SIRIM QAS INTERNATIONAL	**SIRIM QAS INTERNATIONAL SDN. BHD.** Building 4, SIRIM Complex, No. 1 ,Persiaran Dato' Menteri, Section 2, 40700 Shah Alam, Selangor, Malaysia. **RSPO PUBLIC SUMMARY REPORT**	**File Ref.: EH04760003**

CLIENT : **HAP SENG PLANTATIONS (RIVER ESTATES) SDN BHD**

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

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 : **23-26 October 2018** **DURATION :** **16 auditor days**

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

STANDARD : RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014

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

VALIDITY OF RSPO CERTIFICATE : 09/01/2015-08/01/2020

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 Ab Rahman	Name	: KAMAL AMIRUL KAMARUZAMAN
Signature	:	Signature	:
Date	: 24/1/2019	Date	: 4.2.2019

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit					
On-site audit date :				No. of auditor days :	
Audit team :					
No. of major NCR :	-	Indicator: -			Closing date : -
No. of minor NCR :		Indicator:			
Indicate the stakeholders interviewed during the on-site audit :	Employees		Settlers	Villagers	Suppliers
	Contract workers		NGOs	Govt. agency	Independent growers
	Indigenous people		Contractor	Others (Please specify)	
Supply base sampled :					

Annual Surveillance Audit 1					
On-site audit date :				No. of auditor days :	
Audit team :					
No. of major NCR :		Indicator:			Closing date :
No. of minor NCR :		Indicator:			
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees		Settlers	Villagers	Suppliers
	Contract workers		NGOs	Govt. agency	Independent growers
	Indigenous people		Contractor	Others (Please specify)	
Supply base sampled :					
Changes since the last audit :					

RSPO P&C PUBLIC SUMMARY REPORT

Annual Surveillance Audit 2					
On-site audit date	:	22-25/11/16		No. of auditor days :	12
Audit team	:	Hazani Othman, Mohd. Zulfakar Kamaruzaman, Mohd Norddin bin Abd. Jalil			
No. of major NCR	:	7	Indicator: E4.1, 2.1.1, 4.6.5, 4.7.2, 4.7.3, 6.1.3, 6.5.2		Closing date: 25/1/2017
No. of minor NCR	:	5	Indicator: 4.1.2, 4.6.9, 4.7.5, 4.8.2, 6.9.3		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers	Suppliers
		X			X
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specify)	
			X		
Supply base sampled	:	Litang and Tagas Estates			
Changes since the last audit	:	New Manager in Tagas Estate. Tagas Estate: Built new 8 housing blocks (1 block = 2 house units). Litang Estate: New house under construction.			

Annual Surveillance Audit 3					
On-site audit date	:	7-10/11/2017		No. of auditor days :	12 Days
Audit team	:	Rozaimee Ab Rahman, Mohd Zulfakar Kamaruzaman, Abdul Raof Asis			
No. of major NCR	:	1	5.2.2		Closing date: 8/01/2018
No. of minor NCR	:	-	Indicator: -		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers	Suppliers
		X			X
		Contract workers	NGOs	Govt. agency	Independent growers
		Indigenous people	Contractor	Others (Please specify)	
			X		
Supply base sampled	:	Tomanggong POM, Tomanggong Estate, Litang Estate			
Changes since the last audit	:	No change.			
Report approved by	:	Radziah Mohd Daud		Approval date :	13/02/2018

RSPO P&C PUBLIC SUMMARY REPORT

Annual Surveillance Audit 4					
On-site audit date	:	23 - 26 October 2018		No. of auditor days :	16 days
Audit team	:	Rozaimee Ab Rahman, Mohd Zulfakar Kamaruzaman, Hazani Othman, Amir Bahari			
No. of major NCR	:	1	Indicator: 6.5.2		Closing date : 11/1/2019
No. of minor NCR	:	nil	Indicator : -		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local community	Suppliers
		√		√	
		Contract workers	NGOs	Govt. agency	Independent growers
				√	√
		Indigenous people	Contractors	Others (Please specify)	
		√	√		
Supply base sampled	:	Tomanggong POM, Tomanggong Estate, Litang Estate, Tagas Estate			
Changes since the last audit	:	No changes.			
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.			
√Report approved by	:	Radziah Mohd Daud		Approval date : 24/1/2019	

SUMMARY OF INFORMATION

TABLE 1

TYPE OF AUDIT	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period			Nov 2016 – Oct 2017	Nov 2017 – Oct 2018	Nov 2018 – Oct 2019
Certified Area (Ha)			7,515.73	7,515.73	*7,515.75
Planted Area(Ha)			6,900.70	6,900.70	6,900.70
Production Area(Ha)			5,866.20	5,877.10	6,166.40
HCV Area (Ha)			125.64	125.64	125.64
Certified FFB Processed (MT)			129,730.00	139,295.00	134,424.00
Production of Certified CPO (MT)			29,579.00	31,439.00	30,703.00
Production of Certified PK (MT)			5,835.00	6,282.00	6,055.00
REMARKS	ASA 4 - *The certified area is 7,515.75Ha against the previous 7,515.73Ha. This was the corrected figure as certified area for Litang Estate is 2,648.62Ha instead of 2,648.60Ha (that was provided in round-up figure previous submission).				

TABLE 2

	CPO	PK
Last years certified volume (MT)	31,439.00	6,282.00
Last years actual certified sold (MT)	*0.00	*1,110.49
Last years actual sold under other schemes (MT)	0.00	0.00
Last year's sold conventional (MT)	*5,449.29	*57.72
New year certified volume (MT)	30,703.00	6,055.00

*Low sales due to low production of the certified product.

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1.0 AUDIT PROCESS

1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. 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 accredited by ASI on 27 September 2014.

1.2 Qualification of audit team

Member of the Audit Team	**Role/area of RSPO requirements**	**Qualifications**
Rozaimee Ab. Rahman	Auditor Team Leader / Environment and Occupational health and safety	Holds a B. Sc. Of Agriculture. He had several years of working experience in the oil palm operation. He is a qualified auditor for RSPO P&C.
Mohd Zulfakar Kamaruzaman	Auditor / Supply chain, Environment and HCV	Holds a B. Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation.
Amir Bahari	Auditor / Good Agricultural Practices (GAP) and Safety	Holds a B.Sc. (Hons) in Chemistry from Universiti Sains Malaysia and has served the plantations industry for 30 years. He has been involved in ISO 9001, ISO 14001 and EMS OHSAS 18001 implementation during the tenure of service.
Hazani Othman	Auditor / Social	Holds a Bachelor of Forestry Science and Diploma in Forestry, from the Universiti Putra Malaysia. He is a lead auditor for ISO 14001, FSC & MTCC FMC and CoC and RSPO P&C.

1.3 Audit methodology

The audit covered Tomanggong palm oil mill and all three Tomanggong CU supply bases; Tomanggong, Litang and Tagas Estate. The sampling of the number of the supply base was using the formula of 0.8√y. The audit included an on-site audit to the estates, mill, linesites, amenities and facilties 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

Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit.

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 8 months from this audit.

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 (POM) and five supply base, namely the Tomanggong Estate, Litang Estate, Tabin Estate, Tagas Estate and Northbank.Estate. However, due to issues in the new planting procedure at Tabin Estate and Northbank Estate, the management of Tomanggong CU with the consent of RSPO had decided to exclude both estates during the stage 2 audit. 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.

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 to be certified.

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 (Nov 2017 - Oct 2018)

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Tomanggong	7,541.71	6	SIRIM
Tagas	4,275.50	3	SIRIM
Litang	13,632.59	10	SIRIM
Total	***25,449.80**	-	SIRIM
NorthBank	53,346.12	40	Not certified
Tabin	32,957.08	25	Not certified
Outside Crop	22,365.74	17	Not certified
Total Non-certified	**108,668.94**	**-**	Not certified

*Low volume of certified FFB received.

Table 2: Projected FFB production by the supply base for the next reporting period (Nov2018 – Oct 2019)

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Tomanggong	42,172.00	15	SIRIM
Tagas	41,122.00	15	SIRIM
Litang	51,130.00	19	SIRIM
Total certified	**134,424.00**	**-**	SIRIM
NorthBank	66,260.00	24	Not certified
Tabin	45,381.00	17	Not certified
Outside Crop	28,340.00	10	Not certified
Total Non certified	**139,981.00**	**-**	Not certified

Table 3: Actual CPO and PK tonnage for the last reporting period (Nov 2017 – Oct 2018)

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	134,118.74
FFB Processed	134,118.74
Certified FFB	*25,449.80
Non Certified FFB	108,668.94
Crude Palm Oil (CPO)	
Overall CPO Production	29,212.43
Certified CPO Production	*5,449.29
Certified CPO delivered as RSPO	0.00
Certified CPO delivered as non-RSPO	5,449.29
Certified CPO delivered under other sustainable schemes	0.00
Palm Kernel (PK)	
Overall PK Production	5,868.76
Certified PK Production	*1,168.21
Certified PK delivered as RSPO	1,110.49
Certified PK delivered as non-RSPO	57.72
Certified CPO delivered under other sustainable schemes	0.00

*Low sales due to low production of the certified product.

Table 4: Projected CPO and PK tonnage for the next reporting period (Nov 2018 – Oct 2019)

RSPO Supply Chain Model : Mass Balance	Estimated production Total (MT)
FFB Received	274,405.00
FFB Processed	274,405.00
Certified FFB Processed	134,424.00
Non-certified FFB Processed	139,981.00
Crude Palm Oil (CPO)	
Overall CPO Production	60,814.00
Certified CPO Production	30,703.00
Certified CPO delivered as RSPO	30,703.00
Certified CPO delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	0.00
Palm Kernel (PK)	
Overall PK Production	12,155.00
Certified PK Production	6,055.00
Certified PK delivered as RSPO	6,055.00
Certified PK delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	0.00

Table 5: Planted and certified area of the Tomanggong 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
Total	6,900.70	7,515.75

Table 6: Planting profile for Tomanggong Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1994	2nd	Mature	324.50	13.48
1996	2nd	Mature	348.50	14.48
1997	2nd	Mature	101.00	4.20
1998	1st	Mature	401.50	16.68
2014	3rd	Mature	393.20	16.34
2015	3rd	Mature	143.00	5.94
2016	3rd	Immature	352.00	14.62
2017	3rd	Immature	343.30	14.26
Total			**2,407.00**	**100**

Table 7: Planting profile for Tagas Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1994	1st	Mature	189.00	9.36
1997	2nd	Mature	185.00	9.16
2000	2nd	Mature	668.00	33.09
2001	2nd	Mature	414.00	20.51
2004	2nd	Mature	234.50	11.61
2006	2nd	Mature	328.50	16.27
Total			**2,019.00**	**100**

Table 8: Planting profile for Litang Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1993	1st	Mature	614.50	24.83
1994	1st	Mature	397.90	16.08
1997	1st	Mature	321.50	12.99
2011	2nd	Mature	236.00	9.54
2012	2nd	Mature	719.50	29.07
2015	3rd	Mature	146.30	5.91
2017	3rd	Immature	39.00	1.58
Total			**2,474.70**	**100**

2.3 **Organizational Information/Contact Person**

The details of the contact person is as shown 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 / thomds@hapseng.com

3.0 AUDIT FINDING

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

There was no change to the certified products since last assessment.

3.2 Progress and changes in time bound plan (Refer to Attachment 7 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:

Internal Assessment dated in 25 April 2017 was conducted based on RSPO Partial Certification Requirements. No significant non-compliance was observed by the organization. It has been noted that Hap Seng Plantation was progressively undergoing the RSPO Certification process towards 100% RSPO certification of their estates/mills.
HCV Assessment at Northbank and Tabin Estate has been conducted in year 2013 and completed the report on 20th November 2013. Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). The required LUCA data was submitted and has passed by the compensation panel. The company has already provided the Concept Note for review by RSPO.

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?

N/A

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	Not applicable. There is no associated smallholders supplying FFB to the CU.			
iv.	Any new acquisition which has replaced primary forests or HCV areas		Yes	√	No
	N/A				

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

N/A

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 complaints from stakeholders were observed.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) (details refer to Attachment 4)	List : NIL	-
Total no. of major NCR(s) (details refer to Attachment 4)	List : 1	HO 01

4.2 For SC (Details checklist refer to Attachment 5) :

Total no. of minor NCR(s) (details refer to Attachment 5)	List : -	N/A
Total no. of major NCR(s) (details refer to Attachment 5)	List : -	N/A

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.

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) which have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

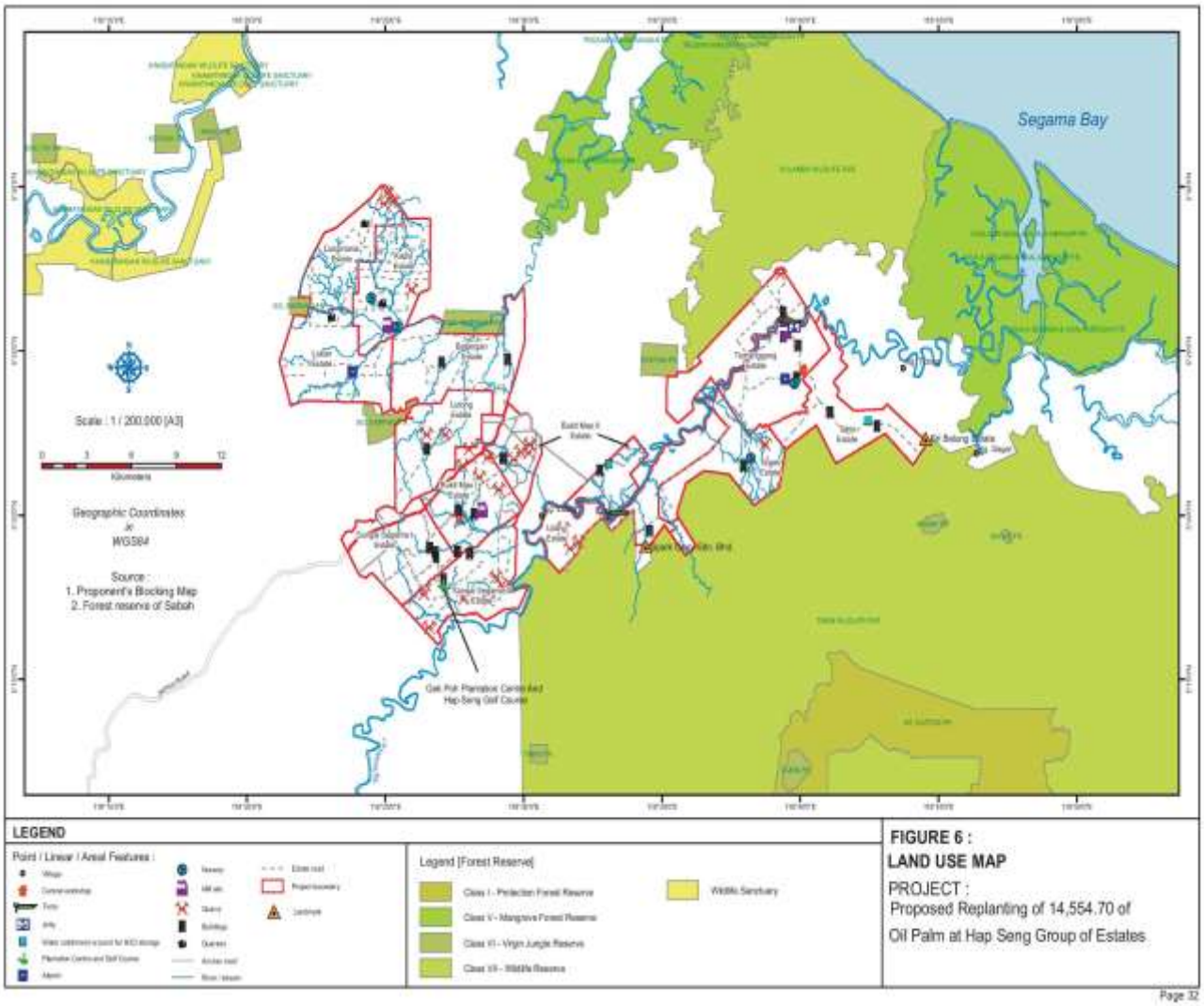
Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.

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		11/1/2019
	(Name)	(Signature)	(Date)

Attachment 1

Map of Tomanggong CU under Hap Seng Group of Estates



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RSPO P&C MYNI ANNUAL SURVEILLANCE AUDIT (4) PLAN

1. **Objectives**

The objectives of the audit are as follows:

(i) To determine Certification Unit conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI)
(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 - 26 October 2018

3. **Site of assessment** : Tomanggong Certification Unit;
   (i) Tomanggong Palm Oil Mill
   (ii) Tomanggong Estate
   (iii) Litang Estate
   (iv) Tagas Estate

4. **Scope of certification** : Production of Sustainable Crude Palm Oil and Palm Kernel Using the Mass Balance Supply Chain Model

5. **Reference Standards used** :
   (i) RSPO P&C MYNI:2014
   (ii) RSPO Certification Systems, June 2017
   (iii) RSPO Supply Chain Standard, 14 June 2017
   (iv) Company's audit criteria including Company's Manual/Procedures

6. **Assessment team members**
   (i) Audit Team Leader: Rozaimee bin Ab Rahman
   (ii) Auditor : i) Mohd Zulfakar bin Kamaruzaman
   ii) Amir Bahari iii) Hazani bin Othman

(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 including observation of practices, interviews with interested parties (all categories of contractors, employees, nearby population, etc.), documentation evaluation 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. For major non conformities raise in the surveillance audit, correction shall be verified in the next audit. **Recurring major non- conformities** on the same indicator **in successive surveillance audits** shall result in **the immediate suspension** of the RSPO P & C certification shall be recommended.

9. **Confidentiality Requirements**

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

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

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

11. **Reporting**

(i) Language : English
(ii) Format : Verbal and Written
(iii) 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**

Date / Time	Coverage of assessment / Activity / Site	Amir	Zulfakar	Rozaimee	Hazani
Day 0 : Monday (22/10/2018) – Travelling day **All four auditor (Amir, Zulfakar, Rozaimee and Hazani) arrived at Lahad Datu airport estimate 3.55 pm**					
Day 1 : Tuesday (23/10/2018)					
8.30am – 9.15am	Opening Meeting – Venue: **PCO** Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings.	/	/	/	/
9.15am – 12.30pm	**Site observation to Tomanggong POM** **P1, P2, P4, P5, P6, P8** Verification of basic information mill & estate Confirmation of time bound plan & review of partial certification Interview with workers, contractors etc. Verified mill best practices	/			
	Site observation to Tomanggong POM **RSPO Supply Chain 2017** RSPO Supply chain standard implementation including model requirements		/		
	Site observation to Tomanggong Estate **P1, P2, P3, P4, P5, P6, P7, P8** • Occupational safety & health aspects, chemical management • Environmental management, waste & chemical management • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters. • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc • Interview with workers, contractors etc. • Legal requirement			/	/

1.00pm – 2.00pm	Lunch Break / Zuhur prayer	/	/	/	/
2.00pm – 5.00pm	Continue assessment at respective sites	/	/	/	/
5.00 pm	End of day 1 audit	/	/	/	/
Date / Time	**Coverage of assessment / Activity / Site**	**Amir**	**Zulfakar**	**Rozaimee**	**Hazani**
Day 2 : Wednesday (24/10/2018)					
8.30am – 12.30pm	**Site observation to Tomanggong Estate** **P1, P2, P3, P4, P5, P6, P7, P8** Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Interview with workers, contractors etc.	/	/		
	Site observation to Tomanggong POM **P1, P2, P3, P4, P5, P7, P8** • Occupational safety & health aspects, chemical management • Environmental management, waste & chemical management • GHG Calculation • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters. • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc • Interview with workers, contractors etc. • Legal requirement			/	/

1.00pm – 2.00pm	Lunch Break				
2.00- 5.00 pm	Continue assessment at respective sites	/	/	/	/
5.00 pm	End of audit day 2	/	/	/	/
Date/Time	**Coverage of assessment / Activity / Site**	**Amir**	**Zulfakar**	**Rozaimee**	**Hazani**
Day 3 : Thursday (25/10/2018)					

8.30am – 12.30pm	**Site observation to Litang Estate** **P1, P2, P3, P4, P5, P6, P7, P8** • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM. • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters. • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc • Interview with workers, contractors etc. • Legal requirement • New planting	/			/
	Site observation to Tagas Estate **P1, P2, P4, P5, P6, P7, P8** • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects, chemical management • Environmental management, waste & chemical management • GHG Calculation		/	/	
1.00pm – 2.00pm	Lunch Break				
2.00 pm – 5.00 pm	Continue assessment at respective sites	/	/	/	/
5.00 pm	End of audit day 3	/	/	/	/
Date/Time	**Coverage of assessment / Activity / Site**	**Amir**	**Zulfakar**	**Rozaimee**	**Hazani**
Day 4 : Friday (26/10/2018)					
8.30am – 12.30pm	**Site observation to Tagas Estate** **P1, P2, P3, P4, P5, P6, P7, P8** • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM. • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters. • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc • Interview with workers, contractors etc. • Legal requirement • New planting	/			/

	Site observation to Litang Estate **P1, P2, P4, P5, P6, P7, P8** • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects, chemical management • Environmental management, waste & chemical management • GHG Calculation		/	/	
12.30pm – 1.30pm	Lunch Break				
1.30pm – 3.00pm	Continue assessment at respective sites	/	/	/	/
3.00pm – 4.00pm	Verification on outstanding issues Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any)	/	/	/	/
4.00pm - 5.00pm	• Closing meeting – venue at **PCO** • Presentation of audit findings, positive comment, • Question & answer	/	/	/	/

Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS

Principle 1: COMMITMENT TO TRANSPARENCY

Clause	Indicators		Comply Yes/No	Findings
C 1.1 Growers and millers provide 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	There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	YES	Tomanggong CU had continued to implement the communication procedure as had been described and established for estates and mill. At the point of audit, there was no request for information from the stakeholders received by the CU. The CU also has established mechanism to channel such queries through regular meetings with workers. Various issues and complaints were heard by the management and decisions made for subsequent action. Procedure on communication which was updated in November 2012 is available. The procedure provided a form to be filled up by any stakeholder who has interest to request any information pertaining to Principle 1. The procedure also allows request through verbal or in writing. Review of records during this audit revealed that since the last audit, there was no request for such information by stakeholders. HSPHB has a website, http://www.hapsengplantations.com.my/index.php which contains brief information about the company's structure, corporate profile, vision and mission, the business they were involved, financial and estates profiles information to name a few.
	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	YES	The estates had identified personnel responsible for complaints. Records of communication were identified and maintained. The internal communication recorded in the 'buku aduan'. Review of this record showed that the requests from internal stakeholders were mainly concerning repairs of employee housing. For external communication, minutes of meetings and 'buku aduan' were maintained. Review of official communication records, including response, found that it has been adequately maintained in the communication file.
C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative	1.2.1	Land titles/user rights (Criterion 2.2);	YES	The right to use the land at Tomanggong CU can be demonstrated and not disputed by any party. Assessor sighted that there were clear land ownership documents.
		Occupational health and safety plans (Criterion 4.7);	YES	Occupational Health & Safety Plan titled 'Occupational Safety & Health Plan 2018' has been established. Indicators set in the plan are being monitored. The audit on the progress monitoring of the programs identified is as in C 4.7 below.
		Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	YES	Environmental and social impact assessment, management action plans, and continuous improvement plan for Tomanggong CU of Estate and mill maintained available by the CU.
		HCV documentation summary (Criteria 5.2 and 7.3);	YES	The report of "Potential High Conservation Value Area Assessment Report of Tomanggong CU, Hap Seng Sdn Bhd, Sabah" is available for public but must through the record request at management and prepared by the Sustainability Executive. The report was completed in Oct 2017.

environmental or social outcomes.		Pollution prevention and reduction plans (Criterion 5.6);	YES	The list of waste generated from estate and mill activities maintained available. All sources of pollution have been identified by management. Mitigation measure and action taken also made available. Among of activities covered include line site, office, drainage, planting, fertilizing, scheduled waste and mill operation.
		Details of complaints and grievances (Criterion 6.3);	YES	The system was open to all aggrieved parties and there is evidence that estate community as well neighbouring community's use of the Grievances Book. The complaints and their outcomes were recorded and filed. The review of grievances book has to be with permission of Manager. Additionally, HSPHB has a website, http://www.hapsengplantations.com.my/index.php, and interested parties/stakeholder can put a complaints/ comment.
		Negotiation procedures (Criterion 6.4);	YES	Management document relating to social observed maintained. However, no case of negotiation observed.
		Continual improvement plans (Criterion 8.1);	YES	Tomanggong CU continued committed to utilize the established system to regularly monitor and review their key activities at the estates, and initiated the relevant action plans for continuous improvement in its key areas of operations on environmental, safety, health and welfare as well as social contribution to workers and community.
		Public summary of certification assessment report;	YES	The public summary was available at website by SIRIM QAS.
		Human Rights Policy (Criterion 6.13).	YES	Human Rights policy was made available at Tomanggong CU. Cross refer Criterion 6.13
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	Tomanggong POM has documented policy to committing on integrity for all their staffs and workers by publishing a book for Gek Poh Holdings Corporate Culture. The CU has communicated the policy to all Staff and Workers during training, also for new staffs and foreign workers during induction course.

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicators		Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	YES	Generally, Tomanggong CU continued to comply with most of the applicable local, national and ratified international laws and regulations.
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	Legal register has been updated by Agronomist Department (sustainability team). Latest updated in July 2018 related to Employment Insurance System Act 2017. Person in charge for compliance in legal requirement (LRR) for Tomanggong CU was the GM.

	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	Tomanggong CU maintained its mechanism to ensure that all the applicable legal requirements are implemented. The mechanism adopted are the annual evaluation of compliance exercise and half-yearly Estate Visit Report by plantation advisor.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	The CU maintained documented system for identifying and tracking the updates of the applicable legal requirements through various media such as LawNet, internet, newsletter, etc. The legal register management noted had been update accordingly. All the new amendment of applicable regulations were included in the legal register.
C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised NCR) land) and the actual legal use of the land shall be available. Major Compliance	YES	The right to use the land at Tomanggong 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 during audit and the original copies of the documents 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.
	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	YES	The perimeter boundary of the estates was visibly maintained by erecting pegs along the boundary, especially the ones that adjacent to state land and Tabin Wildlife forest reserves. During the site review, most of the boundary stones had been located and visibly maintained at Tomanggong Estate, Tagas Estate and Litang Estate.
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Hap Seng Plantations since 1895 -1969. The audit team had confirmed that there were no land issues related to previous owners.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is legitimately owned by Tomanggong CU since 1895 -1969. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.

	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties. Minor Compliance	YES	As reported in 2.2.1, it has been verified that there is no conflict or dispute over the land.
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is legitimately owned by Tomanggong CU since 1895 -1969. Hence, there was no land conflict anticipated nor the need to avoid escalation of conflict is required.
C 2.3 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.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). Major Compliance	YES	As reported in 2.2.1 of this checklist, Tomanggong CU has been developed since 1895 -1969. All the related documentation regarding the land acquisition was kept in Hap Seng HQ (PCO) Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. Hence, there was no map showing the legal, customary, or user right of other users since 1895 -1969.
	2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;	YES	There was no land dispute issue with any of the neighbouring private oil palm plantations. As reported in 2.2.1 of this checklist, Tomanggong CU has been developed since 1895 -1969. All the related documentation regarding the land acquisition was kept in Hap Seng HQ (PCO) Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Based on the audit fndings, copies of negotiated agreements on FPIC and other evidences required by these indicators a) to c) were not applicable.

		c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance		
	2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance	YES	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Tomanggong CU.
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	YES	There was no evidence of land being encumbered by customary rights or disputes from any stakeholder at Tomanggong CU.

Principle 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY

Clause	Indicators		Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	All operating units audited possessed a minimum 5-year financial plan comprising of both OPEX and CAPEX. The cost of production was reviewed and compared against expenditure each year with projections in place for future years. The estate similarly possessed a minimum of 5 years business plans. The estate budget components comprise of the following elements; a) upkeep, cultivation, harvesting & evacuation, b) welfare, RSP/MSPO compliance, etc. c) Crop projection, cost of production, yield statistics and performance, age profile d) Mature and immature cost/ha and cost/mt FFB. e) Management expenses / professional fees / building / compound f) Water and power / security/labour mobilization.

				g) CAPEX–Building/plant machinery/office equipment/motor vehicle attachments/water supply/Infrastructure The cost indicators are to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years.
	3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. Minor Compliance	YES	All the estates in the Tomanggong CU maintained records of replanting for a horizon of 5 years.

Principle 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored	4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	YES	Tomanggong CU continued to use the established manuals i.e. HSPHB's Oil palm Agricultural Policy Manual, Safe and Standard Operating Procedure and Accounting and Administrative Procedure manual. The Oil Palm Agriculture Policy, established in Apr 1994, last revised in Oct 2014 maintained in place for estate operation such as land clearing, field upkeep, pest and disease, FFB harvesting and evacuation, soil conservation and terracing, road construction and maintenance, planting density and planting technique, palm replacement during immaturity and supplying, manuring, palm thinning and replanting. Mill operation for instance, had continued to implement SOP that covered aspects related to oil palm processing, boiler operation, effluent treatment plant, laboratory, workshop activity and chemical and waste handling procedures. For the laboratory activities, the established procedure was updated accordingly in Dec 2014.
	4.1.2	A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	YES	The agronomic advisory report, Plantation Advisory monitoring report and Internal audit has carried out as mechanisms in checking the implementation of the procedures.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	The CU maintained its relevant records of monitoring appropriately.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Tomanggong CU has procedure in place. All the received FFB (internal and external) are recorded in a manner that information about the origin, transportation details and volume are made available. In addition, Joint Consultative Council Meeting was also being maintained accordingly.
C 4.2	4.2.1	There shall be evidence that good agriculture practices, as	YES	Tomanggong CU continued to use the established manuals and standard operating procedures to manage soil fertility to ensure optimal and sustained yield.

<table>
<tr><td rowspan="1">Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</td><td></td><td>contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.
Minor Compliance</td><td></td><td></td></tr>
<tr><td></td><td>4.2.2</td><td>Records of fertiliser inputs shall be maintained.
Minor Compliance</td><td>YES</td><td>Fertilizer inputs were based on recommendation by the Hap Seng’s Agronomy Department. The application programs were monitored using program sheets, bin cards, field cost book and manuring program sheets. Records of programs and applications of fertilizers were available. Records showed that actual applied in 2018 was in line with recommendations in both estates.</td></tr>
<tr><td></td><td>4.2.3</td><td>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance</td><td>YES</td><td>Periodic tissue and soil sampling are performed in Tomanggong CU in a 5-year cycle to monitor changes in nutrient status. The results formed the basis for the fertilizers input recommendation.</td></tr>
<tr><td></td><td>4.2.4</td><td>A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues. Minor Compliance</td><td>YES</td><td>EFB is applied at rate subject to Agronomist recommendations.</td></tr>
<tr><td>C 4.3
Practices minimize and control erosion and degradation of soils.</td><td>4.3.1</td><td>Maps of any fragile/marginal soils shall be available.
Major Compliance</td><td>YES</td><td>All the three estates visited maintained a recognized soil series map maintained for the guidance of the estates operations. In addition, the topography map is kept for the same purposes.</td></tr>
<tr><td></td><td>4.3.2</td><td>A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company’s SOP. Minor Compliance</td><td>YES</td><td>
<table>
<tr><th></th><th>Topography</th><th>Tomanggong</th><th>Litang</th><th>Tagas</th></tr>
<tr><td>1</td><td>0-5</td><td>2391.76</td><td>2581.30</td><td>2153.84</td></tr>
<tr><td>2</td><td>6-10</td><td>166.56</td><td>64.91</td><td>52.87</td></tr>
<tr><td>3</td><td>11-15</td><td>76.17</td><td>3.00</td><td>3.99</td></tr>
<tr><td>4</td><td>16-25</td><td>18.28</td><td>0</td><td>1.00</td></tr>
<tr><td>5</td><td>>25</td><td>2.03</td><td>0</td><td>0</td></tr>
<tr><td></td><td>total</td><td>2654.80</td><td>2649.20</td><td>2211.70</td></tr>
</table>

The details of the land slopes in the CU are shown in the above table. Terraces are constructed, and the cover crop are planted to enhance the erosion and growth of palms and to facilitate the collection of FFB in maturity for the duration of palm age to 25 years. Areas above 25 degree will be left uncultivated in compliance with the Company’s planting guidelines and policy.</td></tr>
<tr><td></td><td>4.3.3</td><td>A road maintenance programme shall be in place. Minor Compliance</td><td>YES</td><td>There is SOP on the Road Construction And Maintenance revised in July 2009. Budget is available and utilized by the estates. The road management is handled by the TCU for the entire CU. Sighted road program for 2018 having details as follows. The roads to be included in the program is drawn in the estate map for monitoring purposes.</td></tr>
</table>

<table>
<tr><td></td><td>4.3.4</td><td>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance</td><td>YES</td><td>No peat soil observed in Litang, Tagas and Tomanggong Estate. The fact was aggravated by the soil map prepared by the Group Agronomy Dept.</td></tr>
<tr><td></td><td>4.3.5</td><td>Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance</td><td>YES</td><td>No peat soil observed in Litang, Tagas and Tomanggong Estate. The fact was aggravated by the soil map prepared by the Group Agronomy Dept.</td></tr>
<tr><td></td><td>4.3.6</td><td>A management strategy shall be in place for other fragile and problem soils (e.g. podzols and acid sulphate soils).
Minor Compliance</td><td>YES</td><td>No peat soil observed in Litang, Tagas and Tomanggong Estate. The fact was aggravated by the soil map prepared by the Group Agronomy Dept.</td></tr>
<tr><td rowspan="4">C 4.4
Practices maintain the quality and availability of surface and ground water.</td><td>4.4.1</td><td>An implemented water management plan shall be in place. Minor Compliance</td><td>YES</td><td>The management plan dated in Sept 2019 summarized for the entire 5 estates and 1 mill for consumption and processing. Details among others include; Tomanggong POM, Tomanggong, Takas and Litang Estates continued to be guided by the CU Water Management Plan which was developed to maintain availability of natural water resources.</td></tr>
<tr><td>4.4.2</td><td>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.
Major Compliance</td><td>YES</td><td>This is available in the company established SOPs.
<table><tr><td></td><td>River</td><td>River reserve</td></tr><tr><td>1</td><td>All rivers with width of 3 – 5 meters or as listed in 5.2.2.2 in EIA report</td><td>Minimum of 20 meters on flat surface area.</td></tr><tr><td>2</td><td>All rivers having width less than 3 meters as described in 5.2.2.2 in EIA report.</td><td>Minimum of 5 meters on flat surface area.</td></tr></table></td></tr>
<tr><td>4.4.3</td><td>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations (Criteria 2.1 and 5.6). Minor Compliance</td><td>YES</td><td>Effluent is treated to meet the standard set by DOE.</td></tr>
<tr><td>4.4.4</td><td>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. Minor Compliance</td><td>YES</td><td>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on monthly basis.</td></tr>
</table>

<table>
<tr><td rowspan="2">C 4.5
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</td><td>4.5.1</td><td>Implementation of Integrated Pest Management (IPM) plans shall be monitored.
Major Compliance</td><td>YES</td><td>Tomanggong CU continued to implement IPM in the Litang, Takas and Tomanggong Estates. All the visited estates continued to manage pests, disease, weeds and invasive introduced species using the appropriate IPM techniques it is guided by the OPAP and the IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma.</td></tr>
<tr><td>4.5.2</td><td>Training of those involved in IPM implementation shall be demonstrated.
Minor Compliance</td><td>YES</td><td>The trainings held in relation to the IPM were :
<table>
<tr><td rowspan="5">Tomanggong Estate</td><td>Subject</td></tr>
<tr><td>Pheromone tarp management</td></tr>
<tr><td>SOP growth of beneficial plant</td></tr>
<tr><td>SOP rat baiting</td></tr>
<tr><td>Litang</td><td>Pheromone trap</td></tr>
<tr><td rowspan="2">Tagas</td><td>SOP Pest Managemnt & Beneficial Plant</td></tr>
<tr><td>SOP Pest Managemnt & Beneficial Plant</td></tr>
</table></td></tr>
<tr><td rowspan="4">C 4.6
Pesticides are used in ways that do not endanger health or the environment</td><td>4.6.1</td><td>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance</td><td>YES</td><td>The use of all agrochemicals by the estates was guided by the OPAP and SSOP. The manual had included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic names.</td></tr>
<tr><td>4.6.2</td><td>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. Major Compliance</td><td>YES</td><td>All the visited estate had maintained records with the following details;
a) the types of pesticides used with active ingredients
b) their LD50
c) where these pesticides had been used.
d) The total quantity used, number of applications and active ingredients (ai) per Ha were also recorded. These includes mature and immature areas.</td></tr>
<tr><td>4.6.3</td><td>Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry’s Best Practice.
Major Compliance</td><td>YES</td><td>In implementing and adherence to the IPM plans, the management of the three estates had established nectariferous beneficial plants Cassia cobanensis, Antigonan leptopus and Turnera sublata). Nurseries were established for continuous planting in order to attract natural predators and thus to reduce use of insecticides. There was no evidence on prophylactic use of pesticides in the audited estates.</td></tr>
<tr><td>4.6.4</td><td>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</td><td>YES</td><td>All the visited 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. Records and interviews with workers, staff and estate assistants, concluded that that they were trained and cautioned, and all precautions taken, and all legal requirements are met.</td></tr>
</table>

<table>
<tr><td></td><td></td><td>not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance</td><td></td><td></td></tr>
<tr><td></td><td>4.6.5</td><td>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). Major Compliance</td><td>YES</td><td>The training held in relation to the chemical handling are shown below;
<table><tr><td>Tomanggong</td><td>Subject</td></tr><tr><td></td><td>Chemicals Premixing</td></tr><tr><td></td><td>Spraying</td></tr><tr><td></td><td>Chemical store handling</td></tr><tr><td></td><td>Triple rinsing</td></tr><tr><td></td><td>Trunk injection</td></tr><tr><td>Litang</td><td>Rat baiting, trunk injection</td></tr><tr><td></td><td>Mist blower spraying</td></tr><tr><td></td><td>SOP – Spraying</td></tr><tr><td></td><td>SOP- Spraying</td></tr><tr><td></td><td>SOP – fertilizer application</td></tr><tr><td>Tagas</td><td>SOP – Trunk injection</td></tr><tr><td></td><td>SOP Rat baiting application</td></tr><tr><td></td><td>Trunk injection</td></tr></table></td></tr>
<tr><td></td><td>4.6.6</td><td>Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations.
Major Compliance</td><td>YES</td><td>The chemical stores in all estates comply with the following legislative requirement;
a) Occupational Safety and Health Act 1994 (Act 514)
b) Pesticides Act 1974 (Act 149).
Records of purchase, storage and use were maintained. All stores were equipped with adequate no of exhaust fans with the door was secured and kept under locked at all times. Only authorized personnel are allowed to handle the chemicals and entrance inside the chemical store. All the chemicals were segregated accordingly sufficiently labelled, with the CSDS displayed. The upkeep of the store is clean and systematically organized.
There was availability of class 1b chemical, Methamidophos (Enforce) in Tomanggong Estate. The stock was packed individually in plastic bags and kept in a locked separate room due to stoppage of application for the bagworm treatment. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store prior proper disposal.</td></tr>
</table>

	4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	Pesticide applications were guided by the OPAP, CHRA and MSDS. The CHRA for the estates was reviewed in December 2015 by third party consultant..
	4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial spraying was not practiced by all the visited estates. There was no evidence to show that aerial spraying was carried out. All estates only practices circle spraying and selective spraying which is only for targeted species such as woodies and VOPs.
	4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demonstrated or made available. Minor Compliance	YES	Continuous training program are initiated and made to the employees involved in the pesticide handling to enhance their skill and knowledge. The following 2018 program has been prepared and already implemented according to the schedule in phases.
	4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated. Minor Compliance	YES	For waste material (domestic waste) – rubbish collection programme and HIRARC has been developed by CU and followed by workers accordingly. Sighted the record of rubbish collection 2 times per week. Rubbish has been disposed through land fill area located at field T14I which is far from housing complexes and water course. For scheduled waste has been disposed on 19/09/2018 through approved contractors.
	4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance	YES	CHRA has been conducted in Dec 2015, by third party consultant. Assessment has been carried out at premix and sprayer workers, manuring workers, laboratory attendant, water treatment plant operator, boiler plant operator, kernel plant operator, and maintenance worker. Recommend made by assessor were to conduct medical surveillance for pesticide handlers and to conduct chemical exposure monitoring for premix and spraying activity. For chemicals exposure monitoring conducted, the result from assessment level of exposure were in compliance with respective permissible exposure limit. For medical surveillance, it has been confirmed that the assessments showed all the workers/staff were fit to handle chemicals.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women Major Compliance	YES	There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in all estates visit. Workers interviewed were aware that pregnant and breast-feeding women should not handle chemicals. Monitoring of pregnancy and lactating was conducted on every quarterly by the estate HA. Sighted record monitoring of chemical handling (spraying and manuring), creche, water treatment plant operator, store attendant, and workshop.
C 4.7	4.7.1	An occupational health and safety policy shall be in place. An	YES	Occupational Safety and Health Policy was established and signed by Chief Executive of the Group Plantation contained several key commitments and management is committed to its obligation, as far

An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:		occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance		as reasonable and practicable, to provide a safe and healthy workplace for all employees. The policy had been communicated to all levels of the organization through briefings and also displayed prominently in Bahasa Malaysia and English on notice boards at mill and estate office and Muster Ground. Random interviewed with employees showed that they generally understood the basic requirements of the policy.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and proc & actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	YES	HIRARC has been conducted for each operation such as transporting workers, FFB checker, genset operation, administrator operation, field operation, spraying activity at electric fencing security guard operation, belt press operation, boiler station operation, delivery of CPO operation, etc. Among of implemented to control the risk by provide a proper PPE for workers,
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices, Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance	YES	Training and Briefing on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involve and how the chemicals should be used in a safe manner.
	4.7.4	The responsible person/s shall be identified. There shall be records of regular meetings the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance	YES	Safety and Health Committee Organization Chart 2018 was available. The appointments for PIV were also available for review.
	4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers.	YES	The ERT consisting of trained First Aiders, field staffs, Mandores, Admin clerk, workshop operator and Security personnel. Interviews with estate staffs and mandores revealed they understood and were aware of the emergency procedures requirements. It was observed that all operating units were provided with first aid boxes which were checked on a monthly basis by the Hospital Assistants. At the

		Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance		estates, first aid box was given to mandores and available at estate office and workplace. Records of replenishment were verified by the auditor.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	Tomanggong CU has provided on site clinic with Hospital Assistant (HA). Any serious injury will be send to the nearest hospital. Local workers are covered by SOCSO. Foreign workers are protected through Foreign Workers Compensation *(skim pampasan pekerja asing SPPA*) provided as per *Compensation Act 1952*. This was made through an insurance company.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Tomanggong Estate Lost Time accident has been recorded in monthly accident key performance indicator (KPI) for year 2018 as per to date. For year 2017 JKKP 8 record has been submitted to DOSH in Jan 2018.
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	Formal training program which cover all aspects of RSPO P&C was available for year 2018. It was established based on training needs identification. Regular assessments of the effectiveness training continued conducted by the CU management. Training plan for 2018 had been established with target month/dates for the training identified.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Tomanggong CU continued to train its executives, staff and workers. Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.

Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

Clause	Indicators		Comply Yes/No	Findings
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified,	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	YES	Latest environment aspect impact assessment was reviewed in Spet 2018 to cover all activities in Tomanggong Groups. The main purposed of for this assessment was to evaluate and analyse impact on soil, water, and lair associated with the organization activities. Among environment aspects assessed were agrochemical applications, land and water contamination from hazardous material and farm vehicles, human settlement disturbance and abandonment. The environmental aspect and impact (EAI) also covers the upstream activities such as FFB reception until the downstream processes. At the mill, the identification and evaluation of environmental impact was

and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.				done for all activities and processes related to the mill operation. Among the significant environmental aspects are air emission from boiler stack, generation of the palm oil mill effluent (POME) and land contamination which related to the management of scheduled wastes and domestic waste.
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/s. Minor Compliance	YES	No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans.
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance	YES	The CU has developed an "Environmental Impact Assessment, Management Action Plans and Continuous Improvement Plan for Tomanggong Group" to monitor the effectiveness of the mitigation measures taken. Noted the activities and action plan implemented at the site.
C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations. Major Compliance	YES	The report of "Potential High Conservation Value Area Assessment Report of Tomanggong Group of Estates and Tomanggong Palm Oil Mill'' is available and prepared by the Sustainability Executive. The report was completed in Sept 2018 had covered all the HCV within and adjacent to the CU. The HCV assessment had identified on the RTEs for estate named Tomanggong, Litang, Tagas, Tabin and North Bank, including the management and action plan. In general, Tomanggong CU had identified 6 potential HCV in the whole estates.
	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	YES	Tomanggong CU has established and implemented the HCV action plan for Kulamba Wildlife Forest Reserve, Tabin Wildlife Forest Reserve, Tributaries of Sg Segama across Tagas Estate, Cemetery at Litang and Tomanggong Estate and Sg Segama river.

they are maintained and/or enhanced.	5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, appropriate disciplinary measures shall be 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. Minor Compliance	YES	A training programme for year 2018 was available. An awareness training like morning briefing has been conducted by Assistant Manager from Tomanggong, Tagas and Litang Estate to all workers, attendance evident.
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	YES	Tomanggong CU is committed to discourage any illegal or inappropriate hunting fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting were erected at guard and forest border. Futhermore, CCTV 24 hours monitoring was placed at strategic area surrounding the estate to control everything including controlling the illegal activities.
	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance	YES	There was no local communities living nearby with Tomanggong CU.
C 5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	Tomanggong has identified all wastes and sources of pollution. The List of Waste Generated for Estate and Mill were established to mitigate and control the identified wastes and source of pollution.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were triple rinse at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation. Inventory and consignment documents verified for confirmation of proper management and disposal. All the chemical containers were disposed accordingly through scheduled waste collector.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be doc & implemented. Minor Compliance	YES	Waste management and disposal plan to avoid or reduce pollution had been documented and implemented as discussed in Indicator 5.1.3 above. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation.

<table>
<tr><td>C 5.4
Efficiency of fossil fuel use and the use of renewable energy is optimised.</td><td>5.4.1</td><td>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.
Minor Compliance</td><td>YES</td><td>Tomanggong CU had established a plan for improving efficiency of the use of fossil fuels and to optimise renewable energy. The plan contained in documented “fossil fuel Management plan”. Among others, the plan contain source of usage, means to reduce usage, and monitoring”.</td></tr>
<tr><td rowspan="2">C 5.5
Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice</td><td>5.5.1</td><td>There shall be no land preparation by burning, other than in specific situations as identified in the ‘Guidelines for the Implementation of the ASEAN Policy on Zero Burning’ 2003. Major Compliance</td><td>YES</td><td>HSPHB maintained a policy of no open burning sighted policy title Sustainable Agriculture Policy dated Feb 2017. All estates visited had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting. Observed trunk were chipped and stacked at inter row.</td></tr>
<tr><td>5.5.2</td><td>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in ‘Guidelines for the Implementation of the ASEAN Policy on Zero Burning’ 2003.
Minor Compliance</td><td>YES</td><td>The CU had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting in both estates. All palms were chipped and left decomposed at field.</td></tr>
<tr><td rowspan="3">C 5.6
Preamble
Growers and millers commit to reporting on operational greenhouse gas emissions.
However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognized that it is not always feasible or practical to reduce or minimise these emissions.</td><td>5.6.1</td><td>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate / soot emissions and effluent.</td><td>YES</td><td>No changes on environmental aspects and impact or new polluting activities observed. The existing EIA documents had identified generation of gaseous emissions from its operation such as lorries and farm tractor. Noted the documents had been reviewed annually at each operating units.</td></tr>
<tr><td>5.6.2</td><td>Significant pollutants and GHG emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance</td><td>YES</td><td>Tomanggong Group had identified emission of GHG from their operations such as emission from their farm tractor and gen set operation. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment., Fuel Consumption, Peat Oxidation, POME and reported in the PalmGHG Summary Report.</td></tr>
<tr><td>5.6.3</td><td>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.
Minor Compliance</td><td>YES</td><td><u>The net GHG emissions from PalmGHG calculator</u>

Please indicate PalmGHG calculation option used: Option 1

<table>
<tr><th>Emissions per Product</th><th>tCO2e/tProduct</th><th></th><th>%</th></tr>
<tr><td>CPO</td><td>1.99</td><td>OER</td><td>22.34</td></tr>
<tr><td>PK</td><td>1.99</td><td>KER</td><td>4.33</td></tr>
</table>

<table>
<tr><th>Production</th><th>t/yr</th></tr>
<tr><td>FFB Processed</td><td>125,876.33</td></tr>
<tr><td>CPO Produced</td><td>28,125.40</td></tr>
</table>
</td></tr>
</table>

Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO.
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

Land Use	**ha**
OP planted area	11,366.83
OP planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	11,366.83

Summary of Field Emissions and Sinks

	Own Crop		Group		3rd Party		Total	
	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/tFFB
Emissions								
Land Conversion	67,959.53	0.67	0	0	0	0	67,959.53	0.67
*CO2 Emissions from Fertiliser	423.21	0	0	0	0	0	423.21	0
**N2O Emissions	1657.3	0.01	0	0	0	0	1,657.3	0.01
Fuel Consumption	2,197.2	0.02	0	0	0	0	2,197.2	0.0
Peat Oxidation	0	0	0	0	0	0	0	0
Sinks	-	-	-	-	-	-	-	-
Crop Sequestration	-46481.29	-0.46	0	0	0	0	-46,481.29	-0.46
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	25,755.95	0.24	0	0	14,657.97	0	40,413.92	0.24

Summary of Mill Emissions and Credits

	tCO2e	tCo2e/tFFB
Emissions	0	0
POME	24,673.89	0.2
Fuel Consumption	1,739.5	0.01
Grid Electricity Utilisation	0	0
Credits	0	0

				Export of Grid Electricity: 0 / 0 Sales of PKS: 0 / 0 Sales of EFB: 0 / 0 **Total**: 26,413.39 / 0.21 **Palm Oil Mill Effluent (POME) Treatment** Divert to compost: 0% Divert to anaerobic digestion: 100% **POME Diverted to Anaerobic Digestion:** Divert to anaerobic pond: 100% Divert to methane capture (flaring): 0% Divert to methane capture (electricity generation): 0%

Principle 6: <u>RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS</u>

Clause	Indicators		Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	The CU maintained its documented SIA titled "Social Impact Assessment, Management Action Plans and Continuous Improvement Plans". The assessment had covered operation aspects of plantation and mill. Among the social aspect covered, include employment opportunity, amenities and facilities, PPE and medical for employees, etc. The progress of plans noted reviewed annually. The review conducted with relevant stakeholders through Joint Consultative Committee (JCC) Meeting. Among them were Sabah Forestry Department, Wildlife Department, Police, Energy Commission, Immigration, HUMANA, communities, neighbouring plantations, suppliers, contractors, etc. The latest review was in Aug 2018.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	The CU continued to engage with stakeholders in review of its social assessment. Among the stakeholders involved were employees, Sabah Forestry Department, Wildlife Department, Police, Energy Commission, Immigration, communities, neighbouring plantations, suppliers, contractors, etc. Records of attendance of stakeholders were available. Interviewed with stakeholders confirm their engagement. Generally, stakeholders acknowledged that they have good relationship with the CU.
	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in	YES	The CU continued implemented social action plan. Noted that continuing building 14 new housing for employee, constructed new bridge that provide alternative access road if existing road flooded, built 3 new toilets at mosque as per workers request, building new sundry shop, allowed for erection of new communication tower by a telecommunication company that would further improve

		consultation with the affected parties, documented and timetabled, incl. responsibilities for implementation. Major Compliance		communication with outsiders and plan to further build another 5 block of employee housing and 1 new Humana class.
	6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance	YES	The social action plan noted had been reviewed annually. The latest review was in Aug 2018. The review conducted with relevant stakeholders through Joint Consultative Committee (JCC) Meeting.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	Not applicable. The CU is not included smallholder scheme. The independent FFB suppliers are free to sell their FFB to other buyers.
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	A documented Consultation and Communication Procedures maintained available. The estates and mill noted maintained files of records of communication and consultation with external and internal parties, for examples, with government agencies, suppliers and their own workers.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	The CU maintained to have an appointed management official at each operating units that responsible for social issues.
	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	YES	The lists of stakeholders were noted retained by all estates and mill. Among the lists included government agencies, suppliers, contractors, schools, bus operators, tenants, suppliers and contractors.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistle blowers, where requested. Major Compliance	YES	The CU maintained that the complaint and grievances system of both procedure were opened to all affected parties, i.e. for employees and stakeholders respectively. Interviewed with both parties acknowledged that they had been informed of the system. There was also evidence that employees recorded their comments in the provided Grievance Book, which part of the system.
	6.3.2	Documentation of both the process by which a dispute was	YES	Complaints on housing and other services were usually entered into record books. The records include the name of the person who complained, address, date, and type of service required.

accepted by all affected parties		resolved and the outcome shall be available. Major Compliance		These complaints among others usually pertaining to housing conditions, roads and lighting maintenance. Interviewed with employees acknowledged that their complaints had been addressed accordingly.
C 6.4 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.	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	YES	The CU maintained procedures to deal with land disputes, squatter disputes, and loss of legal and customary rights. In the case of boundary disputes, the procedure requires the estate management and the disputing party to negotiate, first, failing which the case will have to be referred to the Headquarters for further negotiation. If negotiation fails, the case will be brought to court for arbitration.
	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance	YES	In terms of compensation, the procedures maintained prescribe the determination of lawful owners, distribution of the compensation, time frame for compensation and calculation for various compensations. However, there was no compensation observed. In addition to the above procedures, the Sabah Land Ordinance (SLO) 1930 provides way which natives can have titles and rights to lands and who should be compensated if losses are incurred. Land titles can be awarded to natives under sections 9, 15, 76 and 78 of the SLO. Compensation can be paid under section 16 of the Ordinance. Therefore, there already exists a legal framework against which the estates have to operate when it involves customary lands rights and determination of compensations.
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	YES	Referring to the estates' and mill's communication record, there was no dispute observed.
C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	The CU maintained to provide documented employment which contain information of employment conditions to its employees. Employees interviewed acknowledged that they received documented payslip every payday. Generally, noted they were aware about minimum wage, and acknowledged the important of payslip for them to check their monthly earning.
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or	NO	There were employees who had worked on their rest day not paid double rate as per contract of employment. Also there was no evidence of an employee paid for eligible Public Holidays as per contract of employment. Thus, **Major NCR HO1** is raised.

		explained carefully to them by a management official. Major Compliance		
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	YES	The CU continues provided free housing, water supply, free medical services, subsidized electricity and access to education for children of workers. The CU also provided other amenities and facilities such as clinic, ambulance, *crèche, surau,* football field, groceries shops.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance	YES	The CU maintained have grocery shops, which ensure workers' access to adequate and sufficient food. Price of groceries monitored by Estate Manager. Grocery shops require submitting their price for estate monitoring. Estate also has ensured price of food listed and displayed at outside of sundry shop. Employees including foreign acknowledged no issues pertaining access to adequate, sufficient and affordable food.
C 6.6 The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	The CU maintained the published statements on freedom of association and respect right of workers to form or join trade unions. However, there was no union form in the CU. Thus, the CU management had established Joint Consultative Meeting (JCC) to facilitate their employees to address their issues, if any.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	The CU observed continued to conduct JCC meeting to address social issues, including related to workers. Latest minute of meeting on 8/8/18 retained available and observed workers were represented.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The CU Labour Policy does not allow children below 18 years old to work in the estates / mill. Verification of workers interviewed, employee listing and their personal particular, which provide their date of birth observed that no underage persons were employed.

C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	The CU maintained "Equal Opportunities Policy" to provide equal opportunities to relevant and affected group. Interviewed with various employees of different gender, nationality, race, religion acknowledged that they were treated equal and not discriminated in any form including related to recruitment, works, promotion, amenities, benefits, etc. Interviewed with other stakeholders, such suppliers, contractor, tenant, also acknowledged they had no issues pertaining equal opportunities.
	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	YES	Interviewed with employees observed there was no evidence of discrimination based on race, gender, religion or nationality or any other factors. Reviewed of employment letter also observed there was no differences in the terms of employment condition and benefits between foreign and local workers or between male and female workers. Workers noted live in the same housing complex and enjoy same benefits. However, due to government policies, education opportunities differ between local and foreign children. Interviewed with other stakeholders, such suppliers, contractor, tenant, also acknowledged no such discrimination cases.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	Recruitment and promotion noted were conducted based on job requirements accordingly. Interviewed with various employees acknowledged no issues pertaining recruitment and promotion.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The CU maintained its policy on sexual harassment and noted that the Gender Committee continued to communicate issues to prevent sexual and all other forms of harassment and violence. Periodical meeting observed was conducted.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The CU maintained and implemented its policy to protect the reproductive rights of all, especially of women. The policy continued communicated to its workers during morning musters. Interviewed with female workers noted they understand the policy and their rights, e.g. no work of handling chemicals during pregnancy or breastfeeding.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, communicated to all levels of the workforce. Minor Compliance	YES	The documented procedure also defined the specific mechanism of the system to ensure respect of anonymity and protect of complainants and whistleblowers. The procedure stated clearly that the complainants should not reveal to third party.
C 6.10 Growers and millers deal fairly and transparently with	6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	The mill continued published price of FFB. The current FFB price publicly displayed outside weighbridge counter. The mill practiced to attach the past price with third-party FFB supplier delivery document for payment purpose.

smallholders and other local businesses.	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented. Major Compliance	YES	Interviewed with FFB suppliers confirmed that the CU maintained to have agreement that explained the FFB pricing mechanism. They acknowledged had no problem in doing business with the CU, including about FFB pricing. FFB agreements were presented by the CU upon request. For other inputs / services, the CU maintained its procurement process either through quotation or tendering process. However, for commonly used items (e.g. chemicals, stationery, etc.), the procurement is not under control of the CU, which handled by central procurement office of the group.
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	Interviewed with parties that have agreement with the CU, e.g. FFB suppliers, other suppliers, tenants acknowledged that the agreement that they enter into were fair, legal and transparent.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	Suppliers and contractors' invoices and related payment documentation were presented by the CU upon request. Payments were made by cheque. However, payment is not under control of the CU, which handled by central office of the group. Interview with FFB suppliers and contractors acknowledged that payments were made in timely manner, and no complaint was observed.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	YES	There was no local community lives adjacent or within the CU. However, the CU maintained its engagement with stakeholders including communities outside for assessing social impacts. Interviewed with stakeholders noted that the CU continued made contribution.
	6.11.2	There are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	YES	There were no scheme smallholders in Tomanggong CU.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES	The CU maintained the Sustainable Agriculture Policy which committed to safeguarding operations from employing forced labour.Employees, including foreign and women interviewed noted that they acknowledged no cases of forced or trafficked labour. They acknowledged they were treated accordingly as per employment conditions. Passport of foreign workers are kept by them unless voluntarily request to employer to keep on behalf, as admitted by them. Such documented consent, and record of passport surrender to both parties were made available by the CU. Workers acknowledged that they were not forced to work on rest day / public holiday. Any work on rest day / public holiday was based on their decision. Workers acknowledged that their PPE were provided by employer. Review of employees' wage, records of work, and conditions of employment also observed no cases of forced or trafficked labour. Review of salary and deduction observed were paid in compliance to permit issued from Sabah Labour Department. Further, letter of authorization for deduction from employees also made available.

	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	Interviewed with foreign workers observed there was no contract substitution had occurred. Based on interview, generally they aware about work, pay, condition etc. they would be doing before they applied, as they come to know about the job opportunity from their family, relative or friend directly, i.e. without through third recruitment party.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	Labour policy for foreign workers maintained available at the CU. The policy include the statement as described by specific guidance in this indicator; Statement of the non-discriminatory practices, No contract substitution, Post-arrival orientation programme to focus especially on language, safety, labour laws, cultural practices etc., Decent living conditions to be provided and Procedure for employment of foreign workers maintained available at the CU.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance	YES	Human Rights policy maintained available and communicated by each operating unit of the CU.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance	YES	The CU continued provided Humana School and Creche Ayah for foreign workers' children to access to education and care of their children while their parents are working. There is no charge applied by the CU for providing access to the education. The school buildings and teachers' accommodation provided and maintained free by the CU. The electricity and water supply also continued provided free by the CU.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Auditors has verified through checking the www.globalforestwatch.com, GOOGLE Maps, Estate Maps and also through site visit to the estates area; Tomanggong, Kapis and Litang Estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Tomanggong CU. Thus Principle 7 is not applicable.

Principle 8: COMMITMENT TO CONTINUOUS IMPROVEMENT IN KEY AREAS OF ACTIVITY

Clause	Indicators		Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: Major Compliance		
	a)	Reduction in use of pesticides (Criterion 4.6);	YES	The CU adopted several continuous improvement in reducing of pesticides i.e. increasing planting of beneficial plants mainly *Tunera subulata, Cassia cobanensis* and *Antigonon leptopus* and continue to monitor pest through Early Warning System. The CU also adopted planting of *Legominious* Cover Crop mainly *Pueraria Javanica* and *Calopogonium Mucunoides* at replanting area in order to minimizing circle and selective weeding. *Neproliphis biserata* was maintained and encouraged to be planted in Tomanggong CU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	Environmental impact assessment, management action plans and continuous improvement plan for Tomanggong Group has been updated and monitored by management. Among the improvement actions: (a) construction of sump at chemical and workshop to prevent ground or water contamination. (b) collect back chemicals bags and allocate store for control of misused. (c) use of tray for tractor parking and workshop stations to prevent ground contamination.
	c)	Waste reduction (Criterion 5.3);	YES	The management of Tomanggong CU had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	The management of both estates and mill had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.

	e)	Social impacts (Criterion 6.1);	YES	The CU continued implemented social action plan to improved social impacts. The CU noted: (a) continuing building 14 new housing for employee. (b) constructed new bridge that provide alternative access road if existing road flooded. (c) built 3 new toilet at mosque as per workers request. (d) building new sundry shop. (e) allowed for erection of new communication tower by a telecommunication compant that would improve communication with outsiders. (f) plan to further build another 5 block of employee housing and 1 new Humana class. The CU also observed maintained providing access for education for children of its workers.
	f)	Encourage optimising the yield of the supply base	YES	To optimise yields, both estates implemented best agricultural practices, inclusive of: • timely and proper fertiliser application and EFB & Compost application • Improving on accessibility to maximize crop evacuation • expanding in field mechanized collection of FFB • constructing water bodies and water conservation pits to conserve moisture • reducing surface run off to prevent leaching of fertilisers

RSPO CERTIFICATIONS SYSTEMS FOR PRINCIPLES & CRITERIA JUNE 2017

Clause	Indicators		Comply Yes/No	Findings
4.5.3 Time-bound plan Note: 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	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	HSPHB is committed to undergone fully certify RSPO certification. The target year for certification is 2019 with subject to the remediation and compensation procedures that is still ongoing process for Tabin and Northbank Estate. The retrospective HCV assessment have been made by Green Harvest Sdn Bhd.
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first	Yes	There were no changes to the current time bound plan. It was confirmed during audit with representative of HSPHB. Time bound plan was verified by CB.

failure to proceed with implementation of the plan, a major non-compliance shall be raised;		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;		
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	There were no changes to the current time bound plan as verified during this audit.
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in acc. with RSPO P&C criterion 7.3. Any new plantings since 1st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	The internal assessment has been made on 20th – 24th February 2018 for Northbank and Tabin Estate while 20th February for Pelipikan Estate. Based on recent recertification audit (2018), the following was given feedback from HSPHB representatives: <u>Pelipikan Estate</u> Based on Retrospective HCV assessment made by certified HCV assessor (Green Harvest Sdn Bhd) there were no clearance of primary forest at Pelipikan Estate. However, there were land clearing made on May 2006, September 2010 and February 2011. Whereas clearing was made without HCV assessment. HSP has submitted the Declaration of disclosure of non- compliant land clearance to the RSPO in April 2016 and currently HSP is in progress of preparing the LUCA. As at 25th July 2017, HSP has submitted the item 2a and 2b as per RSPO Land Use Change Analysis (LUCA) checklist to RSPO. Currently still in progress preparing the satellite data and calculation of conservation liability. The satellite data consume time to complete.

				North Bank Estate and Tabin Estate HCV Assessment at Northbank and Tabin Estate has been conducted in year 2013 and completed by 20/11/2013. Northbank and Tabin Estate are currently undergone Remediation and Compensation Procedure (RaCP). As to date, the required LUCA data has already been submitted and has passed by the compensation panel. HSP has also provided the Concept Note for review by RSPO. Noted the latest communication (email) between HSP and RSPO (Mr. Dillon) on 21/06/2017 regarding the concept notes. Final Conservation Liability (FCL) figure was confirmed at 579.48 ha. Final conservation liability is confirmed as 548.79 Ha (based on chronology email dated 21/6/2017). The amended concept note sent to the CEGP for approval. The revise concept notes with attachment (extended riparian reserve maps) submitted to RSPO Compensation and RSPO Compensation had submit the concept note to the Compensation Panel for review. Latest on 25/7/2018 RSPO Compensation had replied and said that they will give feedback about the concept note.
	(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 2.2, 6.4, 7.5 and 7.6;	Yes	The internal assessment has been made on 20th – 24th February 2018 for Northbank and Tabin Estate while 20th February for Pelipikan Estate. Pelipikan Estate Land conflict was resolved with the affected and relevant parties. Please refer Hap Seng Plantations 2015 Annual Report. Refer to HSP Annual Report Page 208-209, 36.d. Northbank and Tabin Estate Land conflict are still under court case. Please refer Hap Seng Plantations 2016 Annual Report. Refer to HSP Annual Report Page 97 -98, 23 (a – b).
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	Yes	The internal assessment has been made on 20th – 24th February 2018 for Northbank and Tabin Estate while 20th February for Pelipikan Estate. Based on the internal assessment report, there was no labour disputed recorded at the all uncertified unit.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	The internal assessment has been made on 20th – 24th February 2018 for Northbank and Tabin Estate while 20th February for Pelipikan Estate. Based on internal assessment report, 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 4.5.4 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	Yes	
		• 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;	Yes	The internal assessment has been made on 20th – 24th February 2018 for Northbank and Tabin Estate while 20th February for Pelipikan Estate. The progress of the certification was concluded as 4.5.4. (a-d) on new planting, 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.
		• Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	Yes	It was evident that in handling uncertified management unit, HSP North Bank Estate and Tabin Estate has conducted Joint Consultation Committee (JCC) meeting on 23/05/2017 (North Bank Estate and Tabin estate) and 11/04/2017 (Pelipikan Estate) to address unresolved issues. Actions in progress.
		• Desktop study e.g. web check on relevant complaints	Yes	Further information can be obtained from https://www.rspo.org/acop/2017/hap-seng-plantations-holdings-bhd/HSPHB%20SUSTANABILITY%20REPORT%202014.pdf
		• If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.	Yes	There was no non-compliance found for all requirements during this audit.

4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.		No additional indicators	NA	The right to use the land at Tomanggong 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. All the estates were under the jurisdiction of Kinabatangan District. It is then established that the oil palm operations were not previously owned by users and/or are subject to any customary rights of local communities and indigenous peoples.

Note:

1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C.

For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;

2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.

Attachment 4

Details of Non-conformities and Corrective Actions Taken

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
6.5.2 NCR HO 01	Major	Requirements: Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. Findings: There were employees who had worked on their rest day not paid double rate as per contract of employment. Also there was no evidence of an employee paid for eligible Public Holidays as per contract of employment.	Correction 1. TPOM has issued out a memo that detailing on the provision of change of rest day. The memo had been communicated to all workers at mill and display at mill notice board. 2. The employee No. 69634 has been paid accordingly (Attachment 1.3) Corrective action plan 1. Refresher training shall be conducted by Personnel & Administration Department who is more familiar with the Sabah Labor Ordinance on the detail of contract agreement at annually basis to all operating unit. 2. Sustainability Team/ Finance Independent Team will yearly cross-check the pay slip to avoid miss-payment for the eligible public holidays.	Sighted the following supporting documents as evidence of the corrective action had been taken. General Manager Processing has issued a memo related to rest day on 06/12/2018. Auditor also sighted pay slip for stated the under paid has been paid accordingly on month of October 2018. **Status Closed.**

Attachment 5

RSPO SUPPLY CHAIN : AUDIT CHECKLIST

SECTION A : GENERAL INFORMATION

1. File Reference No.	EH04760003
2. Name of facility/ site(s) /entity(ies)	Hap Seng Plantations (River Estates) Sdn Bhd - Tomanggong Palm Oil Mill
3. Site Location (single site/multisite/Group)	Off KM 40, Jalan Jeroco, 91109 Lahad Datu, Sabah
4. SC model	Mass Balance
5. Type of entity	Palm Oil Mill
6. RSPO Member Number	1-0098-11-000-00
7. Annual summary records of certified oil palm products purchased and claimed	Projected for last year for period of November 17 until October 18 CPO Projected: 31,439.00 mt PK Projected: 6,282.00 mt CPO Sell: 5,449.29 mt CPO Claim (Mass Balance): 0 mt, (Conventional): 5,449.29 mt PK Sell: 1,168.21 mt PK Claim as (Mass Balance): 1,110.49 mt (Conventional): 57.72 mt

SECTION B (i): RSPO SUPPLY CHAIN CERTIFICATION SYSTEM (REVISED JUNE 2017)

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION AUDIT	
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.	Not Applicable.
	Audit Process Requirements – SURVEILLANCE AUDIT	
5.3.26	The surveillance audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.	The organizational systems, the management systems and the operational systems, including any documented policies and procedures of TPOM are sufficient and adequate in complying with latest revision of RSPO Supply Chain Certification Standard. The Sustainability Agriculture Policy was last updated in Feb 2017.

SECTION B (ii): GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
1	**Applicability of the general chain of custody requirements for the supply chain**	
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.	Tomanggong takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location as mentioned above.
1.2	Traders and distributors require a licence obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.	Not Applicable
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	RSPO Palm Trace Registration under Hap Seng Plantations (River Estat Sdn Bhd – Tomanggong Palm Oil Mill)
1.4	Processing aids do not need to be included within an organization's scope of certification.	Not Applicable
2	**Supply chain model**	
2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	TPOM obtained certified FFB from own certified supply base, Tomanggong Estate, Litang Estate, Tagas Estate. Non Rspo Estate, Tabin and Northbank Estate and as well as external suppliers. TPOM also found to be aware of the downgrading procedure.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	TPOM only apply MB model
3	**Documented procedures**	
3.1	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:	Procedures are available entitled ""Standard Operating Procedures for Traceability" • 001 – CSFFB, SCPO & CSPK Traceability System – Chain of Custody • 002 – Harvesting and Loading of Fresh Fruit Bunch • 003 – Delivery and Reception of CSFFB, In-House and Non In-house FFB • 004 – Dispatch of CSPO and CSPK from the Mill to the Refinery/Bulk Transit Installation • 005 – Monitoring of CSPO and CSPK sales

a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Standard Operating Procedures for Traceability (SOPfT) - Chapter 1: CSFFB, CSPO & CSPK traceability system – chain of custody - Chapter 2: Harvesting and Loading of Fresh Fruit Bunch - Chapter 3: Delivery and Reception of CSFFB, In- house and Non In- house FFB - Chapter 4: Dispatch of CSPO and CSPK from the mill to refinery/ bulk transit installation/ buyer's vessel - Chapter 5: Monitoring of CSPO and CSPK sales Appendix 1: Weighbridge Tickets and Delivery Notes RSPO (& ISCC) Stamping Procedure
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Among record sighted are; FFB delivery note, WB advice ticket, FFB grading. FFB assessment report, Daily FFB, CPO & PK production, Daily FFB received, Daily production report, Certified sustainable FFB form, Non- sustainable certified FFB form, Delivery notes, Sounding report, Supply Chain Mass Balance record.
c)	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 organization's procedures for the implementation of this standard.	The Mill Manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements, assisted by Sustainability Executive.
3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii. Effectively implements and maintains the standard requirements within its organization. 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 nonconformities shall be subject to management review at least annually. The organization shall be able to maintain the internal audit records and reports.	There is Flowchart for Internal Audit system indicating the process for memorandum for IA, appointment of team member, the IA review (overall audit process in general). Coverage of audit sufficient & comprehensive to cater for the new standard. Internal audit conducted in July 2018. No NC issued on supply chain scope.
4	**Purchasing and goods in**	
4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and following minimum information for RSPO certified products is made available by the supplier in document form:	Tomanggong POM had continued received FFB supply from own company estate namely Tomanggong estate, Tagas estate, Litang estate, Non Rspo Estate Tabin and Northbank Estate. And also outsider estate.Sighted FFB consignment note for Tomanggong estate, Tagas estate, Litang estate, Non-Rspo certified Estate Tabin and Northbank Estate. Among the information

	• The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number. Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).	available on the FFB consignment note are estate name, vehicle no, field name, delivery date, no of FFB bunches, FFB weight.
a)	The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).	Demonstrated that purchases are made to the material category agreed with their supplier. The outsider estate being marked/ stamped accordingly with 'CSFFB'.
b)	The site ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcement and Shipping Confirmation on the RSPO IT platform on the level of each shipment.	For certified CPO & PK produced, TPOM update their stock in Palm Trace.
c)	A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements.	Tomanggong POM had continued received source of RSPO certified FFB from own group estate. Internal supplier under same certification – valid certificate.
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Mechanism for handling NCP mentioned under Chapter 1 of SOPfT Mechanism for handling NCD mentioned under Chapter 1 of SOPfT; NCD including those without proper stamping, wrong stamping/ with discrepancies (issued by supplier or issued by TPOM to buyer). Mill Manager will verify the NCD/ corrected documents prior to release to customer. No NCP/ NCD recorded since last audit.

5	**Outsourcing activities**	
5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. *This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the organization (not the tank farm manager).*	Not Applicable since transportation and storage of certified finished products are handled internally. Should there be any additional transporter used in future to carry certified CPO/ PK, TPOM prepared Minor Job Contract for acknowledgement by hired service provider informing on the RSPO SCCS requirements as per para 5.2 below.
5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	Not Applicable
5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	Not Applicable
5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or production of RSPO certified materials.	Not Applicable

6	**Sales and goods out**	
6.1	The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation): • The name and address of the buyer; • The name and address of the seller; • The loading or delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number; • A unique identification number.	Records seen and sampled. The requirement of sales & goods out especially on notation of SC model applied & SC cert no complied by indicating in delivery note, CPO/ PK billing, weighbridge advice ticket .
7	**Registration of transactions**	
7.1	Supply chain actors who: • are supply chain actors between the mill and final refinery; • take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and • are part of the supply chain of RSPO Certified Sustainable oil palm products must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO.	The Sustainability Executive updated the RSPO IT Platform based on input provided by TPOM. Since last audit, there are no delivery of CPO certified materials only PK has been sold as RSPO certified.
8	**Training**	
8.1	The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff.	Annual Training Program established & being reviewed accordingly by the Mill Manager. The training record was well maintained.

8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system. Training shall be specific and relevant to the task(s) performed.	Last training conducted in Sept 2018 by Senior Assistant attended by all relevant staff related to supply chain. Attendance list & photograph was seen. Training focus on relevant MB procedures and record.
9	**Record keeping**	
9.1	The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	The relevant record pertaining to RSPO SCCS within TPOM found to be updated accordingly and easily accessible during the audit.
9.2	Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Relevant record pertaining to implementation of RSPO SCCS within TPOM retained for minimum 2 years.
9.3	The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	This has been provided accordingly. No delivery of certified CPO and PK since last audit.
10	**Conversion factors**	
5.10.1	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org). This is in particular relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. The guidance document for oleochemicals is available on the RSPO website (www.rspo.org).	The OER and KER are the conversion factors.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Updated on monthly basis.

11	**Claims**	
11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO rules on communications and claims.	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork e.g. PK billing, CPO billing, TPOM weighbridge advice ticket and TPOM palm kernel/ CPO delivery note. TPOM apply RSPO trademark with license. The trademark being displayed on mill and estate entrance signboard. TPOM complied with the minimum requirement in term of the corporate communications rules as well as Annex 1 (RSPO trademark usage and guidance) of the RSPO Rules on Market Communications and Claims 2016).
12	**Complaints**	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Refer Grievance Procedure. No complaint from stakeholder with regards to RSPO SCCS since last audit.
13	**Management review**	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Management review planned once annually. Last conducted in July 2018.
13.2	The input to management review shall include information on: • Results of internal audits covering RSPO SCCS • Customer feedback • Status of preventive and corrective actions • Follow-up actions from management reviews • Changes that could affect the management system • Recommendations for improvement	Management review report. Coverage sufficient, among item discussed during audit; - follow up actions from earlier management review - sustainability & adequacy of all SOP's - sustainable agriculture policy - result of internal audit - change in legal requirement of any compliance - compliant (internal & external) - accident & injury (LTA) - environmental quality - waste management - energy usage performance - status of corrective actions - recommendation for improvement
13.3	The output from the management review shall include any decisions and actions related to: • Improvement of the effectiveness of the management system and its processes • Resource needs	

SECTION C : SUPPY CHAIN MODELS *(to only use whichever is applicable)*

	Module E – CPO Mills: Mass Balance	
E.3	**Documented procedures**	
E.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements; b) The name 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 site procedures for the implementation of this standard.	Procedures are available entitled ”Standard Operating Procedures for Traceability” •001 – CSFFB, SCPO & CSPK Traceability System – Chain of Custody •002 – Harvesting and Loading of Fresh Fruit Bunch •003 – Delivery and Reception of CSFFB, In-House and Non In-house FFB •004 – Dispatch of CSPO and CSPK from the Mill to the Refinery/Bulk Transit Installation •005 – Monitoring of CSPO and CSPK sales b)The person having overall responsibility for and authority over the implementation and compliance of the supply chain requirements is the Mill Manager, assisted by the Senior Mill Assistant, sighted the appointment letter at site.
E.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	
E.4	**Purchasing and goods in**	
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	TPOM had continued to receive certified FFBs from the CU’s own supply bases as well as non-certified FFBs from outsiders. There were Three supply bases (estates) sending certified FFBs to TPOM. They were Tomanggong, Tagas and Litang Estate. For non-certified FFBs, TPOM had sourced them from Tabin Estate, Northbank Estate.
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There was no overproduction of certified FFBs during the period under review (Nov 2017 – Oct 2018). No certified CPO sales recorded only certified PK sold since last audit. Only accumulate Mass Balance stock.
E.5	**Record keeping**	
E.5.1	a) The site 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 palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.	Available.

	c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short (i.e. product can be sold before it is in stock. For further details refer to Module C.	

Attachment 6

VERIFICATION OF NON-CONFORMITIES DURING SURVEILLANCE 3 ASSESMENT AT TOMANGGONG CU

P & C Indicator	Specification Major/ Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
5.2.2 NCR RR 01	Major	There were no RTE species identified in the Tomanggong CU, but the management still give the environmental training focusing on RTE and HCV's. However, during site visit at Tomanggong Estate assessor found a 4 RTE birds named White Rumped Sharma (2) and Hilly Myna (2) (Sabah wildlife Protection-Schedule 2) has been kept by workers in the cage at chicken barn area without proper documentation from wildlife department.	-The weekly basis RTE inspection and yearly RTE training are still inadequate to ensure no capturing of RTE by workers. - Estate management has taken immediate action to release all of the identified RTE birds at chicken barn. Warning letter were also been given to those workers who keeping the RTE birds.	Sighted the following supporting documents as evidence of the corrective action had been taken. Estate management had immediately increased the RTE inspection program to 3 times a week (against previous weekly basis) to each area in TMGOE latest inspection has been conducted on 16/10/2018, 9/10/2018, 1/10/2018. Also sighted evidence training on RTE conducted during muster ground also has been increased to 6 monthly intervals from yearly basis starting 2/11/2017 and 06/04/2018 further creating the awareness of employee on the importance of RTE conservation. **Status Closed.**

Attachment 7

Hap Seng Plantations Holdings Berhad Time Bound Plan on RSPO Certification.

No.	CU	Location	Date of Certification	Valid until	CAB & Certificate No.
1	Hap Seng Plantations (River Estates) Sdn Bhd - Sg Segama Group of Estate & Bukit Mas Palm Oil Mill	Lahad Datu	24/05/2017	23/5/2022	PT TUV Rheinland 824 502 14016
2	Jeroco Plantations Sdn Bhd Jeroco Palm Oil Mill 1	Lahad Datu	27/09/2013	26/09/2018	SIRIM QAS RSPO 0018
3	Jeroco Plantations Sdn Bhd Jeroco Palm Oil Mill 2	Lahad Datu	27/09/2013	26/09/2018	SIRIM QAS RSPO 0028
4	Hap Seng Plantations (River Estates) Sdn Bhd - Tomanggong Group of Estates	Lahad Datu	9/01/2015	8/01/2020	SIRIM QAS RSPO 0024
5	Kawa Estate and Hap Seng Estate, Hap Seng Plantations (Ladang Kawa) Sdn Bhd	Tawau	16/10/ 2015	15/10/2020	PT TUV Rheinland 824 502 15028
6	Pelipikan Estate	Kota Marudu	2019 (target)	-	-
7.	Hap Seng Plantations (River Estates) Sdn Bhd - Tomanggong Group Of Estates – North Bank Estate and Tabin Estate	Lahad Datu	2019 (target)	-	-