| a | | Building 4, S Section | SIRIM Complex, No. | TONAL SDN. BHD. 1 ,Persiaran Dato' Me m, Selangor, Malaysia | | File Ref. : EH04760002 |
|--|---|--|--------------------|--|--|---|
| QAS RSPO PUBLIC S | | | | MARY REPORT | | |
| CLIENT : . | JEROC | O PLANTATIONS SI | ON. BHD. – JEROC | O PALM OIL MILL 2 | | |
| PARENT C | OMPAN | NY : HAP SENG PLA | NTATIONS HOLDI | NGS BERHAD | | |
| RSPO MEN | BERSH | HIP No.: 1-0098-11-0 | 00-00 | | | |
| OCATION | OF TH | | | E SUPPLY BASE) | | |
| | | Itisite certification, I | | | | |
| Certific | cation | Mill and Supply | GP | S Location | | |
| Un | | Base | Latitude | Longitude | | Location |
| Jeroco 2 | | Jeroco POM 2 | 5°25'52.002" N | 118°25'02.005" E | | KM 50, Jalan Jeroco, |
| Certification Unit | | Kapis Estate | 5°26'34.303" N | 118°24'51.001" E | | 109 Lahad Datu, Sabah, laysia. |
| | | | | | | |
| | | | 023 | DURATIC | N : | 11 auditor days |
| UDIT DAT | re : NUDIT : | 12 – 14 JULY 2 Annu | al Surveillance Au | udit No. x | | 11 auditor days |
| UDIT DAT YPE OF A TANDARI COPE OF | TE : NUDIT : D : MYN CERTIF | 12 – 14 JULY 2 Annu II 2019 FOR RSPO P FICATION : Product | al Surveillance Au | ERIA 2018 | Recerti | |
| UDIT DAT YPE OF A TANDARI COPE OF upply Chai | TE : NUDIT : D : MYN CERTIF in Mode | 12 – 14 JULY 2 Annu II 2019 FOR RSPO P FICATION : Product | INCIPLE & CRIT | ERIA 2018 | Recerti | fication Audit Using the Mass Balance |
| COPE OF Supply Chai ALIDITY C | TE : UDIT : D : MYN CERTIF in Mode | 12 – 14 JULY 2 Annu II 2019 FOR RSPO P FICATION : Product | RINCIPLE & CRITI | ERIA 2018 Crude Palm Oil and Pa | Recerti | fication Audit Using the Mass Balance |
| TANDARE COPE OF A COPE OF COPE OF Cupply Chai ALIDITY C | TE : UDIT : D : MYN CERTIF in Mode DF RSPO | 12 – 14 JULY 2 Annu II 2019 FOR RSPO P FICATION : Product O CERTIFICATE : 2 chments form part o | RINCIPLE & CRITI | ERIA 2018 Crude Palm Oil and Pa | Recerti | fication Audit Using the Mass Balance |
| AUDIT DAT TYPE OF A TANDARE COPE OF Upply Chai ALIDITY C The followin | TE : UDIT : D : MYN CERTIF in Mode DF RSPO ng attao mity Rep | 12 – 14 JULY 2 Annu II 2019 FOR RSPO P FICATION : Product O CERTIFICATE : 2 chments form part o | RINCIPLE & CRITI | ERIA 2018 Crude Palm Oil and Pa | Recerti Im Kernel 6/12/2023 e(s) | fication Audit Using the Mass Balance |
| AUDIT DAT TYPE OF A TANDARE COPE OF Upply Chai ALIDITY C The followin | TE : UDIT : D : MYN CERTIF in Mode DF RSPO ng attac mity Rep Audit Te | 12 – 14 JULY 2 Annu II 2019 FOR RSPO P FICATION : Product O CERTIFICATE : 2 chments form part of port(s) | RINCIPLE & CRITI | ERIA 2018 Crude Palm Oil and Pa /2023 [extended to 26 List of additional site | Recerti Im Kernel 6/12/2023 e(s) <u>/ Client's</u> | fication Audit Using the Mass Balance |
| AUDIT DAT TYPE OF A TANDARE COPE OF Supply Chai ALIDITY C The followin | TE : UDIT : D : MYN CERTIF in Mode DF RSPO ng attac mity Rep Audit Te | 12 – 14 JULY 2 Annu II 2019 FOR RSPO P FICATION : Product O CERTIFICATE : 2 chments form part o port(s) | RINCIPLE & CRITI | ERIA 2018 Crude Palm Oil and Pa /2023 [extended to 26 List of additional site | Recerti Im Kernel 6/12/2023 e(s) <u>/ Client's</u> | fication Audit Using the Mass Balance |

SUMMARY OF AUDITS

| | | | Stage 2 a | udit / Recertificat | ion audit | |
|--|---|---|-----------|--------------------------|------------------------------------|---------------------------------------|
| On-site audit date | : | 12 – 14 J | ULY 2023 | } | No. of auditor days | : 11 days |
| Audit team | : | Rozaime | e Ab Rahr | nan, Mohd Zulfaka | ir Kamaruzaman, Raha | yu Zulkifli, Selvasingam |
| | | T.Kandia | h | | | |
| No. of major NCR | • | 2 Indicator : 6.2.3, 3.8.11 | | | | Closing date : 13/10/2023 |
| No. of minor NCR | : | 1 | Indicator | : 3.4.2 | | |
| Indicate the stakeholders interviewed during the | : | Employe Workers organizat | | Settlers | Villagers / Local communities | Suppliers |
| on-site audit | | / | | NA | / | / |
| | | Contract | workers | Local & National NGOs | Govt. agency / Statutory bodies | Independent growers / Smallholders |
| | | NA | | | / | / |
| | | Indigenou people | JS | Contractor | Others (Please speci | fy) |
| | | NA | | / | | |
| Supply base sampled | : | Kapis Es | tate | | | |
| Justification of audit planning | : | Total allocation of auditor days for Jeroco 2 CU were: Mill = 5 days (5 days for safety and health, environment, mill best practices, GHG verification and for supply chain certification systems, TBP) All estate = 6 days for verification of safety and health, environment, good agriculture best practices, GHG verification, TBP. | | | | |
| Name of peer reviewer | : | Harso Yu | | | | |
| Report approved by | : | | ooriamoor | thy | Approval date : | 11/11/2023 |

SUMMARY OF INFORMATION

TABLE 1

| | STAGE 2 / RA | ASA 1 | ASA 2 | ASA 3 | ASA 4 |
|---|--------------|-------|-------|-------|-------------|
| *Projection Period / | July 2023 – | | | | July 2022 – |
| Reporting Period | June 2024 | | | | June 2023 |
| Certified FFB | 25,710.00 | | | | 48,160.00 |
| Processed (MT) | | | | | |
| Production of Certified CPO (MT) | 5,399.10 | | | | 9,777.00 |
| Production of Certified PK (MT) | 1,414.05 | | | | 2,313.00 |
| | | | | | |
| Certified Areas (Ha) | 2,681.00 | | | | 2,681.00 |
| Planted Areas (Ha) | 2,342.00 | | | | 2,342.00 |
| Production Areas (Ha) | 2,342.00 | | | | 2,342.00 |
| HCV Areas / Conservation Areas (Ha) | 29.20 | | | | 29.20 |
| REMARKS | - | | | | |

TABLE 2

| | PO | РК |
|--|----------|----------|
| **Last years certified volume (MT) | 9,777.00 | 2,313.00 |
| Last years actual certified sold (MT) | - | 1,490.49 |
| Last years actual sold under other schemes (MT) - ISCC | 178.27 | - |
| Last years sold conventional (MT) | 4,011.60 | 2.84 |
| Last year actual sold CSPO credits (where applicable) | - | - |
| New year certified volume (MT) | 5,399.10 | 1,414.05 |

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Attachment 6:Time-bound PlanAttachment 7:List of Stakeholders (for Stage 2/Recertification Audit only)

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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 |
|-------------------------------|---|--|
| Rozaimee Ab Rahman | Lead Auditor / Supply Chain, TBP, Metrics Template, Environment | Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and SC and MSPO. |
| Mohd. Zulfakar Kamaruzaman | Auditor / HCV, Social External | Holds a B.Sc. Forestry. He had several years of working experience in oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor. |
| Rahayu Zulkifli | Auditor / Social | Rahayu graduated with LLB (Hons) from the United Kingdom in 1988. She practiced in a law firm before she headed the Legal Departments of two public listed companies from 1995 to 2003. Rahayu has been a freelance auditor since 2016, carrying out audits specifically on social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana. Attended SMETA Requirements Training conducted by BSi training |
| Selvasingam T. Kandiah | Auditor / GAP, Safety | Holds a B.Sc. (Hons) of Agriculture University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 29 years of working experience in plantation management covering cocoa, rubber and oil palm. He is a qualified RSPO P & C and MSOP Lead Auditor. |

1.3 Audit methodology

The audit covered the one palm oil mill and one of its supply base, i.e. the Kapis Estate. The audit included an onsite audit to the estate and mill and to verify the implementation of the requirement of the certification. The sampling conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. 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 29 May 2023. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). The stakeholder consultation process is carried out during initial compliance and recertification audit only. However, we did not receive any comment from stakeholder consultation during this recertification process.

SIRIM QAS International had initiated the stakeholder consultation by during the on-site audit. In general, there was no negative comments made against this Certification Unit. In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below.

| eroco Palm Oil 2 and Kapis Esta owing: s no gender racial or other forms nation; e is treated equally and receive the mount of pay for the same type of ve their own worker representative hey have nominated and elected nuster. re aware of what constitutes sexual nent and there has been no ce of sexual harassment. are paid by cheque no later than 7 th ollowing month, and they cash it at rby grocery shops. rchase daily necessities from the grocery stores within Kapis Estate er estates within the Hap Seng table housing is provided rent free y only pay for electricity; water and electricity is available 2 er day. e aware of complaints procedure, ny policies of child labour; for the sian workers, their children attend VA or CLC schools. Idonesian workers have dependant hey have not obtained passports for alan to do so in stages, under the rative programme carried out by ement and the Indonesian Consula er, some who have not legalised the ants had concerns arising from the ation status of their dependants (wir children). This concern has not be d in the CU's Social Impact ment Management & Monitoring nd Non-Compliance was raised unc |
|---|
| or 3.4.2 below |
| ssues regarding land with village |
| i y F |

| | LKM Trading, Lebijaya Sdn Bhd. There were also r local communities living in or neighboring Jeroco CU, hence, no evidence of any land dispute involvir local communities and FPIC |
|--|---|
| 4) Suppliers | Harus Abadi, Spark Glory, Lim Engit Fun, LK Trading, Lebijaya, Bukit Kretam – found they we satisfied due to current price at JPOM 2 was fa compared to outsider Mill |
| 5) Contract workers (local / foreign / Orang Asli workers / male & female) | Not Available |
| 6) Local & national NGOs | Humana- during interview with teachers of Humar was confirmed Hap Seng was given a goo corporation and full support for children education. |
| 7) Government agencies / Statutory bodies | Jabatan Perhutanan Sabah |
| 8) Independent growers / Smallholders | Hap Seng gave support to surrounding smallholder and growers by giving them Free Consultation, Free Assessment, and anything related to RSPO an MSPO certification. Until to date surroundir smallholders who are RSPO certified are Spark Glor Harus Abadi, and LKM Trading. Currently on progres for RSPO and MSPO certification is Lebijaya, Kho Chin Hung, Bukit Kretam and LPC plantation. |
| 9) Indigenous people | Not available |
| 10) Contractor | CPO transporter i.e., Hai Eng enterprise Sdn Bhd. For CPO sea transportation- not issues related to the payment. |
| 11) Previous land owner (if any) | The right to use the land at the Jeroco 2 CU can be demonstrated and not disputed by any part Evidence of legal ownership of the land includin history of land tenure was verified during this aud For Kapis Estate the land was previous owned be Sabah Land Development and Jeroco Plantations So Bhd has bought and develop the land in 01/01/1980 There were clear land ownership documents availab for review. |
| 12) Others (please specify) | - |

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 2 certification unit (hereafter refer to JPOM2 CU) is one of the business units under the Hap Seng Plantation Holdings Berhad (HSPHB). Located at Off 50 KM, Jalan Jeroco, Lahad Datu, Sabah, Malaysia, the CU consists of one mill (JPOM 2) and one supply base i.e., Kapis Estate.

The Jeroco Palm Oil Mill 2 has a processing capacity of 30 metric tonnes of fresh fruit bunches (FFB) per hour. The mill also receives and processes crops from smallholders and villagers near the estate.

JPOM 2 have ISCC/MeSTI/Halal/HACCP/MSPO certification beside RSPO P&C and Supply Chain.

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

The FFB sourced from company owned estates that were certified. Details of the FFB contribution from each source to the JPOM 2 are shown in the following tables:

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

| Fritzer | FFB Production | | |
|-------------------------|----------------|----------------|--|
| Estates | Tonnes | Percentage (%) | |
| Kapis Estate | 2,060.64 | 7.75 | |
| Lokan Estate | 509.16 | 1.91 | |
| Total | 2,569.80 | 9.66 | |
| Third parties certified | | | |
| Bukit Kretam S/B | 15,775.45 | 59.33 | |
| First Raintree S/B | 3,547.78 | 13.34 | |
| Harus Abadi S/B | 4,483.59 | 16.86 | |
| Lebijaya S/B | 152.38 | 0.57 | |
| Chua Soon Lee S/B | 14.01 | 0.05 | |
| Spark Glory S/B | 45.89 | 0.17 | |
| Total | 24,019.10 | 90.32 | |
| Grand total (certified) | 26,588.90 | 100.00 | |
| Third parties | | | |
| Northbank Estate | 96.80 | 0.65 | |
| Bukit Kretam S/B | 10,091.61 | 67.65 | |
| Lebijaya S/B | 2,063.39 | 13.83 | |
| Casem S/B | 837.96 | 5.62 | |
| Sangi Enterprise S/B | 1,827.14 | 12.25 | |
| Total | 14,916.90 | 100.00 | |

| CII own ostatoo | FFB Ce | ontribution |
|-------------------------------|---------|----------------|
| CU own estates | Tonnes | Percentage (%) |
| Kapis Estate | *25,710 | 32.89 |
| Total | 25,710 | 32.89 |
| Third parties certified | | |
| Bukit Kretam Sdn Bhd | 32,001 | 40.95 |
| First Raintree Sdn Bhd | 3,405 | 4.36 |
| Harus Abadi Sdn Bhd | 6,897 | 8.82 |
| Lebijaya Sdn Bhd | 3,580 | 4.58 |
| Total | 45,883 | 58.71 |
| Grand total | 71,593 | 91.60 |
| Other Supply Bases | | |
| Third parties (non-certified) | | |
| Casem Sdn Bhd | 2,410 | 3.08 |
| Sangi Enterprise | 4,150 | 5.31 |
| Grand Total | 78,153 | 100.00 |

*Lesser crop due to replanting i.e., areas 1996/97. This CU's crop majority from outside the supply base.

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

| | Total (MT) |
|-------------------------------------|------------|
| FFB Processed: Certified | 26,588.90 |
| FFB Processed: Non-Certified | 14,916.90 |
| Total CSPO produced | 5,118.41 |
| CPO sold under other schemes (ISCC) | 178.27 |
| CPO delivered as MB | - |
| CPO delivered as non-RSPO certified | 4,011.60 |
| Total CSPK Produced | 1,518.75 |
| PK delivered as IP | - |
| PK delivered as MB | 1,490.49 |
| PK delivered as non-RSPO certified | 2.84 |
| Credit traded under Book & Claim | - |

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

| | Total (MT) |
|--------------------------|------------|
| FFB Received : Certified | 25,710 |
| FFB Processed :Certified | 25,710 |
| Total CPO Produced | 5,399.10 |
| Total PK Produced | 1,414.05 |

Table 5 Planted and certified area of the CU

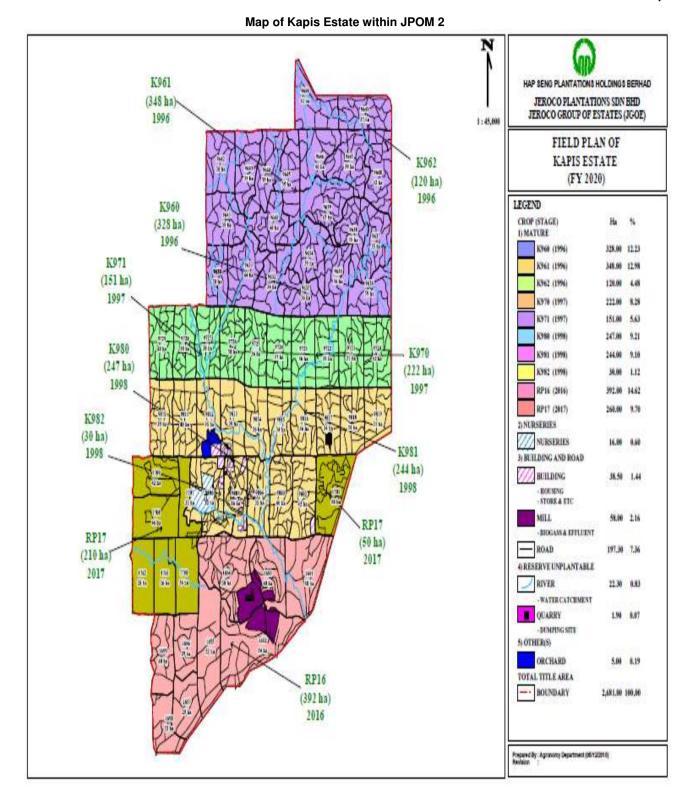
| Estate | Planted (ha) | Certified (ha) |
|--------------|--------------|----------------|
| Kapis Estate | 2,342.00 | 2,681.00 |
| Total | 2,342.00 | 2,681.00 |

| | <u>Estate</u> | <u>Year of</u> planting | <u>Planting</u> <u>Cycle</u> | <u>Mature</u> <u>>3years</u> (Ha) | <u>Immature</u> <u>< 3 years</u> <u>(Ha)</u> | <u>Planted</u> <u>area</u> | <u>% of</u> <u>planted</u> <u>area</u> mature | <u>% of</u> <u>planted</u> <u>area</u> Immaturee |
|----------|---|---|---|---|--|---|--|---|
| | | 1996 | 1st | 796.00 | - | 796.00 | 33.99 | - |
| | | 1997 | 1st | 373.00 | - | 373.00 | 15.93 | - |
| | Kapis Estate | 1998 | 1st | 521.00 | - | 521.00 | 22.25 | - |
| | | 2016 | 2nd | 392.00 | - | 392.00 | 16.74 | - |
| | | 2017 | 2nd | 260.00 | - | 260.00 | 11.09 | - |
| | | Total | | 2,342.00 | - | 2,342.00 | 100.00 | - |
| | Organizational In The details of the Name | e contact per | | low: | | | | |
| | Position | | | ager - Agronomy | | | | |
| | Address | | | intations Holding | s Berhad | | | |
| | Address | | C/O: Hap Ser | ng Fertilizers Sdr Datu, Sabah, Ma | Bhd, Batu 2, Ja | alan Kastam E | Baru, | |
| | Phone no. | | | 3 / +6089 278138 | | | | |
| | Email | : | keekc@hapse | eng.com | | | | |
| ` | | | | | | | | |
| 1 | AUDIT FINDINGS Changes to certifi The CU is plannin certified to RSPO of an-MB certified | ied products ng to receive). However, t | 100% certifie hey may mair | d crop as most on tain both supply | of the FFB suppl chain model for | iers nearby th | | |
| | Changes to certif The CU is plannir certified to RSPO | ied products ng to receive). However, t d sister CU d | 100% certific hey may mair uring annual s | ed crop as most on tain both supply shutdown period. | of the FFB suppl chain model for | iers nearby th the time bein | g to suport th | |
| | Changes to certifi The CU is plannir certified to RSPO of an-MB certified | ied products ng to receive). However, t d sister CU d anges in time | 100% certifie hey may mair uring annual s bound plan (| ed crop as most of ntain both supply shutdown period. Refer to Attachm | of the FFB suppl chain model for ment 6 for the tim | iers nearby th the time bein | g to suport th | e operation |
| | Changes to certific The CU is plannin certified to RSPO of an-MB certified Progress and cha Have all the estat If no, comments of | ied products ng to receive). However, t d sister CU d anges in time tes under the on the organ | 100% certifie hey may mair uring annual s bound plan (parent comp ization's comp | ed crop as most of ntain both supply shutdown period. Refer to Attachm pany been certifie pliance with the F | of the FFB suppl chain model for ment 6 for the timed? RSPO partial cer | iers nearby th the time bein e bound plan tification rules | g to suport th | No |
| | Changes to certific The CU is plannin certified to RSPO of an-MB certified Progress and cha Have all the estat | ied products ng to receive). However, t d sister CU d anges in time tes under the on the organ tions is prog | 100% certifie hey may mair uring annual s bound plan (parent comp ization's comp ressively unde | ed crop as most of ntain both supply shutdown period. Refer to Attachm pany been certifier pliance with the F ergoing the RSP0 | of the FFB suppl chain model for nent 6 for the tim d? RSPO partial cer <u>D Certification p</u> | iers nearby th the time bein e bound plan tification rules | g to suport th | No |
| | Changes to certific The CU is plannin certified to RSPO of an-MB certified Progress and char Have all the estat If no, comments of Hap Seng Planta | ied products ng to receive). However, t d sister CU d anges in time tes under the tes under the on the organ tions is prog tates/mills. D | 100% certifie hey may mair uring annual s bound plan (parent comp ization's comp ressively unde petails provide | ed crop as most of ntain both supply shutdown period. Refer to Attachm any been certifie pliance with the F ergoing the RSP d in the Time Bo | of the FFB suppl chain model for nent 6 for the tim rd? RSPO partial cer <u>D Certification p</u> und Plan descril | iers nearby th the time bein e bound plan tification rules | g to suport th | No |

| iii. | Are there associated smallholders (including scheme smallholders) in the CU | | | | | | | |
|------|--|---|--|--|--|--|--|--|
| | | If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification? | | | | | | |
| | If no, please state reasons | Not applicable. | | | | | | |
| | | There is no associated smallholders supplying FFB to the CU. | | | | | | |
| iv. | Any new acquisition which has replaced primary forests or HCV areas | | | | | | | |
| 3.3 | Other changes (e.g. organizationa | l structure, new contact person, addresses, etc.) | | | | | | |
| | No other changes so far. | | | | | | | |
| 3.4 | Status of previous non-conformities * Closed Not closed* * If not closed, minor nonconformity will be upgraded to major non conformity | | | | | | | |
| 3.5. | Complaint received from stakeho | older (if any) | | | | | | |
| | No negative comment received of | during the stakeholder consultation carried out | | | | | | |
| 4.0 | DETAILS OF NON-CONFORMI | TY REPORT | | | | | | |
| 4.1 | For P&C (Details checklist refer | to Attachment 3) : | | | | | | |
| | Total no. of minor NCR(s) | List :3.4.2 | | | | | | |
| | Total no. of major NCR(s) List :6.2.3, 3.8.11 | | | | | | | |
| 4.2 | For SC (Details checklist refer to Attachment 3) : | | | | | | | |
| | Total no. of minor NCR(s) List : | | | | | | | |
| | Total no. of major NCR(s) | List : | | | | | | |
| 5.0 | | ne organization has established and maintained its management system in line ts of the standard and demonstrated the ability of the system to systematically rements. | | | | | | |

| 6.0 | RECOMM | ENDATION | l | | | | | | |
|-----|---|--|---|-----------------------------------|--------------------------|--|--|--|--|
| | | | | | | | | | |
| | | No NCR | recorded. Recommended to continue cer | rtification. | | | | | |
| | - | | linor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be arried out in the next audit. | | | | | | |
| | | | Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs . | | | | | | |
| | | Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out. | | | | | | | |
| | Recommended to continue certification. | | | | | | | | |
| | Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate. | | | | | | | | |
| | | Note: Ma withdraw | ajor NCRs which are not addressed with n. | in a further 90 days shall result | in the certificate being | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| 7.0 | 7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION. | | | | | | | | |
| Aud | lit Team Lea | ider : | ROZAIMEE BIN AB RAHMAN | Surg | 13/10/2023 | | | | |
| | | | (Name) | (Signature) | (Date) | | | | |

Attachment 1 - Map



Attachment 2 – Audit Plan

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 : 12 14 JULY 2023
- 3. Site of assessment : Jeroco 2 Certification Unit:
 - Jeroco 2 POM
 - Kapis Estate

4. Reference Standard :

- a. MYNI 2019 of RSPO P&C 2018 / RSPO Independent Smallholder Standard, Nov 2019 / RSPO Management System Requirements and Guidance for Group Certification of FFB Production, March 2018/, MSPO 2530-3&-4:2013, MSPO SSCCS
- b. RSPO Certification System Documents
- c. Company's audit criteria including Company's Manual/Procedures

5. Assessment Team

Lead Auditor : Rozaimee Bin Ab Rahman (RAR) - SCCS, GHG, metric template, TBP, Env

Auditor :

- Mohd Zulfakar Kamaruzaman (MZK) Social & HCV
- Rahayu zulkifi (RZ) social internal
- Selvasingam T.Kandiah (STK)- GAP & Safety

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

7. Audit Method

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

8. Audit Findings

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

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

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

9. 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:

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

10. Confidentiality Requirements

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

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

| 11. | Working Language | : | English and Bahasa Malaysia |
|-----|------------------|---|-----------------------------|
|-----|------------------|---|-----------------------------|

12. Reporting

a)

C)

| 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 thisaudit. |

13. Facilities Required

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

14. Assessment Programme Details : As below

Day one: 12/07/2023 (Wednesday)

| Time | Coverage of assessment / Activity / Site | MZK | RAR | STK | RZ |
|---------------------|--|-----|-----|-----|----|
| 8.30am – 9.00am | Opening Meeting – Venue: PCO Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. | / | / | / | NA |
| 9.00am – 12.30pm | Site observation to Jeroco POM 2 P1, P2, P3, P4, P5, P6, P7 Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Site visit and assessment on Supply Chain Implementation | / | / | / | NA |
| 12.30pm – 1.30pm | Lunch Break | / | / | / | NA |
| 1.30pm – 5.00pm | Continue assessment at respective sites | / | / | / | NA |

Day two: 13/07/2023 (Thursday)

| Date / Time | Coverage of assessment / Activity / Site | MZK | RAR | STK | RZ |
|---------------------|--|-----|-----|-----|----|
| 8.30am – 12.30pm | Site observation to Jeroco POM 2 P1, P2, P3, P4, P5, P6, P7 Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management | 1 | / | 1 | / |
| 12.30pm – 1.30pm | Lunch Break | / | / | / | / |
| 1.30pm – 5.00pm | Site observation: • Kapis Estate (MZK & STK) • J2POM (RAR & RZ) P1, P2, P3, P4, P5, P6, P7 • Verification of basic information estate/Metric templates | / | / | / | / |

| Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighboring land use, riparian zone Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. GHG Calculation | |
|--|--|
| New planting | |

Day three: 14/07/2023 (Friday)

| Date / Time | Coverage of assessment / Activity / Site | MZK | RAR | STK | RZ |
|----------------------|---|-----|-----|-----|----|
| 8.30am – 12.30pm | Site observation to Kapis Estate P1, P2, P3, P4, P5, P6, P7 Verification of basic information estate/Metric templates Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighboring land use, riparian zone Occupational safety & health aspects, chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. GHG Calculation New planting | / | / | / | / |
| 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 | Closing meeting | / | / | / | / |

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

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 | 1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public. | Yes | Jeroco 2 CU is committed to providing 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 2 CU, titled <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. The CU continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Hap Seng Plantations Holdings Berhad website at <u>http://www.hapsengplantation.com</u> |
| decision making. | 1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders. | Yes | The CU continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Hap Seng Plantations has revised their website, <u>http://www.hapsengplantation.com</u> to include all management documents relating to the unit's environmental, social and legal issues, provided in appropriate language, demonstrating commitment towards compliance to RSPO criteria via Hap Seng Plantation Sustainability Report. |
| | 1.1.3 (C) Records of requests for information and responses are maintained. | Yes | The estate 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/recommendations by DOSH and DOE on mill and estate operation were recorded in the respective DOSH and DOE inspection book. |
| | 1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. | Yes | The consultation and communication procedures were documented. External and internal communication procedures developed by Hap Seng Plantations for the estate and mill were maintained to be followed and available at the audited sites. An examination of the records kept in the internal and external communication files found |

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| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|--|
| | | | that the estates and mill had followed the procedures and manuals developed by the company regarding communication. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets were displayed on notice boards at the office and the muster ground hence used as a means of internal communication. Regular morning briefings were held 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 2 CU were made available. Details were reviewed prior to proceeding with the stakeholder consultation process. The lists were updated in June 2023. Auditors has also contacted stakeholders during the audits such as IOI Plantation, Harus Abadi Sdn Bhd, First Raintree Sdn Bhd, Bukit Kretam Sdn Bhd, Casem Sdn Bhd, Sangi Enterprise Sdn Bhd, LKM Trading, Lebijaya Sdn Bhd. Humana teachers, and Jabatan Perhutanan Sabah. |
| 1.2 The unit of certification commits to ethical conduct in | 1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. | Yes | Jeroco 2 CU has documented policy to committing on integrity for all their staffs and workers by publishing <i>Anti-Bribery and Corruption Policy (ABC Policy)</i> . The CU has communicated the policy for new staff and foreign workers during the induction course. A briefing of the ABC Policy to all workers was also conducted via morning muster. |
| all business operations and transactions. | 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 COBC and other laws 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 had been briefed to the workers/contractors/other stakeholders during morning muster and internal/external stakeholder meeting respectively. |

<u>Principle 2: Operate legally and respect rights</u> 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 | 2.1.1 (C) The unit of certification complies with applicable legal requirements. | Yes | Jeroco 2 CU continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and Sustainability/Agronomy Dept. The CU had obtained and renewed license and permits as required by the law. |
| ratified international laws and regulations. | 2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. | Yes | The Mill and Estate had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective Managers. The Sustainability / Agronomy Department is responsible for tracking changes and the information was disseminated to all its plantations and Mill department. |
| | 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 | During the site review, the physical markers were visibly maintained at Kapis Estate. The perimeter boundary of the estate was visibly maintained with wooden posts along the boundary, especially the ones that adjacent to other private estate – IOI Group Plantation Berhad (Permodalan Estate). Kapis Estate had also maintained an Electrical Fence along the border with IOI Plantation Berhad. Sighted the wooden boundary post painted green and white along the 2023 and 2020 replants of IOI. Jeroco Palm Oli Mill situated within Kapis Estate had Chain Link Fencing around the Main Mill Complex and Barbed wire fence around its effluent Ponds. |
| 2.2 All contractors providing operational services and | 2.2.1 A list of contracted parties is maintained. | Yes | The list of contracted parties is maintained by each unit in its respective stakeholder list. The lists contain the names of contractors, designated contact persons, address, telephone/fax/email and type of contracted work done. The list of stakeholders for Jeroco 2 POM and Kapis estate were available and sighted by the auditor team. |
| supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | 2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available. | 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. The company also 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 COBC and other law and regulation such as minimum wages order, prohibited child labor, etc |
| | 2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. | Yes | All contracts, including those for FFB supply, were handled by the Processing Department at PCO. Based on contract agreement reviewed, sighted that contract agreement that includes addendum which contained clauses disallowing child, forced and trafficked labour and where young worker is employed are protected. |

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| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|---|
| 2.3 All FFB supplies from outside the unit of certification are from legal sources. | 2.3.1 (C) For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license | Yes | The evidence documents available in the 'Smallholder File'. There are 6 Smallholder and Smallgrower send their FFB at JPOM 2. |
| | 2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. | Yes | Currently in Jeroco 2 POM there is no practice of indirectly source of FFB. All FFB are received direct from the suppliers. |

Principle 3: Optimise productivity, efficiency, positive impacts and resilience Implement plans, procedures and systems for continuous improvement.

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|--|
| 3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and | 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 | Jeroco 2 mill and all the estates possessed respective annual budgets with projections until 2028. There is a 5-year financial plan comprising of both OPEX and CAPEX. The cost of production is reviewed and compared against expenditure each year with projections in place for future years. The 5 years plan is available for the crop processed, produce and cost of production in RM.The business plan is prepared by the respective Managers and verified by the General Managers for onward approval by the Chief Executive - Group Plantations. There are no smallholder schemes managed by Jeroco 2 POM. |
| financial viability. | 3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available. | Yes | The replanting program is documented in the <i>"Replanting Programme J2GOE 2012-2032"</i> . The revised replanting programme for Kapis estate for the forthcoming five years is provided and reviewed during the conduct of audit. |
| | 3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. | Yes | Management Review Meeting (MRM) for the CU was conducted in May 2023 at the Jeroco Club House. It was chaired by General Manager Processing & General Manager Agronomy. Agenda for management review were: 1. Follow up actions from earlier MRM |

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|------------------|--|
| | | | Sustainability and adequacy of all SOPs Sustainable Agriculture Policy Results of internal audits Changes In legal requirement of any compliance Changes that could affect RSPO/MSPO/ISCC/SCCS management system Complaint's/ Customer (internal/external) feedback Accident & injury Environmental quality Waste management Energy usage performance Status of corrective actions Recommendations for improvement Improvement of the effectiveness Resources needed Management has transparently addressed continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO. |
| 3.2 The CU regularly monitors and reviews their economic, social and environmental performance and develops and implements action | 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, MGT action Plan and CIP for Jeroco Group of estates and Jeroco Palm Oil Mill 1 and 2 were updated (5 th review). The updated plan above had each of the issues identified for each of the operating unit. |
| plans that allow demonstrable continuous improvement in key operations. | 3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template. | Yes | The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template before the audit started. The auditor already verified and checked the data and figure given was tally with their database system. Apart from that, reporting time frame for this Jeroco 2 CU was also verified. |
| 3.3 Operating procedures are appropriately documented, consistently implemented and monitored. | 3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place. | YES | Both mill and estate operations are guided by the Group's Manuals and Standard Operating Procedure. The mill processing guidelines and standards are detailed via the Standard Operation Standard. Oil Palm Agriculture Policy (OPAP) is the manual used for the operations in the estate. All activities in the estates from seedlings in nursery to planting in the fields have been included in the Manual. The document specifies among others, the following sections such as pest & diseases management (control of Rhinoceros Beetles, rat, bagworms and nettle caterpillars, ganoderma), fertilizer of replanting (terracing and platforming, planting distances and lining), nursery (single and double stage nursery), manuring, weeding, water management, road maintenance management, thinning, epiphyte eradication, belt press solid application (BPS), pruning and harvesting. |

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| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|---|
| | | | It was also noted that relevant SOPs were displayed at various workstations for easy reference, for example, at the muster ground, workshop, riparian buffer zone, chemical storage and diesel storage. In addition, the CU had the following SOPs: Safe and Standard Operating Procedure for Sexual Harassment, Stakeholder Consultation Procedure – Group Level & Estate/Mill Level, Grievance Procedure (Internal & External), Request for Information Procedure, Procedure Whistleblower, Standard Operating Procedure – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (local & Foreign), SOP – Managing COVID 19 in Plantation. |
| | 3.3.2 A mechanism to check consistent implementation of procedures is in place. | Yes | Both the estate and the Mill had established mechanisms to ensure consistent implementation of procedures. Some of the mechanisms are: Daily Production Report, Unscheduled General Manager, Agronomic advisory report for 2022 & Fertiliser recommendations, Plantation Advisory Report " <i>Estate Visit Report</i> ", and Internal audit by the Agronomy Dept (Sustainability Unit). The mechanisms as established have been implemented. |
| | 3.3.3 Records of monitoring and any actions taken are maintained and available. | Yes | Both J2 POM and Kapis Estate continued to maintain records of monitoring and of any actions taken. These have been reviewed accordingly during the onsite audit. |
| 3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a | 3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented. | YES | There was no new planting in Jeroco 2 CU. Therefore, this indicator not applicable. Nevertheless, Jeroco Group of Estates and Jeroco Palm Oil Mill 1&2 have prepared a Social Impact Assessment, Management Action Plans and Continuous Improvement Plans. Please refer to Indicator 3.4.2 below for details. |
| social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations. | 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 2 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. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the most significant environmental receptors are the boiler stack emission, which is associated with air emission, palm oil mill effluent (POME) discharge to land application. The recent EIA Environmental Aspect Impact assessment covers all activities in the Jeroco II CU/Groups. The main purpose for this assessment was to evaluate and analyze impact on soil, water, and lair associated with the organization activities. |

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| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|--|
| | 3.4.3 © The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. | Yes | The Agronomy Department has internally prepared two reports that contained Social Impact Assessment, Management Action Plans and Continuous Improvement Plans for Jeroco Group of Estates and Jeroco Palm Oil Mill 1 & 2. The reports were being annually reviewed, and the development of the reports, and the annual reviews were done participatorily with affected stakeholders as evidenced by the minutes of discussions. Among the affected stakeholders consulted were 56 external stakeholders who attended an online meeting in May 2023. Numerous interviews were also carried out with internal stakeholders such as sprayers, mandores, harvesters, truck drivers, mill operators, general workers, lab attendants, tippers, weighbridge operators, FFB graders, etc to get their inputs and suggestions. However, the Social Impact Assessment, Management Action Plans and Continuous Improvement Plans for Jeroco Group of Estates and Jeroco Palm Oil Mills 1 & 2, reviewed in July 2023 were not developed with participation of affected Indonesian workers whose dependents remain to be legalized. This has resulted in the CU not being able to identify as a social impact, the worry and concern and the affected workers have on the subject of dependants' immigration status. Therefore, a Minor Non-Compliance RZ 01 of 2023 is raised. The environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way through external communication (stakeholder meeting) conducted in May & July 2023. The social management and monitoring plan prepared internally by the Agronomy Department for the Jeroco CU has been implemented, reviewed and updated annually in a participatory way. The reviews are being conducted annually, and based on the documents sighted, the annual reviews were done participatorily with affected stakeholders consulted were external stakeholders who attended an update atkeholders consulted were external stakeholders who attended an updated stakeholders consulted were external stakeholders who attended |
| 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 | online meeting in May 2023. An SOP entitled Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (Local & Foreign) is available. This SOP which details out employment procedures for recruitment, selection, hiring, termination, retirement and promotion of workers (local & foreign) includes recruitment procedures for walk-in foreign workers and recruitment of foreign workers supplied by agencies. This SOP was made known to the workers during muster briefings to the workers. |
| | 3.5.2 Employment procedures are implemented, and records are maintained. | YES | The employment procedures are maintained and implemented as part of the SOPs which the CU refers to on matters related to employment procedures. |
| 3.6 An occupational | 3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans | Yes | Kapis Estate and POM had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment |

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| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|--|
| health and safety (H&S) plan is documented, effectively communicated and implemented. | and procedures are documented and implemented. | | and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following; a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents The estate had reviewed the HIRARC document in June 2023. Amendments are summarized in a list detailing dates and reasons for updates. |
| | 3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people are monitored. | Yes | HSP Health and Safety plan among others includes the following: No fatality / penalty & to enhance OSH awareness through ESH training. The implementation of OSH plan was monitored by internal audits conducted by Sustainability team. |
| 3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained. | 3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training. | Yes | A Formal training program which covers all aspects of RSPO P&C was available for year 2023. The Program was established based on training needs identification. Regular assessments of the effectiveness training continued conducted by the CU management. Training plan for 2023 had been established with target month/dates for the training identified. |
| | 3.7.2 Records of training are maintained, where appropriate, on an individual basis. | Yes | Training with briefing on the estate and mill operations was provided for workers. This is aimed at educating them on safe working practices to ensure applicable precautions are taken. Training for employees is conducted from time to time based on needs through various methods such as on the job training, briefings, meetings, etc. |
| | 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 has been conducted in June 2022 for supply chain certification sustainability. Training focus on relevant Supply Chain related procedures and record. Training material was found to be adequate in addressing the standard requirements. The training was conducted to all PIC involved with the SCCS systems included the outsource contractor. |

SUPPLY CHAIN REQUIREMENTS FOR MILLS

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|------------------|---|
| 3.8.1 | Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, the inly MB Module is applicable. | Yes | Jeroco 2 POM (J2POM) has planned to certify their mill using 2 Models which is IP and MB. As of now, J2POM sourced their FFB supply from own company for IP model estate namely Kapis Estate and diversion from other CU certified estates and certified out grower and small holders. For MB Model there are 3 Out grower and 3 Small Holders. |
| 3.8.2 | Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base. | Yes | Jeroco 2 POM received certified FFB from own Estate Which is Kapis Estate, Diversion from another CU which is Lokan Estate, certified FFB from surrounding smallholder and smallgrower and Uncertified FFB from own company (Northbank Estate), Surrounding Smallgrower and Small holder. Thus, Jeroco 2 POM has qualifies for the Mass Balance chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. Refer to Table 3-MB for the relevant production data. |
| 3.8.3 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | Yes | Projection data available as in Table 4 of this report. |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|---|--|------------------|--|
| report supply chain (RSP0 | nill shall also meet all registration and ting requirements for the appropriate y chain through the RSPO supply managing organisation O IT platform). | Yes | The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information was: Name: Jeroco Plantations Sdn Bhd – Jeroco Palm Oil Mill 2 Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard. |
| and/o impler applic specif minim • C p in el m • C au c m tr • lc p re o o re o re o re | ite shall have written procedures r work instructions to ensure the mentation of all elements of the sable supply chain model fied. This shall include at num the following: complete and up to date rocedures covering the nplementation of all the lements of the supply chain nodel requirements. complete and up to date records nd reports that demonstrate ompliance with the supply chain nodel requirements (including aining records). dentification of the role of the erson having overall esponsibility for and authority ver the implementation of these equirements and compliance with all applicable requirements. his person shall be able to emonstrate awareness of the rganisation's procedures for the apple that have documented procedures for | Yes | Jeroco 2 POM had used their documented procedure title 'Standard operating procedures for Supply Chain SOP/COC/003. The procedure described the following: Chapter 1: CSFFB, CSPO & CSPK traceability system – chain of custody Chapter 2: Harvesting and Loading of Fresh Fruit Bunch Chapter 3: Delivery and Reception of CSFFB, In- house and Non-In-house FFB- additional procedure to physically separate the certified and uncertified CPO/PK during specific period for the mill that holding both IP and MB model. Chapter 4: Dispatch of CSPO and CSPK from the mill to refinery/ bulk transit installation/ buyer's vessel Chapter 5: Monitoring of CSPO and CSPK sales Appendix 1: Weighbridge Tickets and Delivery Notes RSPO (& ISCC) Stamping Procedure The procedure is complete and up to date covering the implementation of all the elements of the supply chain model requirements including receiving and processing certified and noncertified FFBs. Since this is MB mill, there is no problem regarding noncertified FFB. However, during this audit CU were decided to change of scope of certification by add on IP model (not yet process) The procedure was kept in file RSPO Supply Chain and Traceability. Training has been conducted in July 2022 for supply chain certification sustainability. Training focus on relevant Supply Chain related procedures and record. Training material was found to be adequate in addressing the standard requirements. The training was conducted to all PIC involved with the SCCS systems included the outsource contractor. Based on appointment letter the Mill Manager has been appointed as Person-in-charge for RSPO/ISCC/MSPO on site, assisted by weighbridge operators and other defined critical control point (CCP) personnel (i.e. auxiliary police, and QA). |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|---|------------------|---|
| 3.8.6 | The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. | Yes | As describe under para 8.4 SOP for Supply Chain, Chapter 1: CSFFB, CSPO and CSPK traceability System – Chain of custody, JPOM2 refer to flow Chart Internal Audit System which is follow the RSPO Supply Chain Certification Standard Revision 2020 requirements. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2020 requirements. RSPO internal audit was conducted in Apr 2023 by the internal auditors. 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 during the conduct of audit. Management review meeting has been conducted in May 2023 (combine RSPO, RSPO SCCS and MSPO). |
| 3.8.7 | The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents. | Yes | Jeroco POM 2 had continued to receive certified FFB from own Estate Which is Kapis Estate, Diversion from another CU which is Lokan Estate, certified FFB from surrounding smallholder and small grower and Uncertified FFB from own company (Northbank Estate) Surrounding Smallgrower and Small holder. The mechanism for handling non-conforming oil palm products and/or documents is in-place. No overproduction noted. Details of certified tonnage as per table Table 1 and Table 3 The validity of the certificate of the supplier has been checked accordingly. Sighted sample FFB consignment note for Kapis for the month of July 2022 to June 2023. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as <i>"Supply Chain MB"</i> has recorded the tonnage of certified FFB and its supplying estate. <i>Verified through Jeroco POM 2 weighing system called 'LAK System' and</i> random sample of weighbridge ticket was carried out during the audit. |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|------------------|---|
| 3.8.8 | Sales and Goods Out 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): a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number | Yes | The procedure (SOP Traceability, Chapter 5: Monitoring of CSPO and CSPK Sales) in handling of sale and delivery was sighted and found adequate. Sales activities handled by Hap Seng Plantation Holding Berhad- commodities Trading in Kuala Lumpur on behalf of Jeroco 2 POM. All information required is available. |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|------------------|---|
| 3.8.9 | Outsourcing Activities (i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification. (ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contract or or operation if an audit is deemed necessary. c) 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. | Yes | For PK Not Applicable since transportation and storage of certified finished products are handled internally using own transportation. 1 outsource CPO sea transportation. There is a contract document between J2POM and the transporters. The agreement document was available and communication on the RSPO supply chain requirement was communicated to them. There is addendum a clause regarding Supply chain standard in clause 32 of the agreement. The mill has ensured that CB has access to the outsourcing contractor or operation if an audit is deemed necessary was stated in the same clause of the addendum of contract. Training has been conducted for supply chain certification sustainability. Training focus on relevant Supply Chain related procedures and record. Training material was found to be adequate in addressing the standard requirements. The training was conducted to all PIC involved with the SCCS systems included the outsource transporter. |
| 1 | | | |

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|------------------|---|
| 3.8.10 | The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. | Yes | List of contact person for outsourced transporter was made available and up to date in the stakeholder list. |
| 3.8.11 | The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products. | No | Noted that the mill does not inform CB in advance related to name and contact details of new contractor. Thus, #Major NCR RAR 01 2023 has been raised. |
| 3.8.12 | The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. | Yes | The relevant record pertaining to RSPO SCCS within JPOM2 found to be updated accordingly and easily accessible during the audit. Relevant record pertaining to implementation of RSPO SCCS within JPOM2 retained for minimum 2 years as per statement on Chapter 1 of <i>Standard operating procedures for Supply Chain SOP/COC/001</i> . JPOM2 also had established various reporting template to ensure that they will be able to |
| | 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 | track movement of their certified FFB as well as finished products (CPO & PK). |
| | iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real- time basis. | Yes | Not yet received and process IP module |
| | iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to | Yes | JPOM 2 had continued to keep record and balances of all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table 'Supply Chain MB'. Randomly selected weighbridge tickets issued during July 2022 to June 2023 by JPOM2 for delivery of PK. All weighbridge tickets issued had indicated the status of the CPO and PK (RSPO MB). |

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| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|------------------|---|
| | conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). | | |
| 3.8.13 | Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently. | Yes | J2POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report) to ensure their accuracy as well as monitoring of their ongoing performance. |
| 3.8.14 | Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate. | Yes | |
| 3.8.15 | Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm products, including during transport and storage to strive for 100% separation. | Yes | Jeroco 2 POM (J2POM) has planned to certify their mill using 2 Models Which is IP and MB. However, during the assessment, the process from MB to IP not yet available as CU not yet process and handling physical IP product. |
| 3.8.16 | Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not | Yes | The registration of transaction being carried out by Group Plantation Marketing subordinate. Mill receives copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in). JPOM2 through usually handled by procedure in handling of sale and delivery was sighted and found adequate. Sales activities are usually handled by Hap Seng Commodities Trading Department (HQ) on behalf of Jeroco 2 POM. The Personnel updated the RSPO IT platform system upon confirmed contract. As verified through Transaction in Palm Trace, there is no remove made by the Jeroco 2 CU. It will be |

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| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|------------------|---|
| | more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform | | done at the end of the license period. |
| 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, JPOM2 weighbridge advice ticket and JPOM2 palm kernel/ CPO delivery note. JPOM2 applied for the 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 2022). The license period valid until Apr 2024. |

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

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|--|
| 4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders. | 4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. | Yes | Human Rights policy was made available at Kapis estate and Jeroco 2 POM. There is also a new sustainable Agriculture Policy containing the clause prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staff and workers during morning muster and training sessions in JPOM 2 and Kapis. |
| | 4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations. | Yes | As at time of audit, it was confirmed that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. |

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| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|---|
| 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 | The estate and mill have developed procedures to handle grievances and disputes titled as 'Procedure for reporting complaints and grievances (Prosedur Melapor Aduan dan Permasalahan)' and 'Grievances Procedure – Appendix 1' for staffs and workers, Prosedur Aduan and also company has developed procedure named 'Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)' to protect the complainants. |
| | 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 representatives from the following stakeholders at JPOM 2 and Kapis Estate, it was found that the system was understood by the affected parties, including the illiterates. The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting. Sighted document for Jeroco 2 CU showed briefing the stakeholders meeting during JCC meeting and for External and Internal Stakeholder. For foreign workers, the procedure was explained during the initial report for duty with the assistance of translators. |
| | 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 | Jeroco 2 CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. |
| | 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 Mill and Estates within Jeroco 2 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 also was the new Procedure title 'The Grievance procedure' has included 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 CU contributes to local sustainable dev. 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 | Sighted record showed Hap Seng Plantations Holdings Bhd had contributed to 2021 an amount approximately RM50k towards Community development which included Ferry, Road Maintenance and Clinic services. It included building of a Humana at Kapis Estate for foreign worker's children. Donations were provided related to the operation of the Humana. To note that there was no local community living nearby or within the Jeroco 2 CU plantation area. |

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| Clause | Indicators | Comply Yes/No | Findings |
|---|--|------------------|---|
| 4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. | 4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available. 4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: 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 | Yes | The right to use the land at the Jeroco 2 CU can be demonstrated and not disputed by any party. Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Kapis Estate the land was previously owned by Sabah Land Development and Jeroco Plantations Sdn Bhd bought and develop the land in Jan 1980. There were clear land ownership documents available for review. The original copies of the documents were kept in Plantation Central Office, Sg. Segama. Copies of land titles for the estate were also sighted at Kapis Estate office. The Kapis estate is under the jurisdiction of Kinabatangan District. Review of the documents confirmed the terms of the land title for the estate which was for 'cultivation of an agricultural crop of economic value', hence, had been complied with by Jeroco 2 CU. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Jeroco 2 CU since 1980. The audit team had confirmed that there were no land issues related to previous owners. |
| | on the steps that are taken to involve them in decision making. 4.4.2b Evidence that the unit of | Yes | |
| | certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. | | |
| | 4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected | Yes | |

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|---|
| | 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. | | |
| | 4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities). | Yes | As reported in Indicator 4.4.1, It has been verified that the land is legitimately owned by Jeroco 2 CU since Jan 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. |
| | 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 such as the IOI Plantation, Harus Abadi Sdn Bhd, First Raintree Sdn Bhd, Bukit Kretam Sdn Bhd, Casem Sdn Bhd, Sangi Enterprise Sdn Bhd, LKM Trading, Lebijaya Sdn Bhd. There were no local communities living in or neighbouring Jeroco 2 CU, hence, no evidence of any land dispute involving local communities. |
| | 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, | 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 2 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 2 CU. The audit team had confirmed that there were no land issues related to previous owners and this was confirmed through interview with relevant stakeholder such as the IOI Plantation, Harus Abadi Sdn Bhd, First Raintree Sdn Bhd, Bukit Kretam Sdn Bhd, Casem Sdn Bhd, Sangi Enterprise Sdn Bhd, LKM Trading, Lebijaya Sdn Bhd. Documents showing identification and assessment of demonstrable legal, customary and user rights are not applicable. |

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| Clause | Indicators | Comply Yes/No | Findings |
|---|--|------------------|---|
| customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions. | 4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two- way process of consultation and negotiation. | Yes | Details of previous landowner reported in indicator 4.4.1 above. As reported in 4.4.1 of this checklist, Jeroco 2 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 interviewing relevant stakeholders i.e. IOI Plantation, Harus Abadi Sdn Bhd, First Raintree Sdn Bhd, Bukit Kretam Sdn Bhd, Casem Sdn Bhd, Sangi Enterprise Sdn Bhd, LKM Trading, Lebijaya Sdn Bhd. There were also no local communities living in or neighboring Jeroco 2 CU, hence, no evidence of any land dispute involving local communities and FPIC. |
| | 4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non- coercive and entered into voluntarily and carried out prior to new operations. 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 | Yes | As reported in 4.4.1 of this checklist, Jeroco 2 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 interviewing relevant stakeholders i.e. IOI Plantation, Harus Abadi Sdn Bhd, First Raintree Sdn Bhd, Bukit Kretam Sdn Bhd, Casem Sdn Bhd, Sangi Enterprise Sdn Bhd, LKM Trading, Lebijaya Sdn Bhd. There were also no local communities living in or neighboring Jeroco 2 CU, hence, no evidence of any land dispute involving local communities and FPIC. This Indicator is not applicable. |

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|--|
| | provisioning options are considered. There is transparency of the land allocation process. | | |
| | 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. 4.5.6 Evidence is available that the | Yes | As reported in 4.4.1 of this checklist, Jeroco 2 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 interviewing relevant stakeholders i.e. IOI Plantation, Harus Abadi Sdn Bhd, First Raintree Sdn Bhd, Bukit Kretam Sdn Bhd, Casem Sdn Bhd, Sangi Enterprise Sdn Bhd, LKM Trading, Lebijaya Sdn Bhd. There were also no local communities living in or neighboring Jeroco 2 CU, hence, no evidence of any land dispute involving local communities and FPIC. This Indicator is not applicable. |
| | 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. | | |
| | 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 | |
| 4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented | 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 | Jeroco 2 CU has a standard procedure for identifying social related issues called "Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation". The procedures defined the details process of how compensation for any issues/disputes related to land, ownership and access to land, and ensures negotiations concerning compensation are dealt with. The procedure ensures that any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. However, the CU did not conduct any negotiations concerning compensations for this last 12 months. |

| Clause | Indicators | Comply Yes/No | Findings |
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| system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. | 4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. | Yes | "Land Dispute Compensation and Calculation Procedure" and "Procedure for Calculating & Distribution Fair Compensation" detailed out the procedures for calculating and distributing compensation in a participatory and fair manner. These procedures specify that it would take into account ethnic group, gender differences, etc. A flowchart to the same effect was also sighted. Interviews with the relevant stakeholders IOI Plantations confirmed that the mechanism for them to express their views is available, and the issues (if any) will be dealt with in accordance with this standard requirement. However, the stakeholders have confirmed that there was no existing/known dispute that caused the need for any negotiation resulting in compensation process etc. either in the mill or the estate. |
| | 4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. | Yes | The requirement of this indicator was not applicable as there is no scheme smallholding at Jeroco 2 CU. |
| | 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 | As mentioned in 4.6.2 above, there were no existing/known issues related to this indicator, hence it was not applied to Jeroco 2 CU. |
| 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 | 4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place. | Yes | Jeroco 2 CU have a standard procedure for identifying social related issues called "Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation". The procedures defined details process of how compensation for any issues/disputes related to land, ownership and access to land, and ensures negotiations concerning compensation are dealt with. The procedure ensures that any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. As reported in 4.4.1 of this checklist, Jeroco 2 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 neighboring Jeroco 2 CU, hence, no evidence of any land dispute and land expansion involving local communities and FPIC. |
| agreements. | 4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place | Yes | There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighboring estate. The audit team has also interviewed relevant stakeholders such as the As reported in 4.4.1 of this checklist, Jeroco 2 CU has been developed since 1980, after it was bought from the previous land owner; Sabah Land Development. All the related |

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| Clause | Indicators | Comply Yes/No | Findings |
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| | and documented and made available to affected parties. | | 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. |
| | 4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. | Yes | This requirement in this indicator was not applicable for Jeroco 2 CU. |
| 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 2 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 thus, not applicable. |
| | 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 | |
| | 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 | Yes | |

| Clause | Indicators | Comply Yes/No | Findings |
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| | land use rights, these claims will be settled using the relevant reqs. (Indicators 4.4.2, 4.4.3 and 4.4.4). | | |
| | 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 2 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 thus, not applicable. |

Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.

| Clause | Indicators | Comply Yes/No | Findings |
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| 5.1 The unit of certification deals | 5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders. | Yes | It was observed that the JPOM2 has displayed the current and past FFB prices from Dec 2022 until to date (June 2023) at their weighbridge station. |
| fairly and transparently with all smallholders (Independent and Scheme) and other | 5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. | Yes | There is evidence that Jeroco 2 POM regularly explains the FFB Pricing to Smallholder. Training has been conducted at Jeroco 2 POM on <i>"Taklimat Pensijilan RSPO/MSPO/ISCC"</i> . The <i>"Taklimat Pensijilan RSPO/MSPO/ISCC"</i> explained regarding FFB Quality, FFB Grading, Calculation Payment by MPOB, Oil Extraction Rate (OER), and calculation of pricing given to Smallholder. |
| local businesses. | 5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. | Yes | In Jeroco 2 POM Price for FFB follows MPOB Pricing. All prices are calculated by the MPOB and the mill follows the price to what MPOB guidelines provided. Hap Seng Management also gives allowance to the Smallholder if they send FFB to the mill based on tonnage. |
| | 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 | Yes | Agreements between FFB outsider supplier with JPOM2 were available and sighted. The agreements are with addendum on RSPO requirements. The addendum on Anti Money Laundering and Anti Bribery was also available. During interview with FFB Supplier, they stated that they are involved in decision-making processes and understand the contracts including involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable which is not applicable to them because they are operate by themselves. Hap Seng Management also supports smallholders by give them consultation and guidance to certify surrounding smallholder under MSPO and RSPO without cost. |

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| Clause | Indicators | Comply Yes/No | Findings |
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| | other support mechanisms where applicable. | | |
| | 5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe. | Yes | The contracts between Hap Seng Plantations Sdn Bhd and FFB suppliers sighted were fair, legal and transparent and have an agreed timeframe. Consultations with FFB Suppliers confirmed that they understand the salient points in the agreement, namely contract duration, rate of payment, their obligations under the contract, etc. They also confirmed that the contracts entered into are valid, fair and transparent as the terms of payment are being negotiated upon prior to signing. Contract with suppliers were drafted in the English language, which is understood by the suppliers, as verified during interviews. |
| | 5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. | Yes | All contractors confirmed that payments were received within a reasonable timeframe, which is 7-10 days after submission of invoice. And receipts contain specifying price, weight, deductions and amount paid are given. |
| | 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 2 POM has been calibrated on yearly basis. |
| | 5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. | Yes | Hap Seng Management supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. 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 surrounding smallholders who are RSPO certified are Spark Glory, Harus Abadi, and LKM Trading and Lebijaya. Currently on progress for RSPO and MSPO certification are Khoo Chin Hung, Bukit Kretam 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 <i>Melapor Aduan dan Permasalahan</i>)' and 'Grievances Procedure – Appendix 1' for staffs and workers, <i>Prosedur Aduan</i> and also company has developed procedure named '' <i>Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)</i> '', 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 | 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 | Yes | 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 surrounding smallholders who are RSPO certified are Spark Glory, Harus Abadi, LKM Trading and Lebijaya. Currently in progress for RSPO and MSPO certification |

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| Clause | Indicators | Comply Yes/No | Findings |
|---|--|------------------|---|
| of smallholders and their inclusion in sustainable palm oil | support to improve their livelihoods and their interest in RSPO certification. | | are Khoo Chin Hung, Bukit Kretam and LPC plantation. |
| value chains. | 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, organizational 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. Hap Seng had established RSPO Monitoring Schedule for HSPSB External Independent Smallholder/Outgrower for 2022 and 2023 to ensure operations/training/monitoring in support of the smallholders are implemented. |
| | 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 the legality of their FFB production. |
| | 5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. | Yes | The Pesticide handlings training has been given to surrounding Smallholder and Small grower. Hap Seng had established RSPO Monitoring Schedule for HSPSB External Independent Smallholder/Outgrower for 2022 and 2023 to ensure operations/training/monitoring in support of the smallholders are implemented. |
| | 5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. | Yes | Currently Hap Seng Plantations Management has created a system to trace their stakeholders around their estate. Hap Seng Plantations also regularly reviews and publicly reports on the progress of the smallholder support programme as seen in the Hap Seng Plantation Holdings Berhad 2019 ACOP report. Hap Seng had established RSPO Monitoring Schedule for HSPSB External Independent Smallholder/Outgrower for 2022 and 2023 to ensure operations/training/monitoring in support of the smallholders are implemented. |

Principle 6: Respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.

| Clause | Indicators | Comply Yes/No | Findings |
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| 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, | YES | Commitment to non-discrimination and equal opportunity are available under Equal Opportunity Policy which is posted in both Bahasa Malaysia and English on all main notice boards throughout the CU. Among others, the Policy states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union |

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| Clause | Indicators | Comply Yes/No | Findings |
|---|--|------------------|--|
| | caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. | | membership, political view, religion and age. Implementation of the Policy was verified by all workers interviewed during the recertification who confirmed that no discriminatory practices in whatever form exist within the CU. |
| | 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 | The CU has been able to demonstrate that migrant and local workers have not been discriminated against. Records of housing allocation, wages paid and benefit entitlement such as free housing with amenities, medical treatment, access to training, etc are available to all workers irrespective of their gender, ethnic background or nationalities. Workers from Indonesia interviewed also confirmed that no recruitment fee was paid. |
| | 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 | A review of the CU's employment records shows that it was able to demonstrate that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, and medical fitness relevant to the job applied for. |
| | 6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. | YES | The CU was able to demonstrate that pregnancy testing is not conducted in a discriminatory measure. Female workers interviewed during this recertification audit also confirmed the same. The Medical Assistant also confirmed that female workers whose work involve contact with chemicals such as those in the lab, manurers, sprayers will not be terminated upon pregnancy. However, in the interest of the mother's health, she would be transferred to do an alternative employment once she is confirmed pregnant. Although there were pregnant mothers during this audit period, none of them was a manurer or a sprayer, or worked in the lab. |
| | 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 | It was verified during the recertification audit the existence of a Gender Committee within the CU. The members comprise female employees and male employees' wives. Audit interview conducted with the Gender Committee and a review of their meeting demonstrated that their main activities included awareness talks on sexual harassment, domestic violence and other forms of abuse, how to lodge complaints, and activities that are beneficial such economic opportunities such as food catering and selling of cookies. |
| | 6.1.6 There is evidence of equal pay for the same work scope. | YES | Based on the employment contracts and payslips reviewed during the recertification audit, the CU was able to demonstrate that employees are being paid equal pay for the same work scope. |
| 6.2 Pay and conditions for staff and workers and for contract workers always meet | 6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) | YES | Applicable labour laws and documentation of pay and conditions are available and documented in each worker's employment contract/letter of job offer. These documents are available to the workers in Bahasa Malaysia, which is a language they speak and understand. These are also explained to them during induction briefings, i.e., at the beginning of their employment, and regularly during muster briefings. Workers who were |

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| Clause | Indicators | Comply Yes/No | Findings |
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| at least legal or industry minimum standards and are | and explained to them in language they understand. | | interviewed during the recertification audit confirmed their understanding of the terms of their agreements/letters of offer, and understood their rights and obligations contained therein. |
| sufficient to provide decent living wages (DLW). | 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 | Sampled pay slips and employment contracts contain information about their rates of pay, and for any subsequent increase as a result of the Minimum Wages Order 2022, the workers were issued with a letter informing and documenting the revised rate of pay. The employment contracts are available in Bahasa Malaysia, which is the language understood by all workers. Among the terms included in the employment contract/letter of job offer include regular working hours, payment of overtime, rates for working on rest day and public holidays, statutory payments and employer's contributions, retirement age, paid annual leave, paid medical leave, paid maternity leave, employment termination clause, etc. The documentation of pay (pay slips) contain information such as gross pay, net pay after deducting statutory payments such as EIS, EPF, SOCSO (for local workers), total days of work, and total overtime hours. |
| | 6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. | NO | The employment contracts signed with workers are following the Sabah Labour Ordinance. Generally, the CU was able to demonstrate compliance with legal requirements pertaining to regular working hours, deductions, overtime, paid maternity leave, etc. However, Kapis Estate was not able to demonstrate that overtime was paid to two (2) creche workers at Kapis Estate who worked more than 8 hours per day during the sampled. Therefore, a Major Non-Compliance No. RZ 02 of 2023 was raised. |
| | 6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure. | YES | Field visit to the workers' housing confirmed that the CU provides adequate comfort and housing with water, electricity and sanitation facilities. Water is provided free of charge, and electricity is payable at RM10 per household. Other facilities provided include free medical facilities at the estate clinic attended by the Estate Medical Assistant (EMA), and visited by a Visiting Medical Officer from Klinik Chong, Tawau on a weekly basis. The VMO attends to cases which are referred to him by the EMA, supervises the EMA, and visits the workers' housing to check on hygiene. Local workers' children attend SK Jeroco and foreign workers can send their children to HUMANA at Kapis Estate and CLC which is located at the nearby estate. The CU also provides bus transportation for the pupils. Drinking water analysis is carried out by the laboratory at Hap Seng Plantations (River Estates) Sdn Bhd Plantation Central Laboratory. Weekly housing inspections are also carried out for both workers' housings. |
| | 6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. | YES | Efforts were made to improve workers' access to adequate, sufficient and affordable food. A mill canteen is available at JPOM2 which sells meals at a subsidized price. Additionally, there are also grocery stores where workers could purchase their daily needs. Interviews with the workers confirmed that the price of items sold are reasonable considering the |

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| Clause | Indicators | Comply Yes/No | Findings |
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| | | | distance to the nearest town. At the workers' housing, workers are also allowed to plant their own vegetables to supplement their diet. |
| | 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: | YES | Sighted was the prevailing wage calculated for both Kapis Estate and JPOM2 from January – December 2022. The calculation took into account costs of housing electricity & water, education, creche facilities, healthcare, transport, clothing, food, sports & recreation facilities. |
| | A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. | | JPOM2Local worker (RM)Foreign worker (RM)Prevailing wages1,668.251,757.92Kapis EstateLocal worker (RM)Foreign worker (RM)Prevailing wages1,622.412,064.31 |
| | The implementation plan with specific targets, and a phased implementation process will be in place, including the following: An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. The unit of certification may choose to implement the "living wage" payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation 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. | | Based on the above, the assessment conducted by the CU in determining prevailing wages is acceptable. |
| | 6.2.7 Permanent, full-time employment is used for all core work performed by the unit | YES | The CU only employs full-time employees who carry out full-time jobs. |
| | of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. | | |

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| Clause | Indicators | Comply Yes/No | Findings |
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| 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 | 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 | Sighted at main notice boards within the CU, the Company's Policy that recognizes freedom of association and right to collective bargaining. This Policy were documented in in both Bahasa Malaysia and English. Implementation of the Policy was seen with the election of worker representatives carried out by the workers themselves during morning muster. See also indicator 6.3.2 below. |
| association and collective bargaining are restricted under law, the employer facilitates parallel | 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 | Meetings between workers' representatives who were freely elected, and the management are carried out on a quarterly basis and documented in Bahasa Malaysia. Meetings were attended by workers' representatives including women representatives, Bugis ethnic leader, and leader of JPOM2 housing. |
| means of independent and free association and bargaining for all such personnel. | 6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. | YES | Evidence was available that management does not interfere with the formation or operation of worker representatives. |
| 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 | A formal Policy to protect children, including prohibition of child labour is available and documented. The prohibition against child labour is also included in all service contracts and supplier agreements. In addition, notices that prohibit employment of children were sighted at the several areas within the CU, including the main entrance gate. |
| | 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 | Based on the workers' list containing every worker's date of birth, sampling of workers' ICs, passports and observations in the field, the CU was able to demonstrate that minimum age requirements are met. An age screening verification procedure is also available where all job applicants are required to fill in a form and show original copies of their ICs and/or passports. |
| | 6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. | YES | As verified during this recertification audit, no young person is employed by the CU. All employees are aged 18 and above. |

| Clause | Indicators | Comply Yes/No | Findings |
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| | 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 | Communication of no child labour policy and its negative effects on children can be seen from the briefings given during JCC meeting with external stakeholders and also notices strategically placed at main entrance gates. |
| 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 | A Policy to prevent sexual and all other forms of harassment is documented as "Sexual Harassment, Violence and Abuse Policy" contains a flow chart on how to lodge a report. The Policy was communicated to all levels of workforce and interview with male and female workers confirmed their understanding of the Policy. Interviews conducted with employees during the recertification audit confirmed that no sexual harassment or other forms of harassment exist within the CU. |
| | 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 on Reproductive Rights is available. 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. The implementation of this Policy was seen when new mothers are allowed to nurse their babies during office hours and accorded transportation to send their babies for vaccination. Evidence was also available that two new mothers at Kapis Estate were given 90 days paid medical leave. |
| | 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 | New mothers were identified by JPOM2 and Kapis Estate. Assessment of their needs were carried out where the new mothers had requested for transportation and time off to attend clinic during office hours for her baby's immunisation, and time off. This was granted by the management, and they were allowed to do so. The assessments have been carried out by medical officer and nurse through interview session (face to face) with the new mothers. |
| | 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 | A grievance mechanism which respects anonymity and protects complainants has been developed and is established. All the SOPs were communicated and briefed to workers during morning muster, Gender Committee and JCC meetings. |
| 6.6 No forms of forced or trafficked labour are used. | 6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: Retention of identity documents or passports (except for administration purposes including legalisation and | YES | Based on interviews held with workers during this recertification audit, review of employment contracts and pay slips, it was confirmed that: Foreign workers keep their own passports unless they are needed for renewal and legalization process. Workers did not pay any recruitment fees. There is no contract substitution and workers are aware of the job they are supposed to do. |

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| Clause | Indicators | Comply Yes/No | Findings |
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| | renewal processes) Charging the workers for recruitment fees Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty to the workers for termination of employment Debt bondage Withholding of wages | | Overtime work is being carried out on a mutually agreed basis. Workers are free to resign as specified in their employment contracts/letters of offer by giving notice. There is no penalty payable upon termination of employment. There is no debt bondage. There is no withholding of wages. |
| | 6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. | YES | The CU employes Indonesian workers, and it has in place, a Labour Policy for Foreign Workers, states that all employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival programme will be conducted once arrived for three months. Implementation of this Policy was verified where newly recruited workers were accorded trained upon arrival as part of their induction training programme. |
| 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 | The letter of appointment for the Managers signed by the respective Superiors were sighted for the appointment as the ESH Chairman. The Managers subsequently assigned duties of ESH coordinator to the Assistants for the downline implementation of ESH practices in the estates. All identified Executives were officially given a letter for such an appointment. All estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. Minutes of meetings held by the mill and estates were verified. At the meetings workers participated in the discussion mainly on housing and safety. All units adopted the agenda as provided by Sustainability/Agronomy Dept. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health. The agenda as discussed during the meeting among others includes; a) Lapuran HA/Perubatan / COVID 19 b) Lapuran Pematuhan Perumahan c) Lapuran Pemeriksaan Tempat Kerja d) Lapuran Latihan Keselamatan e) Lapuran Kemalangan g) Lapuran Pengumpulan Maklumat |
| | 6.7.2 Accident and emergency procedures are in place and instructions are clearly | Yes | Procedures for accidents and emergencies have been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been |
| | understood by all workers. Accident | | summarized in a chart flow form and displayed for information of all employees in the |

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| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|------------------|---|
| | 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. | | estate. They includes emergencies relating fire, chemical spillage, flood and accident at work place. The organization chart for the ERP team was established and displayed for information of the employees. Important telephone contact numbers were also provided therein. Procedures guidelines were issued by Agronomy/Sustainability Dept and amended to tailor to the situation differences in the estates and mill. ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training. The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid boxes were available at various points in the estate office, workshop, and store. The estate distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops. Records of all accidents are kept and filed. Details as described in 6.7.5. |
| | 6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. | Yes | The mill and estates issued PPE to its employees for their protection at workplace. Records of PPE 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 & PPE. Acknowledgement of receipt was recorded. Based on the HIRARC carried out at the estates and mill the PPE types for the various activities has been identified and implemented. |
| | 6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law. | Yes | All workers of both the Estate and Mill in the Jeroco 2 CU were provided with medical care and covered by accident insurance. The insurance coverage for both local and foreign workers were covered by SOCSO. Medical services provided by Batangan Estate clinic. Cases requiring severe attention will be referred to the district health office and Lahad Datu Hospital. |
| | 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. 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. |

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 | Potential pests, thresholds for each pest that require chemical and biological techniques to control pests, minimization of pesticide use and review of plans are illustrated in the IPM plan. Census of pests are made on a monthly basis and the Pests and Diseases Report (Early Warning System). Pest management includes the management of rats, bagworms, nettle caterpillars, rhinoceros beetles and Ganoderma. For bagworm control, the program includes the planting of beneficial plants such as <i>Cassia cobanensis, Antigonan leptopus and Turnera subulata</i> and for Rhinoceros beetles by using pheromone traps. The Main pest in the estate was rats. Other pests such as bagworms, nettle caterpillars, rhinoceros beetles and Ganoderma are occasionally encountered. Currently chemical treatment is only applied for rats. Rat baiting campaigns are immediately made when the damage of crop by rats is above threshold level 2 %. Baiting was carried out until acceptance level dropped to <1%. The latest round of Rat baiting was carried in June 2023 where the maximum bait placement required was for 4 rounds and minimum was 2 rounds, For control of bagworms, Beneficial plants are planted according to the plan. |
| | 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 pest. 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 environment. | 7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized. | Yes | Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in Estates HSPHB's Oil Palm Agricultural Policy (OPAP) Manual. The Manual had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. The Estates had maintained chemical registers and were updated periodically. |
| | 7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area | Yes | The estate 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) per ha. |

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| Clause | Indicators | Comply Yes/No | Findings |
|--------|---|------------------|---|
| | treated, amount of active ingredients applied per ha and number of applications) are provided. | | 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. b) All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class III & class IV pesticides. c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estate. Variation of chemical usage are 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. |
| | 7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. | Yes | Kapis Estate continued to minimise the usage of agrochemicals by implementing IPM. Blanket spraying was not practiced 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). |
| | 7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. | Yes | Kapis Estate does not practice the prophylactic use of pesticides. The was no evidence to show otherwise and this was confirmed by workers and staff during the interviews |
| | 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 | The estate 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. a) 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. b) 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. This was also confirmed with worker and staff. c) Kapis Estate has 300 liters of class 1A chemical, Methamidophos (Enforce) that are kept in a separate locked room with proper ventilation. The chemical had been used for treating bagworm outbreaks in 2013. Chemical being kept in event of fresh outbreak in the estates. Regulatory requirement for the purchase in 2013 was sighted and complied. |
| | 7.2.5a Judgment of the threat and verify why this is a major threat. | Yes | 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. | Yes | |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|---|------------------|--|
| | 7.2.5c Which process was applied to verify why there is no other less hazardous alternative. | Yes | 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. |
| | 7.2.5d What is the process to limit the negative impacts of the application. | Yes | |
| | 7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. | Yes | |
| | 7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. | Yes | Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product. a) The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they understood the hazards involved and how the chemicals should be handled in a safe method. b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit. c) 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 | On Kapis Estate all pesticides were stored in accordance with the legal requirement, in compliance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and Regulations as well 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 chemical store was well ventilated and equipped with exhaust fans. All chemicals were arranged/segregated according to the type. In the fertilizer store, fertilizers were well stacked. The Chemical store is equipped with shower, 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. 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. |

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| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|--|
| | 7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes. | Yes | 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 Scheduled Wastes (Hazardous Waste). Presently all SW are dispatched to licensed buyers. 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 was not practised on Kapis Estate. There was no evidence to show that such a method had been/being used. This was also confirmed through interviews with executives, field staffs and workers |
| | 7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. | Yes | Medical surveillance as proposed in the CHRA was performed by an OHD Chong Clinic. The results for the entire team were declared FIT to handle chemical. The management in addition made medical examination for the pesticide operator - fertilizer applicator and rat baiting application for precautionary measures for the workers though not indicated in the CHRA. |
| | 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 | Kapis Estate complied with the procedure and guidelines provided in the SOP whereby <i>no work with pesticides is given to pregnant or breast-feeding women. The Statement was as follows - Pihak majikan tidak akan membenarkan sebarang pekerjaan melibatkan atau mengendalikan racun perosak yang dilakukan oleh orang di bawah usia 18 tahun, Wanita hamil atau Wanita yang menyusukan anak atau orang lain yang mempunyai masalah kesihatan.</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 estate and in compliance. |
| 7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially | 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 | Jeroco 2 CU has established the EIA-management action plan and continuous improvement plan- <i>List of Waste generated and management plan Plan.</i> The purpose of the Plan is to avoid / reduce pollution emerging as results of the estate and mill activities. The procedures and guidelines were used to guide the waste disposal activities and to reduce pollution on the routine operation. |
| responsible | 7.3.2 Proper disposal of waste | Yes | The waste management and disposal plan to avoid or reduce pollution had been documented and Page 54 of 85 |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|--|
| manner. | material, according to procedures that are fully understood by workers and managers, is demonstrated. | | implemented as discussed in Indicator 5.1.3 above. Procedures and guidelines were used to guide the waste disposal activities and to reduce pollution in the routine operation. Disposal of empty pesticide containers was carried out as per established procedures. Triple rinsing was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal also to the same SW collector. |
| | 7.3.3 The unit of certification does not use open fire for waste disposal. | Yes | During site visit at Kapis Estate and Jeroco 2 POM, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Jeroco 2 CU have been disposed via landfill. |
| 7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield. | 7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. | Yes | Kapis Estate adopted established manuals and standard operating procedures among others as listed below for the day-to-day operations. The maintaining of soil fertility was guided by its HSPHB's OPAP manual in the following chapters among others; Establishment and Maintenance of Legume Cover, Manuring, EFB Application, and Belt Press Solid application. 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 Manager. 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. Therein elaborating details on the nursery, immature, mature palm manuring type of fertilizers. Application of fertilizer timing and placement were also described. Other information includes sub-soil manuring, fertilizer sampling, and stacking of fertilizer in estate store. Rainfall data, yield trends, level of nutrients in the palm fronds, level of nutrients in the soil, total fertilizer application for each type of organic and inorganic fertilizers are monitored on a monthly basis. There is continuity in the data obtained and utilized for analysis. |
| | 7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health. | Yes | Kapis Estate continued to carry out annual foliar and soil analysis. The analysis was carried out by Hap Seng Plantations (River Estates) Sdn Bhd – Plantations Central Laboratory. These records were compiled and issued from the Agronomy Dept. Foliar sampling is conducted on an annual basis for Ash, N, P, K, Mg, Ca, S, B, Cu & Zn. On Kapis Estate it was conducted in July 2022. 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 Fertilizer Recommendation. |
| | 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. 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. |
| | 7.4.4 Records of fertiliser inputs are maintained. | Yes | Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were |

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| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|--|
| 7.5 Practices minimise and control erosion and degradation of soils. | 7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available. | Yes | reviewed by auditors. Kapis Estate has a soil map dated in Dec 2020 prepared by Agronomy Department of Hap Seng Plantation Holdings Berhad detailing their soil profile including marginal and fragile soils. Image: Kapis Estate Ha % 1 Kretam 1185.38 44.21 2 Kinabatangan 165.97 6.19 3 Lungmanis 114.10 4.26 4 Rumidi 205.71 7.67 5 Lokan 1009.84 37.67 Total 2681.00 100.00 Kapis Estate has a slope map dated Jan 2016 prepared by Agronomy Department of Hap Seng Plantation Holdings Berhad detailing the slope and steep areas within the estate. There is no area above 25°. The topography details are as follows: <tb colspan="2"> <tb colspan="2"> A fore-25° 1.89 2 6°-10° 278.34 5 >25° 0.00 3 11°-15° 26.84 - - - Total - - 2681.00 - -</tb></tb> |
| | 7.5.2 No replanting on steep slopes (above 25 degress) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification. | Yes | There is no replanting on steep terrains. 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. The cover crop <i>mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. |
| | 7.5.3 There is no new planting of oil palm on steep terrain. | Yes | There was no New Planting observed in Kapis Estate. This was as per HSPHB policy "Slope and River <i>Protection</i> " signed by the CEO dated Jan 2015 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly". It was also confirmed by Executives, Staff and Workers during interviews. |

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|------------------|---|
| Soil surveys and topographic information are used for site planning in the establishment of | 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 | This is not applicable to Kapis Estate as there is no new plantings as mentioned in indicator 7.5.3. |
| new plantings, and the results are incorporated into plans and operations. | 7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. | Yes | This is not applicable to Kapis Estate as there is no new plantings as mentioned in indicator 7.5.3 |
| | 7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. | Yes | This is not applicable to Kapis Estate as there is no new plantings as mentioned in indicator 7.5.3 |
| 7.7 No new planting on peat, regardless of | 7.7.1 (C) There is no new planting on peat regardless of depth after 15/11/2018 in existing and new dev. areas. | Yes | As per the soil map dated in Dec 2020 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 Kapis Estate. This was also confirmed during Field visits and by interviewed Executives, Staff and Workers. |
| depth after 15 November 2018 and all peatlands are managed responsibly. | 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. | Yes | |
| | 7.7.3 (C) Subsidence of peat is monitored, documented and minimised. | Yes | |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|---|------------------|---|
| | 7.7.4 (C) A documented water | Yes | As per the soil map dated in Dec 2020 prepared by Agronomy Department of Hap Seng Plantation |
| | and ground cover management | | Holdings Berhad detailing their soil profile including marginal and fragile soils, there is no Peat Soil in |
| | programme is in place. | | Kapis Estate. This was also confirmed during Field visits and by interviewed Executives, Staff and Workers. |
| | 7.7.5 (C) For plantations planted | Yes | WOIKEIS. |
| | on peat, drainability | | |
| | assessments are conducted | | |
| | following the RSPO Drainability | | |
| | Assessment Procedure, or other | | |
| | RSPO recognised methods, at | | |
| | least five years prior to | | |
| | replanting. The assessment | | |
| | result is used to set the | | |
| | timeframe for future replanting, | | |
| | as well as for phasing out of oil | | |
| | palm cultivation at least 40 | | |
| | years, or two cycles, whichever | | |
| | is greater, before reaching the natural gravity drainability limit | | |
| | for peat. When oil palm is | | |
| | phased out, it ii is replaced with | | |
| | crops suitable for a higher water | | |
| | table (paludiculture) or | | |
| | rehabilitated with natural | | |
| | vegetation. | | |
| | This is subject to transitional (5 | | |
| | years: 2019 to 2025) | | |
| | arrangement stated in the | | |
| | Drainability Assessment | | |
| | Procedure. Within 12 months | | |
| | initial implementation period, | | |
| | company could submit other | | |
| | alternate methodologies to be | | |
| | considered by RSPO for | | |
| | recognition. | | |
| | 7.7.6 (C) All existing plantings on | Yes | |
| | peat are managed according to | | |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|--|
| | the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance. | | |
| | 7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance. | Yes | As above. |
| 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 | Water management plan at all the sampled mill and estates were in place and implemented as verified through records of Water Management Plan FY 2023 updated. Generally, the plan was established to focus on minimizing waste and pollution prevention of water sources. Among the action plans are rainwater harvesting, monitoring of pipeline leakage, and establishment of buffer zones at rivers and other water bodies. Workers of all the sampled estates have adequate access to clean water which were supplied through water treatment plant. |
| | 7.8.1b Workers have adequate access to clean water.7.8.2 (C) Water courses and wetlands are protected, including | Yes | Treated water analysis for J2POM & Kapis Estate were supplied through a water treatment plan located at JPOM. Analysis of treated water has been carried out 6 monthly basis intervals. Visit at block 9803/04 at Kapis Estate was sighted all the riparian zone were maintained and natural grasses were left along the riparian zone |
| | maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO | | |

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| Clause | Indicators | Comply Yes/No | | | Findings | | | |
|--|--|------------------|--|---|--------------------|--|--|--|
| | 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 Biochemical Oxygen Demand (BOD), is regularly monitored. | Yes | Effluent license renewal application for year 2023 and letter from DOE was sighted. An Effluent Treatment Plant (ETP) is available at Jeroco 2 POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum mill capacity per hour is 30mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through waterways. However, currently all the final discharged has been channeled to biogas plan. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. Among the parameters required by the DOE to be monitored are bio-oxygen demand (BOD), suspended solid (SS), oil and grease (O&G), ammoniacal nitrogen (AN) total nitrogen (TN), pH and temperature. The results of analysis were submitted to the DOE on a quarterly basis. All parameters were within the regulatory limit such as BOD discharged to land irrigation was not more than 20 mg/l. | | | | | |
| | 7.8.4 Mill water use per tonne of FFB is monitored and recorded. | Yes | | obtained from water c continued to be monito | | ne mill. The water usage per tonne of fresh 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 | 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: Generator-Regular servicing of the generator set for smooth running of engine and prevent excessive emission of greenhouse gas Vehicles – set up a schedule the usage of fuels and monitor it at 3 times per week basis. drivers are required to inspect their vehicle on daily basis | | | | | |
| 7.10 Plans to reduce | 7.10.1 (C) GHG emissions are identified and assessed for the | Yes | . The input data was | verified and the follow | ring were determin | ied: | | |
| pollution and emissions, | unit of certification. Plans to reduce or minimise them are | | Description | tCO ₂ e/tProduct | | | | |
| including | implemented, monitored through | | CPO | 1.30 | | | | |
| greenhouse gases (GHG), are | the Palm GHG calculator and publicly reported. | | PK 1.30 | | | | | |
| developed, implemented and | | | Land Use Ha | | | | | |
| monitored and | | | OP Planted Area 10082.21 | | | | | |
| new developments are designed to | | | OP Planted on Peat 0.00 | | | | | |
| minimise GHG | | | Conservation (fore: | sted) | 0.00 | | | |

| Clause | Indicators | Comply Yes/No | Findings | | | | | |
|------------|------------|------------------|------------------------------|----------------|----------|------------|-----------|--|
| emissions. | | | Conservation (non-forested) | | 166. |)4 | | |
| | | | |) | | | | |
| | | | Milling extraction rate: | | | | | |
| | | | OER | 19.3 | 32 | | | |
| | | | KER | 5.4 | 0 | | | |
| | | | | | | | | |
| | | | Mill Emission | | | | _ | |
| | | | | Own Cro | | | | |
| | | | Emission source | | tCO2e | tCO2e/tFFB | | |
| | | | POME | | 5902.26 | | - | |
| | | | Fuel consumption | | 157.26 | | | |
| | | | Grid electricity utilisation | n | 0.00 | 0.00 | | |
| | | | Credits | | | | | |
| | | | Export of excess e | electricity to | 0.00 | 0.00 | | |
| | | | housing & grid | | | | - | |
| | | | Sale of PKS | | 0.00 | | | |
| | | | Sale of EFB | | 0.00 | | | |
| | | | Total | | 6059.51 | 0.17 | J | |
| | | | Plantation / field emissior | n | | | | |
| | | | | | Own Crop | | | |
| | | | Emission sources | | tCO2e | tCO2e/ha | tCO2e/FFB | |
| | | | Land Conversion | | 989.7 | | 0.44 | |
| | | | *CO2 Emissions from F | ertiliser | 52.5 | | 0.02 | |
| | | | **N2O Emissions from I | Fertiliser | 78.2 | 0 0.02 | 0.04 | |
| | | | Fuel Consumption | | 37.5 | 5 0.01 | 0.02 | |
| | | | Peat Oxidation | | 0.0 | 0 0.00 | 0.00 | |
| | | | Sinks | | | | | |
| | | | Crop Sequestration | | -795.7 | 4 -0.15 | -0.36 | |
| | | | Conservation Sequestration | | 0.0 | 0.00 | 0.00 | |
| | | | Total | | 362.3 | 5 0.07 | 0.16 | |
| | | | | | | | | |

| Clause | Indicators | Comply Yes/No | Findings | |
|--|--|------------------|--|--|
| | | | Palm Oil Mill Effluent (POME) Treatment | |
| | | | Diverted to compost | 0% |
| | | | Diverted to anaerobic digestion | 100% |
| | | | Diverted to Anaerobic Digestion | |
| | | | Diverted to anaerobic pond | 0% |
| | | | Diverted to methane capture (flaring) | 24% |
| | | | Diverted to methane capture (electricity generation) | 75% |
| | 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 <u>www.globalfores</u> also through site visit to the sampled estates areas. Basiconfirmed that there was no new planting or new develop GHG Assessment Procedure for New Development was not | ed on the observation during the audit, it is ment of areas at J2POM CU. Hence, RSPO |
| | 7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. | Yes | The Environmental Aspect Impact Assessment and Polluti GHG emissions. Some of the Greenhouse Gas emissi Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consum- minimize them are in place. Jeroco 2 CU also plans to reduce methane gas generated from the Effluent Treatment PI electricity for mill and domestic use. Mitigation measure of as per pollution prevention plan to avoid negative impa inspection at replanting area Kapis Estate, sighted diesel/lub | ons are through Land Conversation, Crop mption, Peat Oxidation. Plans to reduce or ce GHG via Biogas plant at J1POM to capture ant to generate biogas engine to produce leakage or spillage of chemical/oil implement ct to the environmental issues. During site pricant/hydraulic drum contain by metal trays. |
| 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 | Jeroco 2 CU complied with the strict Zero Burning Polic Environment & Biodiversity. There was no evidence to show replanting the 2017 replant visited in Kapis Estate during t were felled, shredded, windrowed, and left to decompos HSPHB Estates. | by in Sustainability Agricultural Policy under that fire had been used for preparing land for he audit. It was also observed that all palms |
| | 7.11.2 The unit of certification establishes fire prevention and | Yes | Jeroco 2 CU had established fire prevention and contra management. Fire emergency procedures were availab | |

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|------------------|--|
| | control measures for the areas under its direct management. | | 'Emergency Response' plan–updated Jan 2020 Kapis Estate and Jeroco 2 mill. Important telephone contact numbers were also provided therein. Procedures guidelines were issued by Agronomy Dept and amended to tailor to the situation differences in the estates and mills. In the mill, there were water hydrants and valid fire extinguishers at the various operating stations. Kapis Estate had valid fire extinguishers at the office, worker's quarters, chemical & fertiliser stores, diesel skid tank, etc. |
| | 7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures. | Yes | During external stakeholder meeting in May 2023, that was carried out at Jeroco 2 CU, all stakeholders including neighbour was briefed on 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 Carbon Stock | 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 15/11/2018 has not damaged HCVs or HCS forests. A historic LUCA is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance doc. | Yes | No new land clearing since Nov 2015 evidenced at Jeroco 2 CU, thus this Indicator was not Applicable. |
| (HCS) forest. HCVs and HCS forests in the | 7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows: | Yes | Report on "High Conservation Value Area and Biodiversity Assessment Report" for Kapis Estate and Jeroco Palm Oil Mill 2 (JGOE 2) was available. The report of "Potential High Conservation Value Area Assessment Report of Kapis Estate and Jeroco POM 2" was also made available to the auditor. It was |
| managed area are identified and protected or enhanced. | 7.12.2a For existing plantations with an HCV assessment conducted by an RSPO- approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. | Yes | noted that the report was prepared by the Sustainable Unit of Hap Seng. Based on the assessment, there was no identified RTE at Kapis estate. Kapis Estate had identified a significant HVC4 which the estate has controlled and maintained the river buffer zone for Sg. Kretam Besar (Sg Simpang Kanan). The total HCV area is 29.20 ha. |
| | 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- | Yes | |

| Clause | Indicators | Comply Yes/No | Findings |
|--------|---|------------------|---|
| Clause | HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. 7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other | | Kapis estate has established HCV action plan for Sg Kretam Besar (Sg Simpang Kanan) river titled 'Potential HCV areas Management Action Plans'. The estate planned to maintain the riparian reserve by: Prohibiting the cutting down of the tree at the area, Prohibiting of manuring and spraying operation at the riparian reserve area Workers are constantly informed not to encroach into the riparian reserve and disturb the area Periodic visit to the riparian reserve to monitor any illegal activities Sighted records showed that the HCV integrated management plan at Jeroco 2 CU was developed with consultation with relevant stakeholders. Visits conducted to HCV sites in Blocks 9722 & 9636 to check on |
| | conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). | | indiscriminate spraying, monitor for illegal activities, monitor housing area for any capture of protected wildlife, and continuation of buffer zone maintenance activities found no unacceptable activities. The SOU had 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 following the action plan. Auditor has verified records of consultations with relevant stakeholders regarding the developed HCV management plan, includes the directly managed area and any relevant wider landscape level considerations (where these are identified) were discussed and recorded in minutes of the meeting held at Kapis Estate and updated into the management plan, includes the directly managed area and any relevant wider landscape level stakeholders regarding the developed HCV management plan, includes the directly management plan. Records of consultation with relevant stakeholders regarding the developed HCV management plan, includes the directly management plan. Records of consultation with relevant stakeholders regarding the developed HCV management plan, includes the directly managed area and any relevant wider landscape level considerations (where these are identified) were sufficient to identify the HCV Issue. |
| | 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 | Yes | There were no local communities living nearby with Jeroco 2 CU. So, this indicator was not applicable with this CU. |

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| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|------------------|--|
| | management of these conservation areas. | | |
| | 7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. | Yes | Jeroco 2 CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying is not allowed within buffer area at the Sg. Kretam Besar (Sg Simpang Kanan). It was noted that CCTV was placed at a strategic area surrounding the estate to control everything including any illegal activities. CCTV is in operation 24hours. |
| | 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 | As above. The monitoring activities was recorded in the HCV & RTE Monthly Checklist January- June 2023. |
| | 7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. | Yes | Auditors has verified through checking through <u>www.globalforestwatch.com</u> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that there has been no land clearing at Jeroco 2 CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply. |

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

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|------------------|---|
| 5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills. | (a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat. | | HSP was committed towards getting the 100% RSPO certification. The target year for certification was revised to 2025 (as in ACOP 2022). Pelipikan, Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). The timebound plan to achieve 100% RSPO proposed to be extended to 2025 after seek advice from RSPO Compensation Section/Integrity Unit on 11/04/2022 since HSP still have 3 estates are undergoing compensation procedure On date 11/04/2022 to discuss on the Concept Note (Northbank Estate/Tabin Estate) and LUCA (Pelipikan Estate) A meeting was held at the RSPO office with RSPO Compensation Manager Ms Khing Su Li to discuss on the revise of Concept Note. HSP have response after the meeting by providing updated Concept Note and documents on 01/03/2021. Meanwhile, based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest S/B) there was no clearance of primary forest at Pelipikan Estate. However, there were land clearings made in May 2006, September 2010 and February 2011. Whereas clearing was made without HCV assessment. HSP received the reviewer's comment on the LUCA and concept note and latest replied on 07/05/2023 |
| | (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; | | There were changes to the current time bound plan to be extended to 2025 after seek advice from RSPO Compensation Section/Integrity Unit on 11/042022 also sighted submission on ACOP on date 15/05/2023. |
| | (c) Any revision to the time-bound pla or to the circumstances of the company shall cause the time- | n Yes | The details of the Time Bound Plan 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 |

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| | | bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent); | | Time Bound Plan described as per attachment/revision in the TBP. |
|--|-----|---|-----|--|
| | (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 | The details of the Time Bound Plan 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. As of this audit and Verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan |
| 5.5.3 Requirements for uncertified management units: | (a) | No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB; | Yes | Assessment of compliance to RSPO Partial Certification Requirements was conducted in Northbank and Tabin Estate on 08-09/03/2021 and for Pelipikan Estate on 07-08/10/2020. From the assessment, the status of the uncertified management unit was summarized as follows: <u>Northbank and Tabin Estate</u> a) HCV Assessment at Northbank and Tabin Estate has been conducted in year 2013 and completed the report on 20 November 2013. b) Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). The timebound plan to achieve 100% RSPO proposed to be extended to 2025 after seek advice from RSPO Compensation Section/Integrity Unit on 11/04/2022. Pelipikan Estate 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 and latest replied on 07/05/2023 |

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| (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 | The latest internal assessment has been made to Northbank (3- 4/08/2022) and Tabin Estate (1-2/08/2022) and for Pelipikan Estate on 1- 3/03/2023: Assessment conduct by third parties was carried out through MSPO audit by Control union on date (07-14/10/2022)and Pelipikan (14-16/06/2023) <u>Northbank and Tabin Estate</u> Land conflicts are still under court case. Please refer Hap Seng Plantations 2018 Annual Report – refer page 115 (b) <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) |
|-----|---|-----|--|
| (c) | Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2; | Yes | The latest internal assessment has been made to Northbank (3- 4/08/2022) and Tabin Estate (1-2/08/2022) and for Pelipikan Estate on 1- 3/03/2023: Assessment conduct by third parties was carried out through MSPO audit by Control union on date (07-14/10/2022) and Pelipikan (14- 16/06/2023) <u>Northbank and Tabin Estate</u> JCC meeting with stakeholder which include local communities was conducted on 18/05/2023. The result of the meeting had no significant negative impact by the local community. <u>Pelipikan Estate</u> There was no labour dispute reported during JCC with stakeholder meeting conducted on 03/05/2023. Overall, no negative impacts. |

| (e) The audit team shall assess compliance with these rules at each assessment of compliance applicable management units. Yes Based on the latest internal assessment arried out in 2022 and 2023, the progress of the certification was concluded as non-compliance against 4.5.4. (a-d) on new planting requirement, HCV, legal compliance and labour disputes for Tabin, Northbank and Pelipikan Estate. With regards to the land disputes, the action to address the issues were on- going. with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach. This would team basessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; evidence of the self-assessment against each requirement; consultation, including consultation, including consultation of field inspection, assessing the risk of any non- compliance with the requirements. Yes • If necessary, the audit team may decide on further stakeholder Yes • If necessary, the audit team may decide on further stakeholder Yes • If necessary, the audit team may decide on further stakeholder Yes | (d) | Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1; | Yes | The latest internal assessment has been made to Northbank (1-2/8/22) and Tabin Estate (3-4/8/22) on and for Pelipikan Estate on 1-3/3/23, there was no issue on legal non-compliance for all uncertified unit. |
|--|-----|---|-----|--|
| | | The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach: A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. Desktop study e.g. web check on relevant complaints If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the | Yes | against 4.5.4. (a-d) on new planting requirement, HCV, legal compliance and labour disputes for Tabin, Northbank and Pelipikan Estate. With regards to the land disputes, the action to address the issues were ongoing. It was evident that in handling uncertified management unit has conducted the Joint Consultation Committee to address unresolved issues. Actions in progress. Further information can be obtained from https://document.rspo.org/2022/Hap_Seng_Plantations_Holdings_Bhd_A COP2022.pdf As of this audit Hap Seng Plantations still on track and follow the requirement of uncertified requirement units, Further information can be obtained from https://document.rspo.org/2022/Hap_Seng_Plantations_Holdings_Bhd_A COP2022.pdf. 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 |

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| 5.6.6 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements. | No additional indicators | Yes | Evidence of legal ownership of the land including history of land tenure was verified during this audit. For Kapis Estate the land was previous owned by Sabah Land Development and Jeroco Plantations Sdn Bhd has buy and develop the land in 01/01/1980. As reported in 4.4.1 of this checklist, it has been verified that the land is now The audit team has also interviewed relevant stakeholder such as the IOI Plantation, Harus Abadi Sdn Bhd, First Raintree Sdn Bhd, Bukit Kretam Sdn Bhd, Casem Sdn Bhd, Sangi Enterprise Sdn Bhd, LKM Trading, Lebijaya Sdn Bhd. From the interviews, it can be concluded that there was no evidence of any land dispute at Jeroco 2 CU |
|--|--------------------------|-----|--|
| The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit. | | | |
| The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle. | | | |

ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

| P & C Indicator | Specification Major/Minor | Detail Non-conformances | Root Cause & Corrective Action Taken by the CU | Verification Statement by Auditors |
|---------------------|------------------------------|--|---|---|
| 3.4.2 RZ 01 2023 | Minor | Finding: The Social Impact Assessment, Management Action Plans and Continuous Improvement Plans for Jeroco Group of Estates and Jeroco Palm Oil Mills 1 & 2, reviewed on 10/07/2023 have not been developed with participation of affected Indonesian workers whose dependents remain to be legalized. Objective evidence: Affected Indonesian workers Jeroco 2 Palm Oil Mill have not been developed with participation of Indonesian workers whose dependents have not and/or could not be legalised. This has resulted in the CU not being able to identify as a social impact, the worry and concern and the affected workers have on the subject of dependants' immigration status. | Root cause: This is due to Mill Management misunderstanding that the legalization of Indonesian workers/dependents is under employee's responsibility. Hence, the 2023 review of Social Impact Assessment, Management Plans and Continues Improvement Plans for JGOE/JPOM 1 & 2 have not been developed with participation of affected Indonesian workers whose dependents remain to be legalized. Corrective Action: JGOE/JPOM 1 & 2 will develop the Social Impact Assessment, Management Plans & Continues Improvement Plans with participation of affected Indonesian workers whose dependents remain to be legalized. Sustainability Team will guide JGOE/JPOM 1 & 2 to develop the future Social Impact Assessment, Management Plans & Continues Improvement Plans with participation of affected Indonesian workers whose dependents remain to be legalized. | Root cause accepted. Sighted statement made by sustainability team to ensure all the list of dependents not yet legalize will be monitor and include in the SIA action plan Status: open, corrective action plan accepted, the effectiveness of the implementation will be verified during next audit. |

| 6.2.3 RZ 02 2023 | Major | Kapis Estate Objective ev (Workers No creche befor gate and doo the day. The the working of tidy up the o | who worked r ridence: Two b. 74559 and e the arrival o or, turn on the workers woul day after the creche, mop The following | creche worker 70910) would of the first child, lights and get t d also leave the departure of the up the floor and are the record |) creche workers at 's per day. 's at Kapis Estate daily arrive at the to open the creche he creche ready for creche at the end of last child, so as to ensure its general ds of the children's | No. 74559 and 70910) misunderstood the requirement of overtime, which was only applicable if they exceeded minimum one hour work against time of start/time of finish work. At the same time, both workers also misunderstood their working timetable. Accordingly, both of them have different working time. | Root cause accepted. Sighted an evidence training has been conducted to both Creche workers on date 15/07/2023.the details of working time as per below: -workers 1: 5am-1pm (rest time: 10- 10:30) -workers 2: 6am-2pm (rest time11- 11:30am) A training evaluation was conducted to ensure the workers understood their working timetable and requirement on working overtime. CU | |
|---------------------|-------|--|---|--|--|--|---|--|
| | | Date (2023) | Arrival of 1 st child | Departure of last child | Total hours at creche | creche worker to ensure they only working 8 hours per day without overtime and the | also includes training for creche workers in the annual training | |
| | | 13 July | 0500 hrs | 1409 hrs | >9 hours | briefing on the roster was explained immediately to the creche worker on 15 th July 2023. | program to ensure continuous understanding and refreshers for the workers. | |
| | | 12 July | 0501 hrs | 1409 hrs | >9 hours | The Sustainability Team will monthly cross- | Status: closed | |
| | | 11 July | 0459 hrs | 1414 hrs | >9 hours | check the working hours of creche workers (with record) as per estate roster. | | |
| | | 14 June | 0504 hrs | 1349 hrs | >8 hours | | | |
| | | 16 June | 0503 hrs | 1356 hrs | >8 hours | | | |
| | | 22 June | 0500 hrs | 1350 hrs | >8 hours | | | |
| | | 26 June | 0504 hrs | 1349 hrs | >8 hours | | | |
| | | 27 June | 0501 hrs | 1356 hrs | >8 hours | | | |
| | | respective pa | ay slips for Ju t overtime w | ne and July 202 | upon reviewing their 3, no evidence was creche workers' for | | 1e 73 of 85 | |

| 3.8.11 RAR 01 2023 | Major | Finding: The mill does not inform the CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products. Objective evidence: 1 outsource transporter Hai Heng Enterprise Sdn Bhd. for CPO sea transportation has been used by J2POM. The outsource transporter started handling physical products (CPO) in month of May 2022. However, the names and contact details of the contractor not been provided to the CB. | Root cause: JPOM2 Management misunderstanding that Hai Heng Enterprise Sdn Bhd is an old contractor (who is physical handling of RSPO certified oil palm products) as per Addendum Agreement (dated 17th January 2018) and not need to notify/inform Certification Body Corrective Action: Sustainability Team to yearly audit JPOM2 to ensure mill management to notify/inform Certification Body for any new contractor used by Hap Seng Plantations Holdings Berhad for handling RSPO certified oil palm products. | Root cause accepted. The Sustainability Team has immediately notified/informed the Certification Body on 15 th July 2023 regarding the name and contact details of outsource transportation (Hai Heng Enterprise Sdn Bhd) that has been used by Jeroco Palm Oil Mill 2 to handling RSPO certified oil palm products. Jeroco 2 also has include the training programmed for ensure all the requirement SCCS including the newly used contractor in the annual training programmed. For year 2023 training will be conducted on month October 2023. |
|-----------------------|-------|--|---|---|
| | | | | Status: closed |

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

| P & C Indicator | Specification Major/Minor | Detail Non-conformances | Verification by Assessor |
|----------------------|------------------------------|---|--|
| 3.3.1 MRS 01 2022 | Major | Requirement: 3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place. Finding: Standard Operating Procedures (SOP) for the unit of certification was not in line with current RSPO P&C MYNI e.g.: -SOP Employment for recruiting foreign workers via walk in process was not documented and available. -SOP Employment for recruiting foreign workers via agent/quota basis was not clear to ensure zero recruitment fees. 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 & 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. | It was verified during this Recertification Audit that the Standard Operating Procedure was revised on 16/08/2022. Paragraph B of the revised SOP now includes recruitment procedures for foreign workers (walk-in) and Paragraph C includes recruitment of foreign workers (fresh worker supplied by agency). A specific clause under Paragraph C also states that no recruitment cost should be paid by the worker. It was also verified during the recertification audit that the revised procedure is being implemented during the recruitments of the following new workers from Indonesia: Kapis Estate: Workers No. 74903, 63916, 74559, 70824. Jeroco 2 POM: Worker No. 87661. |
| 6.1.5 MRS 02 2022 | Major | Requirement: 6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. Finding: Opportunities and improvements for women were not addressed during Gender Committee meeting. Objective evidence: There was no discussion or plan during Gender Committee meeting for year 2022 at Jeroco POM 2 and Kapis Estate which highlighted on the opportunities and improvements for | It was verified during this recertification audit that Gender Committee meetings at JPOM2 (dated 03/02/2023 and 26/06/2023) and at Kapis Estate (dated 16/06/2023) discussed sexual harassment threats, how to lodge a complaint, briefing on pregnant women's welfare, child care, mental health support for mothers, the need for medical treatment during and after birth, importance of ensuring health of mother and child, entitlement to paid maternity leave, and prohibition against working in high risk areas during pregnancy |

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| | | women to enhance their knowledge and economy as verified in the minutes of meeting dated 17/06/2022 at Kapis Estate and 21/03/2022 at Jeroco 2 POM. Only cooking activity and volleyball events were conducted to improve relationship among colleagues were mentioned in the minutes. | |
|---------------------|-------|---|--|
| 3.7.2 AB 01 2022 | Minor | Requirement 3.7.2 Records of training are maintained, where appropriate on an individual basis. Finding : The understanding/awareness of the tools keeping of high safety risk at the housing area is not being effectively briefed to the employees. Objective Evidence. Kapis Estate 15/07/2022 - Site visit to the workers housing area has observed that 2 harvesting pole/knife being kept leaning to a tree within vicinity of the housing compound Block C. The tools are being used for tree compound maintenance. Workers were unaware of the procedure/guideline in relation to such practices. | Record, photographs and attendance list of training conducted on 10/08/2022 at the store sighted. Records of month inspections sighted. At time of this audit no harvesting pole/knife was observed kept leaning on to trees during the visit to the housing area. |

ATTACHMENT 6 – Timebound Plan

HAP SENG PLANTATIONS HOLDINGS BERHAD TIME BOUND PLAN ON RSPO CERTIFICATION

| Name of the Unit of | Country | Name of the Mills and | Location | | oordinates nal degree) | Total Managed | Certification Status | Plan Year for |
|---|----------|-----------------------------|----------------------------|---------------------|---------------------------|------------------|--------------------------------|---------------|
| Certification (UoC) | country | Supply Bases | Address | Latitude | Longitude | Area (Ha) | (Certified / Not certified) | Certification |
| Hap Seng Plantations (River Estates) Sdn Bhd – Sg Segama Group of Estate | Malaysia | Bukit Mas Palm Oil Mill | | 5°20'14.2 81"N | 118°28'25.104"E | N/A | Certified | |
| Bukit Mas Palm Oil Mill | Malaysia | Sungai Segama Estate | Locked Bag No.05, 91109 | 5°19'02.4 21"N | 118°27'47.331"E | 5,174.00 | Certified | |
| | Malaysia | Bukit Mas Estate | Lahad Datu, Sabah | 5°19'01.9 28"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 | | 5° 25'52.002"N | 118°25'02.005"E | N/A | Certified | |
| Jeroco Palm Oil Mill 1 | Malaysia | Lokan Estate | Locked Bag No.05, | 5° 25' 51.800" N | 118°22'57.804"E | 3,155.39 | Certified | |
| | Malaysia | Lutong Estate | 91109 Lahad Datu Sabah | 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, | 5° 25' 52.002" N | 118°25'02.005"E | N/A | Certified | |
| Jeroco Palm Oil Mill 2 | Malaysia | Kapis Estate | 91109 Lahad Datu Sabah | 5° 26' 34.303" N | 118°24'51.001"E | 2,681.00 | Certified | |
| Hap Seng Plantations | Malaysia | Tomanggong Palm Oil Mill | Locked Bag | 5°25' 38.3" N | 118°39' 33.5" E | N/A | Certified | |
| (River Estates) Sdn Bhd – | Malaysia | Tomanggong Estate | No.05, | 5°24' 01.9" N | 11 8°39' 51.7" E | 2,654.80 | Certified | |
| Tomanggong Group of Estates | Malaysia | Litang Estate | 91109 Lahad Datu Sabah | 5°19' 31.6" N | 118°34' 28.3"E | 2,648.62 | Certified | |

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| | Malaysia | Tagas Estate | | 5°21' 47.3" N | 118°38' 14.2"E | 2,212.33 | Certified | |
|--------------------------------|----------|--|---|---------------|-----------------|------------|---------------|------|
| Pelipikan Estate | Malaysia | NOT APPLICABLE – No mills at Pelipikan Estate | Locked Bag No.30 89109, Kota Marudu, Sabah | N/A | N/A | N/A | N/A | |
| | Malaysia | Pelipikan Estate | | 6°21'37.600"N | 116°48'04.900"E | 2,091.61 | Not Certified | 2025 |
| Hap Seng Plantations | Malaysia | Tabin Estate | Kinabatangan District | 5°22'47.204"N | 118°42'16.700"E | 2,235.3000 | Not Certified | 2025 |
| Tomanggong Group of Estates | Malaysia | Northbank Estate | | 5°26'06.605"N | 118°39'16.700"E | 2,578.9100 | Not Certified | 2025 |

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 a new update on Pelipikan Estate, Tabin and Northbank Estate, but hasn't got the approval from RSPO yet. A nonconformance has been raised during the audit at sister mill.

ATTACHMENT 7 – Stakeholder listing (Recertification)

| 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 : <u>mpoa.Sabah@email.com</u> | 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:Norfedileh@mpob.gov ,my | H/P No. 03- 78022851 Fax No. 03-780322303- 78033533 | |
| | 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 Kinabalau Sabah. E-mail address: <u>Florenciado@gov.mv</u> | 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 : aliudin@doe.gov.my | |
| 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: pas@s gov.my | Tel No. 088-283283 Fax : 088-239046 | |

| 7 | lbu 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 | lbu Pejabat Polis Kontinjen Sabah (Kota Kinabalu) | DSP Mohammad Bin Taib (Bahagian Pentadbiran) 016-8036628 | lbu Pejabat Polis Kontinjen Sabah, Pol is Di Raja Malaysia, Beg Berkunci No2062, 88560 Kota Kinabalu, Sabah E-mail address: cpo.sabah@rmp.gov.my | Tel No. 088-253555 Fax No. 088-240475 Tel. 088-454125 – Cik Suria (Bagian Perlesenan) |
| 9 | lbu Pejabat Polis Daerah Lahad Datu | Mansor | Ketua Polis Daerah, Ibu Pejabat Daerah, Peti Surat 60133, Poskod 91100, Lahad Datu, Sabah kpdlahaddatu@rmp.gov.my | Tel. No. 089-881255 Fax No. 089-882633 |
| 10 | lbu 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: kpdkkinabatangan@rmp.gov.my | 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. Pbldatu@mohr.gov.my | Tel No. 089-881 623 Fax No. 089-880623 |
| 12 | Pejabat Tenaga Kerja Kota Kinabatangan | Rosmi/En. Berry bin | Pejabat Tenaga Kerja, Lot 5 & 6 Blok E, Bangunan Perkasa Reality, Jalan Majlis Daerah, WDT 120, 90200 Kota Kinabatangan, Sabah. Itkbkkbtgn@mohr.gov.com. My | Tel. No. 089-561967 Fax No. 089-561027 |
| 13 | lbu 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: <u>itknsabah@mohr.gov.my</u> | Tel. No. 088- 238755 Fax No. 088- 242445 |

| 14 | Suruhanjaya Tenaga | En. Mohd Yusrul 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 |
|----|--|--|--|--|
| | 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- 886090/091/092/88 7 Fax. 089-886099 Web. <u>www.kpdnhep.gov.</u> <u>my</u> |
| | Department of Safety and Health (Kota Kinabalu) | En. Zukifli Bin Yahaya | Jabatan Keselamatan dan Kesihatan Perkerjaan Sabah/W.Labuan (Kementerian Sumber Manusia), Tingkat 1, Sayap Kanan, Wisma Perkeso, No. 11, Lorong Sempelang, P.O. Box 60, 88585 Tanjung Aru, Kota Kinabalu, Sabah. Email; <u>kkpsb@mohr.gov.my</u> Email: <u>zulkifii_y@mohr.gov.my</u> | Tel: 088-235855/ 230855-253576 |
| 17 | Department of Safety and Health (Cawangan Sandakan) | Pn.Siti Hawa Binti Sadek | Jabatan Keselamatan dan Kesihatan Perkerjaan Sandakan Email : sitihawasadek@mohr.gov.my | Tel : 010-4474631 <u>Tel:089-672059</u> |
| | 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, singga point, peti surat 61224, 91121 Lahad Datu. | Tel. No. 089-863736 |
| 20 | Lahad Datu Forestry Department | Datuk Hussin Sukiman | Kota Kinabalu DistricForest stry office, WDT No.14 Bukit Garam 90200, Kota Kinabalu, Sabah. | Tel. No 089-242500 |
| | 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 : <u>xba3143@moe.edu.my</u> | 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 | Philiphine Embassy, Kuala Lumpur, Malaysia | Bernard Bonina Social Welfare Attache | No.1 Changkat Kia Peng, 50450, Kuala Lumpur, Malasysia | Tel: +(6023) 2148 4233 |

NEIGHBOURING ESTATES

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

| · | <u> </u> | 1 | 1 | |
|----|---|----------------------------|--|---------------------------------------|
| 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. Sainuddn Yunus | Kg. Paris, WDT 72, 90200 Kota Kinabatangan | H/P No. 011-4858045 |
| 41 | Morisem 5 | Mr. Mohd Zain Massarapi | | 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 | Mr. Fredinand Lobinsiu | WWF Lahad Datu Field | Tel. No. 089-886376/ 089- | - |
| | (WWF) (Lahad Datu) | | Office, Forest Restoration, | 886377 | |
| | | | MDLD 6575,1 st Floor, Lot | Fax No. 089-886378 | |
| | | | 9, Block Airport Plaza, | | |
| | | | 91100 Lahad Datu | | |
| 43 | Humana School | | Humana School | H/P No. 014-5632284 | |
| | | Abdullah | Jeroco Group of Estates, | | |
| | | | Lahad Datu, Sabah | | |
| | | 2. En. Faizal | | H/P No. 013-8778620 | |
| 44 | Kementerian Pendidikan dan | En. Ferry Budy Arifiyanto | 1.No. 6, jalan 3B, KKIP | H/P No. 019-4603291 | |
| | Kebudayaan Sekolah Indonesia | | Selatan Dua, 88460, Kota | | |
| | Kota Kinabalu (CLC) | | Kinabalu, Sabah Malaysia | | |
| | | Cik. Desi Nuri Komariyah | 2.Community Learning | H/P No. 6282113876064 | |
| | | | Centre SMP Jeroco, Jeroco | | |
| | | | Plantations Sdn. Bhd, | | |
| | | | Locked Bag No.19, 91109 | | |
| | | | Lahad Datu. | | |
| 45 | Bulan Sabit Merah Malaysia | Mdm Josie | Cabang Sandakan Peti | Tel No. 089-212852 | |
| | Malaysian Red Crescent Sandakan | | Surat 766, 90708 | Fax No. 089-212852 | |
| | Chapte | | Sandakab Sabah | | |
| | | | Email: | | |
| | | | Office@sdk.redcrescent.m | | |
| | | | ¥ | | |

| | INTERNAL STAKEH | IOLDERS | | | |
|----|---------------------------------|---|---------------------------------------|---------------------|---------|
| No | Department/ Company Name | Contact Person | Address | Contact Number | Remarks |
| 46 | Plantation Central Office | Mr. Peter Liew Chi Kiaw | Locked Bag No.05, | Tel. No.089-278128 | |
| | | | 91109 Lahad Datu | /089-278138 | |
| | | | Sabah | Fax No. 089-278186 | |
| | | | E-mail address: | 089-278168 | |
| | | | peterliewck@hapseng. | | |
| | | | Com | | |
| 47 | Hap Seng Trading (BM) Sdn Bhd | Mr. Johnny Lim | 2713, Jalan Bahagia, | Tel. No. 089-774682 | |
| | hap seng hadning (bivi) san bha | contraction of the second s | P.O. Box No. 240 | 101.110.000 774002 | |
| 48 | Hap Seng (Oil & Transport) Sdn. | Mr. Johnny Lim | MDLD 2714, Batu 2 1/2 J | | |
| 40 | Bhd | Will Sommy Enn | Jalan Kastam Baru, | Tel. No. 088-270899 | |
| | bhu | | P.O Box 61283. | Tel. NO. 088-270855 | |
| | | | 91121 Lahad Datu | | |
| 10 | the one for the original plat | | | T-1 No. 000 000017 | |
| 49 | Hap Seng Fertilizers Sdn. Bhd. | Mr. So Chon Seng | Batu 2 Jalan Kastam Baru, | Tel. No. 089-882017 | |
| | | | P.O Box No. 61064 91119 Lahad Datu | | |
| | | | | | |
| | | | Sabah. | | |
| 50 | Bukit Mas Palm Oil Mill | Sr. Mill Manager, | Locked Bag No.05, | Tel. No. 089-954683 | |
| | | En. Samsudin Bennu | 91109 Lahad Datu | Fax No. 089-954678 | |
| | | | Sabah | | |
| | | | | - 1 | |
| 51 | Sg Segama Estate | Estate Manager, | Locked Bag No.05, | Tel. No. 089-954668 | |
| | | Mr. Chung Yu Fei | 91109 Lahad Datu | | |
| | | | Sabah | | |
| 52 | Bukit Mas Estate | Sr. Estate Manager. | Locked Bag No.05, | Tel. No. 089-954668 | |
| | | En. Sabaruding Utoh | 91109 Lahad Datu | | |
| | | | Sabah | | |
| 53 | Jeroco Palm Oil Mill 1 | Sr Mill Manager, | Locked Bag No.05, | Tel. No 089-843888 | |
| 20 | | Mr. Lee Soon Yung | 91109 Lahad Datu | Fax No. 089-954826 | |
| | | | Sabah | | |
| 54 | Jeroco Palm Oil Mill 2 | Mill Manager, | Locked Bag No.05, | Tel. No. 089-954887 | |
| | | En. Jumansha Abd Rahman | | Fax No. 089-954826 | |
| | | | Sabah | | |
| | | | | | |
| 55 | Batangan Estate | Sr. General Manager, | Locked Bag No.05, | T-1 No. 000 05 4000 | |
| | | Mr. Daniel Lo Kyun Kong | 91109 Lahad Datu | Tel. No. 089-954822 | |
| | | | Sabah | | |
| | | | E-mail: | | |
| | | | igoegm@hapseng.com | | |
| 56 | Lutong Estate | Deputy Manager, | Locked Bag No.05, | Tel. No. 089-954878 | |
| | | Mr. Pang Yun Chieh | 91109 Lahad Datu | | |
| | | | Sabah | | |
| 57 | Kapis Estate | Deputy Manager. | Locked Bag No.05. | Tel. No. 089-954828 | |
| | | | 91109 Lahad Datu | | |
| | | | Sabah | | |
| | 1 | | Suburi | | |

| 58 | Lokan Estate | Deputy Manager, Mr. Timothy Majail | Locked 91109 | Bag Lahad | No.05, Datu | Tel. No. 089-954868 | |
|----|--|---------------------------------------|-------------------|------------------|----------------|--|--|
| | | | Sabah | | | | |
| 59 | Batangan Estate | Deputy Manager, | Locked | Bag | No.05, | Tel. No. 089-954822 | |
| | | En. Amboaka B. Bacho | 91109 | Lahad | Datu | | |
| | | | Sabah | | | | |
| 60 | Lungmanis Estate | Estate Manager, | Locked | Bag | No.05, | Tel. No. 089-954878 | |
| | | En. Nordin b. Teppo | 91109 | Lahad | Datu | | |
| | | | Sabah | | | | |
| 61 | TMGOE | Deputy General Manager, | Locked B | | | Tel. No. 089-954-831 | |
| | | En. Herman B. Lasaung | 91109 | Lahad | Datu | Fax No. 089-954 832 | |
| | | | Sabah | | | | |
| 62 | Litang Estate | Estate Manager, | Locked B | - | | Tel. No. 089-954827 | |
| | | Mr. Maurice Ignatius | 91109 | Lahad | Datu | Fax No. 089-954 832 | |
| | | Sundagit | Sabah | | | | |
| ~~ | | | | | - | 7 L N. 000 074000 | |
| 63 | Tagas Estate | En. Cendrawadi B. Usup | Locked E 91109 | ag No.U Lahad | 5, Datu | Tel. No. 089-954628 Fax No. 089-954 832 | |
| | | | Sabah | Lanad | Datu | Pax No. 089-954 852 | |
| 64 | Tabin Estate | Sr. Estate Manager, | Saban Locked E | an No. O | - | Tel. No. 089-954638 | |
| 04 | labin Estate | En. Mohd Tahir Salang | | Lahad | | Fax No. 089-954 832 | |
| | | En. Wond Tahir Salang | Sabah | Lanau | Datu | Pax NO. 089-954 852 | |
| 65 | Northbank Estate | En. Septianus Tahir | Locked B | ag No 0 | 5 | Tel. No. 089-954898 | |
| | | | 91109 | Lahad | | Fax No. 089-954288 | |
| | | | Sabah | | | | |
| 66 | Tomanggong Palm Oil Mill | En. Aaron Dahing | Locked E | ag No.0 | 5. | Tel. No. 089-954838 | |
| | | _ | 91109 | Lahad | Datu | Fax No. 089-954839 | |
| | | | Sabah | | | | |
| 67 | Ketua Agama Islam/Iman (Ldg | En. Mohammad Ali Bin | Locked | Bag | No.05, | Tel. No. 089-954822 | |
| | Batangan) | Кауа | 91109 | Lahad | Datu | | |
| | | | Sabah | | | | |
| 68 | Ketua Agama Kristian (Ldg | En. Jhonatan Tayo Yamson | Locked | Bag | No.05, | Tel. No. 089-954822 | |
| | Batangan) | | 91109 | Lahad | Datu | | |
| | | | Sabah | | | | |
| 69 | Ketua Wakil Pekerja | En. Mustamin Bin Ruha | Locked | Bag | No.05, | Tel. No. 089-954822 | |
| | (Ldg Batangan) | | 91109 | Lahad | Datu | | |
| | | | Sabah | | | | |
| 70 | Ketua Wanita (Ldg. Batangan) | Pn. Martam Binti Abd Muin | | Bag | No.05, | Tel. No. 089-954822 | |
| | | | 91109 | Lahad | Datu | | |
| | | | Sabah | _ | | | |
| 71 | Ketua Etnik Bugis (Ldg Batangan) | En. Mustamin Bin Ruha | Locked | Bag | No.05, | Tel. No. 089-954822 | |
| | | | 91109 | Lahad | Datu | | |
| | | | Sabah | | | T 11 000 05 1000 | |
| 72 | Ketua Etnik Timur <mark>(</mark> Ldg Batangan) | En. Yasinta Novari Kewa | Locked | Bag | No.05, | Tel. No. 089-954822 | |
| | | | 91109 | Lahad | Datu | | |
| | | | Sabah | | | | |

| Lutong) Ketua Agama (Non Muslim) Ldg Lutong) Wakil Pekerja (Ketua Kampung) Ldg Lutong) | Andreas Setim Abustang Marzuki | Locked Bag No.05, 91109 Lahad Datu | Tel No. 089-954878 |
|--|---|--|--|
| Lutong) Wakil Pekerja (Ketua Kampung) | | 91109 Lahad Datu | IEI NO. 089-954878 |
| Wakil Pekerja (Ketua Kampung) | Abustang Marzuki | | |
| | Abustang Marzuki | | |
| | Abustang Marzuki | Sabah | |
| Ldg Lutong) | in a second man card | Locked Bag No.05, | Tel No. 089-954878 |
| | | 91109 Lahad Datu | |
| | | Sabah | |
| Ketua Etnik Bugis (Ldg Lutong) | Abustang Marzuki | Locked Bag No.05, | Tel No. 089-954878 |
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| | | Sabah | |
| Ketua Etnik Timor (Ldg Lutong) | Arra Japarman | baban | Tel No. 089-954878 |
| | | Looked Rea No. 05 | Tel. No. 013-3376828 |
| Retua Etnik Bugis (Log Rapis) | En. Andy Ramang | | Tel. No. 015-5576828 |
| | | | |
| | | | |
| Ketua Etnik Timor (Ldg Kapis) | En. Johnn Amiruddin | u , | Tel. No. 011-36520042 |
| | | 91109 Lahad Datu | |
| | | Sabah | |
| Ketua Agama Islam/Imam (Ldg | En. Muhajirin Ambo Aso | Locked Bag No.05, | Tel. No. 011-4199962 |
| Kapis) | - | 91109 Lahad Datu | |
| | | Sabah | |
| Ketua Agama Kristian (I dg Kanis) | Pn. Pernatua Masi | Locked Bag No 05 | Tel. No: 011-33173648 |
| record regard to boot (cog rapis) | in respected mass | • · | |
| | | | |
| Katua Wakil Bakaria | En Manniero Sian | | Tel No. 014-3701746 |
| Ketua wakii Pekerja | En. Mappiere Sian | , | IEI. NO. 014-3701746 |
| | | | |
| | | o alo al l | |
| Ketua Wanita | Pn. Kasmawati Labenga | u , | Tel. No. 014-9989792 |
| | | | |
| | | Sabah | |
| Ketua Agama Islam/Imam (Ldg | Hamsah Raja | Locked Bag No.05, | H/P: 010-3726762 |
| Lokan) | | 91109 Lahad Datu | |
| | | Sabah | |
| Ketua Agama Kristian(Ldg Lokan) | Daniel Mage | Locked Bag No.05. | H/P:014-6764540 |
| | | 91109 Lahad Datu | |
| | | Sahah | |
| Ketua Wakil Pekeria(I dg Lokan) | Zaenal Marsan | | H/P: 014-9518791 |
| Netua wakii rekeija(Lug Lukali) | | | 191.014-5510/51 |
| | | | |
| | March Laborat | | 11/0-014 (220201 |
| Ketua wanita (Ldg Lokan) | Nani Johari | | H/P:014-6338391 |
| | | | |
| | | | |
| Ketua Etnik Bugis(Ldg Lokan) | Anca Amir | Locked Bag No.05, | H/P:011-33021758 |
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| | | Sabah | |
| Ketua Etnik Timor (Ldg Lokan) | Herianto Aloysius | Locked Bag No.05, | H/P:010-9581094 |
| | | 91109 Lahad Datu | - |
| | | Sabah | |
| | | | |
| | (apis) (etua Agama Kristian (Ldg Kapis) (etua Wakil Pekerja (etua Wanita (etua Agama Islam/Imam (Ldg Jokan) (etua Agama Kristian(Ldg Lokan) (etua Wakil Pekerja(Ldg Lokan) (etua Wanita (Ldg Lokan) | Ketua Etnik Timor (Ldg Kapis) En. Johnn Amiruddin Ketua Agama Islam/Imam (Ldg En. Muhajirin Ambo Aso Ketua Agama Kristian (Ldg Kapis) Pn. Perpatua Masi Ketua Wakil Pekerja En. Mappiere Sian Ketua Wanita Pn. Kasmawati Labenga Ketua Agama Islam/Imam (Ldg Hamsah Raja Ketua Agama Islam/Imam (Ldg Hamsah Raja Ketua Agama Kristian(Ldg Lokan) Daniel Mage Ketua Wakil Pekerja(Ldg Lokan) Zaenal Marsan Ketua Etnik Bugis(Ldg Lokan) Anca Amir | 91109 Lahad Datu Sabah Ketua Etnik Timor (Ldg Kapis) En. Johnn Amiruddin Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Agama Islam/Imam (Ldg En. Muhajirin Ambo Aso Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Agama Kristian (Ldg Kapis) Pn. Perpatua Masi Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Wakil Pekerja En. Mappiere Sian Ketua Wanita Pn. Kasmawati Labenga Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Wanita Pn. Kasmawati Labenga Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Agama Islam/Imam (Ldg Hamsah Raja Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Agama Kristian(Ldg Lokan) Daniel Mage Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Wakil Pekerja(Ldg Lokan) Daniel Mage Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Wakil Pekerja(Ldg Lokan) Zaenal Marsan Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Wanita (Ldg Lokan) Nani Johari Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Etnik Bugis(Ldg Lokan) Anca Amir Locked Bag No.05, 91109 Lahad Datu Sabah Ketua Etnik Bugis(Ldg Lokan) Anca Amir Locked Bag No.05, 91109 Lahad Datu Sabah |

| | | Alimun | | | |
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| | Ketua Agama (Non-Muslim) | Larry George | Lungmanis Estate | Tel.No 011-51530886 | |
| 92 | Wakil Pekerja (Ladang Lungmanis) | Muhammad Jabir Alimun | binLungmanis 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 A | li 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, | Tel No. 089-881326 | |
| 96 | Sheong Huat Trading Sdn Bhd | Mr. Ng Ket Fui | Lahad Datu Sabah 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 st 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 | 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 | |

| e Shun Food Supplies Sdn. Bhd. Ing Hwa | | | |
|--|--|--|---|
| ing Hwa | | l | |
| | Mr. Yung Ah Lok | P. O. Box 60347, | H/P No. 013-5558288 |
| | | 91112 Lahad Datu | |
| | Hendrikus Sabon Paulus | Jeroco Plantations Sdn. Bhd. | H/P No. 010-9311465 |
| tangan Estate (Kretam) | Ola | Locked Bag No. 19. | ., |
| tangan Estate (netani) | | 91109 Lahad Datu, Sabah | |
| | | STICS Lanau Datu, Saban | |
| Catananian | Adam Tenne Dui Livere | Jeroco Plantations Sdn. Bhd. | U/D No. 012 2007049 |
| ng Enterprise | Mdm Tang Pui Hung | | |
| tangan Estate | (Fong Syn Kiong | Locked Bag No. 19, | H/P No. 012-8016716 |
| | | 91109 Lahad Datu, Sabah | |
| rusahaan Lutong Baru | Fong Syn Fook | Jeroco Plantations Sdn. Bhd. | H/P No. 012-8016716 |
| tong Estate | (Fong Syn Kiong) | Locked Bag No. 19, | |
| | | 91109 Lahad Datu, Sabah | |
| ng Enterprise | Ding Choo Tong | Jeroco Plantations Sdn. Bhd | H/P No. 019-8838482 |
| | bing choo long | | 1,1 110:010 0000 102 |
| Kan Estale | | | |
| | | attoa tanad Datu, Sabah | |
| L: d. p. | | | U/D NL 040 0500007 |
| | Rubin Chun Pau | | H/P NO. 010-9522667 |
| pis Estate | | - · | |
| | | 91109 Lahad Datu, Sabah | |
| ng Enterprise | Ding Choo Tong | Jeroco Plantations Sdn. Bhd. | H/P No. 019-8838482 |
| ngmanis Estate | | Locked Bag No. 19, | |
| 0 | | 91109 Jahad Datu, Sabah | |
| | | | |
| dafiat Sdn Bhd | Miss Amirah | lot 1 2 3 4 5 6 7 | Tel No. 088-437000 |
| adhac odh bha | | | 101110.000 407000 |
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| | | | |
| | | Off Tuaran Road | |
| | | 88300, Kota Kinabalu, | |
| | | Sabah. | |
| Balung Services Agency | Mr. Khoo Shin Hung | Tingkat Bawah, | Tel. No. 088- 887 409 |
| - | | Bangunan Faiar Centre. | |
| | | • • • | |
| | | Jalan Segama, | |
| | | • , | |
| | | 91100 Lahad Datu, Sabah | |
| 1 | Ms. Rosdiana Binti | Lot 26. Utama Zone 3 | |
| guh Niagamaju Sdn. Bhd | | | Tel. No. 089-673043/ |
| guh Niagamaju Sdn. Bhd | Marcus | Commercial, Mile 6, Labuk | 089-673141 |
| guh Niagamaju Sdn. Bhd | | | 089-673141 |
| | | Commercial, Mile 6, Labuk | 089-673141 |
| | Marcus | Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah | 089-673141 Fax No. 089-672646 |
| | Marcus | Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah P.O Box 8878, 46800 Petaling Jaya, | 089-673141 Fax No. 089-672646 |
| Chow Engineering Services | Marcus KP Chow | Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah P.O Box 8878, 46800 Petaling Jaya, Selangor | 089-673141 Fax No. 089-672646 H/P No. 03 7782 9892 |
| Chow Engineering Services | Marcus KP Chow | Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah P.O Box 8878, 46800 Petaling Jaya, Selangor MDLD 3823, Lot 85, | 089-673141 Fax No. 089-672646 H/P No. 03 7782 9892 Tel. No. 089-889028, |
| Chow Engineering Services | Marcus KP Chow | Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah P.O Box 8878, 46800 Petaling Jaya, Selangor MDLD 3823, Lot 85, Ground Floor, Fajar Centre, | 089-673141 Fax No. 089-672646 H/P No. 03 7782 9892 Tel. No. 089-889028, 089-889882, 089- |
| Chow Engineering Services | Marcus KP Chow | Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah P.O Box 8878, 46800 Petaling Jaya, Selangor MDLD 3823, Lot 85, Ground Floor, Fajar Centre, 91100 Lahad Datu. | 089-673141 Fax No. 089-672646 H/P No. 03 7782 9892 Tel. No. 089-889028, 089-889882, 089- 889086 |
| Chow Engineering Services ensi Pekerjaan Hollywood Sdn. d. | Marcus KP Chow Ms. Chin Lee Pui | Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah P.O Box 8878, 46800 Petaling Jaya, Selangor MDLD 3823, Lot 85, Ground Floor, Fajar Centre, 91100 Lahad Datu. Email : hollywoodldu | 089-673141 Fax No. 089-672646 H/P No. 03 7782 9892 Tel. No. 089-889028, 089-889882, 089- 889086 Fax No. 089-889654 |
| Chow Engineering Services ensi Pekerjaan Hollywood Sdn. d. | Marcus KP Chow | Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah P.O Box 8878, 46800 Petaling Jaya, Selangor MDLD 3823, Lot 85, Ground Floor, Fajar Centre, 91100 Lahad Datu. | 089-673141 Fax No. 089-672646 H/P No. 03 7782 9892 Tel. No. 089-889028, 089-889882, 089- 889086 |
| Chow Engineering Services ensi Pekerjaan Hollywood Sdn. d. | Marcus KP Chow Ms. Chin Lee Pui | Commercial, Mile 6, Labuk Road 90000 Sandakan, Sabah P.O Box 8878, 46800 Petaling Jaya, Selangor MDLD 3823, Lot 85, Ground Floor, Fajar Centre, 91100 Lahad Datu. Email : hollywoodldu | 089-673141 Fax No. 089-672646 H/P No. 03 7782 9892 Tel. No. 089-889028, 089-889882, 089- 889086 Fax No. 089-889654 |
| | ang Enterprise (an Estate) bin Chun Pau ois Estate ng Enterprise ngmanis Estate dafiat Sdn Bhd | tong Estate (Fong Syn Kiong) Ing Enterprise (an Estate Ding Choo Tong bin Chun Pau bis Estate Ding Choo Tong Ing Enterprise Ding Choo Tong Ingmanis Estate Ding Choo Tong Ingmanis Esta | Tusahaan Lutong Baru Fong Syn Fook Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah Sing Choo Tong Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah bin Chun Pau bis Estate Rubin Chun Pau Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah ing Enterprise rgmanis Estate Ding Choo Tong Jeroco Plantations Sdn. Bhd. ing Enterprise rgmanis Estate Ding Choo Tong Jeroco Plantations Sdn. Bhd. Locked Bag No. 19, 91109 Lahad Datu, Sabah Jeroco Plantations Sdn. Bhd. Idafiat Sdn Bhd Miss Amirah Lot 1, 2, 3, 4, 5, 6, 7 2 ^{rde} Floor, Block D Metro Town, Jalan Bunga Ulam Raja, Off Tuaran Road 88300, Kota Kinabalu, Sabah. Balung Services Agency Mr. Khoo Shin Hung Tingkat Bawah, Bangunan Fajar Centre, MDLD 3983, |

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

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| 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 [#] Floor Phase 38, Lorong 5, Sri Perdana, 91100 Lahad Datu, Sabah. Email : husadautama09@gmail. Com | 019-8631316 | |
| 120 | King Foh Enterprise | Mr. Yong King Foh | Jalan Tengah Nipah Batu 5. P.O Box 61690, 91128 Lahad Datu, Sabah. Email: wendyyong 5522@hotmail.com | | |
| 121 | Pemborong Rehan | Mr. Lawrence Chau | 1 st 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 ²¹ & 2 nd 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 | |

| | 1 | 1 | International advanta | 1 |
|-----|---------------------------------|----------------------------|-------------------------------------|-----------------------|
| | | | 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 | H/P No. 013-8883188 & |
| | | | Bintang. | 013-8921882 |
| | | | Mile 4, Jalan Sin On, | Fax No. 089-711936 |
| | | | P. O. Box No. 62452, | |
| | | | 91034 Tawau, Sabah. | |
| 124 | Power Com Enterprise Sdn. Bhd. | Mr. Liew Vun Leong | Block A4, Lot 26. | Tel. No. 089-201655 |
| 124 | rower com Enterprise oun. Drid. | Will Elew Vall Econg | 1 st Floor, Utama Place, | Fax No. 089-201655 |
| | | | Phase 2. Mile 5. | 142 100: 000 201000 |
| | | | 9000 Sandakan, Sabah. | |
| | | | , | |
| | | | Email: powercommentsb | |
| 105 | Demonstrated and a plat | the phillip is | @hotmail.com | T-1 N- 000 750054 |
| 125 | Permawin Sdn. Bhd. | Mr. Philip Low | TB10756, Lorong Megah | Tel. No. 089-752054 |
| | | | 4, | H/P No. 019-8331318 |
| | | | Taman Mehah Jaya, | Fax No. 089-753511 |
| | | | Miles 3.5 Apas Road, | |
| | | | Tawau, Sabah. | |
| 126 | Sinaran Jaya Baru | Mr. Leong Kwok Hing | P. O. Box No. 60056 | Tel. No. 089-887539 |
| | | | 91110 Lahad Datu, | |
| | | | Sabah. | |
| 127 | K&T (S) Enterprise | Mr. Tan Pui Ping | Mile 1½, SMK Agaseh | Tel. No. 089-866355 |
| | | | Road, | |
| | | | P.O. Box No. 61932, | |
| | | | 91127 Lahad Datu, Sabah | |
| | | | | |
| 128 | Yong Seng Co. | Mr. Kong Kim Yun | P. O. Box No. 60251, | H/P No. 016-8233344/ |
| | | _ | 91012 Tawau, Sabah. | 014-9577986 |
| 129 | Gemilang Jaya Contractor | Ms. Fong Siew Mee | P. O. Box 62407. | Tel. No. 089-911496 |
| | | | 91034 Tawau | Fax No. 089-911496 |
| 130 | TPM Enterprise | Mr. Siau Nyuk Tong | MDLD 0764. Lot 10 | H/P No. |
| 100 | in the enterprise | ivit. oldu reyak totig | Public Villa, 91100. | 019-8332262 |
| | | | Lahad Datu, Sabah. | Fax No. 089-886443 |
| | | | Lanau Datu, Saban. | Fax NO. 089-880445 |
| 101 | Svarikat Istimaiu | Mr. Teh Tuck Hing | MDLD 5115. | H/P No. 019-8966236 |
| 131 | Syarikat istimaju | wir. Ten Tuck Hing | , | H/P NO. 019-8966236 |
| | | | Lot 299, Lorong Taman | |
| | | | Aman Jaya, 91100 Lahad | |
| | | | Datu, Sabah. | |
| | | | | |
| 132 | Hap Seng Building Materials | En. Hilmi Hijazi Abd.Halim | | H/P No. 013-8815081 |
| | | | Plantations sdn Bhd. Mile45, | |
| | | | Jeroco Road 91109 | |
| | | | Lahad Datu, Sabah | |
| | | | Lim Engit Fun | H/P No. 016- 2061063/ |
| 133 | Lim Engit Fun Development | Lim Engit Fun | Lim Engil Fun | H/P NO. 010-2001003/ |

| | | K688, Lorong Indah Jaya 13, Taman Indah Jaya, Off Cecily Road Batu 4, 90000 Sandakan. | |
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| | | (Managing Director) | Lorong Margosa Dua, | 088-734853 | |
| | | Mr. Michael Liew | Luyang Ohase 8, Jalan | Fax No. 088-734855 | |
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| | | Director | off Lorong | | |
| | | | Buah Duku 1, | | |
| | | | Taman Perindustrian | | |
| | | | Suria, | | |
| | | | Jalan Kolombong, | | |
| | | | 88450 Kota Kinabalu, | | |
| | | | Sabah, | | |
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| 104 | united to the state of the state | Market Street and an | kk@chemsain.com | Tel. No. 013-6123555 | |
| 134 | Utlus Venture (M) Sdn Bhd | Mr. Vijaiyagaandan | No. 21 – 11 Centro | Tel. NO. 013-6123555 | |
| | | A/L Balakishnan/Mr. | | | |
| | | Pavitran Pillay A/L | Klang Malaysia. | | |
| | | Mohan | | | |