



**SIRIM QAS INTERNATIONAL SDN. BHD.**  
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Menteri, Section 2, 40700 Shah Alam, Selangor,  
Malaysia.

File Ref. :  
EH04760003

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : HAP SENG PLANTATIONS (RIVER ESTATES) SDN. BHD.**  
**PARENT COMPANY : HAP SENG PLANTATIONS HOLDINGS BERHAD**  
**RSPO MEMBERSHIP No. : 1-0098-11-000-00**

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Tomanggong CU	Tomanggong POM	5°25' 38.3" N	118°39' 33.5" E	Off 80 KM, Jalan Jeroco, 91109 Lahad Datu, Sabah, Malaysia.
	Tomanggong Estate	5°24' 01.9" N	118°39' 51.7" E	
	Tagas Estate	5°21' 47.3" N	118°38' 14.2" E	
	Litang Estate	5°19' 31.6" N	118°34' 28.3" E	

**MAP :** See Attachment 1

**AUDIT DATE :** 23 – 27 OCTOBER 2023

**DURATION :** 18 auditor days

**TYPE OF AUDIT :**  Annual Surveillance Audit No. 4  Recertification Audit

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

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

**VALIDITY OF RSPO CERTIFICATE :** 09/01/2020-08/01/2025 (RSPO PC 00114)

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

Non-conformity Report(s)  List of additional site(s)

**Report by Audit Team Leader**

**Acknowledgement by Client's Representative**

Name : ROZAIMEE BIN AB RAHMAN

Name : Kee Keow Chong

Signature :

Signature :

Date : 5/02/2024

Date : 9.2.24

**RSPO PUBLIC SUMMARY**

**SUMMARY OF AUDITS**

<b>Recertification Audit</b>			
On-site audit date	: 21 - 24 October 2019	No. of auditor days	: 16 days
Audit team	: Amir Bin Bahari, Rozaimée B Ab Rahman, Mohd Zulfakar B Kamaruzaman, Mohd Ab Raouf B Asis		
No. of major NCR	: 1	Indicator: 2.1.1	Closing date :30/12/2019
No. of minor NCR	: nil	Indicator : -	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local community
	√		√
	Contract workers	NGOs	Govt. agency
			√
	Indigenous people	Contractors	Others (Please specify)
	NA	√	
Supply base sampled	: Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate		
Changes since the last audit	: No changes except for the changes in no. of employees and stakeholders.		
Justification of audit planning	: Allocation 4-man days for each site units (estates) and as for POM 3-man days allocated for P&C auditing and 1 day for Supply Chain System. 4 auditors for 4 days.		
Name of peer reviewer	: Prof. Emeritus Dr. Jalani Sukaimi		
Report approved by	: Kamini Sooriamorthy	Approval date	: 24/01/2020

<b>Annual Surveillance Audit 1</b>			
On-site audit date	: 12-16 April 2021 (13 a.d)	No. of auditor days	: 18 Days
Remote audit date	: 16-18 November 2020 (5 a.d)		
Audit team	: Mohd Zulfakar Kamaruzaman (LA), Selvasingam T. Kandiah, Dzulfiqar Azmi, Rohazimi Mat Nawi (trainee auditor)		
No. of major NCR	: 2	Indicator: 3.8.9, 7.2.11	Closing date: 1/07/2021
No. of minor NCR	: -	Indicator : -	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers orgs.	Settlers	Villagers / Local communities
	√		√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
			√
	Indigenous people	Contractor	Others (Please specify)
	NA	√	
Supply base sampled	: Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate		
Changes since the last audit	: No changes		
Justification of audit planning	: Allocation of mandays during onsite: 3-man days for each site units (estates) and as for POM 4-man days allocated for P&C auditing and 1 day for Supply Chain System. 3 auditors for 4 days And, extra 1 days at POM for Supply Chain		
Name of peer reviewer	: NA		
Report approved by	: Kamini Sooriamorthy	Approval date	: 7/07/2021

## RSPO PUBLIC SUMMARY

<b>Annual Surveillance Audit 2</b>			
On-site audit date	: 29 Nov – 4 Dec 2021	No. of auditor days :	18 Days
Audit team	: Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar Kamaruzaman, Selvasingam T. Kandiah.		
No. of major NCR	: Nil	Indicator: N/A	Closing date: N/A
No. of minor NCR	: 2	Indicator : 3.3.2, 7.8.1	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers orgs.	Settlers	Villagers / Local communities
	√		√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
			√
	Indigenous people	Contractor	Others (Please specify)
	NA	√	
Supply base sampled	: Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate		
Changes since the last audit	: No changes		
Justification of audit planning	: Allocation of mandays during onsite: 4.5-man days for each site units (estates) and as for POM 3.5-man days allocated for P&C auditing and 1 day for Supply Chain System. 3 auditors for 6 days.		
Name of peer reviewer	: NA		
Report approved by	: Kamini Sooriamorthy	Approval date: 4/1/2022	

<b>Annual Surveillance Audit 3</b>			
On-site audit date	: 25 – 28 October 2022	No. of auditor days:	18 auditor days
Audit team	: Dzulfihar Azmi (LA), Mohd Ab Raouf Asis, Mohd Zulfakar Kamaruzaman, Mohd Razman Salim, Amir Bahari.		
No. of major NCR	: 1	Indicator: 3.3.2 (Upgraded)	Closing date: 24/01/2023
No. of minor NCR	: 1	Indicator: 3.3.3	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities
	√	NA	√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	NA	NA	√
	Indigenous people	Contractor	Others (Please specify)
	NA	√	
Supply base sampled	: Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate		
Changes since the last audit	: No changes.		
Justification of audit planning	: Allocation of mandays during onsite: 4.5-man days for each site units (estates) and as for POM 3.5-man days allocated for P&C auditing and 1 day for Supply Chain System. 3 auditors for 6 days.		
Name of peer reviewer	: NA		
Report approved by	: Kamini Sooriamorthy	Approval date: 3/02/2023	

**RSPO PUBLIC SUMMARY**

<b>Annual Surveillance Audit 4</b>					
On-site audit date	:	23 – 27 OCTOBER 2023	No. of auditor days :	18	
Audit team	:	Rozaimée B Ab Rahman, Mohd Zulfakar B Kamaruzaman, Dzulfiqar Azmi, Nor Ezani Ahmad			
No. of major NCR	:	3	Indicator: 6.2.3, 7.8.2, 7.10.3	Closing date : 26/01/2024	
No. of minor NCR	:	1	Indicator :3.7.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		√	NA	√	√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		NA	NA	NA	√
		Indigenous people	Contractors	Others (Please specify)	
		NA	√		
Supply base sampled	:	Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate			
Changes since the last audit	:	No changes.			
Justification of audit planning	:	4.5-man days for each site units (estates) and as for POM 3.5-man days allocated for P&C auditing and 1 day for Supply Chain System.			
Name of peer reviewer	:	NA			
Report approved by	:	Kamini Sooriamoorthy	Approval date :	5/02/2024	

**RSPO PUBLIC SUMMARY**

**SUMMARY OF INFORMATION**

**TABLE 1**

	<b>STAGE 2 / RA</b>	<b>ASA 1</b>	<b>ASA 2</b>	<b>ASA 3</b>	<b>ASA 4</b>
<b>Projection Period / Reporting Period*</b>	Nov 2019- Oct 2020	*April 2021 – March 2022	**Oct 2021 – Sept 2022	***Oct 2022 – Sept 2023	Oct 2023 – Sept 2024
<b>Certified FFB Processed (MT)</b>	132,714.00	127,569.00	131,790.00	137,724.00	142,412.00
<b>Production of Certified CPO (MT)</b>	28,511.73	27,412.00	29,464.00	30,936.00	30,810.00
<b>Production of Certified PK (MT)</b>	5,730.23	5,620.00	6,272.00	6,615.00	6,841.00
<b>Certified Areas (Ha)</b>	7,515.75	7,515.75	7,515.75	7,515.75	7,515.75
<b>Planted Areas (Ha)</b>	6,900.70	6,900.70	6,900.70	6,900.70	6,900.70
<b>Production Areas (Ha)</b>	6,166.40	6,106.20	5,703.20	6,317.70	6317.70
<b>HCV Areas / Conservation Areas (Ha)</b>	125.64	125.64	125.64	125.64	125.64
<b>REMARKS</b>	-				

**TABLE 2**

	<b>PO</b>	<b>PK</b>
<b>**Last years certified volume (MT)</b>	30,936.00	6,615.00
<b>Last years actual certified sold (MT)</b>	0	217.89
<b>Last years actual sold under other schemes (MT)</b>	0	0
<b>Last years sold conventional (MT)</b>	1,093.25	0
<b>Last year actual sold CSPO credits (where applicable)</b>	0	0
<b>New year certified volume (MT)</b>	30,810.00	6,841.00

<b>Table of contents</b>	<b>Page</b>
1.0 AUDIT PROCESS	7
1.1 Certification body	7
1.2 Qualification of audit team	8
1.3 Audit methodology	8
1.4 Stakeholder consultation	10
1.5 Audit plan	10
1.6 Date of next audit	
2.0 SCOPE OF CERTIFICATION AUDIT	10
2.1 Description of the certification unit	10
2.2 Description of the Supply Base (including planting profile)	14
2.3 Organization Information / Contact Person(s)	
3.0 AUDIT FINDINGS	
3.1 Changes to certified products in accordance to the production of the previous year	15
3.2 Progress and changes in time bound plan	15
3.3. Other changes (e.g. organizational structure, new contact person, addresses, etc.)	15
3.4 Status of previous non-conformities * (refer to Attachment 5)	15
3.5 Complaint received from stakeholder (if any)	15
4.0 DETAILS OF NON-CONFORMITY REPORT	
4.1 For P&C (refer to Attachment 3)	16
4.2 For SC (refer to Attachment 3 – Supply Chain Requirements for Mills)	16
5.0 AUDIT CONCLUSION	16
6.0 RECOMMENDATION	16
List of Attachment	
Attachment 1 : Map of CU	18
Attachment 2 : RSPO Audit Plan	19
Attachment 3 : RSPO P&C Audit Checklist and Findings	24
Attachment 4 : Details of Non-conformities and Corrective Actions Taken	83
Attachment 5 : Status of Non-conformities Previously Identified	86
Attachment 6 : Time-bound Plan	88
Attachment 7 : List of Stakeholders (for Stage 2/Recertification Audit only)	NA

## RSPO PUBLIC SUMMARY

### 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
Rozaimiee Ab Rahman	Lead Auditor, Supply Chain, TBP, Metrics, 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.
Nor Ezani Ahmad	Auditor / Internal Social	Possessed M.Sc. in Advancement of Biodiversity and B.Sc. (Hons) in Conservation Biology from Universiti Malaysia Sabah. She had 3 years of working experience at a public listed oil palm plantation organization specializing in sustainability and auditing experience in HCVF and social issues in the oil palm operation since 2017. Successfully completed RSPO Lead Auditor, MSPO Lead Auditor, ISO9001, ISO45001, HCV Assessor and SA8000 courses.
Mohd Zulfakar Kamaruzaman	Auditor / Social (External), HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He had a certificate of Lead Assessor in ISO 9001, OHS 45001, ISO 4001 and qualified social Auditor under RSPO Training, attended the DLW training in 2022 and worker welfare training in 2021 which is conducted by RSPO. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Dzulfiqar Azmi	Auditor / safety, GAP	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is RSPO Lead Auditor since Oct. 2020.

## RSPO PUBLIC SUMMARY

### 1.3 Audit methodology

The audit covered Tomanggong POM and three of its supply bases, with 100% sampling. This is in accordance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The 3 supply-bases covered during the audit are Tomanggong Estate, Tagas Estate and Litang Estate. The audit included an on-site audit to the estates, mill and local communities' 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

The stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below.

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	Workers from Tomanggong CU was confirmed the following: <ol style="list-style-type: none"> <li>a) There is no gender racial or other forms of discrimination;</li> <li>b) Everyone is treated equally and receive the same amount of pay for the same type of work;</li> <li>c) They have their own worker representatives whom they have nominated and elected during muster;</li> <li>d) They are aware of what constitutes sexual harassment and there has been no incidence of sexual harassment;</li> <li>e) Wages are paid by cheque no later than 7<sup>th</sup> of the following month, and they cash it at the nearby grocery shops;</li> <li>f) They purchase daily necessities from the nearby grocery stores within the Estate and other estates within the Hap Seng Group;</li> <li>g) Comfortable housing is provided rent free and they only pay for electricity;</li> <li>h) Drinking water and electricity is available 24 hours per day;</li> <li>i) They are aware of complaints procedure, company policies of child labour; for the Indonesian workers, their children attend HUMANA or CLC schools</li> <li>j) Some Indonesian workers have dependants whom they have not obtained passports for. Some plan to do so in stages, under the collaborative programme carried out by management and the Indonesian Consulate.</li> </ol>
2) Settlers	Not applicable. There are no settlers within Tomanggong CU
3) Villagers / Local communities (including women representatives, displaced communities)	Not applicable. There are no villagers within Tomanggong CU
4) Suppliers	<ul style="list-style-type: none"> <li>▪ Tomanggong CU and supplier contract were signed by both parties. Suppliers would be contacted to supply hardware items as and when the need arises. This happens approximately once in two months for suppliers.</li> </ul>



**RSPO PUBLIC SUMMARY**

	<ul style="list-style-type: none"> <li>▪ Fair dealings with the units in Tomanggong CU.</li> <li>▪ Payments are made within 1 months of invoice.</li> </ul>
5) Contract workers (local / foreign / Orang Asli workers / male & female)	No contractors' workers employed.
6) Local & national NGOs	No issues were raised by local and national NGOs
7) Government agencies / Statutory bodies	No issues were raised by Government agencies / Statutory bodies.
8) Independent growers / Smallholders	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. Currently on progress for RSPO and MSPO certification is Lebijaya, Khoo Chin Hung, Bukit Kretam and LPC Plantation.
9) Indigenous people	Not applicable. There are no indigenous people living within or in vicinity of Tomanggong CU.
10) Contractor	1 outsource CPO transporter i.e. Hai Eng enterprise Sdn Bhd. For CPO sea transportation. There is a contract document between TPOM and the transporters (date 23/09/2021 – for 2 years period; January 2022 until December 2023). 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. Sighted contract agreement (contract extension) was given on 23/09/2021 and contract period 2 years (01/01/2022-31/12/2023). Training has been conducted on 13/05/2023 & 10/04/2023 by Mill engineer 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.
11) Previous land owner (if any)	The right to use the land at <i>Tomanggong</i> CU can be demonstrated and not disputed by any party. Assessor sighted that there were clear land ownership documents which is Hap Seng Plantations acquire/buy the land from Sabah State Government in 1895 -1969. Land titles were available in documents. The original copies of the documents however, were kept in Plantation Central Office, Sg. Segama. Copies of land titles for all estates were sighted. All the estates were under the jurisdiction of Kinabatangan District
12) Others (please specify)	Food facilities are managed by HSPB. Each complex having separate club / food facilities. Provision shop available at the estates visited. No issues raised on the pricing and services.

## RSPO PUBLIC SUMMARY

1.5 Audit plan : Refer to Attachment 2

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

### 2.0 SCOPE OF CERTIFICATION AUDIT

#### 2.1 Description of the certification unit

The Tomanggong Certification Unit (Tomanggong CU) is under the Hap Seng Plantations (River Estates) Sdn Bhd. which is a subsidiary of Hap Seng Plantations Holdings Bhd (HSPHB). The CU is located at Ladang Tomanggong Off 80 KM, Jalan Lahad Datu-Sandakan, Kinabatangan, Sabah, Malaysia.

The Tomanggong CU consists of Tomanggong Palm Oil Mill (TPOM) and five supply bases which 3 certified supply bases and 2 non-certified supply bases, namely the Tomanggong Estate, Litang Estate, Tagas Estate (certified), Tabin Estate and Northbank Estate (non-certified). A time bound plan had been established to include these two estates in the certification. The milling capacity of Tomanggong POM is 45 mt/hr.

Tomanggong CU have ISCC EU/MeSTI/Halal/HACCP/MSPO certification beside of RSPO P&C and Supply Chain.

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

The FFB is sourced from company owned estates of Tomanggong CU and independent suppliers, Northbank Estate and Tabin Estate which are still in the progress of being certified. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

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

**Table 1: Actual FFB production by the supply base for the last reporting period  
(October 2022 – September 2023)**

Supply bases	FFB Production	
	Tonnes	Percentage (%)
*Tomanggong Estate (Certified)	2,222.18	43.23
*Tagas Estate (Certified)	2,095.02	40.76
*Litang Estate (Certified)	772.51	15.03
<b>Total Certified Own</b>	<b>5,089.71</b>	
Spark Glory Sdn. Bhd. (Certified)	34.75	0.68
Bukit Kretam Sdn. Bhd. (Certified)	15.59	0.30
<b>Total Certified Outside</b>	<b>50.34</b>	
<b>Total Certified</b>	<b>5,140.05</b>	<b>100.00</b>
Northbank Estate (Non-Certified)	35,301.72	32.61
Tabin Estate (Non-Certified)	54,853.29	50.67
<b>Outside Crop (detail List) – Non-Certified</b>		
LPC Plantations Sdn. Bhd.	14,691.66	13.57
Khoo Chin Hung	1,458.85	1.35

## RSPO PUBLIC SUMMARY

Lim Engit Fun	643.00	0.59
Korporasi Pembangunan Desa	671.00	0.62
Bukit Kretam Sdn. Bhd.	502.62	0.46
Casem Sdn. Bhd.	4.14	0.00
Sangi Enterprise Sdn. Bhd.	24.30	0.02
Lebihjaya Sdn. Bhd.	115.73	0.11
<b>Total Non-certified</b>	<b>108,266.31</b>	<b>100.00</b>
<b>Overall Total FFB Production</b>	<b>113,406.36</b>	

## RSPO PUBLIC SUMMARY

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

Supply bases	FFB Production	
	Tonnes	Percentage (%)
Tomanggong Estate (Certified)	48,912.00	34.35
Tagas Estate (Certified)	38,400.00	26.96
Litang Estate (Certified)	55,100.00	38.69
<b>Total Certified</b>	<b>142,412.00</b>	<b>100.00</b>
Northbank Estate (Non-Certified)	48,290.00	32.62
Tabin Estate (Non-Certified)	75,400.00	50.91
<b>Outside Crop (detail List) – Non-Certified</b>		
LPC Plantations Sdn. Bhd.	19,460.00	13.14
Khoo Chin Hung	3,546.00	2.39
Lim Engit Fun	680.00	0.46
Korporasi Pembangunan Desa	686.00	0.46
Chin Hock Vui	28.00	0.02
<b>Total Non-certified</b>	<b>148,090.00</b>	<b>100.00</b>
<b>Overall Total FFB Production</b>	<b>290,502.00</b>	

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

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	113,406.36
FFB Processed	113,406.36
Certified FFB Processed	5,140.05
Non-certified FFB Processed	108,266.31
Crude Palm Oil (CPO)	
Overall CPO Production	24,358.23
Certified CPO Production	1,093.25
Certified CPO delivered as RSPO	0
Certified CPO delivered as non-RSPO	1,093.25
Certified CPO delivered under other sustainable schemes	0
Palm Kernel (PK)	
Overall PK Production	5,085.32
Certified PK Production	217.89
Certified PK delivered as RSPO	217.89
Certified PK delivered as non-RSPO	0
Certified CPO delivered under other sustainable schemes	0
Credits traded through Books and Claim	0

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

	Total (MT)
FFB Received	142,412.00
FFB Processed	142,412.00
CPO Production	30,810.00
PK Production	6,841.00

**RSPO PUBLIC SUMMARY**

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Tomanggong	2,407.00	2,654.80
Tagas	2,019.00	2,212.33
Litang	2,474.70	2,648.62
<b>Total</b>	<b>6,900.70</b>	<b>7,515.75</b>

Table 6 Planting profile for Tomanggong CU

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature &gt;3 years (Ha)</u>	<u>Immature &lt; 3 years(Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Tomanggong	1996	2nd	90.00	0.00	90.00	75.78	24.22
	1997	2nd	101.00	0.00	101.00		
	1998	1st	401.50	0.00	401.50		
	2014	2nd	143.00	0.00	143.00		
	2015	2nd	393.20	0.00	393.20		
	2016	2nd	352.00	0.00	352.00		
	2017	2nd	343.30	0.00	343.30		
	2020	3rd	0.00	180.00	180.00		
2021	3rd	0.00	403.00	403.00			
<b>Total Tomanggong Estate</b>			<b>1,824.00</b>	<b>583.00</b>	<b>2,407.00</b>		
Tagas	1994	1st	189.0	0.00	189.0	100.00	0.00
	1997	2nd	185.0	0.00	185.0		
	2000	2nd	668.0	0.00	668.0		
	2001	2nd	414.0	0.00	414.0		
	2004	2nd	234.5	0.00	234.5		
2006	2nd	328.5	0.00	328.5			
<b>Total Tagas Estate</b>			<b>2,019.00</b>	<b>0.00</b>	<b>2,019.00</b>		
Litang	1994	1s	397.9	0.00	397.9	100.00	0.00
	1997	1s	321.5	0.00	321.5		
	2011	2nd	236.0	0.00	236.0		
	2012	2nd	719.5	0.00	719.5		
	2015	2nd	146.3	0.00	146.3		
	2017	2nd	39.0	0.00	39.0		
2019	2nd	614.5	0.00	614.5			
<b>Total Litang Estate</b>			<b>2,474.70</b>	<b>0.00</b>	<b>2,474.70</b>		
<b>Sub Total</b>			<b>6,317.70</b>	<b>583.00</b>	<b>6,900.70</b>	<b>91.55</b>	<b>8.45</b>

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

The details of the contact person are as below:

Name	:	Kee Keow Chong
Position	:	General Manager – Agronomy
Address	:	Hap Seng Plantations (River Estates) Sdn. Bhd. Batu 2, Jalan Kastam Baru, 91119 Lahad Datu, Sabah, Malaysia.
Phone no.	:	089-278183 / 0195532412
Fax no.	:	089 278168 / 089 278186
Email	:	keekc@hapseng.com

## RSPO PUBLIC SUMMARY

### 3.0 AUDIT FINDINGS

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

No changes

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

- i. Have all the estates under the parent company been certified?  Yes  No

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

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

- ii. Are there any changes to the organization's time bound plan?  Yes  No

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

From year 2022 to 2025 as per approved by RSPO secretariat on date 21/09/2023

- iii. Are there associated smallholders (including scheme smallholders) in the CU  Yes  No

If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?  Yes  No

If no, please state reasons NA

- iv. Any new acquisition which has replaced primary forests or HCV areas  Yes  No

#### 3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.)

No changes

- 3.4 Status of previous non-conformities \*  Closed  Not closed\*

\* If not closed, minor non conformity will be upgraded to major non conformity

#### 3.5 Complaint received from stakeholder (if any)

No negative comment received during the stakeholder consultation carried out

## RSPO PUBLIC SUMMARY

### 4.0 DETAILS OF NON-CONFORMITY REPORT

4.1 For P&C (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s) List : **3.7.2**

Total no. of major NCR(s) List : **6.2.3, 7.8.2, 7.10.3**

4.2 For SC (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s) List :

Total no. of major NCR(s) List :

### 5.0 AUDIT CONCLUSION

The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

RSPO PUBLIC SUMMARY

6.0 RECOMMENDATION

- No NCR recorded. Recommended to continue certification.
- Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.  
*Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .*
- Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.
- Recommended to continue certification.
- Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

*Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.*

**7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON-CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.**

Audit Team Leader : ROZAIMEE BIN AB RAHMAN



26/01/2024

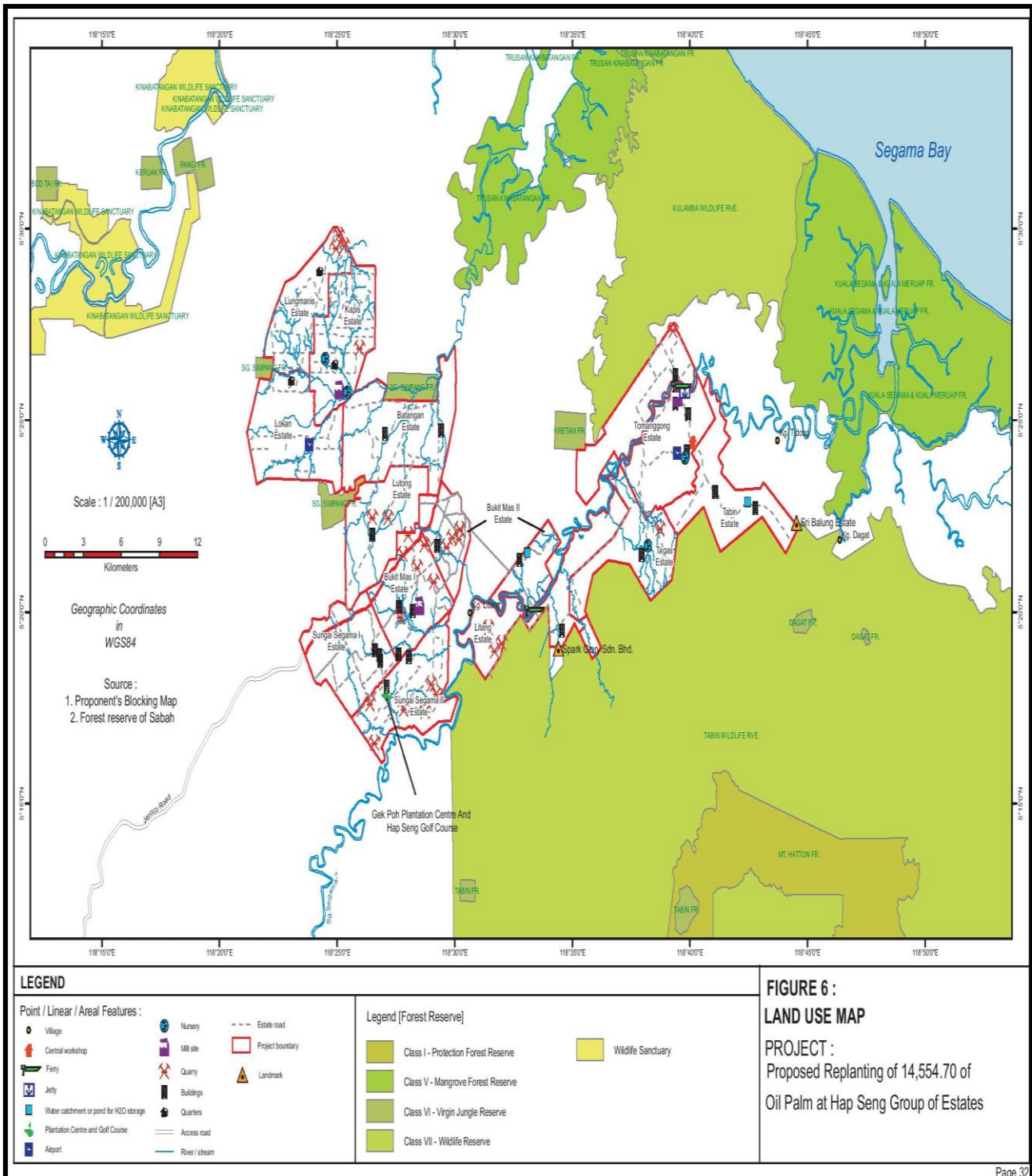
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(Name)

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(Signature)

\_\_\_\_\_  
(Date)



**Map of Tomanggong CU under Hap Seng Group of Estates**



**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 : 23 – 27 OCTOBER 2023**

**3. Site of assessment : Tomanggong Certification Unit:**

- Tomanggong POM
- Tomanggong Estate
- Tagas Estate
- Litang 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 : Rozaimée Bin Ab Rahman (RAR) – SCCS, GHG, metric template, TBP, Env

Auditor :

- Mohd Zulfakar Kamaruzaman (MZK) – Social External & HCV
- Nor Ezani Ahmad (NEA) – social internal
- Dzulfiqar Azmi (DA)- 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 non conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non conformities 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 non conformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major non conformities if the corrective actions are not satisfactory 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:

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

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

**Confidentiality Requirements**

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

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

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

**11. Reporting**

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

**12. Facilities Required**

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

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

**RSPO PUBLIC SUMMARY**

**Day one: 23/10/2023 (Monday)**

Time	Coverage of assessment / Activity / Site	MZK	RAR	DA	NEA
8.30am – 9.00am	Opening Meeting – Venue: <b>Decide by CU</b> 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.	/	/	/	/
9.00am – 12.30pm	<b>Site observation to Litang Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Land titles user rights</li> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,</li> <li>• New planting</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Site visit and assessment on Supply Chain Implementation</li> </ul>	/	/	/	/
12.30pm – 1.30pm	Lunch Break	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/

**Day two: 24/10/2023 (Tuesday)**

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

## RSPO PUBLIC SUMMARY

	mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. <ul style="list-style-type: none"> <li>• GHG Calculation</li> <li>• New planting</li> </ul>				
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### Day three: 25/10/2023 (Wednesday)

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

### Day four: 26/10/2023 (Thursday)

Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	DA	NEA
8.30am – 12.30pm	<b>Site observation to Tomanggong POM P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Land titles user rights</li> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the CU</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,</li> <li>• New planting</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Verification of SCCS</li> </ul>	/	/	/	/

## RSPO PUBLIC SUMMARY

12.30pm – 1.30pm	Lunch Break	/	/	/	/
1.30pm – 5.00pm	<ul style="list-style-type: none"> <li>• Continue assessment at respective sites</li> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> <li>• New planting</li> </ul>	/	/	/	/

### Day Five: 27/10/2023 (Friday)

Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	DA	NEA
8.30am – 10.00am	<p><b>Continue unfinished assessment (auditor will decide later)</b>  <b>P1, P2, P3, P4, P5, P6, P7</b></p> <ul style="list-style-type: none"> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> <li>• New planting</li> </ul>	/	/	/	/
10.00am – 11.00am	<ul style="list-style-type: none"> <li>• Audit Team Discussion</li> </ul>	/	/	/	/
11:00 am – 12 pm	<b>Closing meeting</b>	/	/	/	/

**RSPO PUBLIC SUMMARY**

**Attachment 3**

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

**Principle 1: Behave ethically and transparently**

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

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Tomanggong CU continues to use the internet to disseminate public information. Details concerning land titles, safety and health plans, pollution prevention plans, and the procedure for complaints and grievances are available on the Hap Seng Plantations Holdings Berhad website at <a href="http://www.hapsengplantation.com">http://www.hapsengplantation.com</a> .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The Tomanggong 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, <a href="http://www.hapsengplantation.com">http://www.hapsengplantation.com</a> to include all management documents relating to the unit's environmental, social and legal issues, with appropriate languages 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 estates and mill maintain records of communication and consultation with external and internal parties. This includes communication with DOSH, the Labour Department, the Immigration Department, the Department of Environment, suppliers, and their own workers. Comments by DOSH and DOE on mill and estate operations are recorded in the respective DOSH and DOE inspection books.
	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 estates and mill maintained to be followed and available at the audited sites. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Stakeholder list FY 2023 was established in both mill and estates with last updated in Sept 2023. Stakeholder such as internal stakeholder i.e., workers leader, women leader, ethnic leader and external stakeholders i.e., local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list.
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	Tomanggong 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 staffs and foreign/local workers during induction course. Briefing of the ABC Policy to all workers was conducted via morning muster/briefing.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
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 law and regulation. The overall ethical business practice was regularly monitored through the internal audit conducted by the HSP Sustainability Team and Consolidated Berhad (HQ Department). Based on the ABC Policy, it explains where to get guidance, raising a concern or reporting a violation. This is being brief to the worker during morning muster and internal/external stakeholder meeting.

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

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	It was evident that Tomanggong CU continue to comply with most of the applicable 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	Tomanggong CU had documented the List of Legal Register – Estates & Mills, covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. The Tomanggong CU had the mechanism for ensuring all the applicable legal requirements were implemented. The mechanism is by the implementation of internal checking by its Assistant In-Charge through evaluation of compliance exercise against the legal register. The evaluation was carried out on at Tomanggong CU.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	The estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/Boundary stones along the legal boundaries between was visibly available.
2.2 All contractors	2.2.1 A list of contracted parties is maintained.	YES	List of contractor parties were maintained at Estates and Mill at the Tomanggong CU. These were all maintained and updated accordingly.



**RSPO PUBLIC SUMMARY**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	In Tomanggong CU there is no contractor involved except for Sundry Shop, Budge contractor, sterilizer repairing, electrical/Biogas contractor, all their works are done through Hap Seng owned Machinery and materials. For Budge contractor sterilizer repairing, electrical/Biogas, Sighted, there is evidence that agreements with third parties contain clauses on meeting applicable requirements.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	There is evidence that agreements with third parties contain clauses on meeting applicable requirements.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins.</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul>	YES	The evidence of currently document is available in the 'Summary of Geo Location for FFB Supplier. At present the mill only possessed the valid MPOB licenses for all the directly source FFB as verified by the auditor.
	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 Tomanggong POM there is not indirectly source of FFB. All FFB are received direct from the suppliers.

## RSPO PUBLIC SUMMARY

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	<p>All the estates possessed a minimum of 5 years business plans. The estates expenditure components comprised of the following among others;</p> <ul style="list-style-type: none"> <li>i. Crop yielding area / Prime mature</li> <li>ii. upkeep, cultivation, harvesting &amp; evacuation,</li> <li>iii. Welfare, RSP/MSPO compliance, etc.</li> <li>iv. Crop projection, cost of production, yield statistics and performance, age profile</li> <li>v. Mature and immature cost/ha and cost/mt FFB.</li> <li>vi. Management expenses / professional fees / building / compound</li> <li>vii. Water and power / security/labour mobilization.</li> <li>viii. CAPEX Building/plant machinery/office equipment/motor vehicle attachments</li> <li>ix. water supply/Infrastructure.</li> </ul> <p>The component of the budget comprises of the following items;</p> <ul style="list-style-type: none"> <li>i. Labour statement / Allocation of wages</li> <li>ii. Labour benefit summary / Labour reconciliation</li> <li>iii. Yield statement oil palm</li> <li>iv. Summary of vehicle and running schedule</li> <li>v. Job allocation for vehicles / Summary of workshop running schedule.</li> <li>vi. Summary if budget / Summary of general charges</li> <li>vii. CAPEX, oil palm mature and young mature</li> </ul> <p>The projected FFB and the yield per hectare for the estates has been reviewed during audit.</p>
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	The replanting programs are documented in the “ <i>Replanting Programmed TGOE 2024-2028</i> ”. The latest revision being in accordance with a memorandum dated June 2023, issued by the General Manager of Agronomy. The revised replanting programme for the estate in the CU for the forthcoming five years was made available during the audit.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	<p>The Management Review was held in combination as a Group for the entire CU and complexes chaired by Senior General Manager - Group Plantations. The latest management review was carried out in Aug 2023 for Tomanggong Group. Minutes of meeting were sighted and verified. The agenda discussed among others includes the following.</p> <ul style="list-style-type: none"> <li>a) Follow up action from previous meeting</li> <li>b) Sustainability and adequacy of all SOPs</li> <li>c) Sustainable Agriculture Policy</li> <li>d) Results of internal audits</li> <li>e) Changes in legal requirements and compliance</li> <li>f) Changes that could affect management system</li> </ul>

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
			g) Complaint / Customer feedback h) Accident & injury (LTA) i) Environmental quality / waste management j) Energy usage performance k) Status of corrective actions l) Recommendation for improvement m) Resources needed.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	Plans and impact assessments relating to social and environmental impacts maintained available. The Tomanggong 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 & EIA action plan was updated and each of the issues was identified for each of the operating unit.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	RSPO metric template version 2.1 is used for the reporting of Tomanggong certification unit's metrics (economic, social and environment). Based on verification with input data, no discrepancies of data reported in the metrics for the period under review for all the operating units.
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 the mills and estates operations in the organization are guided by the Group Manuals and Standard Operating Procedure. The mill processing guidelines and standards are detailed via the Safe and Standard Operation Standard. Oil Palm Agriculture Policy (OPAP) is the manual used for the operations in the estate. Safe and Standard Operating Procedures is the Standard Operating Procedures used for the safety precautions for all operations in the estate and mill. Meanwhile, below SOPs noted maintained concerning social matters: <ul style="list-style-type: none"> <li>• Safe and Standard Operating Procedure for Sexual Harassment</li> <li>• Stakeholder Consultation Procedure – Group Level &amp; Estate/Mill Level</li> <li>• Grievance Procedure (Internal &amp; External)</li> <li>• Request for Information Procedure</li> <li>• Procedure Whistleblower</li> <li>• Standard Operating Procedure – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (local &amp; Foreign)</li> <li>• SOP – Managing COVID 19 in Plantation</li> </ul>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	The CU had an established mechanism to perform checking to ensure consistent implementation of procedures. The monitoring of the SOP implementation was closely done by all levels of the supervisory personnel with records maintained and checked.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	<p>The implementation of SOP is monitored daily by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance. The estates among others maintained the following records.</p> <ul style="list-style-type: none"> <li>- work program / Field cost books</li> <li>- bin cards, Harvesting Intervals,</li> <li>- Monthly Estate Report and Account,</li> <li>- Monthly Operations, monthly rainfall,</li> <li>- pest and diseases monthly return,</li> <li>- agrochemical monthly consumption</li> <li>- harvesting details i.e. daily inspection report - yield improvement program,</li> <li>- summary of machinery running hours</li> <li>- harvesting records detailing the number of bunches harvested</li> <li>- quantity of loose fruit collected by each harvesters.</li> <li>- Monthly FFB production, etc.</li> </ul>
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There was no new planting in Tomanggong CU. Therefore, this indicator not applicable. Nevertheless, Tomanggong Group of Estates and Tomanggong Palm Oil Mill have prepared a Social Impact Assessment, Management Action Plans and Continuous Improvement Plans. Please refer to Indicator 3.4.2 below for details.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	<p>For Tomanggong 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 was sighted during assessment. Last reviewed in Sept 2023 by Agronomy Department (Sustainability Team). 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. Tomanggong CU has maintained its documented SIA titled "Social Impact Assessment, Management Action Plans and Continuous Improvement Plans" first report dated October 2012, with the latest update in Sept 2023, as well. The assessment covered operational aspects of plantation and mill. Among the social aspects covered, include employment opportunity, amenities and facilities, complaint and grievances etc. The review was conducted with relevant stakeholders through Joint Consultative Committee (JCC) Meeting in May 2023. Among attendees were:</p> <ul style="list-style-type: none"> <li>▪ Sabah Forestry Department /Wildlife Department</li> <li>▪ PDRM / Energy Commission / Immigration Dept</li> <li>▪ HUMANA / communities / neighbouring plantations</li> </ul>

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings																																
			<ul style="list-style-type: none"> <li>Suppliers / contractors, etc.</li> </ul> <p>It was evident that the establishment of SIA was undertaken through participatory of affected stakeholders. The stakeholders consulted included its own workers (internal stakeholders), government agencies such as MPOA, Immigration Department, Lahad Datu Police Department, Wildlife Department, Sabah Forestry Department and neighboring estates. All feedback from stakeholders was fed back into the SIA Management Action Plan and Continuous Improvement as reference for management for further action.</p>																																
	<p>3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p>Yes</p>	<p>The environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way through external communication (stakeholder meeting) conducted in Aug 2023. Some of example Tomaggong CU has developed “<i>Environmental Impact Assessment, Management Action Plans and Continuous Improvement Plan for Tomaggong Group of Estate</i>”, to monitor the effectiveness of the mitigation measures taken. The following activities were being monitored:</p> <table border="1" data-bbox="1077 683 2016 1212"> <thead> <tr> <th colspan="4">Tomaggong Mill</th> </tr> <tr> <th>No</th> <th>Activity</th> <th>Impact</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Production/release of palm oil mill effluent</td> <td>Insufficient BOD in effluent, due to high sedimentation of solids in ponds and trenches</td> <td>Monitoring of watercourses on monthly basis through water quality index analysis</td> </tr> <tr> <td>2</td> <td>dark smoke emission</td> <td>hazardous to human, contamination of air GHG particulate release.</td> <td>Implementation of CEMS to ensure smoke emission are continually monitor by mill management and install ESP</td> </tr> <tr> <td>3</td> <td>Noise pollution from</td> <td>Workers stress due to high noise pollution</td> <td>Annual audiometric test and conduct noise boundary monitoring</td> </tr> <tr> <td>4</td> <td>SW</td> <td>Indiscriminate throwing and spillages of spent oil causes pollution to soil and waterways</td> <td>-All sw are properly arranged inside the store. -Containment tray are used to contain any leaking oil during vehicle repair or servicing. -fibers are used as spill kits to clean`the spillages</td> </tr> </tbody> </table> <table border="1" data-bbox="1077 1241 2016 1385"> <thead> <tr> <th colspan="4">Tomaggong Group of Estates</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvesting – pruned oil palm fronds</td> <td>Frond not stacked properly will block the streams, site breeding for rats.</td> <td>Pruned fronds currently stack on the ground, proper stacked on contour and terrace lip to prevent soil erosion and block the</td> </tr> </tbody> </table>	Tomaggong Mill				No	Activity	Impact	Action Plan	1	Production/release of palm oil mill effluent	Insufficient BOD in effluent, due to high sedimentation of solids in ponds and trenches	Monitoring of watercourses on monthly basis through water quality index analysis	2	dark smoke emission	hazardous to human, contamination of air GHG particulate release.	Implementation of CEMS to ensure smoke emission are continually monitor by mill management and install ESP	3	Noise pollution from	Workers stress due to high noise pollution	Annual audiometric test and conduct noise boundary monitoring	4	SW	Indiscriminate throwing and spillages of spent oil causes pollution to soil and waterways	-All sw are properly arranged inside the store. -Containment tray are used to contain any leaking oil during vehicle repair or servicing. -fibers are used as spill kits to clean`the spillages	Tomaggong Group of Estates				1	Harvesting – pruned oil palm fronds	Frond not stacked properly will block the streams, site breeding for rats.	Pruned fronds currently stack on the ground, proper stacked on contour and terrace lip to prevent soil erosion and block the
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**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings			
					stream.	
			2	Fertilizer application - fertilizer and empty fertilizer bags.	Pollution through run off and leaching of fertilizer, over application will contribute to greenhouse emission to environment.	Fertilizer application is based on the fertilizer programs in order to effectively and adequate apply fertilizer thus reduce the emission. To avoid fertilizer run off, avoid fertilizer application along the stream edges or riparian reserve.
			3	spraying herbicide, weedicide, etc	Hazardous effects of spillage into drains, watercourse, and land. Affecting land and aquatic biodiversity	Accurate dosage of chemical used, spraying operator will be trained and aware not to spray along the river bank / buffer zone, proper of storage and chemical mixing area
			4	Diesel tank – diesel spillage, fire outbreak, contamination to land	Hazardous effects to watercourses and land, accidental fire will cause losses and emission to air.	Construct diesel bund with capacity 110% from total diesel tank, constructed oil trap, regular cleaning of oil trap, regular monitoring of bund to ensure the bund structure is secure, provide more fire extinguisher nearby the storage.
			5	Replanting operations	Soil erosion, siltation and blockages of water ways	Continue good frond stacking Avoid chemical spraying at stream edges/high erosion Planting of holding plants at areas prone to soil erosion Education of sprayers and fertilizer application.
			6	Nursery	Excessive spraying	Emphasis on mixing at chemical mixing area. Area is bundled.
<p>It was noted that the SIA Management Action Plan and Continuous Improvement Plan has been updated annually. Issues raised during 8<sup>th</sup> stakeholder consultation in May 2023 was captured and fed into the management plan. The management plan has incorporated the action plan, status, person in-charge and the target completion date. Among included in the social impact management plan as follows:</p>						

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
			<p>TPOM Representatives from SK Ladang Tomanggong – uncollected rubbish at teacher’s quarters, stray dogs near teacher’s quarters and schools, request for fencing near school area. The issues are in progress to resolve.</p> <p><u>Tomanggong Estate</u> The shopkeeper representative reported on unsatisfactory telecommunication services at Tomanggong Estate. Tomanggong Estate is in progress to improve telecommunication issue.</p> <p><u>Tagas Estate</u> No issue</p> <p><u>Litang Estate</u> No issue</p> <p>Evidence of the above stakeholder consultation conducted is available and the stakeholder feedback was recorded in the SIA plan. So far, no negative impact issues related to society have been highlighted during stakeholders meeting. The previous year matter arises has sufficiently reviewed, action taken, and status of completion is available.</p>
<p>3.5 A system for managing human resources is in place.</p>	<p>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.</p>	<p>YES</p>	<p>Employment procedures which include recruitment, selection and hiring are contained in a document entitled Standard Operating Procedure – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (Local &amp; Foreign), Recruitment – Foreign Workers (Fresh Worker Supplied by Agency), no 4-management stressed on no recruitment cost should be paid by worker. For matters related to termination of employment and retirement, these are contained in employment contracts. Clause C of the employment contract states that retirement age for workers is 60. These documents are available to workers and their representatives. For Tomanggong CU, there is no recruitment agency has been appointed. All foreign and local workers recruited by walk-in basis.</p>
	<p>3.5.2 Employment procedures are implemented, and records are maintained.</p>	<p>YES</p>	<p>Based on the sampling of the workers’ employment contracts and personal files, there is evidence that the employment procedures on recruitment, selection, hiring, promotion are implemented. Records are also maintained in each worker’s individual file. Promotion would be recommended based on evaluation of behavior, performance appraisal and current work results. No termination had occurred so this element of the procedure could not be verified during the audit.</p>
<p>3.6 An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>	<p>3.6.1 (C) All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>YES</p>	<p>The Occupational Safety and Health Policy was established and signed by the <i>Chief Executive- Group Plantations</i>. The policy focusing on harmonious, safe and healthy work environment for all its employees and business partner including contractor, supplier, trading, out grower and smallholder within HSPHB. There are 10 guidelines listed that should be followed in order to achieve safe and health work environment. The policy had been communicated to all levels of the organization through briefings and also displayed prominently in <i>Bahasa Malaysia and English</i> on notice boards at mill and estates office</p>

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			and muster ground. HIRARC (Hazard Identification, Risk Assessment and Risk Control) Register had been established, documented and implemented at all Operating Units (OU) as means to identify hazards, analyse and assess its associated risk and then apply the suitable control measures. DOSH HIRARC Guideline 2008 was used by the Sustainability Department with consultation input from respective OU Assistant Manager (Estate and Mill) to guide them in developing the Register.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people are monitored.	YES	Occupational health and safety (OHS) 2023 management plan for CU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans FY 2023 were acceptable. Safety executive was carried out safety requirements checking via Internal Audit. Other than that, the workplace inspection was done in monthly basis to ensure all H&S plan was done effectively.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	Formal training program for the year 2023 was prepared in December 2022 for the new financial year. They were sighted available at Tomanggong CU. The training program covers all aspects of RSPO P&C including supply chain and traceability. Program for the 2023 have been implemented. Regular assessment of on-the-job training conducted to ensure understanding among the employees. They training program include productivity and best management practice subjects on estates operating procedures as well as procedural matters caring for Occupational Health & Safety and Environmental, from felling of oil palm trees, nursery, replanting, harvesting and upkeep of fields to evacuation of FFB to mill.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	NO	The CU had trained their staff, workers and records of training were kept in the RSPO training file. The records included information <ul style="list-style-type: none"> <li>a) title of the training</li> <li>b) name and signature of the attendees</li> <li>c) name of the trainer,</li> <li>d) Time and venue.</li> </ul> It was noted that Gender Committee has been established accordingly. The committee comprises of female employees of both management and workers representatives. However, the understanding and implementation of gender committee at Litang and Tagas Estate are very limited and there is no guideline as reference to the establishment of Gender Committee. Thus, Minor NCR NEA 01 2023 has been raised.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard	YES	Appropriate training is provided for personnel carrying out the tasks critical (admin, weighbridge clerk, mill clerk, security, driver, security, transporter contractor) to the effective implementation of the Supply Chain Certification Standard were sighted as per below:



## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	(SCCS). Training is specific and relevant to the task(s) performed.		<ul style="list-style-type: none"> <li>• Weighbridge &amp; SCCS for estate PIC, Apr 2023</li> <li>• SCCS training for contractor, May 2023</li> </ul>

### SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&amp;C, or against a Group Certification Scheme</p> <p>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.</p>	YES	<i>NA – this TPOM used MB supply chain model</i>
3.8.2	<p>Mass balance Module</p> <p>A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3<sup>rd</sup> party certified supply base.</p>	YES	TPOM received certified FFB from own Estate Which is Tomanggong Estate, Tagas estate, Litang Estate and certified FFB from surrounding smallholder and smallgrower (Bukit Kretam Sdn Bhd and Spark Glory) and Uncertified FFB from own company (Northbank & Tabin Estate) Surrounding Smallgrower and Small holder which is 8 suppliers (details in table information above) Thus, TPOM 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	YES	The estimated tonnage of CPO and PK products were as provided in the report body text.

**RSPO PUBLIC SUMMARY**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information was: <b>License Information</b> Commodity : Palm Oil RSPO Membership Number : 1-0098-11-000-00 Type of Business : Oil mill License Status : Active Supply Chain Model : Mass Balance

**RSPO PUBLIC SUMMARY**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</li> </ul>	YES	<p>TPOM had used their documented procedure title '<i>Standard operating procedures for Supply Chain SOP/COC/003, issue 04, dated February 2021</i></p> <p>The procedure described the following:</p> <ul style="list-style-type: none"> <li>- Chapter 1: CSFFB, CSPO &amp; CSPK traceability system – chain of custody</li> <li>- Chapter 2: Harvesting and Loading of Fresh Fruit Bunch</li> <li>- Chapter 3: Delivery and Reception of CSFFB, In- house and Non In- house FFB- additional procedure to physical separate the certified and uncertified CPO/PK during specific period for the mill that holding both IP and MB model.</li> <li>- Chapter 4: Dispatch of CSPO and CSPK from the mill to refinery/ bulk transit installation/ buyer's vessel</li> <li>- Chapter 5: Monitoring of CSPO and CSPK sales</li> <li>-Appendix 1: Weighbridge Tickets and Delivery Notes RSPO (&amp; ISCC) Stamping Procedure</li> </ul> <p>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 non-certified FFBS.</p> <ul style="list-style-type: none"> <li>- The procedure was kept in file RSPO Supply Chain and Traceability. Appropriate training is provided for personnel carrying out the tasks critical (admin, weighbridge clerk, mill clerk, security, driver, security, transporter contractor) for the effective implementation of the Supply Chain Certification Standard.</li> <li>- Based on appointment letter dated in Jan 2023, the Mill Manager was 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).</li> </ul>

**RSPO PUBLIC SUMMARY**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>• Effectively implements and maintains the standard requirements within its organisation.</li> <li>• Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</li> </ul>	YES	<p>As described under para 8.4 SOP for Supply Chain, Chapter 1: CSFFB, CSPO and CSPK traceability System – Chain of custody, TPOM 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 by the internal team, following the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>As describe under para 8.5 SOP for Supply Chain, Chapter 1: CSFFB, CSPO and CSPK traceability System – Chain of custody issue no 4, has stated that the management review will be conducted once a year Management review meeting has been conducted on dated 25/08/2023 (combine RSPO, RSPO SCCS and MSPO)</p> <ul style="list-style-type: none"> <li>• Internal audit – 0 NCR (SCCS only)</li> <li>• Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved.</li> <li>• Previous meeting – was highlighted (to improve format of MR)</li> <li>• Changes – There is no significant changes accept transfer of Assistant Manager.</li> <li>• Recommendation for improvement – improve the established system</li> </ul>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm</p>	YES	<p>TPOM had continued to receive certified FFB from own Estate Which is Tomanggong Estate, Tagas estate, Litang Estate and certified FFB from surrounding smallholder and smallgrower (Bukit Kretam Sdn Bhd, and Spark Glory) and Uncertified FFB from own company (Northbank &amp; Tabin Estate) Surrounding Smallgrower and Small holder which is 8 suppliers (details in table information above). 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 (as per below) for the month of October 2022 – September 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 “Supply Chain MB” has recorded the tonnage of certified FFB and its supplying estate.</p>

**RSPO PUBLIC SUMMARY**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	products and/or documents.		Verified through TPOM weighing system called 'LAK System' <i>and random sample of weighbridge ticket from.</i>
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of buyer;</li> <li>b) The name and address of the seller</li> <li>c) The leading or shipment/delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation</li> <li>i) A unique identification number</li> </ul>	YES	<p>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 Tomanggong POM. Sample of deliveries document were sighted during the audit and it was found all related information was adequate. TPOM's RSPO certificate number and product name together with model used were stated in the delivery documents.</p>

**RSPO PUBLIC SUMMARY**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	<p>For PK Not Applicable since transportation and storage of certified finished products are handled internally using own transportation.</p> <p>1 outsource CPO transporter i.e. Hai Eng enterprise Sdn Bhd. for CPO sea transportation. There is contract document between TPOM and the transporters and the agreement document was available and communication on the RSPO supply chain requirement were communicated to them. There is addendum a clause regarding Supply chain standard in the clause 32 of agreement. the mill has ensure 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 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.</p>

**RSPO PUBLIC SUMMARY**

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. And was updated in Oct 2023.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	Not applicable - no new contractors appointed for the physical handling of RSPO certified oil palm products. Nonetheless, the PIC was aware on the need to inform CB on those new contractors prior to next audit.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	The relevant record pertaining to RSPO SCCS within TPOM found to be updated accordingly and easily accessible during the audit. Relevant record pertaining to implementation of RSPO SCCS within TPOM retained for minimum 2 years.
	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	
	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	
	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 conversion ratios stated by	YES	

**RSPO PUBLIC SUMMARY**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>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).</p>		
3.8.13	<p>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.</p>	YES	<p>TPOM process all the received certified crops &amp; 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 &amp; 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.</p>
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	YES	
3.8.15	<p>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.</p>	YES	<p>Not applicable as TPOM is certified under Mass Balance Module.</p>
3.8.16	<p>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 more than three months after dispatch with the dispatch date</p>	YES	<p>The registration of transaction being carried out by Group Plantation Marketing subordinate using the RSPO Member ID. Mill received copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in). TPOM through usually handled by procedure in handling of sale and delivery was sighted and found adequate. Sales activities are handled by Hap Seng Commodities Trading Department (HQ) on behalf of TPOM. The Personnel updated the RSPO IT platform system upon confirmed contract. As verified through Transaction in Palm Trace, there is no volume remove by the TPOM.</p>



**RSPO PUBLIC SUMMARY**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>		The CU will remove all the certified volume before end of date license.
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	YES	TPOM apply RSPO trademark with license no. 1-0098-11-000-00. TPOM adhered to the minimum requirement in terms 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 is found available at Tomanggong CU, together with the new sustainable Agriculture Policy signed by the CEO, that contained the clause of prohibiting retaliation against Human Rights Defenders. The policy has been communicated to staff and workers during morning muster and RSPO training.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	There was no evidence that the CU instigate violence or use any form of harassment.

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
<p>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.</p>	<p>4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>YES</p>	<p>The system used by the Tomanggong CU in resolving disputes and grievances exists in the procedure called Procedures for reporting complaints and grievances (<i>aduan dan permasalahan</i>) for stakeholders. The Mill and Estates within Tomanggong CU has its own Internal Complaint Book and External Communication Book. The Internal Complaint Books are for employees to lodge complaint pertaining to their houses. The external book is for external stakeholders. In ensuring anonymity of complainants and whistleblowers, this additional whistleblolwer chart "<i>Mekanisme Melindungi Pengadu Terhadap Tatacara Tidak Wajar</i>" is available for use.</p>
	<p>4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>YES</p>	<p>The system was understood by the affected parties, including the illiterate. The procedure for complaint/ grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting. Sighted document for POM showed briefing during the stakeholders meeting and it was held in 2023, for internal and external. For foreign workers, the procedure was explained during initial report for duty with assistance of translators.</p>
	<p>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.</p>	<p>YES</p>	<p>Tomanggong CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders as evidenced by briefing was done during stakeholders' meetings.</p>
	<p>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.</p>	<p>YES</p>	<p>The system used by the Tomanggong CU in resolving disputes and grievances exists in the procedure called 'Prosedur Melapor <i>Aduan dan Permasalahan</i>)' and 'Grievances Procedure – Appendix 1' for staffs and workers, <i>Prosedur Aduan</i>. Noted that the Grievance procedure has already include an ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>
<p>4.3 The unit of certification contributes to local sustainable development as agreed by local communities.</p>	<p>4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p>	<p>YES</p>	<p>There is evidence that contributions to community development was provided based on consultations. There is a donation and providing service for free of charge to the surrounding schools, Mosque and Government agencies. The most important thing is 80% of the staff and non-clerical staff are from surrounding villagers which is the main Contributions to community development.</p>

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
<p>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.</p>	<p>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.</p>	<p>YES</p>	<p>The right to use the land at <i>Tomanggong</i> CU can be demonstrated and not disputed by any party. Assessor sighted that there were clear land ownership documents which is Hap Seng Plantations acquire/buy the land from Sabah State Government in 1895 -1969. Land titles were available in documents. The original copies of the documents, however, were kept in Plantation Central Office, Sg. Segama. Copies of land titles for all estates were sighted. All the estates were under the jurisdiction of Kinabatangan District. Document review shows it was confirmed the terms of the land title for all the estates cultivation of an agricultural crop of economic value have been complied.</p>
	<p>4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Tomanggong CU since 1895 -1969. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders such as the Representative from Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, Harus Abadi Sdn Bhd and IOI Plantations From the interviews, it can be concluded that there was no evidence of Any land dispute at Tomanggong CU, hence the evidence required under this clause was not available.</p>
	<p>4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p>	<p>YES</p>	
	<p>4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p>	<p>YES</p>	
	<p>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</p>	<p>YES</p>	

**RSPO PUBLIC SUMMARY**

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 4.4.1 of this checklist, it has been verified that the land is legitimately owned by Tomanggong CU. The audit team had confirmed that there were no land issues related to previous owners.
	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 Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations.
	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	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 Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	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 Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations.
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 Tomanggong CU and land title, there was no new plantings established on local peoples' land. It has been verified that the land is legitimately owned by Tomanggong CU. The audit team had confirmed that there were no land issues related to previous owners and it was confirmed through interviewed with relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations.

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
<p>customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>	<p>4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, Tomanggong CU has been developed since 1895 -1969, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations.</p>
	<p>4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, Tomanggong CU has been developed since 1895 -1969, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations</p>
	<p>4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, Tomanggong CU has been developed since 1895 -1969, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations</p>

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
	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.	YES	As reported in 4.4.1 of this checklist, Tomanggong CU has been developed since 1895 -1969, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As reported in 4.4.1 of this checklist, Tomanggong CU has been developed since 1895 -1969, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations
	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	As reported in 4.4.1 of this checklist, Tomanggong CU has been developed since 1895 -1969, after it was bought from the previous land owner; Sabah Land Development. All the related documentation regarding the land acquisition was kept in PCO and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team had also confirmed this through interviewed relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views	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	Tomanggong 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.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and	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 such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn

**RSPO PUBLIC SUMMARY**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
through their own representative institutions.	implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.		Bhd, Lim Engit Fun and IOI Plantations. confirmed that the mechanism for them to express their views are 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 Tomanggong 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 Tomanggong 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 agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	Tomanggong 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.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no evidence of any land dispute at Tomanggong CU.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	There was no evidence of any land dispute at Tomanggong CU, Hence the evidence required under this clause was not available.
4.8 The right to use the land is	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Tomanggong CU since 1895 -1969. All the related documentation regarding the land acquisition was kept in PCO and the copy in the estate was verified by the auditor. There were no issues

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	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.		regarding land with villagers, local community and neighbouring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	Land conflict is not present in the area of the unit of certification.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs. (Indicators 4.4.2, 4.4.3 and 4.4.4).	YES	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).		There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, LPC Plantation, Chin Hock Vui, Koperasi Pembangunan Desa, Harus Abadi Sdn Bhd, Lim Engit Fun and IOI Plantations.



## RSPO PUBLIC SUMMARY

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

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	Based on pictorial displayed at TPOM, it was verified that the current and past prices for FFB is being displayed at the notice board near the Tomanggong POM weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	In Tomanggong POM, the price for FFB follows the MPOB Pricing. Hap Seng Management also give allowance to the Smallholder if they send FFB to their mill base on tonnage. The suppliers confirmed that they are happy with the current high price and TPOM price is quite fair in comparison with the outsider Mill.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	YES	There is an agreement between FFB outsider supplier with TPOM. During interview with FFB Supplier above 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 support smallholder by give them consultation and guidance to certify surrounding smallholder under MSPO and RSPO without cost.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	The contractors have been sending their FFB to TPOM for more than 6 years. Their contracts are signed when necessary, and it contains schedule of rates, conditions of contract, event of default, payment terms according to the volume, FFB price, OER price, Specifications FFB, Bonus for Sending FFB. 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.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Tomanggong POM has been calibrated in yearly basis using Metrology Corporation Malaysia Sdn Bhd.
	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 for now.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	There is a document namely 'Procedure for reporting complaints and grievances (Prosedur Melapor Aduan dan Permasalahan)' and 'Grievances Procedure – Appendix 1' for staffs, and Prosedur Aduan for workers. The company also developed procedure named " Mekanisme Melindungi Pengadu Terhadap Tatacara tidak Wajar (Whistleblower)" to protect the complainants.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	YES	Hap Seng Management supports Independent Smallholders with certification, they also already consult with interested smallholders (irrespective of type) including women or other partners in their supply base and already assess their needs for support to improve their livelihoods and their interest in RSPO certification. However, for now, the surrounding smallholders and growers are against the idea of ICS they want to certify independently.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	Hap Seng Plantations already develops and implements smallholder support programs to improve smallholder livelihood and build their capacity to enhance productivity, quality, 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. Until to date surrounding smallholders who are RSPO certified is Spark Glory, Harus Abadi, Bukit Kretam, Lebijaya, Lim Engit Fun and LKM Trading.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Hap Seng gives support to surrounding smallholders and growers to promote legality of their FFB production by giving them Free Consultation, Free Assessment, and things related to RSPO and MSPO certification.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	Sighted the training on Pesticide handlings has been given to surrounding Smallholder and Small grower from Dec 2022 to Feb 2023.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Currently Hap Seng Plantations Management has created a system to trace their stakeholder around their estate. Hap Seng Plantations also regularly reviews and publicly reports on the progress of the smallholder support programme as per see in the Hap Seng Plantation Holdings Berhad 2019 ACOP report in the clause G.4.4.1. As of to date surrounding smallholder who are RSPO certified is Spark Glory, Harus Abadi, and LKM Trading.

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

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	Tomanggong CU subscribes to HSPHB Equal Opportunity Policy and Sustainable Agriculture Policy, both were signed by its Chief Executive Group Plantation. The policy statements emphasize on worker's information, recruitment and selection, training, employee development, based on business needs, terms of service and records of service. It also states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Sustainable Agriculture Policy is available in Bahasa Malaysia and English and made publicly available for review and download from the company's website. The policy too was displayed prominently in the estates. Briefing of the policy to all workers was conducted via morning muster and training sessions.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Evidence is available that no employee has been discriminated against. This is evident from sampled employment contracts where all workers, (male, female, foreign, local) signed the same employment contract and are accorded the same terms of employment, pay, benefits and living standards. Interviews also revealed that there is no discrimination on any basis at the workplace. Foreign workers and local workers received similar pay rate, accorded the same living standard, and enjoy similar medical benefits as their local counterparts. Interviews also revealed that there is no discrimination on any bases in the estates/mill. However, due to government policies, education opportunities differ between local and foreign children. It also stated in the Equal Opportunity Policy. Workers' pay slips were also sampled showed that the workers receive the same amount of daily rate for the same work irrespective of gender, age or nationalities. Foreign workers are not charged any recruitment fees should they come through agent and this was confirmed during interview. This breakdown in payment is agreed between the hiring Company and the workers.

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	As stipulated in the SOP – Recruitment, Selection, Hiring, Termination, Retirement and Promotion of Workers (Local & Foreign), the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs. Recruitment of new workers is done by the Personnel & Administration Department, which would liaise with recruiting agents or via word of mouth from company employees. Recruitment of Malaysian employees commences with a job advertisement which details out the requirements for the advertised position. Among the conditions imposed include foreign worker candidates must have a valid passport and work pass, aged above 18, and must attend a medical check-up before hiring. Once candidates are declared fit, these documents would be filled: medical report, labour engagement form, labour card, wage deduction approval, employee master report. For estate workers, no technical skills are required as only physical fitness is required and on the job, training will be provided to workers. For mill workers, some level of technical training is required depending on the position of the worker. Applicants are required to provide evidence of qualification prior to hiring or they are provided such training at the discretion of the management.
	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	There is no evidence that pregnancy testing is being conducted as a discrimination measure. As confirmed by records and interviews conducted with Medical Assistant and female workers, pregnancy tests were done monthly on female workers who handled chemicals such as sprayer and manurers and quarterly for others and this were done on their own free will. This is to ensure that they are not pregnant while carrying work and to avoid harmful chemical exposure to their foetus if pregnant. Once a worker is confirmed pregnant, she would be reassigned to another job which is not chemical related.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	The gender committees throughout the Tomanggong CU are known as the 'Persatuan Wanita'. Membership comprises of female employees and the employees' wives. Review of meeting minutes, the committees' main purpose are to provide awareness to its members on issues of concern as well as opportunities and improvements for women. These relate to sexual harassment, domestic and other forms of abuse, children's health, creche hygiene, no sick children at the creche, children's' immunization and education, as well as women's reproductive rights, new mother's assessment, maternity benefits and leave entitlement. However, based on interview with significant number of female workers at Litang and Tagas Estate, it was noted that the understanding and implementation of gender committee are very limited. Refer 3.7.2 for non-conformance raised.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	HSPHB has defined wages for each job scopes which is reviewed annually as per "Increase of Daily Rated and Piece Rate Payments to Meet Minimum Wage Requirements". For estate's work, wages are typical on piece rate basis for harvesting (paid by tonne of FFB and rate varies depending on year of planting), FFB loaders (paid by tonne), spraying and slashing (paid by hectare/manday), manuring (paid by hectare/manday), pest census and control (paid by hectare/manday), frond stacking (paid

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
			by frond/manday) and so on. For monthly paid workers, the minimum wage is now increased to RM 1500 per month or RM57.69/day. These rates are in accordance with the Minimum Wage Order 2022. Evidence is available that sampled workers receive equal pay for equal work regardless of gender, nationalities etc.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	Pay and conditions are documented and made available during the surveillance audit. These are contained in the workers' payslips and employment contracts. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during interview with management. Pay slips for Mill and Estate field workers show breakdown for all work done such as allowances received, deductions, number of days worked, and any overtime hours performed. It was also verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order 2022 and the Sabah Labour Ordinance. Documentation of pay is available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Briefing on relevant provisions on the Sabah Labor Ordinance on their rights under the employment contract such as public holidays, paid annual leave, paid maternity leave, final repatriation costs to be paid by employer, and termination of contract.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	Details of payment and conditions of employment are contained in employment agreements. These cover place of work, commencement date, types of salary (daily-rated/piece-rated), wages, overtime pay, work on rest day, designated public holidays, paid medical leave, paid maternity leave, payment of Employment Provident Fund (EPF) for local workers, SOCSO and Employment Insurance Scheme (EIS) benefits, retirement age, repatriation cost, reasons for termination by either party, mutual termination clause and notice period. There is also evidence that the contracts agreement is prepared in a language understood by workers. For example, contracts with Indonesian workers were prepared in Bahasa Malaysia for both Indonesia and Philippines workers. In addition, their terms of contracts were also explained to them upon arrival at the estates/mill. Interviews with workers (both local and foreigners) at the Tomanggong, Tagas and Litang Estates and Tomanggong POM comprising sprayers/manurers and harvesters, general workers and Mill workers, they generally understand the contents of the employment agreements. Conditions of pay such as the agreed working hours, overtime pay, work on rest day pay are also contained in the employment contracts. Sample employment contracts at all audited estates verified to be valid and current, duly signed and witnessed and confirmed to contain all terms and conditions according to legal requirement. Pay slips provided to workers give accurate information on compensation for all work performed.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for	NO	At Tomanggong Estate, interview session with one of the workers (security) mentioned that he works continuously without having rest day. Documentation review of the check-roll logbook showed that the said workers had work continuously including Public Holidays since January, February, March, May, June and September 2023. This were

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
	dismissal, period of notice and other legal labour requirements.		also confirmed during interview with Chief Security. This is contradictory to the SLO and the employment contract signed between the worker and the management. Therefore, a Major Non-conformance NEA 03 2023 has been raised under this indicator.
	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	Evidence is available that the Tomanggong CU provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free. Each house has between 2 to 3 rooms and accommodates between 2 to 5 workers. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation. Free-of-charge treated clean water and electricity were also provided, and the bills are shared among occupants and deducted from their wages (max RM10 per house). Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall. Free medical treatment is provided to all workers and their dependents by having shared clinic facilities within the CU. The upkeep (sanitation) for all estates' linesite visited were observed in good maintained. There is evidence that housing inspections are being carried out once a week based on housing inspection records. Records of housing inspections were sighted and available. Mill and estates done the weekly inspection as required. The checklist of the inspection has been verified.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Tomanggong CU was able to demonstrate that efforts are taken to improve workers' access to adequate, sufficient and affordable food. Tomanggong CU have their own canteen/grocery store which sells items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within the expiry dates. Prices of certain basic items are monitored regularly by the management. The audit team visited Sundry Shop at Tagas Estate and verified price lists were updated once in a month. Workers interviewed informed that the items sold are adequate and reasonably priced considering the distance to the nearest shop. Items purchased can be either paid in cash or on credit.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.  PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2022. Tomanggong CU had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The breakdown of the prevailing wages calculation as follows:

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings															
	<p>targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> <li>An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> <li>There is annual progress on the implementation of living wages</li> <li>Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.</li> <li>The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation</li> </ul> <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		<table border="1" data-bbox="1070 347 2022 580"> <thead> <tr> <th></th> <th><i>Foreign Worker (RM)</i></th> <th><i>Local Worker (RM)</i></th> </tr> </thead> <tbody> <tr> <td>Tomanggong POM</td> <td align="right">3,200.62</td> <td align="right">3,065.62</td> </tr> <tr> <td>Tomanggong Estate</td> <td align="right">3,126.34</td> <td align="right">3,713.13</td> </tr> <tr> <td>Tagas Estate</td> <td align="right">3,116.79</td> <td align="right">2,988.33</td> </tr> <tr> <td>Lintang Estate</td> <td align="right">3,346.60</td> <td align="right">3,207.77</td> </tr> </tbody> </table> <p>The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.</p>		<i>Foreign Worker (RM)</i>	<i>Local Worker (RM)</i>	Tomanggong POM	3,200.62	3,065.62	Tomanggong Estate	3,126.34	3,713.13	Tagas Estate	3,116.79	2,988.33	Lintang Estate	3,346.60	3,207.77
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	<p>6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>YES</p>	<p>All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesian. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.</p>															
<p>6.3 The unit of certification respects the rights of all personnel to form and join trade unions</p>	<p>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</p>	<p>YES</p>	<p>Tomanggong Group subscribes to the documented policy on Freedom of Association and Right to Collective Bargaining dated and signed by Chief Executive – Group Plantation. This Policy is available in Bahasa Malaysia and English. The policy recognizes and respects the rights of employees to join trade union of their choice and to bargain collectively subject to the provisions of relevant national legislations. Additionally, the Company also committed under its own Sustainable Agriculture Policy, with paragraph on</p>															

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	understand, and is demonstrably implemented.		"Respect and Recognize the Rights of All Workers in terms of Freedom of Associations and Right to Collective Bargaining."
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	There are no trade unions at Tomanggong CU. However, the workers' welfare and social committees are represented by Joint Consultative Committee (JCC) which has been established at every unit. The committee is comprised of management and worker's representatives that were elected among workers themselves. The platform serves as a communication channel between management and workers. The interval meeting was carried out by minimum once a year. As confirmed with the workers' representatives, the meeting minutes are made readily available to employees upon request.
	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	It was evident that all worker representatives were freely appointed by the workers as confirmed by the workers' representatives themselves.
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	Tomanggong CU subscribes to Child Labour Policy and Sustainable Agriculture Policy. The Policy states that it would not tolerate the use of child or forced labour, nor exploitation of children in any of its global operations and facilities. This SOP also details out the remediation action to be taken should a child is found working. This includes awareness trainings for all employees and contractors, schools should encourage and motivate children to attend school, parents to be advised and warned verbally on the spot not to allow children to assist them, and the child to be sent home or to an appropriate child-care facility.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Minimum hiring age of 18 years old is clearly stated in SOP for Recruitment, Selection, Hiring, Termination, Retirement & Promotion of Workers (Local & Foreign). There was no evidence that the estates and mill employed anyone below the age of 18 years. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers, passport and dates of birth are available. Stakeholder interview and documentation verified on the Employee Master List confirmed that all the workers employed were above 18 years old. During site visit also confirmed that no child labour work in the Tomanggong CU.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Based on documents sighted, interviews and observations, there was no evidence that the Estates and the Mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' particulars and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.



**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	No Child Labour Policy has been established and implemented where the company shall not use any child labour. The policy was displayed at the notice board and communicated to workers through morning briefings. All contractors were also made known of the policy. Verified, the contractors have signed the contract agreement where under addendum agreement clause (3), the contractor shall ensure no child under age of 18 are employed.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	Tomanggong CU subscribes to Company's Policy of " <i>Sexual Harassment, Violence and Abuse Policy</i> ", and "Flow Chart – Reporting Sexual Harassment (Worker)" at the office notice board. This document contains guarantees of protection against acts of sexual harassment and violence, definitions and complaints procedures. The company also has a documented SOP for making complaints regarding sexual harassment and violence and abuse. The document is entitled Guidelines/Procedure in Lodging Complaints – Sexual Harassment, Violence and Abuse. The policy and procedure are available in both Bahasa Malaysia and English and have been communicated and made available throughout Tomanggong CU. From meeting minutes and interviews with women committee representatives and female workers, it was confirmed that the Policy of Sexual Harassment, Violence & Abuse Policy was briefed to them as well as the grievance mechanism to report such cases. They confirm their understanding of policy and procedure. Interview with them revealed that they have not experienced any sexual harassment or abuse and not aware of any such cases.
	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	Tomanggong CU subscribes to HSPHB Policy on Reproductive Rights. The policy aims to improve the health and well-being of nursing mothers and new-born babies, to reduce sexually transmitted diseases, including HIV, and other reproductive related diseases, that the company respects the reproductive rights of women in accordance with national legislation. Interviews held with female employees (in the field and at the office) confirmed their understanding of their reproductive rights, including the rights to be transferred to another job if pregnant and not to deal with chemicals
	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	Tomanggong CU has maintained the records of pregnancy and birth for all workers or dependents. The assessment conducted where among requested during the assessment were assistance of transportation to go to outside's clinic. Although the assessment includes the mother's needs for designated room to breastfeed or store milk, there is no request at such as new mothers can easily go to their homes or creche to breastfeed or store milk.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and	YES	A grievance mechanism which respects anonymity and protects complainants has been established. The mechanisms were implemented and communicated throughout all level of workforce via Morning Muster, JCC Meeting and Gender Committee.

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
	communicated to all levels of the workforce.		
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	YES	Based on documentation review, interviews conducted with workers of various work scope both at the estate and mill, and observations made, there is no evidence that workers are in forced employment.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	The Company has a documented Labour Policy for temporary or migrant Workers which states a commitment to non-discrimination, no contract substitution, post arrival orientation program (which includes briefing on language, safety, labour laws, cultural practices, etc.) and provision of decent living conditions for foreign workers. The policy was posted on the main estate notice board. The policy mentioned that all employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival programme will be conducted once arrived for three months. The CU maintained its specific procedure / flowchart for employment of foreign workers titled 'Sourcing Process for Foreign Workers'. The procedure has been implemented for any employment related with foreign workers. Sighted Worker's General Induction Form for newly employed workers. Among the topics covered included company policies, personal protective equipment, emergency procedures, disciplinary procedures, employment contract such salary, holidays, rest days, annual leave, overtime, working hours, medical leave, etc. Based on observations and interviews of foreign workers, there is no evidence of contract substitution and no discriminatory practices against foreign workers.
6.7 The unit of certification ensures	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible	YES	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the Assistant Manager for the downline implementation of OSH

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
that the working environment under its control is safe and without undue risk to health.	person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.		<p>practices in the estates and mill. All identified Executives were officially given a letter for such an appointment. OSH Committee meetings are held once in three months. Minutes meetings reviewed. OSH Committee meetings confirmed that among the agenda discussed, included the following:</p> <ul style="list-style-type: none"> <li>▪ Passing of previous minutes and arising matters.</li> <li>▪ Concerns of all parties about health, safety and welfare</li> <li>▪ Accident report (Monthly Data of Mill/Estate Safety Performance)</li> <li>▪ Workplace inspection</li> <li>▪ Safety report/issues and programme</li> </ul>
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	<p>Procedures for accidents and emergencies have been established. There is formation of ERP Team &amp; ERP for all the identified incidences. Besides that, the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They include emergencies relating to earthquake, fire, chemical spillage, flood, animal attack/poison, COVID 19 and accident at workplace. During site inspection at estates, it was sighted Emergency Response Plan was available at Chemical Store, Workshop, Office, Workers Housing, etc. During interviews with workers, it was noted that all workers understand ERP. Fire drill training was conducted to all estates to create awareness and ERP to all workers.</p> <p>All estates and POM have their own first aider and be trained by competency consultant from Persatuan Bulan Sabit Merah Malaysia (Daerah Sandakan). The certificate of competency first aided is valid for 3 years. Based on records verification, the certificate is still valid and available. First aid training was conducted annually, and records training was sighted and reviewed. Master list of first aid box of all estate and POM which is available at the office was checked and verified. Observed that, first aid box is well provided for all the field mandores whose involved in harvesting, manuring, spraying works, etc. The content of the first box which is held by harvesting, manuring and spraying mandore was verified. The contents such as bandage, gauze, triangular bandage, cotton wool, plaster, handy plaster, flavin lotion, antiseptic cream, surgical gloves and scissors were well equipped. The stock of first aid boxes is regularly checked and refilled, when necessary, by an estate Hospital Assistant. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and Government Clinic were also included. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury records were recorded using Lost Time Accident (LTA) metrics. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.</p>
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the	YES	All training and briefing on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered to. During site visit at all estates and mill all PPE has been provided free of charge and was sighted all workers

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
	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.		wearing appropriate PPE. Staff and workers such as the storekeepers, harvesters and sprayers were continuously trained, and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Appropriate PPEs were given to employees of the estates and mill visited. Sanitation facilities for those applying pesticides was available near the chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area. Meanwhile, during site inspection estate and mill workshop, most of the moving part and rotating machinery were installed with machine guarding and properly covered. Noted also the set of oxygen and acetylene cylinders in the workshop available with “flash back arrestors”.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees’ Social Security Act 1969 (Act 4).
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Occupational injuries are recorded using Lost Time Accident (LTA) metrics via monthly accident key performance indicator (KPI) to Safety Executive. JKKP8 for all estates were submitted on time.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	The IPM Plan for the estates has been established and documented in OPAP Chapter 10 - Pest and Diseases in October 2019. a) Potential pests, thresholds for each pest that calls for chemical treatment, 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) indicates the result of the census. b) Pest management includes 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</i> , <i>Antigonan leptopus</i> and <i>Turnera subulata</i> . Rhinoceros beetles are managed by using pheromone traps. c) Main pests in the estates are 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

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
			<p>is above threshold level 2 %. Beneficial plants are planted in all estates according to the plan.</p> <p>d) The SOP to implement IPM and monitor its effectiveness is contained in OPAP 10 titled Pests and Diseases Management.</p> <p>e) Records are available Pests &amp; Diseases Report (Early Warning System, Rat Infestation Report, Rat Infestation Status Report</p> <p>f) There are no signs of fire used for pest control and this was verified during the field visits and interviews with the employees.</p> <p>g) Rat pest droppings are not monitored, and this is not a specific requirement of this standard. The estates instead monitored the fresh rat damage to the FFB.</p>
	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 that are used for pest control in any of the estates. Though no invasive species are used, monitoring of IPM is carried out on a regular basis by the Agronomy team to ensure that no invasive species spreads in the estates.
	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 on the Sustainable Agriculture Policy. Hence no fire is used for pest control or any purpose whatsoever.
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.		<p>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</p> <p>a) Estates HSPHB's Oil Palm Agricultural Policy (OPAP) Manual,</p> <p>b) Safe &amp; Standard Operating Procedure / Accounting/Administrative Procedure (AAP) manual.</p> <p>c) OPAP 10 titled Pests and Diseases Management.</p> <p>d) The Oil Palm Agriculture Policy (OPAP), established on 01/04/1994, last revised in 07/02/2023 maintained in place for estate operation such.</p> <p>i. as land clearing / field upkeep / pest and disease,</p> <p>ii. FFB harvesting and evacuation / soil conservation and terracing,</p> <p>iii. road construction &amp; maintenance,</p> <p>iv. planting density &amp; planting technique, palm replacement during immaturity &amp; supplying,</p> <p>v. Fertilizer application, palm thinning and replanting.</p> <p>vi. Chemical justification and usage/dosage/target weeds</p> <p>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. The registers were updated in Sept 2023. The chemical used in the estates among</p>

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings																																				
			<p>others as listed below;</p> <table border="1"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate iso p/amine</td> <td>III</td> <td>6</td> <td>Cypermethrin</td> <td>III</td> </tr> <tr> <td>2</td> <td>Methamidophos</td> <td>IA</td> <td>7</td> <td>Tric butoxy ester</td> <td>III</td> </tr> <tr> <td>3</td> <td>Glufosinate ammonium</td> <td>III</td> <td>8</td> <td>2,4-D Amine</td> <td>II</td> </tr> <tr> <td>4</td> <td>Triclopyr butoxy</td> <td>III</td> <td>9</td> <td>Brodifacoum</td> <td>IV</td> </tr> <tr> <td>5</td> <td>Metsulfuron methy 20%</td> <td>III</td> <td>10</td> <td>Inaziflam 45.46%</td> <td>III</td> </tr> </tbody> </table> <p>The justification of agrochemicals use is available in the Oil Palm circulars, SOP, and Manuals to justify the usage of certain chemicals for respective treatment. The justification is also described in the agronomist report.</p>		Chemical name	Class		Chemical name	Class	1	Glyphosate iso p/amine	III	6	Cypermethrin	III	2	Methamidophos	IA	7	Tric butoxy ester	III	3	Glufosinate ammonium	III	8	2,4-D Amine	II	4	Triclopyr butoxy	III	9	Brodifacoum	IV	5	Metsulfuron methy 20%	III	10	Inaziflam 45.46%	III
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	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	<p>The estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.</p> <p>a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified.</p> <p>b) All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class III &amp; class IV pesticides.</p> <p>c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates. 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.</p> <p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided for 2 years usage.</p>																																				
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	<p>All the estates continued to minimize the usage of agrochemicals by implementing IPM. Blanket spraying was not practiced by this CU and soft grasses 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).</p> <p>As part of the IPM plans, management of all estates had established nectariferous beneficial plants (<i>Cassia cobanensis</i>, <i>Antigonan leptopus</i> and <i>Turnera sublata</i>) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. During the visit it was observed a number of beneficial plants had been planted and all 3 estates had plants ready for planting in the nurseries. Pheromone traps to trap Rhinoceros Beetles were sighted in all replants and immature in all the 3 estates.</p>																																				
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	<p>There is no prophylactic use of pesticides. The quantity of agrochemicals required for various field conditions are documented and justified in HSP SOP for estates operations.</p> <p>a) The 3 estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000.</p>																																				

**RSPO PUBLIC SUMMARY**

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			From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraquat had been banned in all estates since 2007.																																				
	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 estates confined usage of pesticides which are were 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 HSP 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 been used. c) The class 1A chemical, Methamidophos (Enforce) in all Estates was packed individually and kept in a locked separate room with proper ventilation. The chemical was used for a bagworm outbreak in 2013. Chemicals are being kept in event of fresh outbreak in the estates. Regulatory requirement for the purchase in 2013 was sighted and complied. d) Sighted from records and interviews with workers, staff and estate assistants, concluded that training was held with all precautions being taken and all legal requirements met.																																				
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	The chemical kept in the estates stores among others as listed below;  <table border="1"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate iso p/amine</td> <td>III</td> <td>6</td> <td>Cypermethrin</td> <td>III</td> </tr> <tr> <td>2</td> <td>Methamidophos</td> <td>IA</td> <td>7</td> <td>Tric butoxy ester</td> <td>III</td> </tr> <tr> <td>3</td> <td>Glufosinate ammonium</td> <td>III</td> <td>8</td> <td>2,4-D Amine</td> <td>II</td> </tr> <tr> <td>4</td> <td>Triclopyr butoxy</td> <td>III</td> <td>9</td> <td>Brodifacoum</td> <td>IV</td> </tr> <tr> <td>5</td> <td>Metsulfuron methy 20%</td> <td>III</td> <td>10</td> <td>Bayfolan</td> <td>III</td> </tr> </tbody> </table>		Chemical name	Class		Chemical name	Class	1	Glyphosate iso p/amine	III	6	Cypermethrin	III	2	Methamidophos	IA	7	Tric butoxy ester	III	3	Glufosinate ammonium	III	8	2,4-D Amine	II	4	Triclopyr butoxy	III	9	Brodifacoum	IV	5	Metsulfuron methy 20%	III	10	Bayfolan	III
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	7.2.5b Why there is no other alternative which can be used.	YES																																					
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES																																					
	7.2.5d What is the process to limit the negative impacts of the application.	YES																																					
	7.2.5e Estimation of the timescale of the application and steps taken to limit 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	YES	Tomanggong CU had records showing that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. The staffs and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. Pesticide applications were guided by HSPHB's OPAP manual, CHRA and by SDS supplied by the manufacturer. In the HSPHB's OPAP manual, the guidance was in Chapter 9 – Upkeep of Mature oil palm (for herbicide) and Chapter 10 (for insecticide/rodenticide). The Manual had included a chemical register list, which indicates the purpose of usage (intended target), hazards signage, trade and generic names. The SOP procedure also had written justifications. The trade and generic names of the chemicals were																																				

**RSPO PUBLIC SUMMARY**

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	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.		made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Training including refresher sessions were provided to the workers involved in such activities to ensure a continued understanding of chemicals / hazard. Records showed that pesticides were handled, used and applied by trained personnel and as per the SDS of the pesticide. The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat baits were trained. Random interviews conducted showed that they understood the hazards involved and the usage and handling of chemicals in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites such as chemical store, lubricant store, fertilizer store.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	Tomanggong CU, all pesticides were stored in accordance with the legal requirement, in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations as well as recommendation by manufacturer as per applicable MSDS. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e. storekeeper. The stores in the estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. The fertilizers were well stacked. The stores are equipped with showers, wash area and a PPE storage area. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available at the estates. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities were continually implemented for empty pesticide containers. The activities were carried out at a concrete pond of 3 levels. Empty pesticide containers observed were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	On all 3 Estates Empty pesticide containers were triple rinsed, punctured and stored in the scheduled waste stores before being disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper mgmt. and disposal. Records showed that the empty pesticide containers were disposed of by a DOE licensed contractor.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of	YES	Aerial spraying of pesticides is not a practice in Tomanggong CU. There was no evidence to show that such a method being used in all estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit.



**RSPO PUBLIC SUMMARY**

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	aerial spraying.																						
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	All pesticide operators and recommendation workers from CHRA were sent to OHD Dr. Medical surveillance report verified. From the results, all workers fit to handle chemical. In addition, several workers need medical attention for non-occupational disease. The HA will monitor and treat related health conditions via medical checkup on a weekly basis.																				
	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	On all 3 Estates there was no evidence to show that work with pesticides had been offered to persons under the age of 18, pregnant or breastfeeding women or other people who had medical restrictions, at time of visit. Spraying activity was observed in all estates and interview conducted it was verified that there were no persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions carrying spraying. The Estate had complied with Section 3 c “cause or permit a female worker who is pregnant or lactating to use or handle highly pesticides”, Regulation ‘Prohibition’ of the Pesticide Act (Highly Toxic Pesticide) Regulation 1996. HSPHB also had a policy of recruiting workers 18 years old and above.																				
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Tomanggong Group CU has established the EIA-management action plan and continuous improvement plan- <i>List of Waste generated and management plan</i> . The purpose of the Plan is to avoid / reduce pollution emerging as results of the estate and mill activities. The procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation. The waste management as identified and managed by the CU among others as shown below; <table border="1" data-bbox="943 837 1957 1321"> <thead> <tr> <th></th> <th>Waste type</th> <th>Source</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Organic waste / domestic waste -</td> <td>Line sites, canteen , club house</td> <td>disposal of domestic waste is made on daily basis &amp; kept at landfill which is distant from housing complex &amp; waterways</td> </tr> <tr> <td>2</td> <td>Maintenance oil</td> <td>Workshop.</td> <td>Proper SW management, appointed SW contractor M/s <i>Lagenda Bumimas</i> for both Estates and Mill.</td> </tr> <tr> <td>3</td> <td>Digestive waste /faecal matter</td> <td>Line sites, canteen club house, workshop</td> <td>Septic tanks were installed to each office, houses, workshop, and club house.</td> </tr> <tr> <td>4</td> <td>Scheduled Waste (Empty Chemical Container, Electrical waste, PPE, Used Oil Filter, Scrap Metal)</td> <td>All Operating Unit, Garage/Workshop, Office, House, Chemical Store)</td> <td>Proper SW management, appointed SW contractor M/s <i>Lagenda Bumimas</i> for both Estates and Mill.</td> </tr> </tbody> </table>		Waste type	Source	Action Plan	1	Organic waste / domestic waste -	Line sites, canteen , club house	disposal of domestic waste is made on daily basis & kept at landfill which is distant from housing complex & waterways	2	Maintenance oil	Workshop.	Proper SW management, appointed SW contractor M/s <i>Lagenda Bumimas</i> for both Estates and Mill.	3	Digestive waste /faecal matter	Line sites, canteen club house, workshop	Septic tanks were installed to each office, houses, workshop, and club house.	4	Scheduled Waste (Empty Chemical Container, Electrical waste, PPE, Used Oil Filter, Scrap Metal)	All Operating Unit, Garage/Workshop, Office, House, Chemical Store)	Proper SW management, appointed SW contractor M/s <i>Lagenda Bumimas</i> for both Estates and Mill.
	Waste type	Source	Action Plan																				
1	Organic waste / domestic waste -	Line sites, canteen , club house	disposal of domestic waste is made on daily basis & kept at landfill which is distant from housing complex & waterways																				
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4	Scheduled Waste (Empty Chemical Container, Electrical waste, PPE, Used Oil Filter, Scrap Metal)	All Operating Unit, Garage/Workshop, Office, House, Chemical Store)	Proper SW management, appointed SW contractor M/s <i>Lagenda Bumimas</i> for both Estates and Mill.																				
	7.3.2 Proper disposal of waste	YES	The waste management and disposal plan to avoid or reduce pollution had been documented and																				

**RSPO PUBLIC SUMMARY**

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	material, according to procedures that are fully understood by workers and managers, is demonstrated.		<p>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. Mill wastes had been disposed as follows;</p> <ul style="list-style-type: none"> <li>• Crop residue/biomass i.e. fiber and shell were used as fuel in the boiler.</li> <li>• The monitoring of water and effluent discharge, a monthly and quarterly report for final discharge were submitted to DOE in a timely manner, as required by the written approval.</li> <li>• Scheduled waste management, a procedure “<i>Handling of Scheduled Waste</i>” established. The wastes were disposed through DOE’s licensed contractor <i>Lagenda Bumimas Sdn Bhd.</i> and <i>Sedafiat Sdn Bhd.</i></li> </ul> <p>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. Interview with workers and storekeeper was confirmed they aware and understand all the procedure related to disposal of waste material.</p>
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at Tomanggong Group of Estates and Tomanggong POM, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Tomnggong Group of Estates 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	All the 3 estates 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. These SOP are implemented and monitored. The monitoring of daily implementation of SOP 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 SOP has been well implemented and correctly monitored by the estate management. The fertilizer application SOP was latest revised in February 2021. 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 monthly. 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	<p>The 3 estates-maintained records of foliar and soil analysis in respective office. These records are compiled and issued from the Agronomy Dept.</p> <ol style="list-style-type: none"> <li>a) Foliar sampling is conducted on an annual basis and the soil sampling is done in a 5 year cycle for a particular field. Foliar analysis for the estates was completed in the following period and reports respectively.</li> <li>b) 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, Org C, Total N, Total P, Avail P, exch K, exch Ca &amp; exch Mg. There was no obvious change of soil chemical properties as compared to previous years where estates are required to maintain the current agronomic practices recommended.</li> <li>c) Results of the foliar and soil analysis are taken into account by the agronomists. Correlation of the results of the results of analysis and the recommended fertilizer inputs were noted.</li> </ol>

## RSPO PUBLIC SUMMARY

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	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) and Belt Press Solids (BPS) produced by the mill are applied in the field. The strategy includes EFB mulching and application of BPS in the fields in the estates. Records of application are duly retained by each estate.																																																																																					
	7.4.4 Records of fertiliser inputs are maintained.	YES	The 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 reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2022/23 were in line with the program. The following fertilizers were applied in the 3 estates subject to the recommendation by the Agronomist.																																																																																					
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	<p>All the 3 estates had soil maps detailing their soil profile including marginal and fragile soils. The slope maps identify steep areas within the estates. Figures are in % otherwise stated.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Soil type</th> <th style="text-align: center;">Tagas</th> <th style="text-align: center;">Tomanggong</th> <th style="text-align: center;">Litang</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Dagat</td> <td style="text-align: center;">27.64</td> <td style="text-align: center;">11.49</td> <td style="text-align: center;">0.30</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Gumpal</td> <td style="text-align: center;">3.36</td> <td style="text-align: center;">29.29</td> <td style="text-align: center;">-</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Kinabatangan</td> <td style="text-align: center;">38.47</td> <td style="text-align: center;">24.48</td> <td style="text-align: center;">63.06</td> </tr> <tr> <td style="text-align: center;">4</td> <td>Kretam</td> <td style="text-align: center;">21.30</td> <td style="text-align: center;">-</td> <td style="text-align: center;">24.80</td> </tr> <tr> <td style="text-align: center;">5</td> <td>Lungmanis</td> <td style="text-align: center;">5.72</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> </tr> <tr> <td style="text-align: center;">6</td> <td>Rumidi</td> <td style="text-align: center;">0.41</td> <td style="text-align: center;">-</td> <td style="text-align: center;">2.62</td> </tr> <tr> <td style="text-align: center;">7</td> <td>Tuaran</td> <td style="text-align: center;">3.10</td> <td style="text-align: center;">9.08</td> <td style="text-align: center;">9.22</td> </tr> <tr> <td style="text-align: center;">8</td> <td>Brantian</td> <td style="text-align: center;">-</td> <td style="text-align: center;">25.66</td> <td style="text-align: center;">-</td> </tr> <tr> <td></td> <td style="text-align: center;">Total</td> <td style="text-align: center;">100.00</td> <td style="text-align: center;">100.00</td> <td style="text-align: center;">100.00</td> </tr> </tbody> </table> <p>The topography details are as follows. Figures in ha otherwise stated.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Topography</th> <th style="text-align: center;">Tomanggong</th> <th style="text-align: center;">Litang</th> <th style="text-align: center;">Tagas</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">0-5</td> <td style="text-align: center;">2391.76</td> <td style="text-align: center;">2581.30</td> <td style="text-align: center;">2153.84</td> </tr> <tr> <td style="text-align: center;">2</td> <td style="text-align: center;">6-10</td> <td style="text-align: center;">166.56</td> <td style="text-align: center;">64.91</td> <td style="text-align: center;">52.87</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">11-15</td> <td style="text-align: center;">76.17</td> <td style="text-align: center;">3.00</td> <td style="text-align: center;">3.99</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">16-25</td> <td style="text-align: center;">18.28</td> <td style="text-align: center;">0</td> <td style="text-align: center;">1.00</td> </tr> <tr> <td style="text-align: center;">5</td> <td style="text-align: center;">&gt;25</td> <td style="text-align: center;">2.03</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> </tr> <tr> <td></td> <td style="text-align: center;">Total</td> <td style="text-align: center;">2654.80</td> <td style="text-align: center;">2649.20</td> <td style="text-align: center;">2211.70</td> </tr> </tbody> </table>		Soil type	Tagas	Tomanggong	Litang	1	Dagat	27.64	11.49	0.30	2	Gumpal	3.36	29.29	-	3	Kinabatangan	38.47	24.48	63.06	4	Kretam	21.30	-	24.80	5	Lungmanis	5.72	-	-	6	Rumidi	0.41	-	2.62	7	Tuaran	3.10	9.08	9.22	8	Brantian	-	25.66	-		Total	100.00	100.00	100.00		Topography	Tomanggong	Litang	Tagas	1	0-5	2391.76	2581.30	2153.84	2	6-10	166.56	64.91	52.87	3	11-15	76.17	3.00	3.99	4	16-25	18.28	0	1.00	5	>25	2.03	0	0		Total	2654.80	2649.20	2211.70
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**RSPO PUBLIC SUMMARY**

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	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	There is no replanting on steep terrains. This was verified during the field visits. 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	This compliance being addressed in the “ <i>Slope and River 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”.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	This is not applicable to all the 3 estates as there is no new plantings made. Soil maps are taken into account in plans and operations of estates to ensure long term suitability of land for palm oil cultivation. Maps are used to identify areas that are inappropriate for planting such as slope maps to indicate steep terrain.
	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	There were no marginal and fragile soils in the estates.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Construction of drainage is evident at planted areas where water needs to be drained out especially at the terraces at the undulating areas and along the estate roads. Soil analysis and slope mapping have been used to guide the planning of drainage systems. Information obtained from soil analysis and slope mapping is taken into consideration when roads and infrastructure need to be developed. However, as all the estates in this unit of certification have been long established, there is rarely any new additional roads and drainage been developed. There are also no signs of soil erosion, and this was verified during the field visits.
7.7 No new planting on peat, regardless of depth after 15	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	This is not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.

**RSPO PUBLIC SUMMARY**

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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 (see Procedural Note for 7.7.5 below).	YES	This is not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	This is not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	This is not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with	YES	This is not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.

**RSPO PUBLIC SUMMARY**

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	<p>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.</p>		
	<p>7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p>	<p>YES</p>	<p>This is not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.</p>
	<p>7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p>	<p>YES</p>	<p>This is not applicable as there is no peat soil series in all the 3 estates audited. The fact was supported by the soil map prepared by the Group Agronomy Dept.</p>
<p>7.8 Practices maintain the quality and</p>	<p>7.8.1 A water management plan is in place and implemented to promote more efficient use and</p>	<p>YES</p>	<p>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. 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</p>

**RSPO PUBLIC SUMMARY**

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availability of surface and groundwater.	continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:		bodies. Workers of all the sampled estates have adequate access to clean water which were supplied through water treatment plant.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	The continued availability of water sources and to avoid negative impacts on other users in the catchment has been monitored accordingly. All results are within the permissible limit.
	7.8.1b Workers have adequate access to clean water.	YES	Treated water analysis for TPOM & Tomanggong Group of Estates were supplied through water treatment plant located at TPOM & Tomanggong Group of Estates. Analysis of treated water has been carried out at monthly basis intervals.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	NO	Noted that riparian reserves have been established (i.e., surveyed, demarcated and protected). However, the water courses and wetlands was not effectively protected, including maintaining riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). Based on site inspection at Tagas Estate: 1) The riparian reserves (Sg. Segama) Field RP23/1, sighted traces of chemical spraying operation were carried out at the demarcated area. 2) Field PR23/2, sighted traces of leachate from EFB dumping, that channel to artificial drainage and waterways that directly to Sg. Segama. 3) Field SO2P, sighted traces of selective chemical spraying operation were carried out at the close to the water edge at the artificial drainage and waterways that directly channel to stream within Tagas Estate (Upstream). The selective spraying was implemented due to removed unwanted weed i.e., Itchgrass ( <i>Rottboellia cochinchinensis</i> ). Major NCR DA/RAR 01 2023 was raised to address this.
	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. An Effluent Treatment Plant (ETP) is available at Tomanggong POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum mill capacity per hour is 60mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through land irrigation. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. Among the parameters required by the DOE to be monitored are bio-oxygen demand (BOD), suspended solid (SS), oil and grease (O&G), ammoniacal nitrogen (AN) total nitrogen (TN), pH and temperature. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory limit.
7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Processed water is obtained from water catchments near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on a monthly basis.	
7.9	7.9.1 A plan for efficiency of the	YES	The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored

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Efficiency of fossil fuel use and the use of renewable energy is optimised.	use of fossil fuels and to optimise renewable energy is in place, monitored and documented.		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: <ul style="list-style-type: none"> <li>Generator-Regular servicing of the generator set for smooth running of engine and prevent excessive emission of greenhouse gas</li> <li>Vehicles – set up a schedule the usage of fuels and monitor it at 3 times per week basis.</li> <li>drivers are required to inspect their vehicle on daily basis</li> </ul>																																											
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>The input data was verified and the following were determined:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>tCO<sub>2</sub>e/tProduct</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>1.22</td> </tr> <tr> <td>PK</td> <td>1.22</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted on mineral soil</td> <td>9784.91</td> </tr> <tr> <td>OP Planted on Peat</td> <td>0</td> </tr> <tr> <td>Conservation (forested)</td> <td>0</td> </tr> <tr> <td>Conservation (non-forested)</td> <td>108.64</td> </tr> <tr> <td>FFB production per Ha</td> <td>22.13</td> </tr> </tbody> </table> <p>Milling extraction rate:</p> <table border="1"> <tbody> <tr> <td>OER</td> <td>21.00</td> </tr> <tr> <td>KER</td> <td>4.46</td> </tr> </tbody> </table> <p>Mill Emission</p> <table border="1"> <thead> <tr> <th colspan="3">Own Crop</th> </tr> <tr> <th>Emission source</th> <th>tCO<sub>2</sub>e</th> <th>tCO<sub>2</sub>e/tFFB</th> </tr> </thead> <tbody> <tr> <td>POME</td> <td>21555.11</td> <td>0.20</td> </tr> <tr> <td>Fuel consumption</td> <td>1208.27</td> <td>0.01</td> </tr> <tr> <td>Grid electricity utilisation</td> <td>0</td> <td>0</td> </tr> <tr> <td colspan="3">Credits</td> </tr> <tr> <td>Export of excess electricity to housing &amp; grid</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Description	tCO <sub>2</sub> e/tProduct	CPO	1.22	PK	1.22	Land Use	Ha	OP Planted on mineral soil	9784.91	OP Planted on Peat	0	Conservation (forested)	0	Conservation (non-forested)	108.64	FFB production per Ha	22.13	OER	21.00	KER	4.46	Own Crop			Emission source	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	POME	21555.11	0.20	Fuel consumption	1208.27	0.01	Grid electricity utilisation	0	0	Credits			Export of excess electricity to housing & grid	0	0
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**RSPO PUBLIC SUMMARY**

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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there was no new planting or new development of areas at TPOM CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																																																															
	7.10.3 (C) Other significant pollutants are identified and plans	NO	The Environmental Aspect Impact Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop																																																															

**RSPO PUBLIC SUMMARY**

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	to reduce or minimise them implemented and monitored.		<p>Sequestration, Fertiliser, N<sub>2</sub>O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. Tomanggong CU also plan to reduce GHG via Biogas plant (currently in progress of earth work – target complete Dec 2024) to capture Methane gas generated from the Effluent Treatment Plant to generate biogas engine to produce electricity for mill and domestic use.</p> <p>Mitigation measure of leakage or spillage of chemical/oil implement as per pollution prevention plan to avoid negative impact to the environmental issues. During site inspection at skid tank, workshop, chemical store, etc. area at Tomanggong Group of Estates, sighted diesel/lubricant/hydraulic drum contain by trays and bund. However, the few activities of significant pollutants was not identified and plans to reduce or minimise them. Other pollutants were not effectively implemented and monitored, as follows:</p> <ol style="list-style-type: none"> <li>1) Portable generator and servicing/maintenance vehicle at house activities yet to be identified in the impact and aspect. Based on site inspection at wooden houses Litang Estate and portable generator at Tagas Estate, sighted traces of used oil lubricant on the ground without any preventive maintenance.</li> <li>2) Waste disposal management was not efficiently implemented. During site inspection at wooden houses (Litang, Tagas, Tomanggong Estate/POM sighted recycled wastes such as tin, bottle, plastic, scheduled wastes such as empty pesticides container, used PPE, and food wastes at the back of housing compound and adjacent the broken channel drains.</li> <li>3) Open fire for waste disposal was implemented at Litang Estate. Based on site inspection at wooden houses, sighted traces of fire burning that used for wastes disposal and dried coconut fronds.</li> </ol> <p><i>Therefore, the nonconformance DA/RAR 02 2023 was raised</i></p>
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	Tomanggong CU complied to the strict Zero Burning Policy in Sustainability Agricultural Policy under Environment & Biodiversity There was no evidence to show that fire had been used for preparing land for replanting in the 2017 replant visited in Kapis Estate during the audit. It was also observed that all palms were felled, shredded, windrowed, and left to decompose in the 2022 and 2023 replants in the neighbouring HSPHB Estates.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Tomanggong CU had established fire prevention and control measures for the areas under its direct management. Fire emergency procedures were available in adherence to the HSPHB policy on 'Emergency Response' plan. The 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. At Tomanggong Group of Estates 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 that was carried out at Tomanggong CU, all stakeholders including neighbour was briefed on fire prevention and control measures. For internal stakeholders training has been conducted at each estate.

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
<p>7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>	<p>7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	<p>YES</p>	<p>Auditors has verified through checking through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a>, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Tomanggong CU since Nov 2005.</p>
	<p>7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:</p>	<p>YES</p>	<p>The report of “<i>Potential High Conservation Value Area Assessment Report of Tomanggong Group of Estates and Tomanggong Palm Oil Mill</i>” is available and prepared by the Sustainability Executive. The report was completed in September 2018 and latest update in Sept 2023 had covered all the High Conservation Value (HCV) within and adjacent to the CU. The HCV assessment identified the rare, threatened and endangered species (RTEs) for estate named <i>Tomanggong, Litang, Tagas, Tabin and North Bank</i>, including the management and action plan. In general, Tomanggong CU had identified 6 potential HCV in the whole estates. Total HCV areas for Tomanggong CU is 125.64 Ha.</p>
	<p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>YES</p>	
	<p>7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>YES</p>	
	<p>7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to</p>	<p>YES</p>	

**RSPO PUBLIC SUMMARY**

Clause	Indicators	Comply Yes/No	Findings
	<p>protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>		
	<p>7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p>	<p>YES</p>	<p>There were no local communities living nearby Tomanggong CU only surrounding with Hap Seng Own Estate. So, this indicator was not applicable with this CU.</p>
	<p>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</p>	<p>YES</p>	<p>The following program has been established in relation to the HCV/RTE protection during the year 2023. A training programme for year 2023 was available. An appropriate disciplinary measure was instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species, and also Policy and Procedure has been developed for disciplinary measures titled 'Disciplinary Measures Against Any Activities Involved with Rare Threatened &amp; Endangered Species (RTE) / Tindakan Terhadap Sebarang Aktiviti Melibatkan Haiwan Terancam (RTE)'.</p>

**RSPO PUBLIC SUMMARY**

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	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.		
	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	Tomanggong CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying is not allowed within buffer area at the HCV Area. It was noted that CCTV was placed at a strategic area surrounding the estate to control everything including any illegal activities. CCTV is in operation 24hours.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Auditors has verified through checking through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Tomanggong CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

**RSPO PUBLIC SUMMARY**

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

Clause	Indicators		Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	(a)	<p>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.</p>		<p>HSP was committed towards getting the 100% RSPO certification. The target year for certification was revised to 2025 (as in ACOP 2022) and approval from RSPO Secretariat date 22/09/2023 (sighted communication through email with head of certification of RSPO). 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)</p> <p>A meeting was held at 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 were no clearance of primary forest at Pelipikan Estate. However, there were land clearing 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</p>
	(b)	<p>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;</p>		<p>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.</p>
	(c)	<p>Any revision to the time-bound plan or to the circumstances of the</p>		<p>The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards</p>

**RSPO PUBLIC SUMMARY**

		company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);		100% RSPO certification of estates/mills. Details were provided in the 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.		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 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;		<p>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:</p> <p><u>Northbank and Tabin Estate</u></p> <p>a) HCV Assessment at Northbank and Tabin Estate has been conducted in year 2013 and completed the report on 20 November 2013.</p> <p>b) 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.</p> <p><u>Pelipikan Estate</u></p> <p>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. received the reviewer's comment on the</p>

**RSPO PUBLIC SUMMARY**

				LUCA assessment and latest replied on 07/05/2023
	(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;		<p>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:</p> <p>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)</p> <p><u>Northbank and Tabin Estate</u> Land conflict are still under court case. Please refer Hap Seng Plantations 2018 Annual Report – refer page 115 (b)</p> <p><u>Pelipikan Estate</u> Land conflict was resolved with the affected and relevant parties. Please refer Hap Seng Plantations 2018 Annual Report – refer page 269 (c)</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;		<p>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)</p> <p><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.</p> <p><u>Pelipikan Estate</u> There were no labour dispute reported during JCC with stakeholder meeting conducted on 03/05/2023. Overall no negative impacts.</p>
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;		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.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,		<p>Based on the latest internal assessment carried 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.</p> <p>It was evident that in handling uncertified management unit has</p>



**RSPO PUBLIC SUMMARY**

		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		conducted the Joint Consultation Committee to address unresolved issues. Actions in progress.
		<ul style="list-style-type: none"> <li>A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;</li> </ul>		Further information can be obtained from <a href="https://document.rspo.org/2022/Hap_Seng_Plantations_Holdings_Bhd_A_COP2022.pdf">https://document.rspo.org/2022/Hap_Seng_Plantations_Holdings_Bhd_A_COP2022.pdf</a> .
		<ul style="list-style-type: none"> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>		As of this audit Hap Seng Plantations still on track and follow the requirement of uncertified requirement units, Further information can be obtained from <a href="https://document.rspo.org/2022/Hap_Seng_Plantations_Holdings_Bhd_ACOP2022.pdf">https://document.rspo.org/2022/Hap_Seng_Plantations_Holdings_Bhd_ACOP2022.pdf</a> . 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.
		<ul style="list-style-type: none"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>		
		<ul style="list-style-type: none"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>		
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.		
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above		It has been verified that Tomanggong Group of Estate (TGOE) owned the said lands as Country Lease land title (CL) from The Government of The State of Sabah. The land was not previously owned by any users and

**RSPO PUBLIC SUMMARY**

		<p>may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.</p>		<p>subject to customary rights of local communities and indigenous people. The Mechanism of verification is CB going through Interviewed with surrounding smallholder and government agencies, CB also keep track the records in table 1.4 Stakeholder Consultation above. During this audit, it was confirmed through interviewed relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, Harus Abadi Sdn Bhd and IOI Plantations. There was no land encumbered by customary rights or dispute from any stakeholder at the Tomanggong CU</p>
<p>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.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		<p>No additional indicators</p>	<p>Yes</p>	<p>It has been verified that Tomanggong Group of Estate (TGOE) owned the said lands as Country Lease land title (CL) from The Government of The State of Sabah. The land was not previously owned by any users and subject to customary rights of local communities and indigenous people. The Mechanism of verification is CB going through Interviewed with surrounding smallholder and government agencies, CB also keep track the records in table 1.4 Stakeholder Consultation above. During this audit, it was confirmed through interviewed relevant stakeholder such as the Kg Tidung, small grower Spark Glory Sdn Bhd, Lebijaya, Harus Abadi Sdn Bhd and IOI Plantations. There was no land encumbered by customary rights or dispute from any stakeholder at the Tomanggong CU</p>

**RSPO PUBLIC SUMMARY**

**ATTACHMENT 4**

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

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Root Cause &amp; Corrective Action Taken by the CU</b>	<b>Verification Statement by Auditors</b>
3.7.2 NEA 01 2023	Minor	<p>Finding: Establishment of gender committee unable to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>Objective evidence: It was noted that Gender Committee has been established accordingly. The committee comprises of female employees of both management and workers representatives. However, the understanding and implementation of gender committee at Litang and Tagas Estate are very limited and there is no guideline as reference to the establishment of Gender Committee.</p>	<p>Root cause: Inadequate understanding of the function and role of the gender committee</p> <p>Corrective Action:</p> <ul style="list-style-type: none"> <li>• Estate management to establish the guideline as reference to representative gender committee to ensure they understand the function and role of gender committee.</li> <li>• Estate management &amp; Sustainability Department will cross-check the understanding and implementation of gender committee at yearly basis.</li> </ul>	<p>Root Cause and corrective action plan accepted; the effectiveness of implementation will be verified during next audit.</p> <p>Status: Open</p>
6.2.3 NEA 02 2023	Major	<p>Finding: Workers worked continuously without Rest Day as per Sabah Labour Ordinance (SLO) section 104B.</p> <p>Objective evidence: At Tomanggong Estate, interview session with one of the workers (security) mentioned that he works continuously without having rest day. Documentation review of the check-roll logbook showed that the said workers had work continuously including Public Holidays since January, February, March, May, June and September 2023. This were also confirmed during interview with Chief Security. This is contradictory to the SLO and the employment contract signed between worker and the management.</p>	<p>Root cause: Estate management allow the workers (security) works continuously without having rest day according to his will and was not referring and guided as per Sabah Labor Ordinance. It was assumed as acceptable when it was agreed by the workers at the first place.</p> <p>Corrective Action:</p> <ul style="list-style-type: none"> <li>• The management unit provide training/briefing immediately on 20.11.2023 regarding the important of rest day to the workers.</li> <li>• sustainability department provide training/briefing immediately on 20.11.2023 regarding the SLO on rest day to the CU PIC.</li> <li>• The Sustainability Team will ensure to monthly cross check the</li> </ul>	<p>Root cause accepted. Sighted evidence training material and training record has been conducted to respective CU by Sustainability Department and training has been conducted to all employees on date 20/11/2023 related to SLO and rest days. It emphasized the importance of complying to the legal requirement. Also were sighted an evidence cross check of checkroll by Sustainability Team to the CU before end of every months.</p> <p>Status: closed.</p>

**RSPO PUBLIC SUMMARY**

			check roll regarding the workers rest day.	
7.8.2 DA 01 2023	Major	<p>Finding: Water courses and wetlands was not effectively protected, including maintaining riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>Objective evidence: Based on site inspection at Tagas Estate: 1)The riparian reserves (Sg. Segama) Field RP23/1, sighted traces of chemical spraying operation were carried out at the demarcated area. 2)The Field PR23/2, sighted traces of leachate from EFB dumping, that channel to artificial drainage and waterways that directly to Sg. Segama. 3)The Field SO02P, sighted traces of selective chemical spraying operation were carried out at the close to the water edge at the artificial drainage and waterways that directly channel to stream within Tagas Estate (Upstream). The selective spraying was implemented due to removed unwanted weed i.e., Itchgrass (<i>Rottboellia cochinchinensis</i>).</p>	<p>Root cause: Respective PIC (supervisor) during the chemical activities and EFB dumping sites were on leave. This has resulted the lack of Monitoring of employees during chemical activities at buffer zones or drainages areas that directly channel to the natural waterways and will lead to the pollution.</p> <p>Corrective Action:</p> <ul style="list-style-type: none"> <li>• Will assign other PIC (supervisor) if chemical activities will carry out at buffer zones areas or waterways areas for monitoring of spraying activities and EFB dumping sites.</li> <li>• Provide training for workers to avoid any activities to the area from the water edge at the artificial drainage and waterways that directly channel to the natural waterways also will lead pollution.</li> <li>• Sustainability Team will monitor (twice a year) the efficiency of the training conducted by estate on prohibition to the area near the water edge at the artificial drainage and waterways that directly channel to the natural waterways also will lead pollution.</li> </ul>	<p>Root cause accepted as lack of resources contributed to lack of monitoring by the CU. Sighted evidence training environmental (Spraying &amp; EFB) &amp; safety on date 04/12/2023 by Executive Sustainability. Evidence also received that all the areas have been restored with natural grasses and the EFB areas were removed to the suitable places which far from waterways areas. The auditor also received monitoring programmed for Sustainability team will be checked (twice a year) the efficiency training conducted by the CU by interview and monitoring of the areas of spraying and EFB dumping.</p> <p>Status: closed</p>
7.10.3 DA 02 2023	Major	<p>Finding: The few activities of significant pollutants was not identified and plans to reduce or minimise them. Other pollutants were not effectively implemented and monitored.</p> <p>Objective evidence: 1)Portable generator and servicing/maintenance vehicle at house activities yet to be identified in the impact and aspect. Based on site inspection at wooden houses Litang Estate and portable generator at Tagas Estate, sighted traces of used oil lubricant on the ground without any preventive maintenance.</p>	<p>Root cause: Ineffective monitoring of the current estate management to the pollutant activities as per weekly inspection of housing areas.</p> <p>Corrective Action:</p> <ul style="list-style-type: none"> <li>• To provide training and briefing for PIC handling weekly housing inspection and to workers regarding spillage oil and recycle waste disposal to improve</li> </ul>	<p>Root cause accepted. Sighted an evidence training has been conducted by Sustainability department on date 04/12/2023 to PIC related to housing inspection checklist and to employees related to "tumpahan minyak, pembuangan sampah sarap" and also to no open burning. Auditor also sighted an evidence Environmental Impact</p>

**RSPO PUBLIC SUMMARY**

		<p>2)Waste disposal management was not efficiently implemented. During site inspection at wooden houses (Litang, Tagas, Tomanggong Estate/POM) sighted recycled wastes such as tin, bottle, plastic, scheduled wastes such as empty pesticides container, used PPE, and food wastes at the back of housing compound and adjacent the broken channel drains.</p> <p>3)Open fire for waste disposal was implemented at Litang Estate. Based on site inspection at wooden houses, sighted traces of fire burning that used for wastes disposal and dried coconut fronds.</p>	<p>awareness and cleanliness among the workers and to improve the monitoring manner on the pollutant activities.</p> <ul style="list-style-type: none"> <li>• EIA also has been updated and revised to include the activity at housing areas related to oil spillage during maintenance of own motorcycle or vehicles.</li> <li>• Sustainability Team will monitor (by month) on site checking to avoid any pollutants regarding oil spillage and recycle waste disposal.</li> </ul>	<p>Assessment Mnaagement Action Plan and continuous improvement Plan for Tomanggong Group of Estates on activities maintenance own hehicles at housing areas. Auditor also sighted the schedule of sustainability teams for monthly basis to on site checking to respective sites.</p> <p>Status: closed.</p>
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**RSPO PUBLIC SUMMARY**

**ATTACHMENT 5**

**STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED**

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
3.3.2 MAR 01 2022	Major (Upgraded)	<p>Finding: Mechanism to check consistent implementation of procedures was not fully in place.</p> <p>Objective evidence: During interview and documentation review, it was found that, the workers of the sundry shop i.e Kedai Tomanggong Utama did not have the payslip, agreement and passport with them. There is no mechanism to check the implementation of procedures for the Tomanggong CU management on the compliances of the vendor management such as sundry shop.</p>	<p>Based on interview and documentation review, employment contract between sundry shop's workers and their employees (Tomanggong Estate - Lok Video Centre), monthly payslip and passport are available upon request. Implementation of correction and corrective action is in place. Thus previous NCR was satisfactory closed.</p>
3.3.3 MRS 01 2022	Minor	<p>Finding: Records of monitoring and any actions taken was not fully maintained and available. Facilities of Clarifier Tank and Sand Filter Tank were not fully effectively risk assessed and monitored for health and safety issues.</p> <p>Objective evidence: During inspection of Water Treatment Plant in Tagas Estate and Litang Estate, and records review, there were several non-compliances found on the unsafe condition of the walkway platform and ineffectiveness of the H&amp;S monitoring to address health and safety risks to people as listed below:</p> <ol style="list-style-type: none"> <li>1) At Tagas Estate and Litang Estate, walkway platform connecting from the Clarifier Tank and Sand Filter Tank as verified at Tagas and Litang estates only guarded with handrail and mid-rail. No toeboard/kickplate as protective barrier to provide protection for workers from exposing to the risk fall hazard during walking/working at the walkway platform. This condition will cause significant serious injury in case of accident.</li> <li>2) HIRARC form which was reviewed on 25 March 2022 at Tagas Estate and 3 February 2022 at Litang Estate has identified the hazard of working at height at the water treatment water tank. The existing risk control only covered on handrail for climbing of the WTP tank stairs. No identification of risk control for the walkway platform.</li> <li>3) The Water Treatment Plant or Water Treatment Tank and Sand Filter Tank yet to be listed in the workplace</li> </ol>	<p>Facilities of Clarifier Tank and Sand Filter Tank at Water Treatment Plant (WTP) were effectively risk assessed and monitored for health and safety issues. Site verification at WTP in Tagas Estate and Litang Estate, and records review, there were no evidence unsafe condition of the walkway platform and efficiency of the H&amp;S monitoring to address health and safety risks to people. The walkway platform connecting from the Clarifier Tank and Sand Filter Tank at Tagas and Litang Estate was guarded with handrail and mid-rail, installation of toe board/kickplate as protective barrier to provide protection for workers from exposing to the risk fall hazard during walking/working at the walkway platform was verified. In addition, HIRARC was reviewed and updated on 09/01/2023, identification of risk control for the platform path above the WTP Tank (Clarifier Tank Sand Filter) was risk assessed. Furthermore, the WTP or Water Treatment Tank and Sand Filter Tank have been included in the workplace inspection form at Tagas Estate titled 'Borang Pengumpulan Maklumat Pemeriksaan Tempat Kerja' and at Litang Estate titled 'RSPO Checklist – Litang Estate'. Moreover, the 3 months records checklist and latest minutes meeting OSH was verified, confirmed the H&amp;S was monitored and discussed to address health and safety risks to people. <b>As a result, previous Minor NCR MRS 01 2022 was satisfactory closed.</b></p>

**RSPO PUBLIC SUMMARY**

		<p>inspection form at Tagas Estate titled 'Borang Pengumpulan Maklumat Pemeriksaan Tempat Kerja' and at Litang Estate titled 'RSPO Checklist – Litang Estate'.</p> <p>4) Report on Water Treatment Plant for Tagas Estate - August 2022 dated 6 September 2022 was ticked ✓ 'G' in column 'Conditions' that interpreted as 'good condition' for both the Clarifier Tank and Sand Filter Tank. However, no status/description on the condition of the walkway platform.</p> <p>5) Since the condition of walkway platform was not identified during workplace inspection on 24 October 2022 at Tagas Estate and 20 September 2022 at Litang Estate, this issue will be missed to be brought up to the safety committee meeting for discussion and action.</p>	
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**RSPO PUBLIC SUMMARY**

**ATTACHMENT 6 – Timebound Plan**

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

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification
				Latitude	Longitude			
<i>Hap Seng Plantations (River Estates) Sdn Bhd – Sg Segama Group of Estate</i>	<i>Malaysia</i>	<i>Bukit Mas Palm Oil Mill</i>	<i>Locked Bag No.05, 91109 Lahad Datu, Sabah</i>	<i>5°20'14.281"N</i>	<i>118°28'25.104"E</i>	<i>N/A</i>	<i>Certified</i>	
<i>Bukit Mas Palm Oil Mill</i>	<i>Malaysia</i>	<i>Sungai Segama Estate</i>		<i>5°19'02.421"N</i>	<i>118°27'47.331"E</i>	<i>5,174.00</i>	<i>Certified</i>	
	<i>Malaysia</i>	<i>Bukit Mas Estate</i>		<i>5°19'01.928"N</i>	<i>118°27'46.294"E</i>	<i>4,733.00</i>	<i>Certified</i>	
	<i>Malaysia</i>	<i>Kawa Estate</i>		<i>4° 21' 52.222"N</i>	<i>118° 2' 18.679"E</i>	<i>1,276.19</i>	<i>Certified</i>	
<i>Jeroco Plantation Sdn Bhd</i>	<i>Malaysia</i>	<i>Jeroco Palm Oil Mill 1</i>	<i>Locked Bag No.05, 91109 Lahad Datu Sabah</i>	<i>5° 25'52.002"N</i>	<i>118°25'02.005"E</i>	<i>N/A</i>	<i>Certified</i>	
<i>Jeroco Palm Oil Mill 1</i>	<i>Malaysia</i>	<i>Lokan Estate</i>		<i>5° 25' 51.800" N</i>	<i>118°22'57.804"E</i>	<i>3,155.39</i>	<i>Certified</i>	
	<i>Malaysia</i>	<i>Lutong Estate</i>		<i>5° 21' 55.601" N</i>	<i>118°26'26.201"E</i>	<i>2,448.40</i>	<i>Certified</i>	
	<i>Malaysia</i>	<i>Lungmanis Estate</i>		<i>5° 28' 46.304" N</i>	<i>118°24'11.301 E</i>	<i>2,200.00</i>	<i>Certified</i>	
	<i>Malaysia</i>	<i>Batangan Estate</i>		<i>5° 24' 43.704" N</i>	<i>118°26'59.803"E</i>	<i>3,632.88</i>	<i>Certified</i>	
<i>Jeroco Plantation Sdn Bhd</i>	<i>Malaysia</i>	<i>Jeroco Palm Oil Mill 2</i>	<i>Locked Bag No.05, 91109 Lahad Datu Sabah</i>	<i>5° 25' 52.002" N</i>	<i>118°25'02.005"E</i>	<i>N/A</i>	<i>Certified</i>	
<i>Jeroco Palm Oil Mill 2</i>	<i>Malaysia</i>	<i>Kapis Estate</i>		<i>5° 26' 34.303" N</i>	<i>118°24'51.001"E</i>	<i>2,681.00</i>	<i>Certified</i>	
<i>Hap Seng Plantations (River Estates) Sdn Bhd –</i>	<i>Malaysia</i>	<i>Tomanggong Palm Oil Mill</i>	<i>Locked Bag No.05,</i>	<i>5°25' 38.3" N</i>	<i>118°39' 33.5" E</i>	<i>N/A</i>	<i>Certified</i>	
	<i>Malaysia</i>	<i>Tomanggong Estate</i>		<i>5°24' 01.9" N</i>	<i>11 8°39' 51.7" E</i>	<i>2,654.80</i>	<i>Certified</i>	



**RSPO PUBLIC SUMMARY**

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

**Note:**

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