	SIRIM QAS INTERNATIONAL SDN. BHD. Building 4, SIRIM Complex, No. 1 ,Persiaran Dato' Menteri, Section 2, 40700 Shah Alam, Selangor, Malaysia.	**File Ref. : EB04990001**
	RSPO PUBLIC SUMMARY REPORT	

CLIENT : BOUSTEAD NAK BUSINESS UNIT

PARENT COMPANY : BOUSTEAD PLANTATIONS BERHAD

RSPO MEMBERSHIP No.: 1-0012-04-000-00

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

Certification Unit	Mill / Estate	Location		
		Longitude	Latitude	Address
Boustead NAK Business Unit	NAK Palm Oil Mill	117.8552'E	5.9000'N	Mile 3 off 19 mile, Labuk Road, 90009 Sandakan Sabah
	NAK Estate	117.8522'E	5.9028'N	Mile 19, 27KM Labuk Road, 90009 Sandakan, Sabah
	Resort Estate	117.7842'E	5.6964'N	Km 100 Sandakan Road, 90009 Sandakan, Sabah.
	Sutera Estate	117.3662'E	5.6545'N	Off Mile 45, 68 km Lahad Datu Road, Sandakan, 90009 Sabah.

MAP : See Attachment 1

AUDIT DATE : 23-26 May 2022

TYPE OF AUDIT : ■ **Annual Surveillance Audit No. 2** ☐ **Recertification Audit**

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 16/05/2020 – 15/05/2025

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 :	MOHD ZULFAKAR BIN KAMARUZAMAN	Name :	MITAH LIMPU
Signature :		Signature :	
Date :	30/08/2022	Date :	01.09.2022

SUMMARY OF AUDITS

Recertification audit					
On-site audit date	:	24 – 28 February 2020			
Audit team	:	Dzulfiqar Azmi (TLA), Mohd Zulfakar Kamaruzaman (SC), Mohd Ab Raouf Bin Asis, Ismail Adnan, Amir Bahari.			
No. of major NCR	:	4	Indicator: 4.1.1, 4.2.1, 6.2.1, 6.2.2		Closing date: 8/05/2020
No. of minor NCR	:	4	Indicator: 2.2.3, 4.2.4, 6.5.3, 7.3.1		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities	Suppliers
		√		√	√
		Contract workers	NGOs	Govt. agency	Independent growers
		√	√	√	
		Indigenous people	Contractor	Others (Please specify)	
		√	√		
Supply base sampled	:	Sutera Estate, Nak Estate, Resort Estate			
Changes since the last audit	:	Changes from previous audit: 1) LTT Sabah Estate has been taken out from Boustead Segamaha BU. 2) Changes of planted ha (details in summary of information Table 1). 3) Boustead Nak BU has applied to change their supply chain model from IP to MB. The application has been submitted in May 2019 and approved by RSPO EB. It has been noted that during this reporting period, Nak BU was receiving the certified crop until 14 May 2019. Starting in 15 May 2019, the POM has started to receive and process certified and non-certified crops.			
Justification of audit planning	:	Total allocation of auditor days for NAK BU were: • Mill = 5 days (5 days for safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) • All estate = 5 days each for verification of safety and health, environment, good agriculture best practices, GHG verification.			
Report approved by	:	Kamini Sooriamoorthy		Approval date : 01/06/2020	

Annual Surveillance Audit 1					
Remote Audit date On-site Audit date	:	5-6 Aug 2021 (3 a.d.) 8-12 Nov 2021 (14 a.d.)			
Audit team	:	(Remote) Mohd Zulfakar bin Kamaruzaman (LA), Rozaimee bin Ab Rahman, Dzulfiqar Azmi, (Onsite) Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman, Selvasingam T. Kandiah			
No. of major NCR	:	2	Indicator: 3.6.1, 7.12.4.		Closing date: 8/02/2022
No. of minor NCR	:	1	Indicator :7.8.1		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		√	N/A	√	√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		√	√	√	
		Indigenous people	Contractor	Others (Please specify)	
		N/A	√		
Supply base sampled	:	Sutera Estate, Nak Estate, Resort Estate			
Changes since the last audit	:	No changes			
Justification of audit planning	:	Mill = 5 days (5 days for social, safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) All estate = 4 days each for verification of social, safety and health, environment, good agriculture best practices, GHG verification.			
Name of peer reviewer	:	NA			
Report approved by	:	Kamini Sooriamoorthy		Approval date: 14/02/2022	

Annual Surveillance Audit 2					
Remote Audit date On-site Audit date	:	21, 23 March 2022 (5 a.d.) 23-26 May 2022 (12 a.d.)			
Audit team	:	(Remote) Mohd Zulfakar bin Kamaruzaman (LA), Amir Bahari, Selvasingam T. Kandiah, (Onsite) Mohd Zulfakar bin Kamaruzaman (LA), Dzulfiqar Azmi, Rohazimi Mat Nawi			
No. of major NCR	:	7	Indicator: 3.4.3, 6.2.2 (Remote) 6.2.2, 3.4.3 (Reissue), 3.7.1, 5.1.2, 6.2.3, 6.2.4, 6.7.3		Closing date: 25/08/2022
No. of minor NCR	:	13	Indicator : 3.3.2, 3.3.3 , 5.2.1, 5.2.2(Remote) 1.1.5, 3.3.2 (Reissue) 3.3.3, 3.5.1, 4.2.3, 6.5.3, 5.5.2 (TBP), 4.3.1, 7.12.6. 7.3.1, 6.7.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		√	N/A	√	√
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		√	√	√	
		Indigenous people	Contractor	Others (Please specify)	
		N/A	√		
Supply base sampled	:	Sutera Estate, Nak Estate, Resort Estate			
Changes since the last audit	:	No changes			
Justification of audit planning	:	Mill = 5 days (5 days for social, safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) All estate = 4 days each for verification of social, safety and health, environment, good agriculture best practices, GHG verification.			
Name of peer reviewer	:	NA			
Report approved by	:	Kamini Sooriamoorthy		Approval date:	30/08/2022

Annual Surveillance Audit 3					
On-site audit date	:				
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 / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		Indigenous people	Contractor	Others (Please specify)	
Supply base sampled	:				
Changes since the last audit	:				
Justification of audit planning	:				
Name of peer reviewer	:	NA			
Report approved by	:			Approval date :	

SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Feb 2020 – Oct 2021	##Nov 2021 – Oct 2022	May 2022 – Apr 2023		
Certified FFB Processed (MT)	80,300.33	76,380.00	77,500.00		
Production of Certified CPO (MT)	16,939.60	16,039.80	16,662.50		
Production of Certified PK (MT)	2,742.17	2,673.30	2,712.50		
Certified Areas (Ha)	4,721.90	*4,707.50	4,707.50		
Planted Areas (Ha)	4,431.40	**4,436.00	#4,435.50		
Production Areas (Ha)	3,172.60	3,385.60	3,670.20		
HCV Areas / Conservation Areas (Ha)	6.90	6.90	6.90		
REMARKS	**ASA 1** *Certified areas reduced 14.40 ha due to: 1. Sutera- decreased by 3.2ha due to finalization of land acquisition since 2017 (Pan Borneo Highway Project). 2. Resort- TNB's rentice has been deducted from Resort hectarage with 11.2ha due this has been acquired by SESB w.e.f. 2020. **Planted areas increased due to: Resort- Nursery 4.6ha were declared PR2020. **ASA 2** #Nak Estate total planted Ha was reduced by 0.5Ha against previous report due to 0.5Ha from 1996 planted was excise out for New Mill Labour Quarters in Year 2021. ##Actual period covered was from Nov 2021 to Apr 2022				

TABLE 2

	PO	PK
Last years certified volume (MT)	16,039.80	2,673.30
Last years actual certified sold (MT)	7,392.25	984.98
Last years actual sold under other schemes (MT)	-	-
Last years sold conventional (MT)	7,392.25	984.98
Last year actual sold CSPO credits (where applicable)	-	-
New year certified volume (MT)	16,662.50	2,712.50

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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 & OHS 45001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar bin Kamaruzaman	Lead Auditor / SCCS, Social – External, GAP, HCV	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Dzulfiqar bin Azmi	Auditor / Social – Internal, TBP	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Rohazimi bin Mat Nawi	Auditor Safety, Environment, GHG, Mill Best Practices	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill more than 5 years. He was qualified in the auditing line with experienced in Sustainability (MSPO), QMS, EMS, OHSMS and RSPO/MSPO Supply Chain audit.

1.3 Audit methodology

All three estate were audited. This audit has covered Nak POM and all of its supply bases i.e. Nak Estate, Sutera Estate and Resort Estate. The audit has included the on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020.

1.4 Stakeholder Consultation

SIRIM QAS International had sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out as below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	The following were confirmed during the conduct of audit as there was no evidence to prove otherwise: ▪ Foreign workers employed via recruitment agents confirmed that they did not pay any recruitment fees. ▪ All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. ▪ They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. ▪ They have been getting salaries above RM1,200 since January 2022 and It shall increase to RM 1500 during this month of May 2022 after revised of Minimum Wages Order 2022. Salaries were paid before the 7th of every month. ▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. ▪ No discrimination between migrant workers and local workers, between male and female workers. ▪ Comfortable housing with water and electricity provided. ▪ Have access to affordable food from the canteen/sundry shops within the estate/mill premises. ▪ Entitled to free medical facilities at the estate clinic. ▪ Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. ▪ When they are at work, their children stay at the creche or the Community Learning Centre. The legalisation process of all the children has been done and some are still ongoing ▪ However, certain issues related to social workers were found duing the audit. The NCRs have been raised under indicator 3.3.3, 3.4.3, 4.2.3, 6.2.2, 6.2.3, 6.2.4 & 6.5.3. The list of workers interviewed can refer in the clause **6.2.1**
2) Settlers	Not applicable.
3) Villagers / Local communities (including women representatives, displaced communities)	▪ Four (4) villagers living near the NAK BU ▪ No land claims/disputes and no social issues. ▪ Confirmed there is no land dispute between NAK BU and neighbouring estates ▪ No social issues arising from estate workers. ▪ Occassionally are called to attend meetings by NAK mill and estates. The last one was held few months ago. ▪ All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings.
4) Suppliers	▪ Suppliers of hardware and fertilizers, harvesters and FFB transporters since 1997. ▪ NAK BU and supplier contracts were signed by both parties. Suppliers would be contacted to supply hardward items and agro products when the need arises. Also, FFB transporter's service was needed when required. This happens approximately once in two months for suppliers but daily for transporters and harvesters. ▪ Fair dealings with the units in NAK BU. ▪ Payments are made within 1 months of invoice.
5) Contract workers (local / foreign / Orang Asli workers / male & female)	Interviewed contract workers i.e., those employed by contractors to provide harvesting and loading works. They confirmed that they have signed employment contracts with their contractor, receive more than minimum wages, wages are paid before the 7th of every month, provided accommodation with basic facilities such as water, electricity, free medical facilities. They did not raise any complaints or grievances during the audit.
6) Local & national NGOs	▪ No issue

7) Government agencies / Statutory bodies	Not applicable
8) Independent growers / Smallholders	Not applicable
9) Indigenous people	Not applicable
10) Contractor	▪ Contractor harvesters and FFB transporters since 1997. ▪ NAK BU and supplier contracts were signed by both parties. Suppliers would be contacted to supply hardward items and agro products when the need arises. Also, FFB transporter's service was needed when required. This happens approximately once in two months for suppliers but daily for transporters and harvesters. ▪ Fair dealings with the units in NAK BU. ▪ Payments are made within 1 months of invoice.
11) Previous land owner (if any)	Boustead owned the land (brought from the Government) as mentioned in 4.4.1 of these checklists. Based on the interviews and this audit finding, it has been confirmed that there was no such case concerning the rights of local communities and indigenous people at NAK BU.
12) Others (please specify)	Not applicable

1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Nak Certification Unit (hereafter referred to as Nak CU) is one of the business units under the Boustead Plantation Bhd (BPB), which is also known as Boustead Nak Business Unit. The CU comprises of the Nak Palm Oil Mill (Nak POM) and three supply bases i.e. Nak Estate, Resort Estate and Sutera Estate. All of the estates were fully owned by BPB. The Nak POM has a mill capacity of 40 mt/hr. All the estates have been fully developed before 2005.

Boustead Nak BU have ISO 9001 quality management system certification beside of RSPO P&C and Supply Chain. Boustead Nak BU has applied to change their supply chain model from IP to MB. Starting on 15 May 2019, the POM started to receive and process certified and non-certified crops.

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

The FFB sourced from company owned estates that are certified and not yet certified i.e. Tawai BU. Details of the FFB contribution from each source to the Nak Palm Oil Mill are shown in the following tables:

Table 1: Actual FFB production by the supply base for the last reporting period (Nov 2021 to April 2022)

CU own estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Nak Estate	7,701.47	23.14	SIRIM QAS
Resort Estate	6,926.24	20.81	SIRIM QAS
Sutera Estate	17,575.67	52.80	SIRIM QAS
Boustead Sister Estate			
Ladang Tabung Tentera- Sabah	154.76	0.46	SIRIM QAS
Ladang Bukit Segamaha	280.81	0.84	SIRIM QAS
Ladang Sungai Segamaha	395.13	1.19	SIRIM QAS
Ladang G&G	155.13	0.47	SIRIM QAS
Outsider Crop			
Gagah Makmur	98.11	0.29	
TOTAL	**33,287.32**	**100**	

Table 2: Projected FFB production by supply base for the next reporting period (May 2022 to April 2023)

CU own estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Nak Estate	20,400	26.32	SIRIM QAS
Resort Estate	18,000	23.23	SIRIM QAS
Sutera Estate	39,100	50.45	SIRIM QAS
TOTAL	**77,500**	**100**	

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period (Nov 2021 to Apr 2022)

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	33,287.32
FFB Processed	33,287.32
Certified FFB Processed	33,189.21
Non – Certified FFB Processed	98.11
Crude Palm Oil (CPO)	
Overall CPO Production	7,414.04
Certified CPO Production	7,392.25
Certified CPO Delivered as RSPO	-
Certified CPO Delivered as Non-RSPO	7,392.25
Certified CPO Delivered under other sustainable schemes	-
Credits traded through Book and Claim	-
Palm Kernel (PK)	
Overall PK Production	987.88
Certified PK Production	984.98
Certified PK Delivered as RSPO	-
Certified PK Delivered as non RSPO	984.98
Certified PK Delivered under other sustainable schemes	-
Credits traded thru Book & Claim	-

Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period (May 2022 to April 2023)

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	77,500
FFB Processed	77,500
Certified CPO Production	16,662.50
Certified PK Production	2,712.50

Table 5: Planted and certified area of the NAK CU

Estate	Planted (ha)	Certified (ha)
Nak	1,289.40	1,386.10
Sutera	2,086.70	2,197.50
Resort	1,059.40	1,123.90
Total	**4,435.50**	**4,707.50**

Table 6: Planting profile for NAK CU

Estate	Year of planting	Planting Cycle	Mature >3 years (Ha)	Immature < 3 years(Ha)	Planted area	% of planted area mature	% of planted area immature
Nak Estate	1995	1st Generation	110.6		110.6	8.6	
	1996	1st Generation	142.4		142.4	11.0	
	2001	1st Generation	111.7		111.7	8.7	
	2002	1st Generation	154.2		154.2	12.0	
	2006	2nd Generation	82.5		82.5	6.4	
	2007	2nd Generation	50.2		50.2	3.9	
	2008	2nd Generation	42.4		42.4	3.3	
	2009	2nd Generation	79.9		79.9	6.2	
	2010	2nd Generation	60.2		60.2	4.7	
	2016	2nd Generation	68.9		68.9	5.3	
	2017	2nd Generation	83.6		83.6	6.5	
	2018	2nd Generation	78.0		78.0	6.0	
	2019	2nd Generation	63.2		63.2	4.9	
	2020	2nd Generation		85.9	85.9		6.6
	2021	2nd Generation		75.7	75.7		5.9
Total					**1289.4**	**82.7**	**12.5**
Resort Estate	2015	2nd Generation	158.9		158.9	15.0	
	2016	2nd Generation	169.1		169.1	16.0	
	2017	2nd Generation	169.5		169.5	16.0	
	2018	2nd Generation	210.7		210.7	20.0	
	2019	2nd Generation	221.9		221.9	21.0	
	2020	2nd Generation		129.3	129.3		12.0
Total					**1059.40**	**67.0**	**33.0**
Sutera Estate	2005	2nd Generation	173.10		173.10	8	
	2006	2nd Generation	139.00		139.00	7	
	2007	2nd Generation	101.70		101.70	5	
	2009	2nd Generation	145.20		145.20	7	
	2010	2nd Generation	134.20		134.20	6	
	2011	2nd Generation	145.40		145.40	7	
	2012	2nd Generation	137.30		137.30	7	
	2013	2nd Generation	92.90		92.90	4	
	2014	2nd Generation	105.80		105.80	5	
	2015	2nd Generation	89.30		89.30	4	
	2016	2nd Generation	100.90		100.90	5	
	2017	2nd Generation	247.50		247.50	12	
	2019	2nd Generation		217.90	217.90		10
	2020	2nd Generation		256.50	256.50		12
Total					**2086.70**	**78.0**	**22.0**
Sub Total					**4435.50**	**227.70**	**72.30**

2.3 Organizational Information/Contact Person(s)

NAK CU (PIC)

Name	:	FARIDAN BIN OTHMAN
Position	:	HEAD OF NAK BUSINESS UNIT
Address	:	NAK PALM OIL MILL, KM5, OFF 19TH MILE, LABUK ROAD, 90009 SANDAKAN, SABAH.
Phone no.	:	089-200375
Fax no.	:	-
Email	:	faridan@bplant.com.my

3.0 AUDIT FINDINGS

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

No changes.

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

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

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

Some of Complex and Newly acquired site still Follow the Current TBP and progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details provided in the Time Bound Plan described in Attachment 6.

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

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

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

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

No changes, all remains the same.

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 significant complaints from stakeholders were observed. Auditor has verified during the Audit by interview the stakeholder such as surrounding villagers and contractors		
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 3)	List : 7	**3.4.3, 6.2.2 (Remote) 6.2.2, 3.4.3 (reissue), 3.7.1, 5.1.2, 6.2.3, 6.2.4, 6.7.3**
	Total no. of major NCR(s) (details refer to Attachment 3)	List : 13	**3.3.2, 3.3.3 , 5.2.1, 5.2.2(Remote) 1.1.5, 3.3.2 (Reissue) 3.3.3, 3.5.1, 4.2.3, 6.5.3, 5.5.2 (TBP), 4.3.1, 7.12.6. 7.3.1, 6.7.2**
4.2	For SC (Details checklist refer to Attachment 5) :		
	Total no. of minor NCR(s) (details refer to Attachment 3)	List :	
	Total no. of major NCR(s) (details refer to Attachment 3)	List :	
5.0	**AUDIT CONCLUSION**		
	The audit team concludes that the organization has / ~~has not*~~ 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.

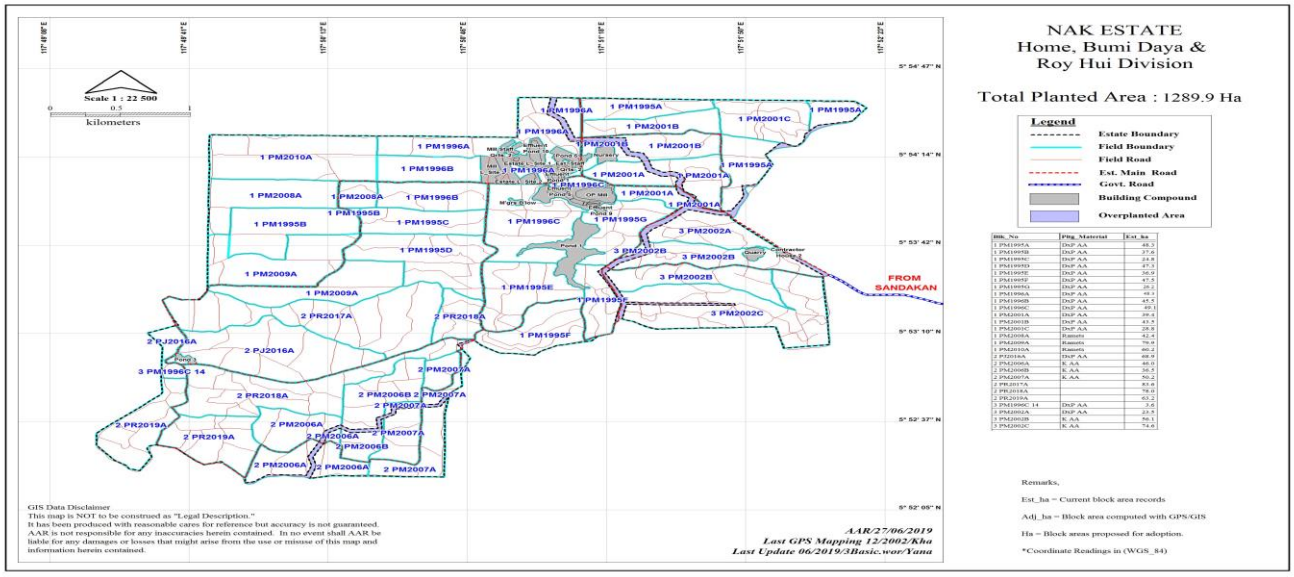
☐ Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)…… have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

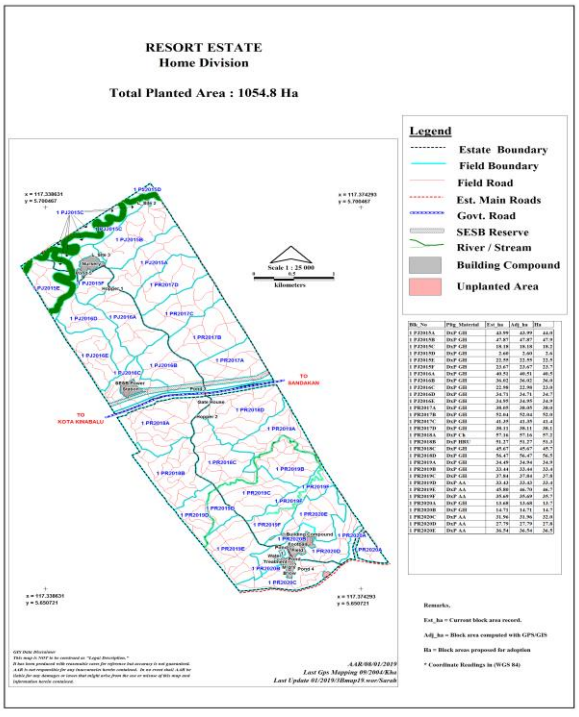
7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.

Audit Team Leader :	MOHD ZULFAKAR BIN KAMARUZAMAN		25/8/2022
	(Name)	(Signature)	(Date)

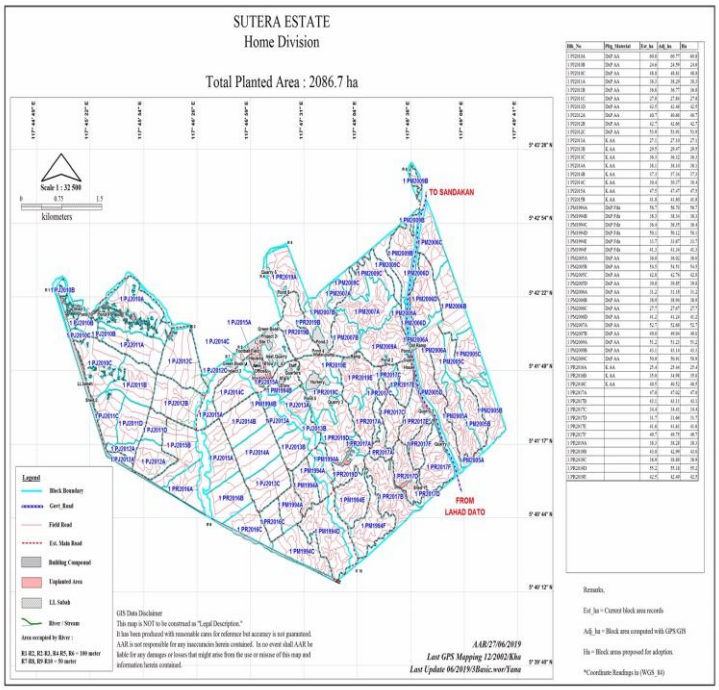
Nak Estate and Nak POM (within Nak Estate)



Resort Estate



Sutera Estate



SURVEILLANCE 2 RSPO AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

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

2. Date of assessment : 23rd to 26th May 2022.

3. Site of assessment : Nak Certification Unit:

(i) Nak POM
(ii) Nak Estate
(iii) Resort Estate
(iv) Sutera Estate

4. Reference Standard:

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

5. Assessment Team

Lead Auditor	:	Mohd Zulfakar Kamaruzaman (SCCS, Social – External, GAP,HCV)
Auditor	:	Dzulfiqar Azmi (Social – Internal, TPB) Rohazimi Mat Nawi (Safety, Environment, GHG, Mill Best Practices)
Observer	:	N.A.
ASI Witness	:	Haye Semail and Technical Expert (ASI)

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

7. Audit Method

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

8. Audit Findings

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

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

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

9. Confidentiality Requirements

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

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

10. Working Language : English and Bahasa Malaysia

11. Reporting

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

12. Facilities Required

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

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

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

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

a) Reporting time frames for economic data are:
   i. Calendar year (January to December): January 2021 to December 2021, and
   ii. 12-month period counting up to two months before audit month: April 2021 to March 2022
b) Reporting time frames for demographic data:
   i. For mill and estate workers: as of 31 December 2021
   ii. For smallholders and outgrowers: January 2021 to December 2021
c) Reporting time frame for all other social and environmental data:
   i. January 2021 to December 2021

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

14. Confidentiality Requirements

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

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

15. Working Language : English and Bahasa Malaysia

16. Reporting

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

17. Facilities Required

f. Room for discussion
g. Relevant document and record
h. Personnel protective equipment if required
i. Photocopy facilities
j. A guide for each group

Assessment Programme Details : As below

Day 1: 23/05/2022 (Monday)

<table>
<tr><th>Time</th><th colspan="3">Activities / areas to be visited</th><th>Auditee</th></tr>
<tr><td>9.00 am</td><td colspan="3">Opening Meeting for Boustead Plantations Berhad (Boustead Gradient Sdn. Bhd. – NAK CU). Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.</td><td>All CU</td></tr>
<tr><td>9.20 am</td><td colspan="3">Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative.</td><td>Management Representative</td></tr>
<tr><td>9.30 am</td><td colspan="3">Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Sutera Estate.</td><td>Management Representative</td></tr>
<tr><td rowspan="3">9.35 am</td><td colspan="3">To assign each audit team members – site and the P&C requirements</td><td></td></tr>
<tr><td>Dzul
Sutera Estate</td><td>Zulfakar
Sutera Estate</td><td>Rohazimi
Sutera Estate</td><td></td></tr>
<tr><td>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Training and skill development programs
▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.
▪ Interview with Union/workers representatives
▪ Interview with gender committee, worker representative, contractors, supplier, etc
▪ Workers Issues & welfare
▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc)
▪ Continuous improvement

Other area identified during the assessment.</td><td>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Training and skill development programs
▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.
▪ Interview with Union/workers representatives
▪ Interview with external stakeholders i.e. local communities, contractors, supplier, etc.
▪ Consultation with relevant government agencies
▪ Local communities and stakeholders, Local sustainable development, Support smallholder inclusion, Complaints and grievances
▪ Mill/Estate Boundary, adjacent and neighbouring land use, External stakeholders issues & welfare
▪ HCV/RTE and action plan
▪ Continuous improvement
▪ Production area field inspections (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.)
▪ Training and skill development programs</td><td>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Safety & Health practice – witness activities at site
▪ Hazard identification and Risk Management
▪ Chemical management
▪ Waste management including disposal site
▪ Aspects/impacts of estate management
▪ Facilities at workplace inspection (water treatment plant, clinic, stores, workshop, landfill area & etc.)
▪ Controlled/open burning
▪ Pollution mitigating plans
▪ Management and disposal of waste including pesticides containers
▪ River system and Effluent Treatment/Discharge
▪ Buffer/Riparian Zones
▪ Training and skill development programs
▪ Continuous improvement

Other area identified during the assessment.</td><td></td></tr>
</table>

		▪ Controlled/open burning ▪ Good Agriculture Practices ▪ Training and skill development programs Other area identified during the assessment.	
12.30 pm	**LUNCH BREAK & ZUHUR PRAYER**		
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records		
5.00 pm	Audit team discussion / Interim closing / End of Day 1 audit		
9.00pm	Discussion LA and teams on potential NCRs		

Day 2: 24/05/2022 (Tuesday)

Time	Activities / areas to be visited		Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at **Resort Estate.**		Management Representative
9.35 am	To assign each audit team members – site and the P&C requirements		
	Dzul	**Zulfakar**	**Rohazimi**
	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Training and skill development programs ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union/workers representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues & welfare ▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision	**Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:** ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Training and skill development programs ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union/workers representatives ▪ Interview with external stakeholders i.e. local communities, contractors, supplier, etc. ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders, Local sustainable development, Support smallholder inclusion, Complaints and grievances ▪ Mill/Estate Boundary, adjacent and neighbouring	**Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:** ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Waste management including disposal site ▪ Aspects/impacts of estate management ▪ Facilities at workplace inspection (water treatment plant, clinic, stores, workshop, landfill area & etc.) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ River system and Effluent Treatment/Discharge ▪ Buffer/Riparian Zones

	shop & etc) ▪ Continuous improvement Other area identified during the assessment.	land use, External stakeholders issues & welfare ▪ HCV/RTE and action plan ▪ Continuous improvement ▪ Production area field inspections (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.) ▪ Training and skill development programs ▪ Controlled/open burning ▪ Good Agriculture Practices ▪ Training and skill development programs Other area identified during the assessment.	▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment.
12.30 pm	**LUNCH BREAK & ZUHUR PRAYER**		
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records		
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit		
9.00pm	Discussion LA and teams on potential NCRs		

Day 3: 25/05/2022 (Wednesday)

Time	Activities / areas to be visited		Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at **Nak Estate.**		Management Representative
9.35 am	To assign each audit team members – site and the P&C requirements		
	Dzul	**Zulfakar**	**Rohazimi**
	Coverage of assessment: P1, P2, P3, P4, P5, P6, P7: ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Training and skill development programs ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union/workers representatives	**Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:** ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Training and skill development programs ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management	**Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:** ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Waste management including disposal site

	▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues & welfare ▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc) ▪ Continuous improvement Other area identified during the assessment.	plans. ▪ Interview with Union/workers representatives ▪ Interview with external stakeholders i.e. local communities, contractors, supplier, etc. ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders, Local sustainable development, Support smallholder inclusion, Complaints and grievances ▪ Mill/Estate Boundary, adjacent and neighbouring land use, External stakeholders issues & welfare ▪ HCV/RTE and action plan ▪ Continuous improvement ▪ Production area field inspections (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.) ▪ Training and skill development programs ▪ Controlled/open burning ▪ Good Agriculture Practices ▪ Training and skill development programs Other area identified during the assessment.	▪ Aspects/impacts of estate management ▪ Facilities at workplace inspection (water treatment plant, clinic, stores, workshop, landfill area & etc.) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ River system and Effluent Treatment/Discharge ▪ Buffer/Riparian Zones ▪ Training and skill development programs ▪ Continuous improvement Other area identified during the assessment.
12.30 pm	**LUNCH BREAK & ZUHUR PRAYER**		
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records		
5.00 pm	Audit team discussion / Interim closing / End of Day 3 audit		
9.00pm	Discussion LA and teams on potential NCRs		

Day 4: 25/05/2022 (Thursday)

<table>
<tr><th>Time</th><th colspan="3">Activities / areas to be visited</th><th>Auditee</th></tr>
<tr><td>9.00 am</td><td colspan="3">Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Nak POM.</td><td>Management Representative</td></tr>
<tr><td rowspan="3">9.35 am</td><td colspan="4">To assign each audit team members – site and the P&C requirements</td></tr>
<tr><td>Dzul</td><td>Zulfakar</td><td colspan="2">Rohazimi</td></tr>
<tr><td>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Training and skill development programs
▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.
▪ Interview with Union/workers representatives
▪ Interview with gender committee, worker representative, contractors, supplier, etc
▪ Workers Issues & welfare
▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc)
▪ Continuous improvement

Other area identified during the assessment.</td><td>Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Training and skill development programs
▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.
▪ Interview with Union/workers representatives
▪ Interview with external stakeholders i.e. local communities, contractors, supplier, etc.
▪ Consultation with relevant government agencies
▪ Local communities and stakeholders, Local sustainable development, Support smallholder inclusion, Complaints and grievances
▪ Mill/Estate Boundary, adjacent and neighbouring land use, External stakeholders issues & welfare
▪ HCV/RTE and action plan
▪ Continuous improvement
▪ Production area field inspections (harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.)
▪ Training and skill development programs
▪ Controlled/open burning
▪ Good Agriculture Practices
▪ Training and skill development programs

Other area identified during the assessment.</td><td colspan="2">Coverage of assessment: P1, P2, P3, P4, P5, P6, P7:
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Safety & Health practice – witness activities at site
▪ Hazard identification and Risk Management
▪ Chemical management
▪ Waste management including disposal site
▪ Aspects/impacts of estate management
▪ Facilities at workplace inspection (water treatment plant, clinic, stores, workshop, landfill area & etc.)
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▪ Management and disposal of waste including pesticides containers
▪ River system and Effluent Treatment/Discharge
▪ Buffer/Riparian Zones
▪ Training and skill development programs
▪ Continuous improvement

Other area identified during the assessment.</td></tr>
</table>

12.30 pm	**LUNCH BREAK & ZUHUR PRAYER**
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records
3.00 pm	Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.
3.30 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager
4.00 pm	Closing meeting at the CU
5.00 pm	End of audit

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

Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	The Nak BU continued to implement the procedure for responding to any communication as outlined in their Estate/Mill Quality Management System documents. The records of communication were identified and maintained in different files depending on the stakeholder. Among the records reviewed were correspondences with the authorities and employees. The CU continued to use internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Boustead Plantation website at http://www.bousteadplantations.com.my/home.html
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The Nak CU continued to maintain stakeholders for contractors, vendors/suppliers, government agencies, schools, local communities, etc. It was noted that Boustead has revised their website, http://www.bousteadplantations.com.my/home.html to include all management documents relating to the unit's environmental, social and legal issues demonstrating commitment towards compliance to RSPO criteria.
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The Nak CU have identified personnel responsible for complaints. Records of communication (classified as internal and external) were identified and maintained in different files, depending on the stakeholders. Among the records reviewed were correspondences with the authorities, local communities and employees. The latest communications sighted in these records were the "Borang Aduan" requesting repairs of the employee's houses.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedures were documented. External and internal communication procedures developed by Boustead Plantation for the estates and mill maintained to be followed and available at the audited sites. Consultation and communications procedures for Nak CU is documented in the *Carta Aliran Membuat Aduan Kepada Pihak Pengurusan (Dalaman),* External Communications Procedure, Fair Compensation Procedure. This document was sighted during the audit.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	NO	There is no internal stakeholder listed in the stakeholder list at Resort and Nak Estate such as workers leader, women leader, religion head, ethnic leader etc. this group is the biggest affected group by the CU operations. *As a result, Minor NCR DA 01 2022 was raised.*

Clause	Indicators	Comply Yes/No	Findings
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	A Policy for ethical conduct is available known as 'Code of Ethics & Conduct'. Based on interviews with sampled contractors including manpower service providers, evidence is available that the Code of Ethics are being implemented. The requirement to comply with this Policy is also included in contracts signed with third parties.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	The system in place to monitor compliance and implementation of the Policy is via internal audits and integrity pledges signed by contractors which contain provisions requiring contractors to ensure compliance with the Company's Code of Ethics.

Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	NAK Mill and Estates CU continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the respective operating units and SSD sustainability team. The CU had obtained and renewed license and permits as required by the law.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	Document titled "Legal & Other Requirement Register (LORR)" maintained available at NAK BU. Updated by HQ.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/Boundary stones along the legal boundaries between was visibly available
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	YES	A list of contracted parties is maintained. As at audit visit, 11 contractors have listed in the stakeholder list.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for	YES	There is evidence that agreements with third parties contain clauses on meeting applicable requirements. Evidence of legal due diligence carried out include getting the vendors to sign the undertaking to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption.

Clause	Indicators	Comply Yes/No	Findings
	migrant workers, service providers and labour contractors, is available.		
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons. Sampled Contract agreement at Nak Estate does contain clauses disallowing child, forced and trafficked labour.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: • Information on geo-location of FFB origins. • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license	YES	Nak POM has evidence for the following for the directly source of FFB: a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder (MPOB License, MAP) The evidence of currently document is available in the 'OCP Suppliers'. At present the mill only possessed the valid MPOB licenses and OCP Land Title for all the directly source FFB as verified by the auditor.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Currently in Nak POM there is no indirectly source of FFB. All FFB are received direct from the suppliers.

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

Implement plans, procedures and systems for continuous improvement.

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td rowspan="3">3.1
There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</td><td>3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</td><td>YES</td><td>NAK Business Unit continued to achieve long term economic and financial viability through documented management plan projected for 25 years. Since there are no smallholders in this Business Unit, therefore a business case for scheme smallholders is not considered.
All the estates had a standard budgeting format. The records were reviewed during the audit. The Business Plan also included a 5-year budget/forecast financial plan (i.e. 2022 to 2027) with allocation on the following:
▪ Crop yielding area / Prime mature
▪ Total mature / Cost/ha
▪ General charges/upkeep/collection/depreciation
▪ CAPEX</td></tr>
<tr><td>3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.</td><td>YES</td><td>Nak CU had established and documented a management plan (budget) inclusive of the long-range replanting programs (LRRP) for 25 years. This management plan inclusive of the replanting program was reviewed annually. The decision for replanting was based on factors like FFB crop availability for the mill, FFB Yield, Height & Age of palms, market price of CPO, etc.
The oldest palm on Resort estate being planted only on 2015 and on Sutera only in 2005 there is no replanting on both for the next five years.</td></tr>
<tr><td>3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</td><td>YES</td><td>NAK CU continued to have management reviews at planned intervals of 1 year. The latest combined PO and Estates Management Review was held after Internal Audits on 19/02/2022. Generally, the RSPO system has been maintained in good order as per requirements of RSPO MYNI 2019 Standard. The management review meeting for Nak CU was held on 24th July 2021 and attended by all the Sustainability Chairman, Head Business Unit, Estates and Mill Managers and sustainability team.</td></tr>
<tr><td>3.2
The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key</td><td>3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</td><td>YES</td><td>For environment sighted sample sites for Nak certification unit improvement plan:
<table>
<tr><th></th><th>OU/Area</th><th>Management Plan/ Objectives</th></tr>
<tr><td>1</td><td>Sutera Estate</td><td>Overhead cable/pole & lighting arrestor</td></tr>
<tr><td>2</td><td>Sutera Estate</td><td>Water pond/tank and fencing</td></tr>
<tr><td>3</td><td>Sutera Estate</td><td>Grabber system HIAB - FFB collection</td></tr>
<tr><td>4</td><td>Sutera Estate</td><td>Workers Quarters - 8 units</td></tr>
<tr><td>5</td><td>Sutera Estate</td><td>Re-roofing workers quarters 8 units</td></tr>
<tr><td>6</td><td>Sutera Estate</td><td>Volleyball Court</td></tr>
<tr><td>1</td><td>Resort Estate</td><td>Workers Quarters - 8 units</td></tr>
<tr><td>2</td><td>Resort Estate</td><td>New Unit Tractor / Farm FFB</td></tr>
<tr><td>1</td><td>NAK Estate</td><td>New Unit Tractor / Grabber</td></tr>
<tr><td>2</td><td>NAK Estate</td><td>LF Netting - Replace existing bags system</td></tr>
<tr><td>1</td><td>NAK POM</td><td>ESP - Boiler Operation</td></tr>
<tr><td>2</td><td>NAK POM</td><td>New Horizontal Deoiling Tank -CPO</td></tr>
<tr><td>3</td><td>NAK POM</td><td>Social - Membrane bio-reactor</td></tr>
</table></td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings
operations.	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template together with palm trace renewal. This requirement refers to a small set of strategic outcome-based metrics, which are of value to growers, relates directly to the P&C, and aligns with the RSPO Theory of Change1 (ToC) and RSPO organizational Key Performance Indicators (KPIs).
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	CU has developed and documented several manuals for its use. Among them were: • Standard Operating Procedure (SOP) dated 02/05/2012 that provide guidelines to staff members in respect of certain major aspects of Estate and Mill operations. • Oil Palm Circulars • Safe Work Procedure • OSHA Manual, Occupational Safety and Health Guideline • Procedure for the training entitled Sustainability Guidelines: Training
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	NO	NAK Business unit, the mechanisms to check the implementation of procedures were carried out through RSPO/MSPO internal audits by PSQM team, safety and health meeting and routine inspection (workplace inspection) by assistant manager, staff and hospital assistant. RSPO/MSPO Internal audit at Nak CU was conducted on 16 to 19/02/2022 and the report was made available to the management for their review. In addition, sustainability team from HQ had conducted quarterly monitoring on procedures such as loose fruit collection, harvested bunch left uncollected and unharvested bunches, safe work and mechanization. Visits by PAs and Agronomist also monitored implementation of procedures. Yearly agronomic assessment and fertiliser recommendation was conducted Applied Agricultural Resources Sdn.Bhd. (AAR). The visit was carried to cover all the oil palm field and the findings were used as guidance in formulating the fertilizer input and recommendation on good agricultural practices to improve growth and subsequently the FFB yields. However, on Sutera Estate – Rat damage on oil palm fruits on palms and on harvested bunches on roadside platforms were observed at time of audit in field PM2013C. However, no records were available to show that a census had been carried to establish extent of damage so as to initiate a rat baiting campaign. Thus, the Minor NCR STK 01 2022 was issued.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	NO	In the Nak BU the monitoring of the SOP implementation was closely made by all levels of the supervisory personnel with records maintained and checked. Mill Manager/Engineers and the shift Supervisors on the day-to-day routine supervision in the mill Nevertheless, records of monitoring and any action taken regarding unauthorised harvesting, working on rest day during non-offered work was not maintained and not available. Based on interview with harvesters from Sutera Estate, there is unauthorised harvesting occurred on rest day (Friday) without approval from the estate management. There was no records and supervision were carried out during on the rest day based on confirmation by estate management. With this no records, there was also no rest day payment been paid to workers working on rest day during non-offered day. Thus, Minor NCR DA 02 2022 was maintained.
3.4	3.4.1 (C) In new plantings or	YES	There was no new planting in Nak CU. Environmental Aspect and Impact (EAI) and Social Impact

Clause	Indicators	Comply Yes/No	Findings
A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.		Assessment (SIA) was conducted internally considering activities associated to estate and mill operations.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	A documented High Conservation Value & Social Impact Assessment (SIA) dated 7 May 2012 was made available during audit. It was noted that the report had covered all the three estates and the mill. The report also covered the stakeholder mapping, wages and decent living wages, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations. Nak Estate is neighbouring with Kampung Sungai Tiram, while Sutera Estate is neighbouring with Kampung Sungai Segaliud. There is no village nearby to Resort Estate. The CU also had conducted SIA for Ladang Tabung Tentera (LTTS) in March 2017. LTTS is neighbouring with Kampung Sri Takala. The assessment was done with workers, kindergarten teacher, clinic attendant, independent smallholders, small growers, Kampung Sungai Segaliud and Kampung Sungai Tiram. All records of the meetings, consultation takes place during the SIA is incorporated in the assessment document. List of the stakeholders consulted are also available within the document. Auditor have verified the latest external stakeholders meeting conducted via virtual meeting and questionnaire methods due to COVID 19 restriction. The meetings were held on 16/07/2021 (Nak POM), 08/06/2021 (Nak Estate), 10/07/2021 (Resort & Sutera Estate) which were participated by government agencies, local communities and private sectors (contractors and neighbouring estates). Evidence of the above external stakeholder consultation conducted are available in the questionnaire form feedback and the records of minutes meeting. Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the SIA plan. Summary recorded of stakeholder consultation conducted by the Nak CU via questionnaire methodology. So far, no negative impacts were observed during the stakeholder's feedback or meeting. The aspect and impact analysis for all the mill/estate operations are documented and revised annually recent being Jan 2022. In the comprehensive report, the study of aspect and impact are aimed to; a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG d) To ensure water quality meets EQA 1974 e) Conservation of Soil Erosion at any point from further destruction

Clause	Indicators	Comply Yes/No	Findings
			f) To reduce contamination of chemical and fertilizer to surface water source g) To reduce chemical application usage
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	NO	The Social/Environmental Management Plan 2022 are available for each unit were available having information i.e issues, management plan, PIC and time frame. The input is gathered from the meeting minutes a) Gender Committee, Workers Representative b) Safety Meeting, c) Complaint & Request from internal & external stakeholders and muster briefing). d) Stakeholders meeting However, it was noted that the social management and monitoring plan was not fully implemented, reviewed and updated regularly in a participatory way. Hence, Major NCR DA 10 2022 was raised.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	NO	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination was documented and available to the workers and their representatives. However, 1) During the assessment, assessor have found 2 workers origin from Philippine and Indonesian applied for work via walk in application. However, there was no clear procedure on this walk-in process and timeline for the working pass application. 2) The CU have recruitment procedures for foreign workers via agent/quota basis. However, there was no clear procedure or mechanism to ensure zero recruitment fees paid by workers. Hence, Minor NCR DA 03 2022 was raised.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Based on the documentation review, employment procedures are implemented and records are maintained. Also, there was document sighted i.e ''Prosedur Pengambilan Kakitangan Baharu''. It was mentioned that on the process undertaking new employees, report for duty, probationary period and confirmation.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	The CU had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following; a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents The estates had list of review on HIRARC dated Jan 2022 document no BEA/OSH/HIRARC/01 respectively for the estates and mill. Amendments are summarized in a list detailing dates and reasons for updates. There is no new activities in both mill and estates. Mill had commissioning ESP as air pollution control system. Estates expand mechanization area through purchase of additional MTG for the mature palms and also spraying operations. This being introduced to reduce reliance on labour. Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and

Clause	Indicators	Comply Yes/No	Findings
			properly covered. Appropriate administrative controls such as Safe work procedures and safety signage were displayed at all workstations in the mill and estate office and workshop. In general, the control measures were appropriate to the identified risks. *Hence the NCR STK 01 2021 raised is closed and concluded.*
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	Occupational health and safety (OHS) management plan for Nak BU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2022 were acceptable.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	NO	The training program for 2022 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. Training identification matrix has been established with target months for of implementation. However, it was found that, Nak BU had the Programme of Training related to Health & Safety, Environment, Good Agriculture Practices, However, Programme training related to technical Aspect of RSPO such as Social Related, SIA, HCV, Vacation Leave Pay was not available, overall there is also no training for RSPO P&C MYNI 2019 for administration Staff. Thus Major NCR MZK 01 2022 has been raised.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	NAK Business Unit had trained their staff, workers and records of training were kept in the RSPO 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.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Training was conducted on 15/1/22, attended by 7 person including PIC, Clerk, Assistant Engineer, Staff and Weighbridge Operator. Attendance list & photograph was seen and 17/02/2022 for transporter contractor and Refinery PIC.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Not applicable due to Nak POM using Mass Balance model.
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base.	YES	Nak POM has continued to maintain Mass Balance model. NAK POM obtained certified FFB from owned estate such as: ▪ Nak Estate ▪ Resort Estate ▪ Sutera Estate Diversion from Certified Boustead estate such as: • Tabung Tentera Sabah Estate • Sungai Segamaha Estate • Bukit Segamaha Estate • G&G Estate For Uncertified FFB from non-certified Boustead estate such as: ▪ Pertama Estate ▪ Sungai Ruku-Ruku Estate ▪ Sapa Payau Estate Noncertified from outside crop • Gagah Makmur • Luboh Estate
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product	YES	Projection May 2022 – Apr 2023 Detail can be referred at Table 4 on this report

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	(CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information was: The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information was: Name: Boustead Bhd - Boustead Nak Business Unit Gradient Sdn Bhd Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil Sub License ID: - Start date: 22/02/2022 End date: 15/08/2022 (Downgraded to Mass Balance on May 2019 RSPO approved on 23/7/19) Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	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: • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	YES	The Supply Chain Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered which included: • 4.0 Responsibilities • 5.0 Control of Documents • 6.0 Delivery of FFB the Estates (FFB) • 7.0 Purchasing and Goods in • 8.0 Process monitoring • 9.0 CPO and PK Despatch • 10.0 Record Keeping • 11.0 Product Claims • 12.0 Outsourced Contractor • 13.0 Training • 14.0 Management Review & Audit • 15.0 Reclassification of Mill's Supply Chain Model • 16.0 Processing/Continuous Accounting System • 17.0 Complaints • 18.0 Definitions • 19.0 List of Appendix

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. • Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.	YES	As describe under para 14.0 SOP, RSPO: Supply Chain Revision, which follow the RSPO Supply Chain Certification Standard Revision 2017 requirements. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements and cover module requirements specific to the site – Module E: CPO Mills: Mass Balance. RSPO internal audit was conducted in July 2021. There are 1 NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, and NC was sighted by auditor. Management review meeting dated Feb 2022 (combine RSPO SC and MSPO traceability and MSPO SCCS).

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	YES	Nak POM had continued to receive certified FFB from own Estate Which is Nak Estate, Sutera Estate, and Resort Estate. They also receive diverted certified crop from Tabung Tentera Estate, Bukit Segamaha Estate, Sungai Segamaha Estate and G&G estate. And Outsider Crop from Luboh Plantation, Gagah Makmur and C.A.K. Plantation. The validity of the certificate of the supplier has been checked accordingly. Sighted sample FFB consignment note for Nak Estate, Sutera Estate, and Resort Estate. They also receive diverted certified crop from Tabung Tentera Estate, Bukit Segamaha Estate, Sungai Segamaha Estate and G&G estate. And Outsider Crop from Luboh Plantation, Gagah Makmur and C.A.K. Plantation for the month of Jan 2021 – Oct 2021. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Verified through NPOM weighing system called 'Boustead Management System (BMS)*' and random sample of weighbridge ticket from. Among the information available i.e.* Monitoring records titled as *"RSPO & MSPO Mass Balancing Records for Oil Mills"* has recorded the tonnage of certified FFB and its supplying estate*. No* overproduction as the mill applies for extensions volume.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation): a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number	YES	Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, Nak POM has deliver certified materials to end buyer such as KLK Premier Oils Sdn Bhd, Sandakan Edible oils Sdn Bhd, Lahad Datu Edible Oil Sdn Bhd

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	Outsourcing Activities (i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification. (ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.	YES	Nak POM outsource transportation of certified product (CPO & CPK) to end buyer. There is contract document between NAK POM and the transporters) stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. The RSPO Supply Chain procedure has described on Outsource Contractor and briefed to the contractors. Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contact person for both transporters were made available and up-to-date in the List of Stakeholder. And was updated on in Jan 2022.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	i)The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date. .
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	All records related to RSPO SC were maintained minimum for 2 years. Sample CPO dispatch note since Jan 2015 until to date was available and well maintained.
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	NA since this mill is MB Mill
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell	YES	Randomly selected weighbridge tickets issued during Jan 2022 – Apr 2022 by Nak POM for delivery of RSPO-certified CPO were verified and found to have indicated all the required information including the status of the products (RSPO MB).

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	short (i.e. product can be sold before it is in stock.)		
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	YES	Nak POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	YES	Marketing Department personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer.
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the IT platform	YES	Marketing Department personnel updated the RSPO IT platform system upon confirmed contract, normally completed via the system within 3-month period after shipment or within the duration agreed by Mill's respective customer/ buyer. They shall update the system based on input provided by Nak POM (e.g. of input Projected & Actual FFB Processed template, Mass Balancing Records for Oil Mills (3 monthly), daily production summary report, monthly production summary report etc.)
3.8.17	Claims The mill shall only make claims regarding the	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. NPOM has not use RSPO corporate logo as

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.		well as trademark logo.

Principle 4: Respect community and human rights and deliver benefits

Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	Human Rights Policy was updated and reviewed by Boustead Plantations Berhad in Dec 2019 and signed by CEO Mr. Ibrahim Abdul Majid. The policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As at time of audit, it was confirmed that the unit of certification does not instigate violence or use any form of harassment, in their operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	NAK CU have a mutually agreed system open to all affected parties, to resolve disputes in an effective, timely and appropriate manner. System available as Complaint/ Suggestion Flowchart and implemented accordingly. All complaints and grievance raised were recorded as sighted in *'Rekod Aduan dan Maklumbalas 2022'* at Sutera Estate and Resort Estate. Most recorded complaints were from workers regarding requests for house repairs as recorded in *'Buku Aduan Kerosakkan Rumah'* maintained at all Estates and POM. Most complaints were resolved within 2 to 7 days, depending on the complication of the case. In some cases, some delays were noted. All the complaints forms sighted contain sections for complainants to fill up their names, and in some forms, their job and address.
	4.2.2 Procedures are in place to ensure that the system is understood	YES	Based on documentation of stakeholders at the following, it has been found that the system was understood by the affected parties. The procedure for complaint/grievance resolution was

Clause	Indicators	Comply Yes/No	Findings
	by the affected parties, including by illiterate parties.		explained to all workers and external stakeholders through management/workers/stakeholders meeting.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	Nak CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders through stakeholders meeting as evidenced by Internal and External Stakeholders' meetings dates (Refer 1.1.4).
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The system used by the NAK CU in resolving disputes and grievances exists in the procedure called '*Prosedur Cara Cara Mengemukakan Aduan'* and "*Prosedur* Aduan/Pendapat'. The Mill and Estates within NAK BU each has its own Internal Complaint Form/Book and External Communication/Complaint Form/Book available. The Internal Complaint Books are mostly for employees to lodge complaint pertaining to their houses. The external stakeholder complaint record/book reviewed did not show complaints against the CU. The addendum dispute and grievance procedure were updated in Jan 2020 with ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator was verified.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	No	There is evidence that contributions to community development was provided based on consultations. Beside That NAK BU also hire staff and workers from the nearby villagers as their CSR. However, it was found that records of community development that are based on the results of consultation with local communities was not demonstrated therefore **Minor NCR MZK 02 2022 has been raised.**
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	YES	It has been verified that for Sutera Estate, Boustead has bought the land in 1995, as Country Lease. It was previously owned by The North Borneo Trading Company Limited of 60, The Strand, London. The Land Title was stated the company has leased since 10/7/1888 for 999 years and registered at Jesselton (Kota Kinabalu) on 28/2/1953 after that, the land has been sold to Sharikat Hing Lee Sdn Bhd on date 6/12/1972 (as per land Title). Boustead has acquired the land from Sharikat Hing Lee Sdn Bhd on year 1995 and change the name to Boustead Sutera on 7/6/2005. For Resort Estate, as Country Lease, the land Title was previously owned by Thai Hong Hang (Sabah) Sdn Bhd and was sublease to Resort Corporation (Sabah) Sdn Bhd. Resort Corporation has changed their name to Boustead Segaria Sdn Bhd on 4/9/2014 and at the same time has changed their sublease to Boustead Rimba Nilai Sdn Bhd. As for Nak Estate there are mixed land title which is from several company Boustead has bought all the land in 1985, as Country Lease. It was previously owned by Syarikat Kemajuan Bumi Daya (Sabah) Sdn Bhd, Gradient Holdings Sdn Bhd, Yaw Lim Plantations Sdn Bhd.

Clause	Indicators	Comply Yes/No	Findings
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by Boustead Nak CU since 1990. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by Boustead Nak CU since 1990. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.

Clause	Indicators	Comply Yes/No	Findings
	participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).		
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	The requirement in this indicator does not apply to Nak CU.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	The requirement in this indicator does not apply to Nak CU.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	The requirement in this indicator does not apply to Nak CU.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak CU and the audit team had confirmed that there were no land issues related to previous owners
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-	YES	Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak CU and the audit team had confirmed that there were no land issues related to previous owners.

Clause	Indicators	Comply Yes/No	Findings
institutions.	way process of consultation and negotiation.		
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new ops.	YES	Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak and the audit team had confirmed that there were no land issues related to previous owners
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak and the audit team had confirmed that there were no land issues related to previous owners.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak and the audit team had confirmed that there were no land issues related to previous owners.
	4.5.6 Evidence is available that the communities (or their representatives)	YES	Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak and

Clause	Indicators	Comply Yes/No	Findings
	gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.		the audit team had confirmed that there were no land issues related to previous owners.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title. The requirement in this indicator does not apply to Nak CU.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	It has been verified that the land is legitimately owned by Nak CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Communities that have lost access and rights to land for plantation expansion did not exist at Nak CU, hence, this Indicator is not applicable.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the *'Prosedur Aduan/Masalah"* and 'Stakeholder Engagement/ Negotiation" at Nak CU include Handling of Boundaries Disputes, calculating and distributing fair and gender-equal compensation (monetary or otherwise). However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and consulted estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There were no scheme small holdings at Nak CU. The Fresh Fruit Bunches are supplied from Nak CU owned estates and Contracted FFB suppliers.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7	4.7.1 (C) A mutually agreed	YES	A procedure for identifying legal, customary or user rights, and compensation process is

Clause	Indicators	Comply Yes/No	Findings
For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	procedure for identifying people entitled to compensation is in place.		incorporated in the BPB's Sustainability Policy established by the BPB's HQ. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. However, the requirement in this indicator does not apply to Nak CU at present.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	The *'Prosedur Aduan/Masalah"* and 'Stakeholder Engagement/ Negotiation" at Nak CU include Handling of Boundaries Disputes, calculating and distributing fair and gender-equal compensation (monetary or otherwise) are documented and available to affected parties. Since there was no land dispute at Nak CU at present, the requirement in this indicator does not apply to Nak CU
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	It has been verified that the land is legitimately owned by Nak CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Communities that have lost access and rights to land for plantation expansion did not exist, hence, this Indicator is not applicable.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	It has been verified that the land is legitimately owned by Nak CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The Auditors had confirmed that there was no land claim and user right conflict at Nak CU hence, this Indicator is not applicable.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	

Clause	Indicators	Comply Yes/No	Findings
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	YES	
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	YES	

Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	During the audit, it was verified that the current and past prices for FFB (Jan – Apr 2022) are being displayed at the notice board near the Nak POM weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	NO	Nak POM is currently on Mass Balance as not all its suppliers are RSPO certified. Nak regularly explains the FFB pricing to the smallholders (FFB suppliers) as attachment to the monthly invoice. However, it was found that No Records of training related FFB pricing to smallholders (Gagah Makmur) thus, Major NCR MZK 04 2022 has been raised against this indicator.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	At Nak POM, fair FFB pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base. This was confirmed by the feedback from representatives of FFB suppliers: Luboh Estate and Gagah Makmur Estate interviewed during the Audit
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting	YES	At Nak CU, there are records kept of parties, including women and independent representative organisations assisting smallholders involved in decision-making processes and understand the contracts. These include those involving finance,

Clause	Indicators	Comply Yes/No	Findings
	smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.		loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. The requirement of this Indicator is not applicable.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	Contractors' representatives had confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	These contractors interviewed confirmed that payments are made in a timely manner, namely within 7 to 10 days of invoice. Audit team has verified the latest payments record for month of March and April 2022.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in Nak POM has been calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn Bhd.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Nak CU supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. However, at Nak CU, at the time of Audit, there were no Independent Smallholders with certification yet.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the Boustead Nak BU as per the Grievances Process, Grievances Procedure ", and " Consultation and Grievances Communication Procedure Internal/External" and Land Dispute compensation and calculation procedure. As at to date there is no complaint by stakeholders.
5.2 The unit of certification supports improved livelihoods of smallholders and	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and	NO	Nak CU are interested to provide consultation to interested smallholders (irrespective of type and outside the supply base) including women or other partners to assess their needs for support to improve their livelihoods and their interest in RSPO certification. However, it was evident that there were no records of consultation in Sutera and Resort Estate & Nak POM. Thus Minor NCR MZK 01 2022 has been raised (Remote)

Clause	Indicators	Comply Yes/No	Findings
their inclusion in sustainable palm oil value chains.	their interest in RSPO certification.		
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	NO	It was found that, there were no records to develop and implement smallholder support program at Sutera and Resort Estate & Nak POM, for surrounding smallholders and villagers. Thus, Minor NCR MZK 02 2022 has been raised (Remote).
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Nak CU are interested to provide consultation to interested smallholders (irrespective of type and outside the supply base) including women or other partners to assess their needs for support to improve their livelihoods and their interest in RSPO certification. However, based on available record at the CU, no smallholders outside the supply base had shown interest to contact Nak CU for consultation.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	Nak CU are interested to provide consultation to interested smallholders (irrespective of type and outside the supply base) including women or other partners to assess their needs for support to improve their livelihoods and their interest in RSPO certification. However, based on available record at the CU, no smallholders outside the supply base had shown interest to contact Nak CU for consultation.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Nak CU are interested to provide consultation to interested smallholders (irrespective of type and outside the supply base) including women or other partners to assess their needs for support to improve their livelihoods and their interest in RSPO certification. However, based on available record at the CU, no smallholders outside the supply base had shown interest to contact Nak CU for consultation.

Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion,	YES	The Boustead Equal Opportunity Policy was made publicly available and displayed on the notice board. This Policy states Boustead Policy on equal opportunity in all aspects of its employment including recruitment, training and promotion. The Policy identifies under-represented groups where they are encouraged to apply for training and employment opportunities with the Company, and that where possible, special training will be provided for such groups to prepare them to compete on equal terms for jobs and promotion.

Clause	Indicators	Comply Yes/No	Findings
	disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.		
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against. Interviews conducted with workers (male, female, local and migrant) as well as local communities also confirmed that this is so. There is also no evidence of payment of recruitment fees by migrant workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	As stipulated in the contracts, Job Description and Yearly Salary Scale for workers and Staff the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs. For monthly paid employees, interviews are done by Estate Manager/Mill before a panel of interviewers who would objectively assess the candidate for suitability. Promotions are based on recommendations, Years of service and performance.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	As confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test was done on her own free will. During interview it was confirmed that if they require contact with chemicals, they will allocate to other light works.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	Women committee was in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. The committee was established with the members been appointed by all women employees through meetings. However, based on interview revealed that the gender committee at mill was not functioning as required by the standard, as she was busy with her daily chores.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	The Boustead Equal Opportunity Policy is publicly available at the offices of the Nak Palm Oil Mill, NAK Estate, Sutera Estate and Resort Estate. This Policy states Boustead Policy on equal opportunity in all aspects of its employment including recruitment, training and promotion. The Policy identifies under-represented groups where they are encouraged to apply for training and employment opportunities with the Company, and that where possible, special training will be provided for such groups to prepare them to compete on equal terms for jobs and promotion.
6.2 Pay and conditions for staff and workers and for contract workers always	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa	YES	For the Nak CU documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthy pay slips and employment contracts were made available and reviewed during the remote audit. Labour laws, union and/or other collective agreements detailing payments and other conditions, was made available in the languages understood by the workers and explained to them by a

Clause	Indicators	Comply Yes/No	Findings
meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	Malaysia) and explained to them in language they understand.		management during induction. Each pay slip documents the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions (statutory such as EPF, SOCSO and non-statutory), net salary, annual leave and medical leave taken, etc.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	NO	Employment contracts and related documents detailing payments and conditions of employment was not compliance with national legal requirements and payroll documents was not give accurate information on compensation for all work performed. This includes a form of record for work done by family members. During the audit, this objective evidence was found: 1) Sighted at Sutera Estate, expired contract agreement between a supplier and his employees was expired. 2) Not accurate information on compensation for all work performed for contractor workers (at Sutera Estate). 3) There are 2 female employees who giving births in Sutera Estate yet to received 60' day maternity leaves payments (stated in the contract agreement under point no. 6). 4) Sighted inaccurate of vacation leave pay calculation methods for 3 workers. 5) Based on spraying gang checkroll book at Nak Estate, sighted the calculation of working hours was not accurate recorded as per workers' contract. *As a result, Major NCR DA 05 2022 was raised.*
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	NO	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements in the workers contract agreement. However, the CU was not complied with the Minimum Wages Order (Amendment 2020). Based on pay slip verification of Jan. to Apr. 2022 for 3 sprayers and 3 loose fruit pickers at Nak Estate, sighted the salaries was not according to the Minimum Wages Order (Amendment 2020) which below RM 1,200. The estate management already take action such as warning letter i.e., targeted productivity per day was not achieved, absent, etc. However, there is no mechanism to ensure that workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW). *Therefore, Major NCR DA 06 2022 was raised.*
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed	NO	Inadequate of "structural safety and reasonable levels of decency, hygiene and comfort" at wooden housing and sundry shop. Site visit to wooden housing at all estates, observed that: 1) Few housings without mosquito netting due to broken 2) Monsoon drain is not permanent and not concreate floor Site visit at sundry shop at Sutera Estate, observed that: 1) Unsafe condition as collapse ceiling and wooden stair is robust. *Thus, Major NCR DA 07 2022 was issued.*

Clause	Indicators	Comply Yes/No	Findings
	detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.		
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units have its own canteen and grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within its expiry period. Workers interviewed informed that they purchase items from these stores, but also since the estates and mill are easily accessible to the nearest town, they also go out to the towns. Workers could either pay in cash, or on credit.
	6.2.6 A “DLW” is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a “decent living wage” is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be	YES	Based on the suggested method(s) by RSPO guideline, an assessment of the Prevailing Wage was conducted in an RSPO Certified Unit in Nak CU and reviewed during the audit.

Clause	Indicators	Comply Yes/No	Findings
	evaluated and adapted before an eventual scale-up of the living wage implementation Until such time where the Malaysian version of "decent living wage" has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesian. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	Boustead Plantations Berhad has developed Freedom of Association Policy, was publicly available on the notice board. The company is committed and allowed their stakeholders such as employees, clients, business partner and etc to form or join any association. The company has established a Workers' Community for the employees to speak freely and the meeting will be conducted once every 3 months. Interviews with workers they are aware of their workers' representatives.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	Although there were no official trade unions in Sabah operating within the NAK CU, workers had appointed their own representatives to sit on the Workers Representative Committee. The Workers Representative Committee comprise worker and management representatives. Minutes of the Workers Representative Committee meetings (JCC) were documented, sighted and verified during the audit.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Evidence is available that all worker representatives were freely appointed by the workers as confirmed by the workers' representatives themselves as confirmed by a harvesting mandora and spraying mandore from Sutera Estate, Resort Estate and Nak Estate.
6.4 Children are not	6.4.1 A formal policy for the protection of children, including prohibition of child	YES	The formal Policy on protection of children and non-employment of children is contained in the ''Polisi Penggajian Pekerja Kanak-Kanak Dan Had Umur Minima''. This undertaking to not hire

Clause	Indicators	Comply Yes/No	Findings
employed or exploited.	labour and remediation is in place, and included into service contracts and supplier agreements.		child labour is included in all service contracts and supplier agreements.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout NAK CU. There also have a documented age screening verification procedure.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that any young persons were employed in any of the units at NAK CU as evidenced from documentation review, field observations and interviews.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	Based on the documents sighted, communication about its no child labour Policy was communicated to all levels of employees as evidenced from training records at the NAK CU.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	A policy on sexual harassment titled *'Polisi Gangguan Seksual'* has been established, signed by the Plantation Director and is available in Malay language. The policy is displayed on the notice boards at the mill and the estates offices. No evidence or acts that contradict this policy were observed as interviewed the women workers/staffs and gender committee during the audit in the CU.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	Nak CU has established a policy titled *'Hak Reproduktif*'. Nak POM, NAK Estate, Sutera Estate and Resort Estate have briefed their workers from time to time during muster briefings. Based on interview with workers, they basically understood the intent of the policy.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have	NO	There are no evidence of records needs of new mothers' assessment at Sutera, Resort and Nak Estate. *Therefore, Minor NCR DA 08 2022 was raised.*

Clause	Indicators	Comply Yes/No	Findings
	been identified.		
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	A grievance mechanism has been maintained by the CU. Chairman of Gender Committee at each operating units responsible in handling and channeling issue to management. The management has directed the chairman of the Gender Committee to respects and protects anonymity and complainants where requested. The mechanism has been communicated to all levels of the workforce as verified by auditor during interview with female workers at all estates and Mill.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages	YES	Collective evidence is available that all sampled workers have entered into employment voluntarily. This is based on the following: a. review of sampled employment contracts which contain mutually agreed termination clause; b. review of documents where workers signed consenting for their passports to be kept at the office; c. interview with foreign workers who confirmed they could have access to the passports at any time; d. review of recruitment agency contract between NAK CU and Syarikat Usaha Bakti Bersama and MBS Sdn Bhd where no recruitment fee is payable by the workers and confirmed by the workers (except for passport, medical in and biometrics in home country) e. records of punch cards and workers confirmation that overtime work is mutually agreeable and not forced on them; f. confirmation from the foreign workers that they received accurate briefing in their home country on the job they would be doing in Malaysia, and confirmation from the workers that there is no debt bondage or withholding of wages.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	A special labour policy for employment of foreign workers has been addressed in the *'Polisi Pekerja Buruh Asing'*. The policy mentioned that all employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival programme will be conducted once arrived for three months. The CU maintained its specific procedure / flowchart for employment of foreign workers titled 'Sourcing Process for Foreign Workers'. The procedure has been implemented for any employment related with foreign workers.
6.7 The unit of certification ensures that the working environment under	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health,	YES	The Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Managers subsequently assigned duties of ESH coordinator to the Assistants or Healthcare Assistant for the down line implementation of ESH practices in the estates and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to

Clause	Indicators	Comply Yes/No	Findings
its control is safe and without undue risk to health.	safety and welfare are discussed at these meetings, and any issues raised are recorded.		discuss about health and safety had been verified to the satisfactory maintained. Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2022 was available. The Estate/Mill Manager is the Chairman and the Mill Engineer/Assistant Manager is the secretary.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	NO	The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They includes emergencies relating fire, chemical spillage, flood and accident at work place. a) *Ahli J/Kuasa Pasukan Bertindak Kecemasan 2022* headed by the Estate/Mill Managers b) *Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran* c) *Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir* d) *Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia* e) Carta Aliran Pelan Tindakan Kecemasan -Covid 19 The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SSD and amended to tailor to the situation differences in the estates and mill. ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training. The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid boxes were available at various points in the estate office, workshop, and store. The estate distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops. However sighted the emergency shower and eye wash was not practicable to operate during emergency situation hence minor NCR RMN 02 raised. Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner. In general all major incidences were attended to with proper documents maintained to address root causes and prevention measures etc.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine	NO	Training and briefing on the operations were provided for workers to educate them on safe working practices. This is also made to ensure that the 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 involved and how the chemicals should be used in a safe manner. Based on the HIRARC carried out at both estates and the mill

Clause	Indicators	Comply Yes/No	Findings
	operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		the PPE types for the various activities were identified and recommended. However sighted that at : Nak estate the sample workers for spraying activities received rubber boot only on 26/2/2020 and based on interview informed the employees own buy her shoes. Nak POM the sample workers for Workshop, Grader and fireman PPE were not accordance to indicator and been highlighted as NCR RMN 03.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	Both the Estates and Mill in the NAK CU adopted SOCSO for the coverage for the local and foreign workers. The insurance coverage has ceased effective 2018 following the Government directive on the coverage.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement and accident Statistics are being maintained in a satisfactory manner.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	NAK BU continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOPs ref OPC 04a, OPC 04b, OPC 04f, OPC 04g and OPC 04h. b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as *Tunera subulata*, *Cassia cobanensis* and *Antigonon leptopus* along the roadsides and designated points in the fields and also within the nursery perimeter. c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff. d) Census records for Ganoderma affected palms were sighted e) All the estates carried census on rat damage and diseases like Ganoderma. Rat

Clause	Indicators	Comply Yes/No	Findings
			baiting was when census showed damage of above 5%. Baiting was continued until bait acceptance threshold level.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	This is not practiced in the 3 estates audited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	Based on the field visit, no burning in replanting activity was witnessed as per the policy and item 1.5.1 in the "Polisi Kemampanan BPB". Furthermore, no previous crop in the 3 Estates were highly diseased and where there was a significant risk of disease spread or continuation into the next crop
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in a) SOP - O.P.C.No.01b / 01c, b) SOP – O.P.C No 02a / 04b / 04c, c) SOP – O.P.C No 04f / 04g / 05b. The Manual had included a chemical register list which indicated the purpose of usage (intended target), hazards signage, trade and generic names. All the Estates had maintained chemical registers and were up dated periodically.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	All three (3) Estates in Nak Business Unit, Resort, Sutera & Nak, continued to maintain records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients applied per ha. Pesticides are used only when justified and areas used were recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. All estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	NAK BU was committed to minimise the usage of agrochemicals by implementing IPM with the increased in the planting of beneficial plants such as *Tunera subulata*, *Cassia cobanensis* and *Antigonon leptopus.* Blanket spraying is also not practiced by the BU and soft grasses were maintained in the field. It had also been the practice that insecticides and rat baits are used only after a threshold level has been exceeded as per the S.O.P. (O.P.C. no. 04b; 04f and 04g). Prophylactic use of such pesticides was carried out in the Oil Palm nurseries as per SOP.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of any prophylactic use of pesticides except in immature and young fields, where prophylactic spraying using diluted cypermethrin was still practiced for the control of Rhinoceros Beetle as per SOP.

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td></td><td>7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</td><td>YES</td><td>All 3 Estates only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated the 3 estates had none of the chemicals. The use of paraquat was banned in all Boustead estates. Most pesticides used were class III & class IV.
There was no evidence to show that Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, were used in all 3 estates visited.
a) The Estates had used only Class II, Class III and Class IV chemicals.
b) The chemical used in the estate captured from the chemical register among others as listed below;
<table>
<tr><th></th><th>Chemical name</th><th>Class</th><th></th><th>Chemical name</th><th>Class</th></tr>
<tr><td>1</td><td>Glyphosate isopropylamine</td><td>III</td><td>6</td><td>Cypermethrin</td><td>III</td></tr>
<tr><td>2</td><td>Sodium chlorate</td><td>III</td><td>7</td><td>Triclopyr butoxy e/ester</td><td>III</td></tr>
<tr><td>3</td><td>Glufosinate ammonium</td><td>III</td><td>8</td><td>Canyon 20G</td><td>IV</td></tr>
<tr><td>4</td><td>Triclopyr butoxy</td><td>III</td><td>9</td><td>Amine 2.4 D</td><td>II</td></tr>
<tr><td>5</td><td>Metsulfuron methy 20% w/w</td><td>III</td><td>10</td><td>Bayfolan</td><td>III</td></tr>
</table></td></tr>
<tr><td></td><td>7.2.5a Judgment of the threat and verify why this is a major threat.</td><td>YES</td><td>As mentioned above in ndicator 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need for judgement of threat does not arise.</td></tr>
<tr><td></td><td>7.2.5b Why there is no other alternative which can be used.</td><td>YES</td><td>As mentioned above in ndicator 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need for other alternatives does not arise.</td></tr>
<tr><td></td><td>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</td><td>YES</td><td>mentioned above in ndicator7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need as to which process was applied to verify why there is no other less hazardous alternative is not required.</td></tr>
<tr><td></td><td>7.2.5d What is the process to limit the negative impacts of the application.</td><td>YES</td><td>As mentioned above in indicator 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need to limit the negative impacts of the application does not arise</td></tr>
<tr><td></td><td>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</td><td>YES</td><td>As mentioned above in indicator 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been</td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings
			used. Hence, the need to estimation of the timescale of the application and steps taken to limit application to the specific outbreak does not arise.
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	Records showed that pesticides were handled by trained persons and used as per the MSDS/CSDS of the pesticide., the estate had the SOPs for safe-handing of pesticides. Appropriate safety and application equipment had been provided and used as per the CHRA. The staff and workers such as the storekeepers, sprayers and those workers apply the fertilizer were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). Records of purchase, storage and used were maintained. All of the stores were equipped with exhaust fans and the door was secured and keys held by only the storekeeper and attendant. Only authorized personnel are allowed to handle the chemicals. Chemicals were segregated and fertilizers were well stacked. Relevant MSDS/CSDS were available in the stores. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	The procedure titled “Scheduled Wastes (Hazardous Waste) Management has been established. Visit to waste storage confirmed that empty pesticide containers were collected with proper storage. These items will be punctured and disposed as scheduled waste as the EQA. The SOP of disposal pesticide container is described in the estates in NAK CU, The procedure Scheduled Wastes (Hazardous Waste) Management has been established. Content includes the triple rinsing procedures and the relevant training to be conducted. Visit to waste storage confirmed that empty pesticide containers were collected with proper storage. These items will be punctured and disposed as scheduled waste as the EQA. The SOP of disposal pesticide container is described in the procedure. Content includes the triple rinsing procedures and the relevant training to be conducted. Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows; a) All class 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.
	7.2.9 (C) Aerial spraying of pesticides is	YES	The Management confirmed that Aerial spraying was not practiced by all the 3 estates.

Clause	Indicators	Comply Yes/No	Findings
	prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.		
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	The medical surveillance respectively was performed in private clinics in Sandakan. The results for the entire workers were positive and all being declared FIT to handle chemicals.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Hospital Attendant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	NO	The Estates and Mill had established the waste and pollution management plan 2022 as shown below. The PIC and time frame was also shown in the management plan. However, during site visit, sighted the operating units were not effectively implemented waste management as per waste management plan hence Minor NCR RMN 01 raised.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	NAK CU estates and mill. The landfills were located away i.e. about 2-3 km from water sources. Site visits verify compliance of landfill areas. The SOP on Scheduled Waste disposal is established and implemented. Details as provided in Boustead Plantations - Scheduled Waste Management dated June 2017. The inventory of the waste generated is recorded using the “E-SWISS” inventory system. Methodology of SW disposal is also described in indicator 7.2.8 above. All SW in the CU are disposed through approved contractor. There was deferment experienced in dispatches in 2020/21 arising from the MCO. Schedule made as per planning and schedule. Delay due to transportation restriction in movement. Issue raised as NCR RMN 01.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	NAK CU estates and mill. The landfills were located away i.e. about 2-3 km from water sources. Site visits verify compliance of landfill areas.
7.4 Practices maintain soil fertility at, or where improve soil	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	NAK BU continued to implement the good agriculture practices as contained in SOPs, to manage soil fertility, to optimise yield and minimise environmental impacts. The SPOs were in the Oil Palm Circular Manual (O.P.C.). Fertilizers application, which was of paramount importance for maintenance of soil fertility,

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td rowspan="4">fertility to, a level that ensures optimal and sustained yield.</td><td></td><td></td><td>was carried based on the recommendation made by the Applied Agricultural Resources Sdn Bhd. Annual fertilizer recommendations were made based on annual foliar sampling. Fertilizer application program was monitored using program sheets, bin cards, Field Cost book and Fertilizer Quality Assessment by Applied Agricultural Resources Sdn Bhd.</td></tr>
<tr><td>7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.</td><td>YES</td><td>Periodic foliar and soil sampling were carried out by the Applied Agricultural Resources Sdn.Bhd. (AAR) and its result formed part of the basis for the fertilizers input recommendation. Periodic tissue and soil sampling were carried to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg, Ca & B. Foliar samplings and Soil sampling, which is conducted together, between Sept 2021 to Feb 2022.</td></tr>
<tr><td>7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</td><td>YES</td><td>All the Estates continued to have a nutrient recycling strategy in place. Palm fronds were stacked and left to decompose in the fields and EFB applied. EFB was applied at 40 tons /Ha/year in single layers in plots between palms. Records of application and maps were made available to auditors EFB applications.</td></tr>
<tr><td>7.4.4 Records of fertiliser inputs are maintained.</td><td>YES</td><td>NAK BU continued to monitor their fertilizer inputs as recommended by their agronomist from Applied Agricultural Resources Sdn. Bhd (AAR). The records of the fertiliser inputs were maintained in the Fertilizer Application Record Books and the Bin Card.</td></tr>
<tr><td>7.5 Practices minimise and control erosion and degradation of soils.</td><td>7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.</td><td>YES</td><td>On the 3 Estates, Resort, Sutera & Nak, maps identifying marginal and fragile soils, including steep terrain, had been prepared by AAR. The soil series in the estates were classified as follows as updated on 2012/2018 subject to the requirement of the estates:
<table>
<tr><th></th><th>NAK</th><th>Sutera</th><th>Resort</th></tr>
<tr><td>1</td><td>Batang</td><td>Bangawat</td><td>Kumansi</td></tr>
<tr><td>2</td><td>Kumansi</td><td>Inanam</td><td>Laab</td></tr>
<tr><td>3</td><td>Masaum/Lumpari</td><td>Kelawat</td><td>Tanjung Lipat</td></tr>
<tr><td>4</td><td>Sipit</td><td>Kumansi</td><td>Luasong</td></tr>
<tr><td>5</td><td>Siput/Tanjung Lipat</td><td>Kumansi Reddish</td><td>Pallu</td></tr>
<tr><td>6</td><td></td><td>Kumansi Shallow</td><td></td></tr>
<tr><td>7</td><td>-</td><td>Laab</td><td></td></tr>
<tr><td>8</td><td>/</td><td>Luasong</td><td></td></tr>
<tr><td>9</td><td>-</td><td>Luba</td><td></td></tr>
<tr><td>10</td><td>-</td><td>Mangkawagu</td><td></td></tr>
<tr><td>11</td><td>-</td><td>Masaum</td><td></td></tr>
<tr><td>12</td><td>/</td><td>Tanjung Lipat</td><td></td></tr>
<tr><td></td><td></td><td>Soil Type A</td><td></td></tr>
</table>
</td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings
			There were no problematic soils (e.g. podzols and acid sulphate soils) on NAK BU. The estates maintained the following maps and documents for proof of recognized legal rights. Documents were sighted and verified. A scale of map at 1:10000 to 1: 15000 is established. Maps were prepared by AAR and updated in 2018.
	7.5.2 No replanting on steep slopes (above 25 degress) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	Auditors had verified through checking the www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to the sampled estates, it is confirmed that there were no new planting or new development of areas at Boustead Nak BU.
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	Auditors had verified through checking the www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to the sampled estates, it is confirmed that there were no new planting or new development of areas at Boustead Nak CU.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	All estates in NAK Business Unit, to demonstrate the long-term suitability of land for palm oil cultivation, had conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain, As mentioned under indicator 7.5.1 soil maps and slope classification maps prepared by the AAR and updated in 2018 were made available. This was to take into account in plans and operations. On Resort Estate the Soil Map by Applied Agricultural Resources Sdn.Bhd was updated in Aug 2018.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	This is not applicable as there is no marginal and fragile soils in the 3 estates visited, Resort, Sutera and Nak Estates, as supported by the soil maps of respective estates. No marginal and fragile soil areas were observed during the visit.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	All 3 Estates in in NAK Business Unit, Resort, Sutera and Nak, had used soil and topographic maps prepared by AAR to plan their drainage roads and other infrastructures
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	NA	Auditors had verified through checking the www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to the sampled estates, it is confirmed that there were no new planting or new development of areas at Boustead Nak CU. This is not applicable as there is no peat soil in the 3 estates visited, Resort, Sutera and Nak Estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	NA	This is not applicable as there is no peat soil in the 3 estates visited, Resort, Sutera and Nak Estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.

Clause	Indicators	Comply Yes/No	Findings
	PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	NA	This is not applicable as there is no peat soil in the 3 estates visited, Resort, Sutera and Nak Estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
	7.7.4 (C) A documented water and ground cover management programme is in place.	NA	This is not applicable as there is no peat soil in the 3 estates visited, Resort, Sutera and Nak Estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it ii is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.	NA	This is not applicable as there is no peat soil in the 3 estates visited, Resort, Sutera and Nak Estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for	NA	This is not applicable as there is no peat soil in the 3 estates visited, Resort, Sutera and Nak Estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.

Clause	Indicators	Comply Yes/No	Findings
	existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.		
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	NA	This is not applicable as there is no peat soil in the 3 estates visited, Resort, Sutera and Nak Estates, as supported by the soil maps of respective estates. No peat areas were observed during the visit.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	Water Management Plan for Nak CU was made available and documented in BRSPO 4.4.7. The Management Plan was developed in order to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	The following Environmental Compliance Report (ECR) was taken by the estate which made by the 3rd party appointed by the Company. Results were complying to the standard requirement.
	7.8.1b Workers have adequate access to clean water.	YES	The following water analysis (drinking water) was taken by the estate management for supply to the entire complexes upon treatment. Frequency is taken at 6-monthly. Analysis made by Dynakey Laboratories Sdn Bhd Sandakan as appointed by the Company. Results were also within limit.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	The Estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. During the field visit, there were evidence that these areas were free from chemical spraying and manuring application. The estates adopted the existing Boustead policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The signboards were displayed accordingly at the site where applicable. The guideline was issued by the Business Unit. During the field visit there was no spraying activities or signs left in the visited areas. The buffer zones identified at the estates are

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td></td><td></td><td></td><td>made visible.</td></tr>
<tr><td></td><td>7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</td><td>YES</td><td><u>EQ (Prescribed Premise) Crude Palm Oil Regulations 1977</u>
a) License valid. The license indicated that the mill has a capacity of 40mt/hr
b) Treated effluent is allowed to be discharge as land irrigation
c) Analysis of the final discharge was carried out by accredited laboratory Dynakey Laboratories Sdn Bhd on monthly basis. Review of the results indicated that all parameters were within the regulatory limit.</td></tr>
<tr><td></td><td>7.8.4 Mill water use per tonne of FFB is monitored and recorded.</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 a monthly basis.Variation of water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc</td></tr>
<tr><td>7.9
Efficiency of fossil fuel use and the use of renewable energy is optimised.</td><td>7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.</td><td>YES</td><td>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report 2022. The document was reviewed/updated on Jan 2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:
<table>
<tr><th></th><th>Target</th><th>Objective</th><th>Action plan</th></tr>
<tr><td>1</td><td>Backhoe tractor</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>To ensure the vehicle engine is turn off during idle time
To record vehicle activity which consume fuel</td></tr>
<tr><td>2</td><td>Van / Supervisory vehicle</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>To record vehicle activity in order to eliminate waste activity which consume fuel.
To turn off vehicle engine during idle time.</td></tr>
<tr><td>3</td><td>Electrical supply</td><td>To reduce reliance on gen-sets for power supply</td><td>To run steam turbine during non-processing min 2 hours</td></tr>
<tr><td>4</td><td>Electrical supply</td><td>Reduce electricity usage</td><td>Use time switches and daylight sensors for outside lighting</td></tr>
<tr><td>5</td><td>Electrical supply</td><td>Reduce electricity usage</td><td>Educate employees on power saving via inspection and training.</td></tr>
</table>
There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</td></tr>
<tr><td>7.10
Plans to reduce pollution and emissions, including greenhouse gases</td><td>7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</td><td>YES</td><td>For input FY 2021, the report sends via email to RSPO on 16/04/2022 through the Palm GHG calculator and publicly reported.
<table>
<tr><th>Description</th><th>tCO_2e/tProduct</th><th>Description</th><th>tCO_2e/tProduct</th></tr>
<tr><td>CPO</td><td>0.99</td><td>PK</td><td>0.99</td></tr>
</table></td></tr>
</table>

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td>(GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</td><td></td><td></td><td>
<table>
<tr><td>Production</td><td>t/yr</td></tr>
<tr><td>FFB Processed</td><td>246,173.66</td></tr>
<tr><td>CPO Processed</td><td>53,216.672</td></tr>
</table>
<table>
<tr><td>Land Use</td><td>Ha</td></tr>
<tr><td>OP Planted on Mineral Soil</td><td>20266.00</td></tr>
<tr><td>OP Planted on Peat Soil</td><td>58.20</td></tr>
<tr><td>Total oil palm planted area</td><td>20324.20</td></tr>
<tr><td>Conservation (forested)</td><td>1405.37</td></tr>
<tr><td>Conservation (non-forested)</td><td>299.29</td></tr>
</table>
Milling extraction rate:
<table>
<tr><td>OER</td><td>21.62</td></tr>
<tr><td>KER</td><td>3.14</td></tr>
</table>
Mill Emission
<table>
<tr><td>Emission source</td><td>tCO2e</td><td>tCO2e/tFFB</td></tr>
<tr><td>POME</td><td>5505.93</td><td>0.02</td></tr>
<tr><td>Fuel consumption</td><td>1583.65</td><td>0.01</td></tr>
<tr><td>Grid electricity utilisation</td><td>0.00</td><td>0.00</td></tr>
<tr><td colspan="3">Credits</td></tr>
<tr><td colspan="3">Export of excess electricity to housing & grid</td></tr>
<tr><td>Sale of PKS</td><td>0.00</td><td>0.00</td></tr>
<tr><td>Sale of EFB</td><td>0.00</td><td>0.00</td></tr>
<tr><td>Total</td><td>7089.59</td><td>0.03</td></tr>
</table>
Plantation / field emission
<table>
<tr><td></td><td colspan="3">Own</td></tr>
<tr><td>Emission sources</td><td>tCO2e</td><td>tCO2e/ha</td><td>tCO2e/FFB</td></tr>
<tr><td>Land Conversion</td><td>90346.56</td><td>9.76</td><td>0.45</td></tr>
<tr><td>CO2 Emissions from Fertiliser</td><td>4826.06</td><td>0.52</td><td>0.02</td></tr>
<tr><td>N2O Emissions from Peat</td><td>189.10</td><td>0.02</td><td>0.00</td></tr>
<tr><td>N2O Emissions from Fertiliser</td><td>3383.61</td><td>0.37</td><td>0.02</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>Fuel Consumption</td><td>2539.67</td><td>0.27</td><td>0.01</td></tr>
<tr><td>Peat Oxidation</td><td>1379.27</td><td>0.15</td><td>0.01</td></tr>
<tr><td>Sinks</td><td></td><td></td><td></td></tr>
<tr><td>Crop Sequestration</td><td>-85636.56</td><td>-9.25</td><td>-0.43</td></tr>
<tr><td>Conservation Sequestration</td><td>-1382.82</td><td>-0.15</td><td>-0.01</td></tr>
<tr><td>Total</td><td>15644.90</td><td>1.69</td><td>0.08</td></tr>
</table>
Palm Oil Mill Effluent (POME) Treatment
<table>
<tr><td>Diverted to compost</td><td>0%</td></tr>
<tr><td>Diverted to anaerobic digestion</td><td>100%</td></tr>
</table>
Diverted to Anaerobic Digestion
<table>
<tr><td>Diverted to anaerobic pond</td><td>1%</td></tr>
<tr><td>Diverted to methane capture (flaring)</td><td>0%</td></tr>
<tr><td>Diverted to methane capture (electricity generation)</td><td>99%</td></tr>
</table>
</td></tr>
<tr><td></td><td>7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).</td><td>YES</td><td>Auditor has verified through checking the www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Nak CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.</td></tr>
<tr><td></td><td>7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</td><td>YES</td><td>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records which covers estates and mill activities / operation. ‘Pollution Identification Environmental Improvement Action Plan’ is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</td></tr>
<tr><td rowspan="2">7.11
Fire is not used for preparing land and is prevented in the managed area.</td><td>7.11.1 (C) Land for new planting or replanting is not prepared by burning.</td><td>YES</td><td>There was no land preparation in NAK CU by burning ever since Boustead Plantations Berhad practice zero burning.</td></tr>
<tr><td>7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.</td><td>YES</td><td>Boustead Plantations Berhad practices zero burning throughout the plantation properties within the management.</td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	Records showed that Nak CU engaged adjacent stakeholders on fire prevention and control measures through stakeholders' meetings.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	Auditors has verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at NAK BU since Nov 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The report "High Conservation Value & Social Impact Assessment Boustead Plantations, Sabah, Malaysia" was showed to the audit team. It was noted that the report was prepared by Wild Asia (Malaysia) in May 2012 and had identified all the High Conservation Value (HCV) within and adjacent to the Nak CU. The HCV assessment had also identified the rare, threatened and endangered species (RTEs) at the Nak, Sutera, and Resort estate. The report has also included the management and action plan. The total HCV area for this CU is 6.90Ha. In general, HCV assessor had concluded no potential HCV in the 3 estates, but they have identified some species of bird in the estates.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is	YES	The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird sighted. NAK CU has established and reviewed the action plan and monitoring programme for HCVs area. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action. There were no major changes to the integrated management plan, except awareness training, continuous monitoring for HCVs area.

Clause	Indicators	Comply Yes/No	Findings
	developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	There were no local communities living nearby with Nak CU only surrounding with Small grower and Plantation Estate such as Melipan Estate, Wilmar Sapi Estate, Tawau Cocoa, Ladang Irat, Pintasan Estate, Kwantas. So, this indicator was not applicable with this CU.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	NO	A training programme for year 2022 was available. An awareness training like morning briefing has been conducted by Assistant Manager from Nak, Sutera and Resort to all workers (Sprayer, Manuring, Harvester, and Maintenance). However, it was found that Nak BU had the Programme of Training related to Health & Safety, Environment, Good Agriculture Practices, However, programme to regularly educate the workforce (e.g. administration staff, PIC, HCV, A.P) about the status of RTE species was not available, Thus Minor NCR MZK 03 2022 has been raised against this indicator. An appropriate disciplinary measure was instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species, and also Policy and Statement has been developed for disciplinary measures. The statement also available at AP Post surrounding Nak CU.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Nak CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the HCV Area. It was noted that AP has been monitoring surrounding the estate to control everything including any illegal activities.

Clause	Indicators	Comply Yes/No	Findings
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Auditors has verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Nak CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

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

Clause	Indicators		Comply Yes/No	Findings
5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	For the time-bound plan, Boustead Plantations Berhad has committed to ensure all their certification unit (CU) to be certified within 5 years i.e. year 2019 to 2024. Samples TBP as per below: Tawai Business Unit -2021-2023 New Acquisition in 2018 and 2019, the planning to certified in 2021. However, due to the pandemic Covid-19, the company need to postpone to 2023, apart from that the company plans to certify another 1 business unit consisting of 1 mill and 5 supply base and 3 estate without mill in 2022. Kanowit Business Unit-2021-2024 The company has put out a Request for Proposal (RFP) for all assets in Sarawak. The process for disposal is in progress and waiting for a potential buyer. Loagan Bunut Business Unit 2021-2024 The company has put out a Request for Proposal (RFP) for all assets in Sarawak. The process for disposal is in progress and waiting for a potential buyer. Sighted an evidence submission of “RSPO TBP Revision Template to RSPO on 21/04/2022 and was approved by RSPO.

	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	There are twelve (12) CU highlighted in the time-bound plan and the certification progress consistent with that in the time-bound plan. The progress details as provided in the TBP in Attachment 6. For another 4 CUs i.e. Lepan Kabu / Sugut / Loagan Bunut / Pertama / Kanowit and Tawai, the Sustainability Section team has conducted the periodic internal audit accordingly.
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	YES	There was revision of the time-bound plan being updated on 21/04/2022. Details as per attachment 6. This is due newly acquired properties i.e. Tawai CU in Telupid Sabah in 2019 from Sit Seng & Sons Realty Sdn Bhd. As per RSPO Certification System for P&C June 2017; new acquisitions shall be certified within a three-year timeframe.
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	NO	Boustead Plantations have deviations for certifying uncertified unit from year 2021 to 2023 and 2024. The RSPO Time Bound Plan Revision Template was submitted to RSPO secretariat dated 21/04/2022 and follow up email dated 10/05/2022. However, until of audit assessment, the new TBP Revision Template yet to get approval by the RSPO Secretariat. *Therefore, Minor NCR DA 09 2022 was raised.*
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1st January 2010 shall comply with the RSPO New	YES	Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed.

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

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

				requirements such as: MPOB Licenses (menjual dan mengalih FFB). KPDNKK Permit Barang Kawalan berjadual for Diesel.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	YES	Based on statement in (a) to (d) above, the CU has assessed the condition of their uncertified unit and has stated full commitment to comply with all relevant requirements as specified above. a) Sighted the series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit as conducted and reported accordingly. The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. b) Evidence of audit attendance list, audit checklist & report were made available to auditor as the supporting evidence. c) Verification through www.globalforestwatch.com, GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting and no new development of area was observed. d) With this, it can be concluded that the positive assurance made was justified.
		• A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;		
		• Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.		
		• Desktop study e.g. web check on relevant complaints		
		• If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.		
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the	YES	As of this audit, Boustead Plantation Berhad still on track and follow the requirement of uncertified requirement units, Further information can be obtained from Boustead ACOP. The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as

		current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.		per attachment/revision in the TBP.
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Cert Systems.	YES	As of this audit, Boustead Plantation Berhad still on track and follow the requirement of uncertified requirement units, Further information can be obtained from Boustead ACOP. The details of the Time Bound Plan described as per attachment 6. HSP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
5.6.6 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements. The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit. The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.		No additional indicators	YES	Boustead owned the land (brought from the Government) as mentioned in 4.4.1 of these checklists. Based on the interviews and this audit finding, it has been confirmed that there was no such case concerning the rights of local communities and indigenous people at NAK CU.

ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

Remote

P & C Indicator	Specification Major/Minor	Detail Non-conformances	*Root Cause & Corrective Action* Taken by the CU	Verification Statement by Auditors
3.3.2 STK 01 2022	MINOR	Requirement: 3.3.2 A mechanism to check consistent implementation of procedures is in place. Finding: A mechanism to check consistent implementation of rat damage census as required by Item 1 of BPB OPC 4b, 2018. Objective evidence: Sutera Estate – Rat damage on oil palm fruits on palms and on harvested bunches on roadside platforms were observed at time of audit in field PM2013C. However, no records were available to show that a census had been carried to establish extent of damage so as to initiate a rat baiting campaign.	Root cause: The issue: No record on rat damage census had been carried out. The root cause: No rat baiting has been carried out since 2nd half 2021 due to Jimat Campaign Corrective Action: Correction: (The correction shall address the objective evidence) Resume rat damage census. Corrective action: (The corrective action shall address the root cause of this NC) Conducted rat baiting as per OPC 4b, 2018, unless instructed to stop the rat baiting by top management	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit
3.3.3 DA 01 2022	MINOR	Requirement: 3.3.3 Records of monitoring and any actions taken are maintained and available. Finding: Records of monitoring and any action taken regarding illegal harvesting, working on rest day during non-offered work was not maintained and not available. Objective evidence: Based on interview with harvesters from Sutera Estate, there is illegal harvesting occurred on rest day (Friday) without approval from the estate management. There was no records and supervision was carried out during on the rest day based on confirmation by estate management. With this no records, there was also no rest day payment been paid to workers working on rest day during non-offered day.	Root cause: The issue: Unauthorized harvesting occurred on rest day without approval from Sutera estate management and the work done not recorded. The root cause: Memo of not allowing working on rest day have come into effect on 2nd January 2019 at Sutera estate. However, some of the workers i.e., harvesters, did not obey to the memo due to intention to gain more income by doing so. Corrective Action:-	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

			Correction: Establish a memo on mechanism working on rest day. *Refer attachment* ***Mechanism Working on Rest Day 2022***. Corrective action: Conducted briefing on the mechanism working on rest day to workers	
3.4.3 DA 03 2022	MAJOR	Requirement: 3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. Finding: The social management and monitoring plan was not fully implemented, reviewed and updated regularly in a participatory way. Objective evidence: - Stakeholder consultation method was not effective. Only one session of consultation was conducted. There was no meeting conducted due to COVID 19 restriction. Sutera Estate using questionnaire form methodology. About 46 stakeholders was involved and questionnaire were submitted on 20/07/2021, they are mainly contractors, government departments, neighboring estates, head of villagers and others. Nak POM using questionnaire form methodology. About 26 stakeholders was involved and questionnaire were submitted on 07/07/2021, they are mainly contractors, government departments, neighboring estates, head of villagers and others and for Internal only 5 person was involsed on date 15/7/21. Resort Estate using Face to face methodology on 28/10/21 they are mainly contractors, government departments, neighboring estates, head of villagers, workers and others. Nak Estate using Face to face methodology on 19 and 20 March 2022 they are mainly contractors, government departments, neighboring estates, head of villagers, workers and others and for workers on 9 March 2022, There were no specific issues related to revising of SIA Management Plan such as discussion about main activities such as replanting, transporting, safety and health, land conflict, access right etc. and for worker, Only worker's representative involved in the social management action plan.	Root cause: The issue: - The social impact management and monitoring plan was not effectively addressing all social issues arise in NAK BU due to The root cause: - NAK BU management was lack of knowledge that the social impact assessment must be reviewed to ensure that all social impact arise from estate operation were effectively addressed. Absence of competent person in social aspect at site caused the RSPO requirement pertaining the social issue being neglected. Corrective Action: Correction: Review Social Impact Assessment annually and develop Social Impact Management Plan based on the assessment report and also consideration of consultation outcome from affected parties/stakeholders, The Plan has been updated on 9/8/2022 Corrective action: NAK BU has Appointed PIC on every estate and mill (Refer Attachment) to monitored the updated and also NAK BU	Auditor has received and verify the SIA Action Plans that include all the issue mentioned, auditor also verify the minutes meeting has been done to update the Plan dated 1/8/2022, auditor also reviewed Appointment letter of PIC to monitor the issue and evidence of Social Impact Assessment Form – Internal and Social Impact Assessment Form – External to monitor this issue and found the evidence acceptable to close the NCR **Status : Closed**

		Inadequate involvement of workers such as non-union workers, dependence, gender, races, job scopes and etc. From the management plans, there was no discussion about previous Social Management Plan, Either adequately addressed and can be closed. - sighted also at Sutera Estate certain housing area water supplies mixing with treated water and rain water. The estate already notified the issues and in progress to fixing the piping system. Sighted letter awarded to contractor dated 01/03/2022 with 45 days' completion. Issues from Villagers ask to repair the main road to avoid accident, 'AJK Agama' ask to allow religious speaker to enter the estate, all this issues above failed to identify in the SIA Management Plan.	will Assess social impact using template provided by Sustainability department. Refer attachment Social Impact Assessment Form – Internal and Social Impact Assessment Form – External	
6.2.2 DA 02 2022	MAJOR	Requirement: 6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. Finding: 1) Employment contracts for Yee Seng Trading Company at Sutera Estate was expired. 2) Payroll documents, there is no accurate information on compensation for all work performed for Yee Seng Trading Company 3) No evidences of maternity leave payment have been made by Sutera Estate to 2 females employee. Objective evidence: 1) Contract agreement between Yee Seng Trading Company and his 6 employee was expired dated 31/12/2020. 2) Based on pay slip Yee Seng Trading verification on Dec. 2021, Jan. 2022 and Feb. 2022, there is no detailing payments and no accurate information on compensation for all work performed. 3) There are 2 female employees who giving births in Sutera Estate yet to received 60 days' maternity leave	The issue: 1) Contract agreement Yee Seng Trading Company was expired. 2) No detailing payments and information on compensation in pay slip Yee Seng Trading Company. 3) No maternity leave paid to Mirnawati Ramli and Maribel. The root cause: 1. Yee Seng Trading Company did not update the contract agreement with his 6 workers due to negligence. 2. There is no PIC to monitoring on contractor's pay slip due to shortage of staff. The management admit that 3. There is no PIC to monitoring on the list of workers who are on maternity leave. The management admit that Corrective Action: Correction: 1. Inform contractor Yee Seng Trading Company to renew the expired agreement with his 6 workers and obtain a copy for estate record. Refer attachment	Auditor has received and verify the contract agreement, Pay Slip, and evidence maternity leave has been paid, auditor also has verify the Appointment Letter of PIC to monitored on this issue, and found the evidence acceptable to close the NCR **Status : Closed**

		payments (stated in the contract agreement under point no. 6). a. Mirnawati Ramli – delivered the baby on 26/02/2020 b. Maribel – delivered the baby on 19/08/2021	Contract Agreement Yee Seng - Amirudin 2. Obtain detailed pay slip payment from contractor Yee Seng. Refer attachment Pay Slip Contractor Worker Yee Seng 3. Pay maternity leave pay to Mirnawati Ramli and Maribel on April 2022. Refer attachment Maternity Leave Pay Corrective action: 1. Appoint PIC to monitor all agreement including contractor's workers to ensure contract agreement contractor are valid. 2. Appoint PIC to monitor pay slip payment of contractor workers to ensure all details are accurate and the information on compensation for all work performed included. 3. Appoint PIC to monitor list of workers who are on maternity leave to ensure maternity leave are paid accordingly.	
5.2.1 MZK 01 2022	MINOR	Requirement: 5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. Finding: Sutera Estate, Nak POM , Resort Estate did not consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. Objective evidence: Sutera Estate Sighted record of consultation with Gagah Makmur Estate dated 3/3/22, However There is no records for another 2 Surrounding Smallholder and villagers	Root cause: The issue: - Sutera Estate: Consultation with surrounding smallholder and villagers regarding interest in RSPO certification was not conducted except for Gagah Makmur Estate. Resort Estate: Consultation with Tanah Mas Estate and Cocoa Suchi regarding interest in RSPO certification was not conducted. NAK Mill: Consultation with FFB Suppliers i.e., Luboh Estate, Gagah Makmur, and	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

		Nak POM There is no Records of consultation with FFB Suppliers Luboh Estate, Gagah Makmur, and C.A.K Plantations Resort Estate There is no Records of consultation with Tanah Mas Estate, Cocoa Suchi.	CAK Plantations regarding interest in RSPO certification was not conducted. The root cause: - Sutera Estate: Estate management was not understand that requirements of this indicator that consultation with surrounding smallholder and villagers regarding interest in RSPO certification must be done. Resort Estate: Estate management was not understand that requirements of this indicator that consultation with surrounding smallholder and villagers regarding interest in RSPO certification must be done. Estate management have conducted external stakeholder meeting on 20th Oct 2021, however, did not conduct consultation with Tanah Mas Estate and Cocoa Suchi regarding interest in RSPO Certification due to negligence. NAK Mill: Estate management was not understand that requirements of this indicator that consultation with surrounding smallholder and villagers regarding interest in RSPO certification must be done. A letter dated 11th March 2022 regarding the interest of RSPO certification have been sent to all FFB suppliers, however, mill management did not include Luboh Estate, Gagah Makmur and CAK Plantations in the list due to negligence. Corrective Action: Sutera Estate: Conduct external stakeholder meeting in regard to interest in RSPO Certification. Refer attachment	

			Sutera – External Stakeholder Meeting Resort Estate: Conduct external stakeholder meeting in regard to interest in RSPO Certification and keep the minutes. Refer attachment Resort – External Stakeholder Meeting Minutes (RSSF) NAK Mill: Record any consultation with all FFB Suppliers of their interest in RSPO certification. Refer attachment NAK POM – External Stakeholder Meeting Minutes and Feedback Form RSPO Certification. Corrective action: (The corrective action shall address the root cause of this NC) Sutera Estate: Include interest in RSPO Certification as an agenda in External Stakeholder meeting and record stakeholder's feedback on it. In case of stakeholder absence in the meeting, a meeting via phone call, video conference or physical meeting will be conducted. Resort Estate: Include interest in RSPO Certification as an agenda in External Stakeholder meeting and record stakeholder's feedback on it. In case of stakeholder absence in the meeting, a meeting via phone call, video conference or physical meeting will be conducted. NAK Mill: Include interest in RSPO Certification as an agenda in External Stakeholder meeting and record stakeholder's feedback on it. In case of stakeholder absence in the meeting, a	

			meeting via phone call, video conference or physical meeting will be conducted.	
5.2.2 MZK 02 2022	MINOR	Requirement: 5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). Finding: Sutera Estate, Nak POM did not develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). Objective evidence: Sutera Estate There is no records to develops and implements smallholder support program for another 3 Surrounding Smallgrower and villagers Nak POM There is no Records to develops and implements smallholder support program with FFB Suppliers Luboh Estate, Gagah Makmur, and C.A.K Plantations Resort Estate There is no Records to develops and implements smallholder support program with Surrounding Smallholder	Root Cause The Issue Sutera Estate, Resort and Mill : Estate management was not understand that requirements of this indicator that consultation with surrounding smallholder and villagers regarding interest in RSPO certification must be done No development and implementation of smallholder support program for Luboh Estate, Gagah Makmur, and C.A.K, 3 surrounding small growers and villager. The root cause: - Sutera Estate: Estate has not scheduled external stakeholder meeting to explain discuss on the smallholder support program during audit visit. Resort Estate: Estate was not aware that they need to develop and implement smallholder support program for surrounding small growers and villager. NAK Mill: NAK mill have sent a letter to FFB supplier regarding the smallholder support program, however, did not sent the letter to Luboh Estate, Gagah Makmur, and CAK Plantations due to negligence. Corrective Action: Correction: Sutera Estate: Conduct consultation with surrounding smallholder and villagers regarding smallholder support program. Refer attachment Consultation with local community. Resort Estate: Conduct consultation with surrounding smallholders regarding smallholder support program. Refer	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

			attachment Resort – External Stakeholder Meeting Minutes (RSSF) NAK Mill: Develops and implements the program; RSPO Smallholder Support Fund (RSSF) with Gagah Makmur, Luboh Estate and CAK Plantation. Corrective action: Sutera Estate: Conducted another External Stakeholder Meeting on 25th May 2022 to get input for development and implementation of smallholder support program with surrounding smallholder. Resort Estate: Conducted another External Stakeholder Meeting on 19th May 2022 to get input for development and implementation of smallholder support program with surrounding smallholder. NAK Mill: Resend letter to Luboh Estate, Gagah Makmur, and CAK Plantations regarding the smallholder support program.	
ONSITE				
1.1.5 DA 01 2022	MINOR	Requirement: 1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives. Finding: Stakeholder list incomplete. No internal stakeholder listed. Objective evidence: There is no internal stakeholder listed in the stakeholder list at Resort and Nak Estate such as workers leader, women leader, religion head, ethnic leader etc. this group is the biggest affected group by the CU operations.	The issue: There is an incomplete internal stakeholder list at NAK and Resort estate. The root cause: No dedicated staff to monitor on the update of stakeholder list at NAK and Resort estate. Correction: Update Stakeholder List by including workers leader, women leader, religion head, and ethnic leader. Refer attachment NAK Estate – Stakeholder List and Appendix Resort.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

			Corrective action: Appoint dedicated staff to monitor and update stakeholder list.	
3.3.3 DA 02 2022	MINOR	Requirement: 3.3.3 Records of monitoring and any actions taken are maintained and available. Finding: Records of monitoring and any action taken regarding unauthorise harvesting, working on rest day during non-offered work was not maintained and not available. Objective evidence: Based on interview with harvesters from Sutera Estate, there is unauthorise harvesting occurred on rest day (Friday) without approval from the estate management. There was no records and supervision were carried out during on the rest day based on confirmation by estate management. With this no records, there was also no rest day payment been paid to workers working on rest day during non-offered day.	The issue: Unauthorized harvesting occurred on rest day without approval from Sutera estate management and the work done not recorded. The root cause: Memo of not allowing working on rest day have come into effect on 2nd January 2019 at Sutera estate. However, some of the workers i.e., harvesters, did not obey to the memo due to intention to gain more income by doing so. The Management will impose full force staff in-charge to avoid workers working on rest day. Correction: Establish a memo on mechanism working on rest day. Refer attachment Mechanism Working on Rest Day 2022. Corrective action: Conducted briefing on the mechanism working on rest day to workers.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit
3.5.1 DA 03 2022	MINOR	Requirement: 3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. Finding: 1) Employment procedures for recruiting foreign workers via walk in process was not documented and available. 2) Employment procedures for recruiting foreign workers via agent/quota basis was not clear to ensure zero recruitment fees. Objective evidence: 1) During the assessment, assessor have found 2 workers origin from Philippine and Indonesian applied for work	The issue: 1. Employment procedures for recruiting foreign workers via walk in process was not documented and available. 2. Employment procedures for recruiting foreign workers via agent/quota basis was not clear to ensure zero recruitment fees. The root cause: 1. Recruitment procedures are not available to estates as recruitment is managed centrally at HQ. 2. Estate does not aware on the	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

		via walk in application. However, there was no clear procedure on this walk-in process and timeline for the working pass application. 2) The CU have recruitment procedures for foreign workers via agent/quota basis. However, there was no clear procedure or mechanism to ensure zero recruitment fees paid by workers.	recruitment fee as no mechanism to ensure zero recruitment fee imposed available as all the recruitment is HQ Base. Correction: 1. Request recruitment procedure from Foreign Worker Unit. 2. Liaise with foreign workers department and sustainability department to review back the employment procedures for recruiting foreign workers via agent/quota in order zero recruitment fees to workers. Corrective action: 1. Maintain the recruitment procedure at NAK BU 2. The Foreign Labour Management has established recruitment of foreign workers procedure to ensure no recruitment fee imposed to the workers at origin country.	
4.2.3 DA 04 2022	MINOR	Requirement: 4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. Finding: The unit of certification did not of informed the grievance progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. Objective evidence: JCC meetings dated 12/02/2022 at Nak POM was raised 1 issue which have remained unresolved since Feb 2022 related to main gate at Nak Estate closed at 10.00pm. The workers requested the main gate to be closed at 12.00pm. However, the complaint mechanism was not informed of its progress, including against agreed timeframe and the outcome.	The issue: NAK POM did not inform the progress and outcome on the issue of main gate closing time to the complainant within agreed timeframe. The root cause: NAK POM's management was lack of knowledge that the progress of complaint must be informed to the complainant. The PIC for communication was not well versed with the grievance procedure because he is just appointed as PIC Social. Correction: NAK POM – Conduct a follow-up meeting regarding the time of gate closing. Corrective action: Conduct training on grievance procedure to	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

			NAK POM management and PIC for Communication.	
6.2.2 DA 05 2022	MAJOR (reissue from Remote with more evidence)	Requirement: 6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. Finding: 1) Employment contracts was expired. 2) Payroll documents, there is no accurate information on compensation for all work performed. 3) No evidence of maternity leave payment has been paid for 2 females' employee. 4) Inaccurate of vacation leave pay calculation methods. 5) Calculation working hours was not accurate recorded Objective evidence: 1) Sighted at Sutera Estate, contract agreement between Yee Seng Trading Company and his 6 employee was expired dated 31/12/2020. 2) Based on pay slip verification on Dec. 2021, Jan. 2022 and Feb. 2022, there is no detailing payments and no accurate information on compensation for all work performed for contractor workers (Yee Seng Trading Company at Sutera Estate). 3) There are 2 female employees who giving births in Sutera Estate yet to received 60' day maternity leaves payments (stated in the contract agreement under point no. 6). a. Mirnawati Ramli – delivered the baby on 26/02/2020 b. Maribel – delivered the baby on 19/08/2021 4) Based on pay slip verification Dec. 2021 at Nak Estate, sighted inaccurate of vacation leave pay calculation methods for 3 workers. Based on records and confirmation with second clerk, these workers never take any entitled 16 days annual/vacation leave for the year 2021. 5) Based on spraying gang checkroll book at Nak Estate, sighted the calculation of working hours was not accurate recorded as per workers' contract. Recorded work	The issue: NAK Estate – 1. Inaccurate of vacation leave pay calculation on year 2021. 2. Inaccurate calculation of working hours for checkroll spraying gang. Sutera Estate – 1. Contract agreement between Yee Seng Trading Company and his workers was expired. 2. No detailing payment on pay slip contractor workers Yee Seng Trading Company. 3. No maternity leave paid to Mirnawati Ramli and Maribel. The root cause: NAK Estate – 1. Error of vacation leave pay calculation due to misunderstanding of the criteria applicable for vacation leave pay. 2. The calculation of working hours of checkroll spraying gang recorded in the checkroll book was based on actual time the sprayer start operating spraying in order productivity can be calculated. Sutera Estate – 1. Yee Seng Trading Company did not update the contract agreement with his 6 workers due to negligence. 2. No monitoring on contractor's pay slip. 3. No monitoring on the list of workers who are on maternity leave. Correction: NAK Estate –	**Nak Estate** Auditor has received and verify the Vacation Leave Pay has been paid back to workers, , checkroll book change of calculation and Contract agreement stated change of calculation auditor also has verify the Appointment Letter of PIC to monitored on this issue, and found the evidence acceptable to close the NCR **Sutera Estate** Auditor has received and verify the contract agreement, Pay Slip, and evidence maternity leave has been paid, auditor also has verify the Appointment Letter of PIC to monitored on this issue, and found the evidence acceptable to close the NCR **Status : Closed**

		start @ 6.00am or 6.30am contradict with workers' contract work start @ 5.30am.	1. Pay the illegible workers the balance of unpaid vacation leave pays 2021 in month of June 2022 salary payment. Refer attachment NAK Estate - VLP 2. Change the calculation of working hour as per employment contract. Sutera Estate – 1. Inform contractor Yee Seng Trading Company to renew the expired agreement with his 6 workers and obtain a copy for estate record. Refer attachment Contract Agreement Yee Seng - Amirudin 2. Obtain detailed pay slip payment from contractor Yee Seng. Refer attachment Pay Slip Contractor Worker Yee Seng 3. Pay maternity leave pay to Mirnawati Ramli and Maribel on April 2022. Refer attachment Maternity Leave Pay Corrective action: NAK Estate – 1. Conduct training of vacation leave pay to all related staff, clerk and all workers in order they are aware of this matter. 2. Establish separate record between workers working hour and workers productivity in order to not contradict with the contract employment. 3. Appoint PIC to Monitor all of Social Issues Sutera Estate – 1. Monitor all agreement including contractor's workers to ensure contract agreement contractor are valid. 2. Monitor pay slip payment of contractor workers to ensure all details are accurate and the information on	

			compensation for all work performed included. 3. Monitor list of workers who are on maternity leave to ensure maternity leave are paid accordingly. 4. Appoint PIC to Monitor all of Social Issues	
6.2.3 DA 06 2022	MAJOR	Requirement: 6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. Finding: The CU was not complied with the Minimum Wages Order (Amendment 2020). Objective evidence: Based on pay slip verification of Jan. to Apr. 2022 for 3 sprayers and 3 loose fruit pickers at Nak Estate, sighted the salaries was not according to the Minimum Wages Order (Amendment 2020) which below RM 1,200. The estate management already take action such as warning letter i.e., targeted productivity per day was not achieved, absent, etc. However, there is no mechanism to ensure that workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	The issue: NAK Estate – No mechanism to ensure that workers always meet at least legal or industry minimum standards and sufficient to provide decent living wages (DLW). The root cause: NAK Estate – The estate shortage of workforce and recruitment of local and foreign workers is in dire situation forcing the estate to retain these workers even though warning letter has been issued. These workers can't achieve the minimum wages due to absenteeism and working less than 8 hours per day. Estate will find mechanism to avoid this issue repeated Correction: Analyze the productivity i.e., days/hours of working, area covered per day, and tonnage of loose fruit, of 3 sprayers and 3 fruit pickers in NAK estate to ensure they are getting minimum wages provided that they fulfill the minimum working days. Corrective action: Appoint PIC to monitor in this Wages issue, and workout the best way to avoid this happen, in case still happen, change the work for this workers in order to get the Minimum Wages.	Auditor has received and verify the minutes Meeting to Analyze the productivity i.e., days/hours of working, area covered per day, and tonnage of loose fruit, of 3 sprayers and 3 fruit pickers in NAK estate auditor also has verify the Appointment Letter of PIC to monitored on this issue, and found the evidence acceptable to close the NCR Status : Closed
6.2.4 DA 07 2022	MAJOR	Requirement: 6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or	The issue: NAK Estate - Few unit housings without mosquito netting due to broken and rotten.	Auditor has received and verify the picture and evidence Mosquito Netting & Monsoon Drain has been

		above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure. Finding: The CU did not provide adequate housing and sanitation facilities according to ILO Guidance on Workers' Housing Recommendation No. 115. Objective evidence: Inadequate of "structural safety and reasonable levels of decency, hygiene and comfort" at wooden housing and sundry shop. Site visit to wooden housing at all estates, observed that: 1) Few housings without mosquito netting due to broken 2) Monsoon drain is not permanent and no concrete floor Site visit at sundry shop at Resort Estate, observed that: 1) Unsafe condition as collapse ceiling and wooden stair is robust.	Concrete Monsoon drain was broken due to soil movement. Sutera Estate – 1. Few housings without mosquito netting. 2. Monsoon drain is not permanent and no concreate floor. Resort Estate – Resort estate did provide adequate housing and sanitation facilities such as at wooden housing, however there are few unit housings sighted without mosquito netting due to broken, monsoon drain is not permanent and no concrete floor and unsafe condition at sundry shop. The root cause: NAK Estate – 1. Repairing program for the affected housing were not yet conducted as the repairing plan is in phase by phase. 2. Construction of monsoon drain is still in tendering process during the audit. Sutera Estate – 1. Maintenance program for the affected housing were not yet conducted as the improvement plan is in phase by phase. 2. Unbudgeted cost to construct concrete monsoon drain due to this area always flooding and past Management thought it will be better to dig as not permanent. Resort Estate – Maintenance program for the affected housing and sundry shop were not yet conducted as the repairing plan is in phase	start to construct and repair also ceiling Sundry Shop at Resort Estate and found the evidence acceptable to close the NCR Status : Closed

			by phase. Correction: NAK Estate – 1. Install new mosquito net to the affected houses. Refer attachment NAK Estate – Mosquito Netting & Monsoon Drain 2. Construct 200 meter of monsoon drain in July 2022 to replace the old units which was broken. Refer attachment NAK Estate – Mosquito Netting & Monsoon Drain Sutera Estate – 1. Replace broken mosquito netting at linesite. Refer attachment Sutera – Repair OWA & Replace Mosquito Netting 2. Construct new concreate monsoon drain. Refer attachment Sutera – Quotation to construct monsoon drain Resort Estate – 1. Install new mosquito net to the affected houses. Refer attachment Appendix Resort. 2. Construct concrete floor for monsoon drain and constructing new ceiling for sundry shop. Refer attachment Appendix Resort. Corrective action: NAK Estate – 1. Speed up the progress installing of new mosquito net 2. Carried out the construction of monsoon drain as per planning in order no broken monsoon drain at line site	

			Sutera Estate – 1. Monitor housing via weekly housing inspection and take action for any broken/damaged mosquito netting. 2. Monitor the condition of monsoon drain by weekly housing inspection. Resort Estate – Speed up the progress installing of new mosquito net, constructing a concrete floor for monsoon drain and constructing new ceiling for sundry shop. Conduct housing inspection quarterly basis using Labour Quarters Condition checklist. Please refer "Appendix C Resort Estate"	
6.5.3 DA 08 2022	MINOR	Requirement: 6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. Finding: Management yet to assess the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. Objective evidence: There are no evidence of records needs of new mothers' assessment at Sutera, Resort and Nak Estate.	The issue: No records need of new mothers' assessment at Resort, Sutera and NAK estate. The root cause: Needs of new mothers' have been assessed in Resort, Sutera and NAK estate. However, the records were not meet the requirement as the PIC only monitor the month of Pregnant. Correction: Resort Estate – Conduct and record the need of new mothers' assessment. Refer attachment Resort – New mother assessment Sutera Estate – Amend on data needs of new mothers' assessment as per auditor requirement. Refer attachment Sutera – New mother assessment NAK Estate – Carry out the assessment for need of new mother by consultation and take action base on the consultation result.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

			Refer attachment NAK Estate – New Mother Assessment Corrective action: Resort Estate, Sutera Estate & Resort Estate – Document all the records either in consultation of new mothers or action taken regarding needs of new mothers.	
Time-bound plan 5.5.2 (d) DA 09 2022	MINOR	Requirement: 5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills. (d) Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised. Finding: There are isolated lapses in implementation of a time-bound plan. Objective evidence: Boustead Plantations have deviations for certifying uncertified unit from year 2021 to 2023 and 2024. The RSPO Time Bound Plan Revision Template was submitted to RSPO secretariat dated 21/04/2022 and follow up email dated 10/05/2022. However, until of audit assessment, the new TBP Revision Template yet to get approval by the RSPO Secretariat.	The issue: Time Bound Plan (TBP) is yet approved by RSPO Secretariat. The root cause: Management has decided to re-strategized on certification management due to post-pandemic situation and current drop of CPO price. Official request to amend the RSPO Time Bound Plan has been made to RSPO on 21st April 2022. Follow up request has been made on 10th May 2022. Approval has been granted by certification unit RSPO on 31st May 2022. Correction: Follow up call to RSPO Unit for the progress of Time Bound Plan Approval. Approval has been granted by certification unit RSPO on 31st May 2022. Corrective action: Sustainability & Safety Department (SSD) to monitor on the certification strategy and progress.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit
3.7.1 MZK 01 2022	MAJOR	Requirement: 3.7.1 (C): A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training. Finding: A documented programme Training did not not cover	The issue: NAK Estate, Sutera Estate & Resort Estate – Training program did not cover all applicable aspects of the RSPO P&C i.e., Social related, for workers and administration staff. The root cause:	Auditor has received and verify the picture and evidence Training has been conducted, and Evidence of Appointment letter of PIC technical and found the evidence acceptable to close the NCR **Status : Closed**

		applicable aspects of the RSPO P&C Objective evidence: Nak BU had the Programme of Training related to Health & Safety, Environment, Good Agriculture Practices, However, Programme training related to technical Aspect of RSPO such as Social Related, SIA, HCV, Vacation Leave Pay was not available, overall there is also no training for RSPO P&C MYNI 2019 for administration Staff.	NAK Estate, Sutera Estate & Resort Estate – NAK BU did not have a competent and trained person for handling training related to technical Aspect of RSPO such as Social Related, SIA, HCV, Vacation Leave Pay etc. Correction: (The correction shall address the objective evidence) NAK Estate, Sutera Estate & Resort Estate – Request training from Sustainability Department for technical aspect of RSPO i.e., social related, SIA, HCV, VLP, etc. Refer attachment Training Material NAK BU Corrective action: (The corrective action shall address the root cause of this NC) NAK Estate, Sutera Estate & Resort Estate – Appoint a PIC on the technical side of RSPO P&C who has been educated by sustainability personnel to teach RSPO P&C to the administrative staff of NAK BU.	
4.3.1 MZK 02 2022	MINOR	Requirement: 4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated. Finding: No contributions to community development that are based on the results of consultation with local communities are demonstrated Objective evidence: Records of Contribution was available at NAK BU, However, records of community development that are based on the results of consultation with local communities was not demonstrated	The issue: NAK Estate, Sutera Estate & Resort Estate – No contributions to community development that are based on the results of consultation with local communities The root cause: NAK Estate, Sutera Estate & Resort Estate – The estate was Lack of understanding and Knowledge of the requirement pertaining the contribution to local community development, as well as due to MCO, visiting to local communities was prohibited to avoid spreading of COVID-19. Correction: (The correction shall address the objective evidence) NAK Estate, Sutera Estate & Resort Estate – Include community development as one	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

			of the agenda in external stakeholder meeting to assess the needs on local development i.e., estate operation techniques, etc. for the estate to contribute to community development. Corrective action: (The corrective action shall address the root cause of this NC) NAK Estate, Sutera Estate & Resort Estate – Request briefing on local community development from Sustainability Department to understand better the requirement	
7.12.6 MZK 03 2022	MINOR	Requirement: 7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. Finding: A documented programme to regularly educate the workforce about the status of RTE species was not in place Objective evidence: Nak BU had the Programme of Training related to Health & Safety, Environment, Good Agriculture Practices, However, programme to regularly educate the workforce (e.g. administration staff, PIC, HCV, A.P) about the status of RTE species was not available	The issue: NAK Estate, Resort Estate & Sutera Estate - A documented programme to regularly educate the workforce about the status of RTE species was not in place. The root cause: NAK Estate, Resort Estate & Sutera Estate - No competent person available at NAK BU to educate the workforce about the status RTE species. Correction: NAK Estate, Resort Estate & Sutera Estate – Request RTE training from Sustainability Department. Refer attachment Training Material NAK BU Corrective action: (The corrective action shall address the root cause of this NC) NAK Estate, Resort Estate & Sutera Estate –NAK BU has established a programme to educate the workforce about the status of RTE and have appointed PIC who have been trained by Sustainability personnel for RTE related matters.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

3.4.3 DA 03 2022	MAJOR (reissue from Remote with more evidence)	Requirement: 3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. Finding: The social management and monitoring plan was not fully implemented, reviewed and updated regularly in a participatory way. Objective evidence: - Stakeholder consultation method was not effective. Only one session of consultation was conducted. There was no meeting conducted due to COVID 19 restriction. Sutera Estate using questionnaire form methodology. About 46 stakeholders was involved and questionnaire were submitted on 20/07/2021, they are mainly contractors, government departments, neighboring estates, head of villagers and others. Nak POM using questionnaire form methodology. About 26 stakeholders was involved and questionnaire were submitted on 07/07/2021, they are mainly contractors, government departments, neighboring estates, head of villagers and others and for Internal only 5 person was involsed on date 15/7/21. Resort Estate using Face to face methodology on 28/10/21 they are mainly contractors, government departments, neighboring estates, head of villagers, workers and others. Nak Estate using Face to face methodology on 19 and 20 March 2022 they are mainly contractors, government departments, neighboring estates, head of villagers, workers and others and for workers on 9 March 2022, There were no specific issues related to revising of SIA Management Plan such as discussion about main activities such as replanting, transporting, safety and health, land conflict, access right etc. and for worker, Only worker's representative involved in the social management action plan. Inadequate involvement of workers such as non-union workers, dependence, gender, races, job scopes and etc. From the management plans, there was no discussion about previous Social Management Plan, Either adequately addressed and can be closed. - sighted also at Sutera Estate certain housing area water supplies mixing with treated water and rain water. The estate already notified the issues and in progress to fixing the piping system. Sighted letter awarded to contractor dated	Root cause: The issue: - The social impact management and monitoring plan was not effectively addressing all social issues arise in NAK BU due to The root cause: - NAK BU management was lack of knowledge that the social impact assessment must be reviewed to ensure that all social impact arise from estate operation were effectively addressed. Absence of competent person in social aspect at site caused the RSPO requirement pertaining the social issue being neglected. Corrective Action: Correction: Review Social Impact Assessment annually and develop Social Impact Management Plan based on the assessment report and also consideration of consultation outcome from affected parties/stakeholders, The Plan has been updated on 9/8/2022 Corrective action: NAK BU has Appointed PIC on every estate and mill (Refer Attachment) to monitor the updated and also NAK BU will Assess social impact using template provided by Sustainability department. Refer attachment Social Impact Assessment Form – Internal and Social Impact Assessment Form – External	Auditor has received and verify the SIA Action Plans that include all the issue mentioned, auditor also verify the minutes meeting has been done to update the Plan dated 1/8/2022, auditor also reviewed Appointment letter of PIC to monitor the issue and evidence of Social Impact Assessment Form – Internal and Social Impact Assessment Form – External to monitor this issue and found the evidence acceptable to close the NCR Status : Closed

		01/03/2022 with 45 days' completion. Issues from Villagers ask to repair the main road to avoid accident, 'AJK Agama' ask to allow religious speaker to enter the estate, all this issues above failed to identify in the SIA Management Plan. - Request from workers related to welfare & aminities such as Sport Facilities e.g Futsal court, Table tennis placement area. all this issues above failed to identify in the SIA Management Plan. - There were no reviewed of SIA Management Plan, No monitoring report of previous SIA Management Plan		
5.1.2 MZK 04 2022	MAJOR	Requirement: 5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. Finding: No evidence available NAK POM regularly explains the FFB pricing to smallholders Objective evidence: No Records of training related FFB pricing to smallholders (Gagah Makmur)	The issue: NAK POM – No training of FFB pricing to smallholder conducted. The root cause: NAK POM – Lack of understanding regarding the FFB pricing explanation that formal training needed to be carried out in addition to issuing monthly price calculation reports to smallholders. Actually, mill always conduct the training every monthly when Smallholders submit their Invoice NAK POM – Conduct training and record explanation related FFB pricing to smallholders. Refer attachment NAK POM – Training FFB Pricing to Smallholder. Corrective action: (The corrective action shall address the root cause of this NC) NAK POM – To plan regularly training starting on month of July 2022. Refer Training Plan attached.	Auditor has received and verify the Training has been conducted on 25/7/22, and Training Plan for 2022 and found the evidence acceptable to close the NCR Status : Closed
7.3.1 RMN 01	MINOR	Requirement: 7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. Finding: The waste management plans were not effectively implemented. Objective evidence: Sighted at Resort Estate storage of scheduled waste were	The issue: NAK Estate – 1. Unattended empty pesticide containers were left at general store. 2. No new landfill opened at PM96A Nak Estate as last landfill closed on 25/4/2022.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

		exceeding 180 days without special approval received from DOE as per below: a. SW 305 date of generation 10/10/2021 b. SW 409 date of generation 15/10/2021 c. SW 410 date of generation 10/10/2021 Site visit at linesite for Resort estate sighted recyclable items been left unattended. Sighted at Nak Estate unattended empty pesticide containers were left at general store. Site visit at PM96A at Nak Estate only sighted landfill closed on 25/4/2022 and no new landfill opened. Site visit at Nak POM sighted unattended empty chemical containers were left at effluent ponds and MBR. Site visit at Nak POM sighted recyclable items been left unattended at effluent ponds.	Resort Estate – Schedule waste storage in Resort Estate is exceeding 180 days without DOE approval. NAK POM – 1. Unattended empty chemical containers were left at effluent ponds and MBR. 2. Recyclable items been left unattended at effluent ponds. The root cause: NAK Estate – 1. The empty pesticide container found at general store was reused to store petrol was not labelled due to negligence. 2. New landfill unable to open due to fragile soil caused by rainy season during audit visit. Resort Estate – Miscommunication regarding payment caused the contractor refused to dispose the scheduled waste in April 2022. NAK POM – 1. No monitoring on empty pesticide container collection due to shortage of Staff. 2. No monitoring on the management of recyclable items due to shortage of Staff. Correction: (The correction shall address the objective evidence) NAK Estate – 1. Label the empty pesticide container with “PETROL”. Refer attachment NAK Estate – Petrol Container & Landfill	

			2. Immediately open new landfill. Refer attachment NAK Estate – Petrol Container & Landfill Resort Estate – Apply 180 days extension of storing scheduled waste from Department of Environment (DoE). Refer attachment Appendix Resort NAK POM – 1. Collect the empty pesticides container, store it at Scheduled Wastes store, and update the SW inventory. 2. Collect recyclable items and store it at recycle bin. Corrective action: NAK Estate – 1. To establish monitoring record book for empty pesticide container mainly which used for petrol storage and label the container accordingly. 2. To ensure the monitoring record book for landfill is up-to date to avoid incident happen against. Resort Estate – To dispose Schedule Waste Store within 180 days and to apply for storing SW more than 180 days, where necessary. NAK POM – 1. To conduct continuous briefing to all workers/ operators about management of empty containers and regular monitoring on empty pesticides container collection. 2. To conduct continuous briefing to all workers/ operators about management of recycle items and regular monitoring on the management of recyclable items.	

6.7.2 RMN 02	MINOR	Requirement: 6.7.2 - Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed. Finding: Emergency shower and eye wash were not in good operation condition. Objective evidence: Sighted at below estates, the emergency shower and eye wash were not in good conditions. 1.Sutera Estate location at Water treatment plant, chemical store and premix area. 2.Resort Estate location at Chemical store. 3.Nak Estate location at Workshop.	The issue: NAK Estate, Resort Estate & Sutera Estate – Emergency shower and eyewash was not in good condition. The root cause: NAK Estate, Resort Estate & Sutera Estate – The emergency shower and eyewash installed was self-made. The installation does not consider proper safety features as company has lowered the budget. Correction: NAK Estate, Resort Estate & Sutera Estate – To purchase new proper emergency shower and eyewash and install it at respective site. Refer Appendix Resort (Appendix G), NAK Estate – Portable Eyewash, NAK Estate – Purchase of Emergency Shower, and Sutera – Emergency Shower & Eye wash. Corrective action: NAK Estate, Resort Estate & Sutera Estate – To inspect all other emergency shower and eye wash and change it into proper design.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit
6.7.3 RMN 03	MAJOR	Requirement: 6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. Finding: Personal protective equipment (PPE) was not provided free of charge and not to cover all potentially hazardous operations. Objective evidence:	The issue: NAK Estate – A sprayer (Saripah) has bought rubber boots for work NAK POM – Safety boots have bought (Senin & Jonas) for work while safety boots Sabri was found not in good condition. The root cause: NAK Estate – The sprayer did not inform the estate management that she has bought a rubber boot even though estate	Auditor has received and verify the evidence of compensation to Saripah, Replacement of PPE at 3 Workers Mill, also Training for PPE and monitoring Form for PPE and found the evidence acceptable to close the NCR Status : Closed

		Nak Estate Based on PPE issuance record for sprayer (Saripah) shown latest received rubber boots dated 26/2/2022 and based on the interview during site visit informed that the employee had personally bought her rubber boots for work. Nak POM Based on PPE issuance record for sample workshop (Senin), FFB grader (Jonas) and Boilerman (Sabri) shown latest received safety boots dated 20/1/2022 (Senin), 6/3/2021(Jonas) and 12/9/2021(Sabri) and based on the interview during site visit informed that the employee had personally bought (Senin & Jonas) their safety boots while safety boots Sabri was found not in good condition.	has informed to all workers that PPE is provided for free. Management admits there is no Monitoring checklist for PPE to monitor PPE Given to the workers NAK POM – Mill did not have sufficient stock for safety shoes and unable to provide new safety shoes to Senin, Jonas and Sabri. This is due to complicated purchase procedure that needs three (3) quotations from suppliers and limited suppliers to supply/ provide SIRIM & DOSH safety shoes. Management admit there is no Monitoring checklist for PPE to monitor PPE Given to the workers Correction: NAK Estate – Compensate Saripah the money that she used to buy the rubber boots for work. Refer attachment NAK Estate – Compensation for PPE. NAK POM – Replace the self-purchased shoes with the shoes supplied by mill. Corrective action: NAK Estate – To conduct regular briefing pertaining the PPE to ensure all workers are aware on this matter and are clearly aware that all PPE were given free of charge (FOC). Refer Training records, - Create monitoring checklist for monitor PPE given and Usage by workers Refer attachment NAK POM – 1. To conduct monthly inspection of PPE to all workers/ operators. Refer attachment 2. To ensure at least 20 pairs of	

			safety shoes are available at store for replacement purposes. Refer attachment 3. Create monitoring checklist for monitor PPE given and Usage by worker Refer attachment	
3.3.2 STK 01 2022	MINOR (reissue from Remote with more evidence)	Requirement: 3.3.2 A mechanism to check consistent implementation of procedures is in place. Own procedure : Chemical handling Management isu 1 rev 1 Prosedur Kerja Selamat Meracun isu 1 Finding: The organization did not consistent implement on their own procedure. Objective evidence: During site visit at Nak estate sighted that: 1.Petrol container without safety label/signage found at store. 2.No emergency eye wash provided at spraying activity at PM 2002A. During site visit at Nak POM sighted that: 1.Diesel container without safety label/signages found inside store.	The issue: NAK Estate – 1. Petrol container without safety label found at store. 2. No emergency eye wash provided at spraying activity at PM2002A NAK POM – Diesel container without safety label/signages found inside store. The root cause: NAK Estate – 1. No inspection of petrol container labelling before being used. due to shortage of Staff. 2. Water supply for emergency shower and eyewash for spraying activity was provided in one tank. No separate container provided for the purpose of eyewash, management of estate admit that. NAK POM –No inspection and monitoring of diesel container labelling before being used due to shortage of Staff Correction: NAK Estate – 1. Label all the petrol container using paint. Refer attachment NAK Estate – Petrol Container & Landfill 2. Provide extra water tank/container for the purpose of eyewash. Refer attachment NAK Estate – Portable Eyewash	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

			NAK POM – Label the diesel container with proper label following the standards. Corrective action: NAK Estate – 1. Inspect and monitor all petrol container labelling before use. 2. Maintain two water tank with sufficient water supply for emergency use i.e., emergency shower and eyewash, for spraying gang. NAK POM – Conduct SW management and chemicals handling to store operator.	

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	*Root Cause & Corrective Action* Taken by the CU	Verification Statement by Auditors
7.8.1	Minor	**Finding :** Water management plan was not in place in order to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. **Objective evidence :** Based on water management plan in NAK POM, there was no action plan to eliminate in Escherichia Coli, cfu / 100mL and total coliforms, cfu / 100mL as per drinking water quality standard.	Root cause: 1. Increased on the flowrate water consumption but chlorine dosage injection remain unchanged. 2. Water management plan not updated to include on the action plan to eliminate e coli and total coliforms. Corrective Action: 1.Change the period vertical clarifier tank cleaning for two times for every month. 2.Increase the chlorine injection. 3. Automation mode for chlorine dosing pump to ensure sufficient dosage injection to water flow.	In the Water Management Plan, the BU has also identified actions to be taken in the event of water supply shortage, as the estates reply on the rainwater and owned water catchment for the domestic consumption. Water is sampled from the respective estates water source mainly for the drinking purposes before and upon treatment. The common practices in the estates are shown below; a) Implementation of Rain Water Harvesting b) Construction of water gate for effective management of collection/main drain. c) Establishment of mucuna bracteata to prevent erosion. d) Side drain at field road to control water e) L shaped frond stacking f) Enhancement of ground vegetation at bare ground area In addition the Mill had conducted the following analysis: Domestic Water -Lab.Ref.No. W220304/01A dated 18/03/2022 – sample 04/03/2022 Total Coliforms – Absent in 100ml After Water Treatment -Lab.Ref.No. W220304/01B dated 18/03/2022 – sample 04/03/2022 Total Coliforms –

				Absent in 100ml Water Management for 2022/2023 had included • Automation mode for chlorine dosing pump to ensure sufficient dosage injection to water flow. • Process of adding chlorine to kill parasites, bacteria and viruses. Increase the chlorine injection till adequate dosage to make sure E-coli and Total Coliforms are absent after water treatment • Change the period vertical clarifier tank cleaning for two times for every month. **Status: Closed.**
7.12.4	Major	**Finding**: The integrated management plan was not developed in consultation with **relevant stakeholders** **Objective evidence:** HCV management Plan has been developed at all Estates under Nak Business Unit. But the integrated management plan is not developed in consultation with **relevant stakeholders.**	Root cause: Management plan already exist, but not consult yet to the relevant stakeholders due to MCO situation. Corrective Action: Management for each estate (Nak Estate, Resort Estate and Sutera Estate) has been conducted the consultation with relevant stakeholders in term of the HCV management plan tentatively on 21/12/2021.	The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan dated 8/2/22 (Sutera), 13/1/22 (Nak), 14/1/22 (Resort) and made available in all Estate and it was reviewed with participation of stakeholders during stakeholders meeting at during stakeholders meeting at 10/7/2021 (Surrounding Stakeholders Sutera) Nak, Resort and 21/12/21 with Wildlife Department Therefore, Past Major NCR MZK 01 2021 was successfully closed **Status: Closed**
3.6.1	Major	**Finding :** All operations were risk assessed but identification of H&S issues were not identified. **Objective evidence :** The HIRARC of all 3 Estates had not identified injury caused to eyes of sprayers by spray mist,	Root cause: Management not identified on the injury caused to eyes of sprayers by spray mist, accidental spillage and suitability of PPE usage at harvesting and loose fruit	The estates had made revision on HIRARC effective 30/12/21 establishing on subject titled below; “Racun Terpecik Ke Dalam Mata /

		accidental spillage and suitability of PPE usage at harvesting and loose fruit collection activities.	collection activities. Corrective Action: Management has revised the the existing HIRARC to include on the injury caused to eyes of sprayers by spray mist, accidental spillage and suitability of PPE usage at harvesting and loose fruit collection activities. New HIRARC revised dated 30/12/2021.	Terkena Badan / Terhidu Bau / Wap Racun". Remedy and prevention among others include to provide the following; a) Training and enforcement PPE adherence /Shower b) Prohibition of class 1A/1B c) Handling of chemical with Management's permission d) and guidelines /Signage Hence the NCR STK 01 2021 raised is closed and concluded. **Status: Closed**

Attachment 6

Boustead Plantations Berhad Time Bound Plan on RSPO Certification (Apr 2022)

No	PMU	Loc	Main Assessment	Certification Status	Status	Updated Information for Partial Certification, Clause 4.5.3 RSPO Time-bound Plan & 4.5.4 Requirements for uncertified management units
1.	Sg. Jernih BU	Pahang			Completed	nil
2.	Nak BU	Sabah			Completed	nil
3.	Trong BU	Perak			Completed	nil
4.	Segaria BU	Sabah			Completed	nil
5.	Segamaha BU	Sabah			Completed	nil
6.	Telok Sengat BU	Johor			Completed	nil
7.	Lepan Kabu Bekoh Eldred	Kelantan Johor Johor	2022	-	CB appointment process Deferred to 2022 (initially 2020) (Delayed due to Pandemic Covid-19 and land liability disclosure)	BPB in progress of RFQ (Request For Quotation) stage to appoint CB and the audit will be conducted by this year.
8.	Rimba Nilai (Sugut) BU	Sabah	2022	-	CB appointed Deferred to 2022 (initially 2020) (Delayed due to Pandemic Covid-19)	
9.	Tawai BU	Sabah	2023	-	New Acquisition in 2018 and 2019, the planning to certified in 2021. However, due to the pandemic Covid-19, the company need to postpone to 2023, apart from that the company plans to certify another 1 business unit consisting of 1 mill and 5 supply base and 3 estate without mill in 2022.	Revised TBP approved by RSPO
10.	Kanowit BU	Sarawak	2024	-	The company has put out a Request for Proposal (RFP) for all assets in Sarawak. The process for disposal is in progress and waiting for a potential buyer.	