Soon	Block B, Tingkat Satu, Bandar Ramai-Ramai, PO Box 812, 90709 Sandakan, Sabah	Tel. No. 089-216785 Fax No. 089-274628 H/P No. 019-8159601	
36	Unico-Desa Plantations Berhad (IOI Plantations)	Mr. Saimon	50KM Jln Jeroco, P.O.Box 6037,91113, Lahad Datu	Tel. No. 089-577281	
37	Amalania Koko Berhad	En. Mohs Aisi Salem	Peti Surat 61020, 91119 Lahad Datu, Sabah.	Tel No. 089-577015	

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38	Permodalan Plantations Sdn. Bhd. (Permodalan 3 & 4 Estate)	En. Tamrin Hallo	MDLD 5123, KM3, Jln Segama, Beg Berkunci 15, 91109 Lahad Datu, Sabah	Tel No. 089-577015	
39	Liew Kok Mengtrading /Chua Soon Lee SB	Mr. Chua Soon Lee	MDLD 48977, Taman Good View, 91100 Lahad Datu, Sabah	H/P No. 019-8072223/016-7114317	
40	Mekar Bersatu Padu	En. Sainuddin Yunus	Kg. Paris, WDT 72, 90200 Kota Kinabatangan	H/P No. 011-4858045	
41	Morisem 5	Mr. Mohd Zain Massarapi	MDLD 5123, KM3, Jln Segama, Beg Berkunci 15, 91109 Lahad Datu, Sabah	Tel. No. 011-26893614 /014-6681017	

### NON-GOVERNMENTAL ORGANIZATION (NGO)

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
42	World Wide Fund for Nature (WWF) (Lahad Datu)	Mr. Fredinand Lobinsiu	WWF Lahad Datu Field Office, Forest Restoration, MDLD 6575, 1 <sup>st</sup> Floor, Lot 9, Block Airport Plaza, 91100 Lahad Datu	Tel. No. 089-886376/ 089-886377 Fax No. 089-886378	
43	Humana School	1. Cik. Norjaini Bin Abdullah 2. En. Faizal	Humana School Jeroco Group of Estates, Lahad Datu, Sabah	H/P No. 014-5632284 H/P No. 013-8778620	
44	Kementerian Pendidikan dan Kebudayaan Sekolah Indonesia Kota Kinabalu (CLC)	En. Ferry Budy Arifiyanto  Cik. Desi Nuri Komariyah	1. No. 6, jalan 3B, KKIP Selatan Dua, 88460, Kota Kinabalu, Sabah Malaysia  2. Community Learning Centre SMP Jeroco, Jeroco Plantations Sdn. Bhd, Locked Bag No.19, 91109 Lahad Datu.	H/P No. 019-4603291  H/P No. 6282113876064	
45	Bulan Sabit Merah Malaysia Malaysian Red Crescent Sandakan Chapte	Mdm Josie	Cabang Sandakan Peti Surat 766, 90708 Sandakab Sabah Email: <a href="mailto:Office@sdk.redcrescent.my">Office@sdk.redcrescent.my</a>	Tel No. 089-212852 Fax No. 089-212852	

### INTERNAL STAKEHOLDERS

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
46	Plantation Central Office	Mr. Peter Liew Chi Kiaw	Locked Bag No.05, 91109 Lahad Datu Sabah E-mail address: <a href="mailto:peterliewck@hapseng.com">peterliewck@hapseng.com</a>	Tel. No.089-278128 /089-278138 Fax No. 089-278186 089-278168	
47	Hap Seng Trading (BM) Sdn Bhd	Mr. Johnny Lim	2713, Jalan Bahagia, P.O Box No. 240	Tel. No. 089-774682	
48	Hap Seng (Oil & Transport) Sdn. Bhd	Mr. Johnny Lim	MDLD 2714, Batu 2 1/2 J Jalan Kastam Baru, P.O Box 61283, 91121 Lahad Datu	Tel. No. 088-270899	
49	Hap Seng Fertilizers Sdn. Bhd.	Mr. So Chon Seng	Batu 2 Jalan Kastam Baru, P.O Box No. 61064 91119 Lahad Datu Sabah.	Tel. No. 089-882017	
50	Bukit Mas Palm Oil Mill	Sr. Mill Manager, En. Samsudin Benu	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954683 Fax No. 089-954678	
51	Sg Segama Estate	Estate Manager, Mr. Chung Yu Fei	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954668	
52	Bukit Mas Estate	Sr. Estate Manager, En. Sabaruding Utoh	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954668	
53	Jeroco Palm Oil Mill 1	Sr Mill Manager, Mr. Lee Soon Yung	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No 089-843888 Fax No. 089-954826	
54	Jeroco Palm Oil Mill 2	Mill Manager, En. Jumansha Abd Rahman	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954887 Fax No. 089-954826	
55	Batangan Estate	Sr. General Manager, Mr. Daniel Lo Kyun Kong	Locked Bag No.05, 91109 Lahad Datu Sabah E-mail: <a href="mailto:goegm@hapseng.com">goegm@hapseng.com</a>	Tel. No. 089-954822	
56	Lutong Estate	Deputy Manager, Mr. Pang Yun Chieh	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954878	
57	Kapis Estate	Deputy Manager, Abd Aziz Mohammad Ali	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954828	

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58	Lokan Estate	Deputy Manager, Mr. Timothy Majail	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954868	
59	Batangan Estate	Deputy Manager, En. Amboaka B. Bacho	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954822	
60	Lungmanis Estate	Estate Manager, En. Nordin b. Teppo	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954878	
61	TMGOE	Deputy General Manager, En. Herman B. Lasaung	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954-831 Fax No. 089-954 832	
62	Litang Estate	Estate Manager, Mr. Maurice Ignatius Sundagit	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954827 Fax No. 089-954 832	
63	Tagas Estate	En. Cendrawadi B. Usup	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954628 Fax No. 089-954 832	
64	Tabin Estate	Sr. Estate Manager, En. Mohd Tahir Salang	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954638 Fax No. 089-954 832	
65	Northbank Estate	En. Septianus Tahir	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954898 Fax No. 089-954288	
66	Tomanggong Palm Oil Mill	En. Aaron Dahing	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954838 Fax No. 089-954839	
67	Ketua Agama Islam/Iman (Ldg Batangan)	En. Mohammad Ali Bin Kaya	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954822	
68	Ketua Agama Kristian (Ldg Batangan)	En. Jhonatan Tayo Yamson	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954822	
69	Ketua Wakil Pekerja (Ldg Batangan)	En. Mustamin Bin Ruha	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954822	
70	Ketua Wanita (Ldg Batangan)	Pn. Martam Binti Abd Muin	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954822	
71	Ketua Etnik Bugis (Ldg Batangan)	En. Mustamin Bin Ruha	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954822	
72	Ketua Etnik Timur (Ldg Batangan)	En. Yasinta Novari Kewa	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 089-954822	
73	Ketua Agama (Muslim) Ldg	Harisa Malik	Lutong Estate	Tel No. 089-954878	
74	Ketua Agama (Non Muslim) Ldg Lutong)	Andreas Setim	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel No. 089-954878	
75	Wakil Pekerja (Ketua Kampung) Ldg Lutong)	Abustang Marzuki	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel No. 089-954878	
76	Ketua Etnik Bugis (Ldg Lutong)	Abustang Marzuki	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel No. 089-954878	
77	Ketua Etnik Timor (Ldg Lutong)	Arra Japarmen		Tel No. 089-954878	
78	Ketua Etnik Bugis (Ldg Kapis)	En. Andy Ramang	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 013-3376828	
79	Ketua Etnik Timor (Ldg Kapis)	En. Johnn Amiruddin	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 011-36520042	
80	Ketua Agama Islam/Imam (Ldg Kapis)	En. Muhajirin Ambo Aso	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 011-4199962	
81	Ketua Agama Kristian (Ldg Kapis)	Pn. Perpatua Masi	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No: 011-33173648	
82	Ketua Wakil Pekerja	En. Mappiere Sian	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 014-3701746	
83	Ketua Wanita	Pn. Kasmawati Labenga	Locked Bag No.05, 91109 Lahad Datu Sabah	Tel. No. 014-9989792	
84	Ketua Agama Islam/Imam (Ldg Lokan)	Hamsah Raja	Locked Bag No.05, 91109 Lahad Datu Sabah	H/P: 010-3726762	
85	Ketua Agama Kristian(Ldg Lokan)	Daniel Mage	Locked Bag No.05, 91109 Lahad Datu Sabah	H/P:014-6764540	
86	Ketua Wakil Pekerja(Ldg Lokan)	Zaenal Marsan	Locked Bag No.05, 91109 Lahad Datu Sabah	H/P: 014-9518791	
87	Ketua Wanita (Ldg Lokan)	Nani Johari	Locked Bag No.05, 91109 Lahad Datu Sabah	H/P:014-6338391	
88	Ketua Etnik Bugis(Ldg Lokan)	Anca Amir	Locked Bag No.05, 91109 Lahad Datu Sabah	H/P:011-33021758	
89	Ketua Etnik Timor (Ldg Lokan)	Herianto Aloysius	Locked Bag No.05, 91109 Lahad Datu Sabah	H/P:010-9581094	
90	Ketua Agama (Muslim)	Muhammad Jabir bin	Lungmanis Estate	Tel.No 016-6855693	

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		Alimun			
91	Ketua Agama (Non-Muslim)	Larry George	Lungmanis Estate	Tel.No 011-51530886	
92	Wakil Pekerja (Ladang Lungmanis)	Muhammad Jabir bin Alimun	Lungmanis Estate	Tel.No 016-6855693	
93	Wakil Wanita (Ladang Lungmanis)	Dahliah Bengga	Lungmanis Estate	Tel.No 011-33625437	
94	Ketua Etnik Bugis (Ladang Lungmanis)	Muhammad Said Bin Ali	Lungmanis Estate	Tel.No 010-2327828	

### SUPPLIER

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
95	Millivest Sdn. Bhd	Mr. Timmy Kong	Lot 9, MDLD 3447 Bandar Tabanac, Jalan Segama. P.O Box 60617, 91115, Lahad Datu Sabah	Tel No. 089-881326	
96	Sheong Huat Trading Sdn Bhd	Mr. Ng Ket Fui	P.O.Box 60185, 91111 Lahad Datu Sabah.	Tel. No. 089-886290	
97	Wijaya Alam	Mr. Chin	Ground Floor MDLD 6586 Lot 20, Block C, 91111, Lahad Datu, Sabah	Tel. No. 089-886268	
98	Hock Leng Office Supplies Sdn.Bhd	Mr. Pang	Lot 5,MDLD 6571,Ground & 1 <sup>st</sup> floor,airport plaza,Jalan Segama,91100 Lahad Datu,Sabah	Tel No. 089-884680/882037/883037 Fax No. 089-888680	
99	PI System Sdn.Bhd	Ms. Aini	P.O Box No.2675, 90730 Sandakan Sabah	Tel. No. 089-225923	
100	Poly Electrical Company	Mr. Yap	Block 3,LOT1,Jalan Singgamata P.O Box 60366,91113 Lahad Datu,Sabah. Malaysia Email : kmyap18@yahoo.com	Tel No. 089-882505, 016-8269736/737 Fax No.089-882505	
101	Sri Jaya Perniagaan	Mr. Raymond Chung	Lot 57, Lorong 2, MDLD 6965, Ground Floor, Bandar Sri Perdana, Jln Silam. P.O.Box 61245, 91121 Lahad Datu, Sabah	Tel. No. 089-862866 H/p: 019-8073323	
102	Kedai Bukit Mas Estate	Young Chee Siong	P.O. Box 60347, 91112 Lahad Datu, Sabah	H/P No. 013-5510007	
103	Kedai Nadi Jaya	En. Suardi Bin Sakka	P.O. Box 60347, 91112 Lahad Datu	H/P No. 014-6565737	

104	Yee Shun Food Supplies Sdn. Bhd.	Mr. Yung Ah Lok	P. O. Box 60347, 91112 Lahad Datu	H/P No. 013-5558288	
105	Liang Hwa Batangan Estate (Kretam)	Hendrikus Sabon Paulus Ola	Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah	H/P No. 010-9311465	
106	Fong Enterprise Batangan Estate	Mdm Tang Pui Hung (Fong Syn Kiong)	Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah	H/P No. 012-2087048 H/P No. 012-8016716	
107	Perusahaan Lutong Baru Lutong Estate	Fong Syn Fook (Fong Syn Kiong)	Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah	H/P No. 012-8016716	
108	Ding Enterprise Lokan Estate	Ding Choo Tong	Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah	H/P No. 019-8838482	
109	Rubin Chun Pau Kapis Estate	Rubin Chun Pau	Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah	H/P No. 010-9522667	
110	Ding Enterprise Lungmanis Estate	Ding Choo Tong	Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah	H/P No. 019-8838482	
111	Sedafiat Sdn Bhd	Miss Amirah	Lot 1, 2, 3, 4, 5, 6, 7 2 <sup>nd</sup> Floor, Block D Metro Town, Jalan Bunga Ulam Raja, Off Tuaran Road 88300, Kota Kinabalu, Sabah.	Tel No. 088-437000	
112	Sri Balung Services Agency	Mr. Khoo Shin Hung	Tingkat Bawah, Bangunan Fajar Centre, MDLD 3983, Jalan Segama, 91100 Lahad Datu, Sabah	Tel. No. 088- 887 409	
113	Teguh Niagamaju Sdn. Bhd	Ms. Rosdiana Binti Marcus	Lot 26, Utama Zone 3 Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah	Tel. No. 089-673043/ 089-673141 Fax No. 089-672646	
114	KP Chow Engineering Services	KP Chow	P.O Box 8878, 46800 Petaling Jaya, Selangor	H/P No. 03 7782 9892	
115	Agensi Pekerjaan Hollywood Sdn. Bhd.	Ms. Chin Lee Pui	MDLD 3823, Lot 85, Ground Floor, Fajar Centre, 91100 Lahad Datu. Email : hollywoodldu	Tel. No. 089-889028, 089-889882, 089-889086 Fax No. 089-889654	
116	Chong Clinic	Dr Sim Yong Sing	No 1028, Dunlop Street, PO Box 723, 91008 Tawau, Sabah	Tel. No. 089 762 202	

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117	Lagenda Bumimas Sdn Bhd	Pek Chian Tan	Lagenda Bumimas Sdn Bhd, Lot 1 & 2 Industrial Zone 13 (GIZ Package) KKIP, Menggatal 88450 Kota Kinabalu, Sabah E-mail address: pekchain@gmail.com	H/P No. 016- 2061063/ Tel. No. 088-473593	
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### CONTRACTOR

No	Department/ Company Name	Contact Person	Address	Contact Number	Remarks
118	KF Kong Enterprise	Mr. Kong Kim Fah	P. O Box No. 614403, 91024 Tawau, Sabah	Tel No. 089-711797 H/P No. 019-8138920 Fax No. 089-714199	
119	Husada Utama Sdn. Bhd.	Mr. Pang Chin Kien	MDLD 7204, Lot 238, 1 <sup>st</sup> Floor Phase 3B, Lorong 5, Sri Perdana, 91100 Lahad Datu, Sabah. Email : husadautama09@gmail.com	Tel No. 089-862295 / 019-8631316	
120	King Foh Enterprise	Mr. Yong King Foh	Jalan Tengah Nipah Batu 5, P.O Box 61690, 91128 Lahad Datu, Sabah. Email: wendyyong5522@hotmail.com	H/P : 016-5537005	
121	Pemborong Rehan	Mr. Lawrence Chau	1 <sup>st</sup> Floor, MDLD 0653, Block B, Ming Huat Light Industrial Area, Mile 1, Dam Road, P. O. Box No. 61081, 91120 Lahad Datu, Sabah.	Tel. No. 089-882918 H/P No. 016-8127062 Fax No. 089-882981	
122	Rome Building Construction	Mr. Ng Keng Foon	No. 816, Batu 2½, Jalan Apas W.D.T. No. 156, Tawau	Tel. No. 089-771568 H/P No. 013-8888278 Fax No. 089-768278	
123	PYK Enterprise	Mr. Pan Yung Kee	Lot B31, Utama Lakeview Villas, Batu 06, Jalan Utara Sandakan, Peti Surat 1561, 90717 Sandakan, Sabah	H/P No. 012-8011123 & 012-8522231 Fax No. 089-212807	
123	First Star Construction Sdn. Bhd.	Mr. Chung Thien Lim	1 <sup>st</sup> & 2 <sup>nd</sup> Floor, Lot 5, Block C5 Lorong Labuk Jaya C3, Bandar Labuk Jaya, Batu 7,	Tel. No. 089-238381/ H/P No. 016-8333815/ 019-8333815 Fax No. 089-237391	

			Jalan Lintas Labuk W.D.T 101, Pejabat Pos Batu 1½, 90309 Sandakan, Sabah.		
123	Yun Hap Enterprise Sdn. Bhd.	Mr. Kong Peng Onn	TB 7936, Taman Bukit Bintang, Mile 4, Jalan Sin On, P. O. Box No. 62452, 91034 Tawau, Sabah.	H/P No. 013-8883188 & 013-8921882 Fax No. 089-711936	
124	Power Com Enterprise Sdn. Bhd.	Mr. Liew Yun Leong	Block A4, Lot 26, 1 <sup>st</sup> Floor, Utama Place, Phase 2, Mile 5, 9000 Sandakan, Sabah. Email: powercommentsb@hotmail.com	Tel. No. 089-201655 Fax No. 089-201655	
125	Permawin Sdn. Bhd.	Mr. Philip Low	TB10756, Lorong Megah 4, Taman Mehah Jaya, Miles 3.5 Apas Road, Tawau, Sabah.	Tel. No. 089-752054 H/P No. 019-8331318 Fax No. 089-753511	
126	Sinaran Jaya Baru	Mr. Leong Kwok Hing	P. O. Box No. 60056 91110 Lahad Datu, Sabah.	Tel. No. 089-887539	
127	K&T (S) Enterprise	Mr. Tan Pui Ping	Mile 1½, SMK Agaseh Road, P.O. Box No. 61932, 91127 Lahad Datu, Sabah	Tel. No. 089-866355	
128	Yong Seng Co.	Mr. Kong Kim Yun	P. O. Box No. 60251, 91012 Tawau, Sabah.	H/P No. 016-8233344/ 014-9577986	
129	Gemilang Jaya Contractor	Ms. Fong Siew Mee	P. O. Box 62407, 91034 Tawau	Tel. No. 089-911496 Fax No. 089-911496	
130	TPM Enterprise	Mr. Siau Nyuk Tong	MDLD 0764, Lot 10 Public Villa, 91100, Lahad Datu, Sabah.	H/P No. 019-8332262 Fax No. 089-886443	
131	Syarikat Istimaju	Mr. Teh Tuck Hing	MDLD 5115, Lot 299, Lorong Taman Aman Jaya, 91100 Lahad Datu, Sabah.	H/P No. 019-8966236	
132	Hap Seng Building Materials	En. Hilmi Hijazi Abd.Halim	Lutong Quarry, Jeroco Plantations sdn Bhd. Mile45, Jeroco Road 91109 Lahad Datu, Sabah	H/P No. 013-8815081	
133	Lim Engit Fun Development	Lim Engit Fun	Lim Engit Fun Development Enterprise,	H/P No. 016- 2061063/ Tel. No. 088-473593	

## RSPO PUBLIC SUMMARY

			K688, Lorong Indah Jaya 13, Taman Indah Jaya, Off Cecily Road Batu 4, 90000 Sandakan.		
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133	Chemsain Konsultant Sdn Bhd	Mdm Jessica Malagkas Director	Lot 7, Lorong Suria, off Lorong Buah Duku 1, Taman Perindustrian Suria, Jalan Kolombong, 88450 Kota Kinabalu, Sabah, Malaysia E-mail address: kk@chemsain.com	Tel. No. 088-381277 FAX No. 088-381280	
134	Utulus Venture (M) Sdn Bhd	Mr. Vijaiyagaandan A/L Balakishnan/Mr. Pavitrn Pillay A/L Mohan	No. 21 – 11 Centro Mall, No 8 Jalan Batu Klang Malaysia.	Tel. No. 013-6123555	