	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 and Supply Base	GPS Location		Location
		Longitude	Latitude	
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	117.3662'E	5.6545'N	Km 100 Sandakan Road, 90009 Sandakan, Sabah.
	Sutera Estate	117.7842'E	5.6964'N	Off Mile 45, 68 km Lahad Datu Road, Sandakan, 90009 Sabah.

MAP : See Attachment 1

AUDIT DATE : 25 – 29 MARCH 2024 **DURATION : 17 auditor days**

TYPE OF AUDIT : ■ **Annual Surveillance Audit No. 04** ☐ **Recertification Audit**

STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

SCOPE OF CERTIFICATION : Production of Sustainable Crude Palm Oil and Palm Kernel Using Mass Balance (MB) 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 :	9 July 2024	Date :	11 July 2024

SUMMARY OF AUDITS

Recertification audit					
On-site audit date	:	24 – 28 February 2020		No. of auditor days:	20 Auditor days
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.)		No. of auditor days :	17 auditor days
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.)		No. of auditor days :	17 auditor days
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	:	6-10 Mac 2023		No. of auditor days :	17 auditor days
Audit team	:	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman, Rozaimee bin Ab Rahman, Dzulfiqar bin Azmi			
No. of major NCR	:	2	Indicator: 6.1.5, 7.3.1 (Recurrence)		Closing date: 7/06/2023
No. of minor NCR	:	2	Indicator : 6.2.7, 6.3.2		
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)	
		NA	√		
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 :	12/06/2023

Annual Surveillance Audit 4					
On-site audit date	:	25 – 29 March 2024		No. of auditor days :	17 auditor days
Audit team	:	Mohd Zulfakar bin Kamaruzaman (LA), Rohazimi Mat Nawi, Rozaimee bin Ab Rahman, Dzulfiqar bin Azmi, Nor Ezani Ahmad			
No. of major NCR	:	1	Indicator: 7.8.2		Closing date: 27 June 2024
No. of minor NCR	:	3	Indicator: 2.2.2, 2.3.2, 7.8.1		
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	Contractors	Others (Please specify)	
		NA	√		
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 : 11/07/2024	

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	Mac 2023 – Feb 2024	Mac 2024 – Feb 2025
Certified FFB Processed (MT)	80,300.33	76,380.00	77,500.00	75,978.00	80,501.68
Production of Certified CPO (MT)	16,939.60	16,039.80	16,662.50	16,230.75	17,307.86
Production of Certified PK (MT)	2,742.17	2,673.30	2,712.50	2,291.40	2,637.00
Certified Areas (Ha)	4,721.90	*4,707.50	4,707.50	4,707.50	4,707.50
Planted Areas (Ha)	4,431.40	**4,436.00	***4,435.50	4,435.50	4,435.50
Production Areas (Ha)	3,172.60	3,385.60	3,670.20	3,769.30	3,769.30
HCV Areas / Conservation Areas (Ha)	6.90	6.90	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.				

TABLE 2

	PO	PK
Last years certified volume (MT)	16,230.75	2,291.40
Last years actual certified sold (MT)	12,697.21	2,080.43
Last years actual sold under other schemes (MT)	0	0
Last years sold conventional (MT)	2,930.47	37.17
Last year actual sold CSPO credits (where applicable)	0	0
New year certified volume (MT)	18,899.00	2,637.00

Table of contents **Page**

1.0	AUDIT PROCESS	7
	1.1 Certification body	7
	1.2 Qualification of audit team	7
	1.3 Audit methodology	8
	1.4 Stakeholder consultation	8
	1.5 Audit plan	10
	1.6 Date of next audit	10
2.0	SCOPE OF CERTIFICATION AUDIT	10
	2.1 Description of the certification unit	10
	2.2 Description of the Supply Base (including planting profile)	10
	2.3 Organization Information / Contact Person(s)	12
3.0	AUDIT FINDINGS	13
	3.1 Changes to certified products in accordance to the production of the previous year	13
	3.2 Progress and changes in time bound plan	13
	3.3. Other changes (e.g. organizational structure, new contact person, addresses, etc.)	13
	3.4 Status of previous non-conformities * (refer to Attachment 5)	13
	3.5 Complaint received from stakeholder (if any)	13
4.0	DETAILS OF NON-CONFORMITY REPORT	14
	4.1 For P&C (refer to Attachment 3)	14
	4.2 For SC (refer to Attachment 3 – Supply Chain Requirements for Mills)	14
5.0	AUDIT CONCLUSION	14
6.0	RECOMMENDATION	14

List of Attachment

Attachment 1	:	Map of CU	15
Attachment 2	:	RSPO Audit Plan	16
Attachment 3		RSPO P&C Audit Checklist And Findings	24
Attachment 4	:	Details of Non-conformities and Corrective Actions Taken	84
Attachment 5	:	Status of Non-conformities Previously Identified	87
Attachment 6	:	Time-bound Plan	90

1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Zulfakar Kamaruzaman	Lead Auditor, Social (External), HCV	Holds a B.Sc. Forestry from UPM. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor.
Rohazimi 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 companies 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.
Rozaimee Ab Rahman	Auditor, Safety & Environment, SC	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Dzulfiqar Azmi	Auditor, GAP, 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 RSPO Lead Auditor since Oct. 2020.
Nor Ezani Ahmad	Auditor / Internal Social	Possessed B.Sc. Conservation Biology and master's in science (Advancement of Biodiversity) from Universiti Malaysia Sabah with total more than 4 years of working experience in the in the oil palm operation. She had 3 years of auditing experience in the oil palm operation including auditing in HCVF and social issues. She is a qualified Auditor for RSPO P&C and MSPO.

1.3 Audit methodology

The audit covered the Nak palm oil mill and 3 of its supply bases i.e., Nak Estate, Sutera Estate and Resort Estate. The sampling methodology only applies for supply bases with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	The following were confirmed during the conduct of audit as there was no evidence to prove otherwise: ▪ Foreign workers employed via walk in process 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 RM1,500 since May 2022 as per 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.
2) Settlers	Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	▪ Four (4) villagers living near the NAK BU were interviewed and confirmed that 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 they were 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	No issues with the suppliers. Payment has been made within 1 month of the issuance of invoices.
	5) Contract workers (local / foreign / Orang Asli workers / male & female)	Interviewed foreign and local contractor workers and documents reviewed, confirmed the employment contracts and conditions of employment for contractor workers contained in employment contracts signed between the respective contractor on one hand, and their workers on the other. All workers been paid by pieced rated wages. Workers are provided with comfortable housing with free water and electricity at the estate. No abuse at work and force labour occurred for contractor workers. Salary paid via cash payment with payment voucher provided along with detailing as payslip. The workers have been paid the entitlement as per Sabah Labour Ordinance such as work on rest day, public holiday, annual leave, medical leave, etc.
	6) Local & national NGOs	No issue
	7) Government agencies / Statutory bodies	No issue
	8) Independent growers / Smallholders	Not applicable
	9) Indigenous people	Not applicable.
	10) Contractor	Interview with representative contractor provided long term services to estate for the past more than 3 years. Each signed a contract and understood contractual obligations and the need to comply with legal requirements. ▪ Fair dealings. ▪ For harvesting contractor, the estate manager will verify the work the contractor has done before his invoice can be approved for payment. ▪ All contractors' workers had attended MSPO training, signed ethical business conduct commitment statement and safety. briefing. The Company provides PPE (shoe, vest, goggles, straw hat) ▪ Payment to contractors were made usually within 14 days of invoice. Renewal of contract is via tender system. ▪ All contractors also attended stakeholder meetings. ▪ Contractors must provide to the estate copies of their worker details and payslips.
	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 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 Plantations 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 has ISO 9001 quality management system certification besides RSPO P&C and Supply Chain. Boustead Nak BU has changed their supply chain model from IP to MB. Starting from 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. 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 (Mac 2023 – Feb 2024)

CU own estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Nak Estate	15,670.66	20.44	SIRIM QAS
Resort Estate	21,607.82	28.19	SIRIM QAS
Sutera Estate	36,436.64	47.54	SIRIM QAS
Outsider Crop			
Koperasi Penanam Sawit Mampan	46.03	0.06	Nil
PA Tech Sdn Bhd	33.10	0.04	Nil
Cahaya Sawit Jaya Enterprise	494.55	0.65	Nil
Bongkol Sawit Sdn Bhd	2,359.81	3.08	Nil
TOTAL	**76,648.61**	**100.00**	

Table 2: Projected FFB production by supply base for the reporting period (Mac 2024 to Feb 2025)

CU own estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Nak Estate	17,900.00	17.98	SIRIM QAS
Resort Estate	19,900.00	19.99	SIRIM QAS
Sutera Estate	42,701.68	42.89	SIRIM QAS
Subtotal	**80,501.68**		
Outsider Crop			
Total Outsider	19,068.32	19.15	
TOTAL	99,570.00	**100.00**	

Table 3: Actual FFB received and CPO & PK dispatch by Nak Mill for the last reporting period (Mac 2023 – Feb 2024)

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	76,648.61
FFB Processed	76,648.61
Certified FFB Processed	75,827.30
Non – Certified FFB Processed	2,933.49
Crude Palm Oil (CPO)	
Overall CPO Production	16,476.00
Certified CPO Production	15,878.44
Certified CPO Delivered as RSPO	12,697.21
Certified CPO Delivered as Non-RSPO	2,930.47
Certified CPO Delivered under other sustainable schemes	0
Credits traded through Book and Claim	0
Palm Kernel (PK)	
Overall PK Production	2,134.00
Certified PK Production	2,043.10
Certified PK Delivered as RSPO	2,080.43
Certified PK Delivered as non RSPO	37.17
Certified PK Delivered under other sustainable schemes	0
Credits traded thru Book & Claim	0

Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period (Mac 2024 – Feb 2025)

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	99,570.00
FFB Processed	99,570.00
Certified FFB Processed	80,501.68
Certified CPO Production	17,307.86
Certified PK Production	2,637.00

Table 5 Planted and certified area of the NAK BU

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	1996	1st generation	142.4		142.4	11.04	
	2001	1st generation	111.7		111.7	8.66	
	2002	1st generation	154.2		154.2	11.96	
	2006	2nd generation	82.5		82.5	6.40	
	2007	2nd generation	50.2		50.2	3.89	
	2008	2nd generation	42.4		42.4	3.29	
	2009	2nd generation	79.9		79.9	6.20	
	2010	2nd generation	60.2		60.2	4.67	
	2016	2nd generation	68.9		68.9	5.34	
	2017	2nd generation	83.6		83.6	6.48	
	2018	2nd generation	78.0		78.0	6.05	
	2019	2nd generation	63.2		63.2	4.90	
	2020	2nd generation		85.9	85.9		6.66
	2021	2nd generation		75.7	75.7		5.87
	2023	2nd generation		110.6	110.6		8.58
Total			**1017.2**	**272.2**	**1289.4**	**78.9**	**21.1**
Resort Estate	2015	2nd generation	158.90		158.90	15.00	
	2016	2nd generation	169.10		169.10	15.96	
	2017	2nd generation	169.50		169.50	16.00	
	2018	2nd generation	210.70		210.70	19.89	
	2019	2nd generation	221.90		221.90	20.95	
	2021	2nd generation		129.30	129.30		12.21
Total			**930.1**	**129.3**	**1059.4**	**87.79**	**12.21**
Sutera Estate	2005	2nd generation	166.40		166.40	7.97	
	2006	2nd generation	136.10		136.10	6.52	
	2007	2nd generation	100.20		100.20	4.80	
	2009	2nd generation	139.60		139.60	6.69	
	2010	2nd generation	131.30		131.30	6.29	
	2011	2nd generation	142.10		142.10	6.81	
	2012	2nd generation	138.10		138.10	6.61	
	2013	2nd generation	97.50		97.50	4.67	
	2014	2nd generation	111.10		111.10	5.32	
	2015	2nd generation	88.60		88.60	4.24	
	2016	2nd generation	105.40		105.40	5.05	
	2017	2nd generation	248.50		248.50	11.90	
	2019	2nd generation	217.10		217.10	10.40	
	2020	2nd generation		265.80	265.80		12.73
Total			**1822.00**	**265.80**	**2086.70**	**87.27**	**12.73**
Sub Total			**3769.30**	**667.30**	**4435.50**	**84.96**	**15.04**

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Faridan Othman
Position	:	Regional Head, Sabah Region.
Address	:	Sabah Regional Office KM 5, Off 19th Mile, Labuk Road, Locked Bag No. 69, 900009 Sandakan, Sabah.
Phone no.	:	089-200 375
Fax no.	:	Nil
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 complexes and newly acquired site still follow the current TBP and progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.

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?

It has been approved by RSPO, as of Jan 2024.

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 _____

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

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

No changes

3.4 Status of previous non-conformities * ■ Closed ☐ Not closed*

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

3.5. Complaint received from stakeholder (if any)

No complaint received from the stakeholder.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s)	List : 3	2.3.2 (MZK 02 2024) , 2.2.2 (NEA 01 2024) 7.8.1(b) (RAR 01 2024)
Total no. of major NCR(s)	List : 1	7.8.2 (MZK 01 2024)

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

Total no. of minor NCR(s)	List : NA
Total no. of major NCR(s)	List : NA

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.

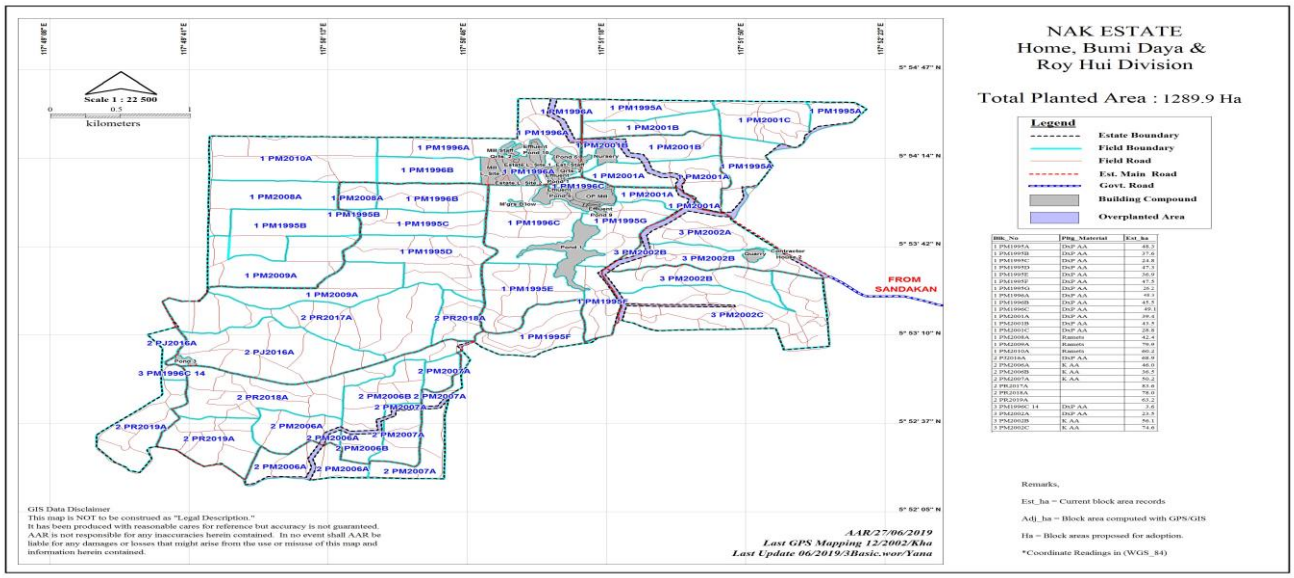
■ Recommended to continue certification.

☐ 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 90 days of the audit. Recommended for suspension of the certificate.
Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.

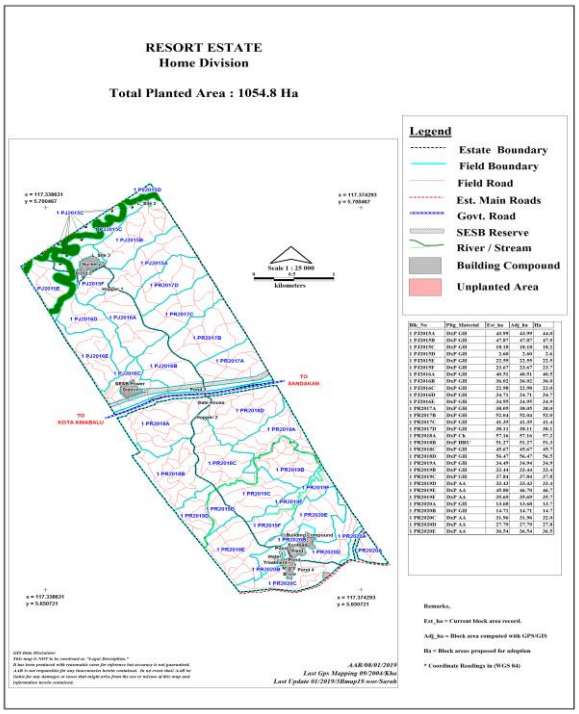
7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.

Audit Team Leader :	MOHD ZULFAKAR KAMARUZAMAN		27/6/24
	(Name)	(Signature)	(Date)

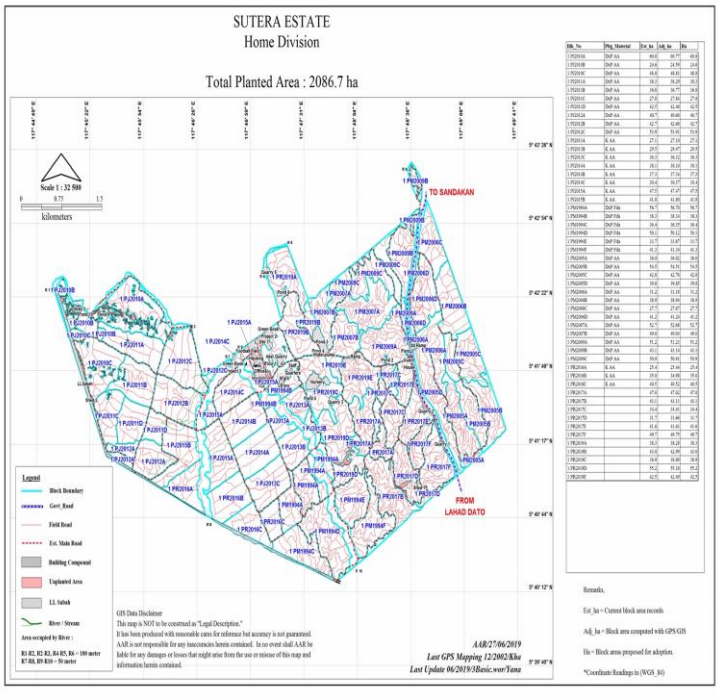
Nak Estate and Nak POM (within Nak Estate)



Resort Estate



Sutera Estate



Attachment 2 – Audit Plan

SURVEILLANCE 4 RSPO/MSPO 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 **:** 25 – 29 March 2024.

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

5. Assessment Team

Lead Auditor	:	Mohd Zulfakar Kamaruzaman (Social – External,HCV)
Auditor	:	Dzulfiqar Azmi (Social – Internal (Mill Only), Safety, GAP, Estate TPB) Rozaimee Ab Rahman (SCCS, Environment, GAP, GHG, TBP) Rohazimi Mat Nawi (Safety & Environment (Mill only), Mill Best Practices) Nor Ezani Ahmad (Social – Internal (Estate only)
Observer	:	N.A.

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

7. Audit Method

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

8. Audit Findings

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

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

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

9. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all mattersarising 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 thisaudit.

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 2023 to December 2023, and
   ii. 12-month period counting up to two months before audit month: February 2023 to January 2024

b) Reporting time frames for demographic data:
   i. For mill and estate workers: as of 31 December 2023
   ii. For smallholders and outgrowers: January 2023 to December 2023

c) Reporting time frame for all other social and environmental data:
   i. January 2023 to December 2023

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

14. Assessment Programme Details : As below

Day 1: 25/03/2024 (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 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>MZK
Nak POM</td><td>DA
Nak POM</td><td colspan="2">RAR
Nak POM</td></tr>
<tr><td>Coverage of assessment: (Social – External)
Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc.
Interview with mill workers – female, male, various nationality, various job scope, contractor workers, check roll workers
Follow up from previous assessment findings.
Laws and regulations
Interview with contractors, supplier, etc
Interview with Villagers
Workers Issues & welfare
Training and skill development programs
Continuous improvement
Interview with Contractor and their workers
Check TBP
Interview with FFB Supplier Cahaya Sawit Jaya Enterprise and Bongkol Sawit Sdn Bhd</td><td>Coverage of assessment: (Social – Internal)
▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc.
▪ Interview with mill workers – female, male, various nationality, various job scope, contractor workers, check roll workers
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Discussion with relevant management (CSR, community affairs) , Decent Living Wage, and view documentation such as SIA, assessment and management plans.
▪ Interview with Union/workers representatives
▪ Interview with gender committee, worker representative,
▪ Workers Issues & welfare
▪ Training and skill development programs
▪ Continuous improvement
▪ Other area identified during the assessment.</td><td colspan="2">Coverage of assessment: (Environment and SCCS)
- Follow up from previous assessment findings.
- Waste management including disposal site
- Aspects/impacts of mill management
- Pollution mitigating plans
- Management and disposal of waste including pesticides containers
- GHG Calculation
- Continuous improvement
Other areas identified during the assessment.
Site visit and assessment on Supply Chain Implementation including the:
▪ Model used
▪ General Chain of Custody
▪ System Requirements
▪ for the supply chain
▪ Documented procedures
▪ Purchasing and goods in
▪ Outsourcing activity
▪ Sales and goods out
▪ Processing
▪ Records keeping
▪ Registration
▪ Training
▪ Claims
Other areas 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
5.00 pm	Audit team discussion / Interim closing / End of Day 1 audit
9.00pm	Discussion LA and teams on potential NCRs

Day 2: 26/03/2024 (Tuesday)

<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 Estate.</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>MZK</td><td>DA</td><td colspan="2">RAR</td></tr>
<tr><td>Coverage of assessment: (Social – External & HCV)
▪ Site inspection/interview at production area
▪ Interview with external stakeholders i.e. local communities, government agencies, etc.
▪ Site visit at HCV area
▪ HCV/RTE and action plan.
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.
▪ Local sustainable development
▪ Support smallholder inclusion
▪ Complaints and grievances
▪ External stakeholders issues & welfare
▪ Training and skill development programs
▪ Continuous improvement

Other areas identified during the assessment...</td><td>Coverage of assessment: (Safety and GAP)
▪ Facilities at workplace inspection (worker quarters, water treatment plant, clinic, stores, workshop, landfill area & etc.
▪ Site inspection/interview at production area () – harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Safety & Health practice – witness activities at site
▪ Hazard identification and Risk Management
▪ Chemical management
▪ PPE
▪ Training and skill development programs
▪ Continuous improvement
▪ Training and skill development programs
▪ Good Agriculture Practices
▪ Training and skill development programs

Other area identified during the assessment.</td><td colspan="2">Coverage of assessment: (Environment and GAP)
- Facilities at workplace inspection (worker quarters, , School, water treatment plant, clinic, stores, workshop, landfill area & etc.
- Site inspection/interview at production area
- Follow up from previous assessment findings.
- Laws and regulations
- Mill/Estate Boundary, adjacent and neighbouring land use
- Waste management including disposal site, GHG calculation,
- Aspects/impacts of estate management
- Pollution mitigating plans
- Management and disposal of waste including pesticides containers
- River system and Effluent Treatment/Discharge
- Buffer/Riparian Zones
- Controlled/open burning
- Landfill Verification.
- Chemical management
- Training and skill development programs
- Continuous improvement

Other areas 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
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit
9.00pm	Discussion LA and teams on potential NCRs

Day 3: 27/03/2024 (Wednesday)

<table>
<tr><th>Time</th><th colspan="5">Activities / areas to be visited</th><th>Auditee</th></tr>
<tr><td>9.00 am</td><td colspan="5">Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Resort Estate and Nak POM.</td><td>Management Representative</td></tr>
<tr><td rowspan="3">9.35 am</td><td colspan="6">To assign each audit team members – site and the P&C requirements</td></tr>
<tr><td>MZK</td><td>DA</td><td>RAR</td><td>NEA</td><td colspan="2">RMN
(Nak POM)</td></tr>
<tr><td>Coverage of assessment: (Social – External & HCV)
▪ Site inspection/interview at production area
▪ Interview with external stakeholders i.e. local communities, government agencies, etc.
▪ Site visit at HCV area
▪ HCV/RTE and action plan.
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.
▪ Local sustainable development
▪ Support smallholder inclusion</td><td>Coverage of assessment: (Safety and GAP)
▪ Facilities at workplace inspection (worker quarters, water treatment plant, clinic, stores, workshop, landfill area & etc.
▪ Site inspection/interview at production area () – harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Safety & Health practice – witness activities at site
▪ Hazard identification and Risk Management
▪ Chemical management
▪ PPE
▪ Training and skill development programs</td><td>Coverage of assessment: (Environment and GAP)
- Facilities at workplace inspection (worker quarters, , School, water treatment plant, clinic, stores, workshop, landfill area & etc.
- Site inspection/interview at production area
- Follow up from previous assessment findings.
- Laws and regulations
- Mill/Estate Boundary, adjacent and neighbouring land use
- Waste management including disposal site, GHG calculation,
- Aspects/impacts of estate management
- Pollution mitigating plans
- Management and disposal of waste including pesticides containers
- River system and Effluent</td><td>Coverage of assessment: (Social – Internal)
▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc.
▪ Interview with workers – female, male, various nationality, various job scope, contractor workers, check roll workers
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Discussion with relevant management (CSR, community affairs) , Decent Living Wage, and view documentation such as SIA, assessment and management plans.
▪ Interview with Union/workers representatives
▪ Interview with gender committee, worker representative, contractors,</td><td colspan="2">Coverage of assessment: (Good Milling Practice, Environment, Safety)
▪ Facilities at workplace inspection (worker quarters, Final Discharge, water treatment plant, laboratory, landfill area clinic, stores, workshop & etc.
▪ Site inspection/interview at production area – FFB loading ramp, boiler, sterilizer, biogas & etc.
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Safety & Health practice – witness activities at site
▪ Hazard identification and Risk Management
▪ Chemical management
▪ Safety Meeting, Workplace inspection
▪ Workers Insurance, PPE, Safety Matters
▪ Waste management including</td></tr>
</table>

	▪ Complaints and grievances ▪ External stakeholders issues & welfare ▪ Training and skill development programs ▪ Continuous improvement Other areas identified during the assessment...	▪ Continuous improvement ▪ Training and skill development programs ▪ Good Agriculture Practices ▪ Training and skill development programs Other area identified during the assessment.	Treatment/Discharge - Buffer/Riparian Zones - Controlled/open burning - Landfill Verification. - Chemical management - Training and skill development programs - Continuous improvement Other areas identified during the assessment.	supplier, etc ▪ Workers Issues & welfare ▪ Training and skill development programs ▪ Continuous improvement ▪ Other areas identified during the assessment	disposal site ▪ Aspects/impacts of mill management ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ River system and Effluent Treatment/Discharge ▪ Training and skill development programs ▪ GHG Calculation ▪ Continuous improvement Other areas 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: 28/03/2024 (Thursday)

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 **Sutera Estate and Nak POM.**				Management Representative
9.35 am	To assign each audit team members – site and the P&C requirements				
	MZK	**DA**	**RAR**	**NEA**	**RMN (Nak POM)**
	Coverage of assessment: (Social – External & HCV) ▪ Site inspection/interview at production area ▪ Interview with external stakeholders i.e. local communities, government agencies, etc. ▪ Site visit at HCV area ▪ HCV/RTE and action plan.	Coverage of assessment: (Safety and GAP) ▪ Facilities at workplace inspection (worker quarters, water treatment plant, clinic, stores, workshop, landfill area & etc. ▪ Site inspection/interview at production area () – harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.	Coverage of assessment: (Environment and GAP) - Facilities at workplace inspection (worker quarters, , School, water treatment plant, clinic, stores, workshop, landfill area & etc. - Site inspection/interview at production area - Follow up from previous	**Coverage of assessment: (Social – Internal)** ▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc. ▪ Interview with workers – female, male, various nationality, various job scope, contractor workers, check roll	**Coverage of assessment: (Good Milling Practice, Environment, Safety)** ▪ Facilities at workplace inspection (worker quarters, Final Discharge, water treatment plant, laboratory, landfill area clinic, stores, workshop & etc. ▪ Site inspection/interview at production area – FFB loading

	▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ External stakeholders issues & welfare ▪ Training and skill development programs ▪ Continuous improvement Other areas identified during the assessment...	▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ PPE ▪ Training and skill development programs ▪ Continuous improvement ▪ Training and skill development programs ▪ Good Agriculture Practices ▪ Training and skill development programs Other area identified during the assessment.	assessment findings. - Laws and regulations - Mill/Estate Boundary, adjacent and neighbouring land use - Waste management including disposal site, GHG calculation, - Aspects/impacts of estate management - Pollution mitigating plans - Management and disposal of waste including pesticides containers - River system and Effluent Treatment/Discharge - Buffer/Riparian Zones - Controlled/open burning - Landfill Verification. - Chemical management - Training and skill development programs - Continuous improvement Other areas identified during the assessment.	workers ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) , Decent Living Wage, 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 ▪ Training and skill development programs ▪ Continuous improvement ▪ Other areas identified during the assessment	ramp, boiler, sterilizer, biogas & etc. ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Safety Meeting, Workplace inspection ▪ Workers Insurance, PPE, Safety Matters ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ River system and Effluent Treatment/Discharge ▪ Training and skill development programs ▪ GHG Calculation ▪ Continuous improvement Other areas 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				

<table>
<tr><th colspan="6">Day 5 – 29/03/24</th></tr>
<tr><th>Time</th><th colspan="5">Activities / areas to be visited</th></tr>
<tr><td>9.00 am</td><td colspan="5">Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Nak Estate and Nak POM.</td></tr>
<tr><td rowspan="3">9.35 am</td><td colspan="5">To assign each audit team members – site and the P&C requirements</td></tr>
<tr><td>MZK</td><td>DA</td><td>RAR</td><td>NEA</td><td>RMN (Nak POM)</td></tr>
<tr>
<td>Coverage of assessment: (Social – External & HCV)
▪ Site inspection/interview at production area
▪ Interview with external stakeholders i.e. local communities, government agencies, etc.
▪ Site visit at HCV area
▪ HCV/RTE and action plan.
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans.
▪ Local sustainable development
▪ Support smallholder inclusion
▪ Complaints and grievances
▪ External stakeholders issues & welfare
▪ Training and skill development programs
▪ Continuous improvement
Other areas identified during the assessment.</td>
<td>Coverage of assessment: (Safety and GAP)
▪ Facilities at workplace inspection (worker quarters, water treatment plant, clinic, stores, workshop, landfill area & etc.
▪ Site inspection/interview at production area () – harvesting, spraying, manuring, OP nursery, replanting area, peat area & etc.
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Safety & Health practice – witness activities at site
▪ Hazard identification and Risk Management
▪ Chemical management
▪ PPE
▪ Training and skill development programs
▪ Continuous improvement
▪ Training and skill development programs
▪ Good Agriculture Practices
▪ Training and skill development programs

Other area identified during the assessment.</td>
<td>Coverage of assessment: (Environment and GAP)
- Facilities at workplace inspection (worker quarters, , School, water treatment plant, clinic, stores, workshop, landfill area & etc.
- Site inspection/interview at production area
- Follow up from previous assessment findings.
- Laws and regulations
- Mill/Estate Boundary, adjacent and neighbouring land use
- Waste management including disposal site, GHG calculation,
- Aspects/impacts of estate management
- Pollution mitigating plans
- Management and disposal of waste including pesticides containers
- River system and Effluent Treatment/Discharge
- Buffer/Riparian Zones
- Controlled/open burning
- Landfill Verification.
- Chemical management
- Training and skill development programs
- Continuous improvement
Other areas identified during the assessment.</td>
<td>Coverage of assessment: (Social – Internal)
▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau, community center, School/CLC, Humana/Crèche, provision shop & etc.
▪ Interview with workers – female, male, various nationality, various job scope, contractor workers, check roll workers
▪ Follow up from previous assessment findings.
▪ Laws and regulations
▪ Discussion with relevant management (CSR, community affairs) , Decent Living Wage, 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
▪ Training and skill development programs
▪ Continuous improvement
Other areas identified during the assessment</td>
<td>Coverage of assessment: (MSPO Supply Chain)
▪ Site visit and assessment on Supply Chain Implementation including the:
▪ Model used
▪ General Chain of Custody
▪ System Requirements
▪ for the supply chain
▪ Documented procedures
▪ Purchasing and goods in
▪ Outsourcing activity
▪ Sales and goods out
▪ Processing
▪ Records keeping
▪ Registration
▪ Training
▪ Claims
▪ Other areas identified during the assessment..</td>
</tr>
<tr><td>12.30 pm</td><td colspan="5">LUNCH BREAK & FRIDAY PRAYER</td></tr>
<tr><td>1.30 pm</td><td colspan="5">Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records</td></tr>
<tr><td>3.30 pm</td><td colspan="5">Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / General Manager/BUH</td></tr>
<tr><td>4.30pm</td><td colspan="5">Closing meeting at the Boustead Nak CU (Places decided by Management) / End of audit</td></tr>
</table>

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 the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Boustead Plantations Berhad website at http://www.bousteadplantations.com.my/home.html In NAK BU, the management documents relating to environment, social and legal issues, are made available to the public except for those prevented by commercial confidentially or where disclosure of information would result in negative environmental or social outcomes.
	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 in appropriate language 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 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.
	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 Bousteads Plantations Berhad for the estates and mill maintained to be followed and available at the audited sites. Consultation and communications procedures for Nak CU are documented in the *Carta Aliran Membuat Aduan Kepada Pihak Pengurusan (Dalaman),* External Communications Procedure, Fair Compensation Procedure. This document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estates

Clause	Indicators	Comply Yes/No	Findings
			and mill followed the procedures and manuals developed by the company. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets observed displayed on notice boards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which was kept in the External Communication File.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	Stakeholder list FY 2024 was established in both mill and estate in Jan 2024. Stakeholder such as local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list. Nominated representative with contact number and address was sighted. Sighted also There is a list internal stakeholder listed in the stakeholder list at POM, Sutera, Resort and Nak Estate such as workers leader, women leader, religion head, ethnic leader etc.
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 sustainability team.
	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. The document was last reviewed in Jan 2023 by the HQ team. Changes to the law and regulation are monitored by the OSH Department of Boustead Sandakan Office. Various sources were referred in obtaining information about the updates of legal requirements.

Clause	Indicators	Comply Yes/No	Findings
	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	All the physical markers/Boundary stones along the legal boundaries between was visibly available with clear paint red/white. Mill had been clearly demarcated with complete installation of green fencing covered all area under the mill management inside Nak Estate land tittle.
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.
	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal req, and this can be demonstrated by the 3rd party. Evidence of legal due diligence of all contracted third parties, recruitment agencies for migrant workers, service providers and labour contractors, is available.	No	There is evidence that 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. However, it was found that Resort Estate has appointed Xin Lok Yean Trading as sundry shop owner, but the legal due diligence was not evident. Therefore, Minor NCR NEA 01 2024 has been raised.
	2.2.3 All contracts, incl. 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)
	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.	No	For all indirectly sourced FFB at Nak POM, there is no evidence the Nak POM obtains 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. Thus, Minor NCR MZK 02 2024 has been raised

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (min 3-years) is doc. that includes, where applicable, a jointly developed business case for Scheme Smallholders.	Yes	Nak CU has established and implemented its commitment towards long term sustainability and improvements through a "4 YEARS PLANNING HORIZON". The 4 Years Planning Horizon shows a business plan for the year 2024 to 2027 where the throughput (FFB, CPO), Area statement & Yield, Cost and Capital Expenditure is projected. The business plan shows the commitments of estates and POM towards better management of resources to increase productivity while reducing the cost of expenditure. The CU has a yearly budget prepared by the management and approved by top management that indicates the business plan on an annual basis. This annual budget specifies the details of the expenditures through better and more sustainable management.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	Nak CU had a Long-Range Replanting Program up to 2028. The program was reviewed annually and provided to the auditors on site.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	Management review has been planned to conduct yearly basis. Sighted latest management review meeting has been conducted (combine RSPO, RSPO SCCS and MSPO) to discuss issues related to audit findings, estate and mill operations. Generally, the RSPO system has been maintained in good order as per the requirements of RSPO MYNI 2019 Standard. The management review meeting for which were held in Oct 2023 and attended by Head Sustainability & Safety Department, Head Business Unit, Sustainability Teams and all the estate/mill managers. It was chaired by Head Sustainability & Safety Department. Management has transparently addressed the continuous suitability, adequacy, and effectiveness of the requirements for effective implementation of RSPO.
3.2 The CU regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	Yes	The action plan for continuous improvement was implemented, based on consideration of the main social impacts and opportunities of the unit of certification. The CU is currently focusing on housing repair and housing upgrade as per compliance with National Laws. This plan is to ensure the buildings can be kept in a good state and safe to be occupied and used from time to time. See the Budget for housing repairs/upgraded, drainage system, sanitation, garden upkeep and CAPEX & OPEX from all operating units. For Environment This has been established in the Continuous Improvement Plan 2024 updated in Jan 2024 respectively for all units. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities,

Clause	Indicators	Comply Yes/No	Findings
improvement in key operations.			government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available.
	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	Nak CU has developed and documented several manuals for its use. Among them were: ▪ Standard Operating Procedure (SOP) that provide guidelines to staff members in respect of certain major aspects of Estate and Mill operations. ▪ Oil Palm Circulars (OPC) – that provides guidelines Oil Palm from land clearing & planting to despatch of FFB. ▪ Safe Work Procedure ▪ OSHA Manual, Occupational Safety and Health Guidelines ▪ Procedure for the training entitled Sustainability Guidelines
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	Yes	Head of Business Unit, Plantation Advisory Department, and Safety & Sustainability Department inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Operating units visited maintain all records of monitoring and available for review. Checklists were available and being used by the estates and mills for operations, health and safety monitoring, workers' welfare and environmental issues. Sighted RSPO/MSPO internal audits by Sustainability and Safety Department (SSD) 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 in Oct 2023 and the report was made available to the management for their next review. Engineering visit report by Visiting Engineer Sabah Region date visit in May 2023 and mill in progress on the recommendation made by visiting engineer.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	The implementation of SOP is monitored on a daily basis by the field staff and Assistant Managers with an overall overview by the Managers. The monitoring is done via supervision and records maintenance. The estates among others maintained the following records. a) work program / Field cost books b) bin cards, Harvesting Intervals, c) Monthly Estate Report and Account, d) Monthly Operations, monthly rainfall, e) pest and diseases monthly return,

Clause	Indicators	Comply Yes/No	Findings
			f) agrochemical monthly consumption g) harvesting details i.e., daily inspection report - yield improvement program, h) summary of machinery running hours i) harvesting records detailing the number of bunches harvested j) quantity of loose fruit collected by each harvester. k) Monthly FFB production, etc. Similarly, the mill, the monitoring records maintained among others were related to; a) monitoring of effluent / black smoke b) Processing & produce parameters c)Dispatches / scheduled wastes etc. d)monitoring consistent implementation of procedures through internal audit e) daily shift report for the process performance. f) There was a flow chart showing methods for monitoring compliance of requirements including legal requirements. g) Internal audits are performed once a year minimum. Records of follow-up action, if any, are retained where necessary.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	Yes	There was no new planting in Nak CU. The mill and estates' operation continue to exhibit consistent impacts towards their social aspects and has undertaken comprehensive evaluation of their social impacts through Social Impact Assessment (SIA). Sighted, an independent Social Impact Assessment was conducted by Wild Asia in May 2012. Supplementary SIA report was also available dated March 2023 by Sustainability and Safety Department of Boustead HQ. There are no new plantings or operations within NAK CU. However, there were plans and impact assessments relating to environmental impacts based on documents as following: a) Environmental compliance for replanting activities conducted by appointed 3rd party, and b) EIE & EAI was updated in March 2023. Documents are maintained as sighted above with latest review on Jan 2024
	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	Nak Business Unit has maintained its documented Social Impact Assessment (SIA) Report revising date March 2023. The assessment was carried out throughout NAK Business Unit ("Nak BU") which include (1) Palm Oil Mill and three (3) Oil Palm Estates namely Nak, Sutera, and Resort Estate as the supply bases of the Nak Palm Oil Mill. The SIA was done by the Sustainability and Safety Department. Both internal and external stakeholders were consulted during the assessment. The methodology of the assessments included workers' interview according to their job description such as harvesters, sprayers, worker's representatives, gender committee, contractors, suppliers, local community, neighboring estate/smallholders, government agencies and school.

Clause	Indicators	Comply Yes/No	Findings
			Included in the SIA Report among others are socio-economic data, social profile, as well as their list of stakeholders. Background information of NAK BU operations, company's policies, grievance procedures (internal and external), facilities and amenities offered by the estates was included in the assessment. The report includes both positive and negative impact and its recommendation for estates to come out with proper management plan.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	The social management and monitoring plan was implemented, reviewed and updated regularly in a participatory way. 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, facilities and amenities provided was highlighted in the revising social management plan. Sighted at all estates, the SIA Management Plan was updated accordingly for year 2024 which include issues from various meeting minutes such as gender and workers representatives, safety and health, internal and external stakeholder meetings as well as Complaint & Request from internal and external stakeholders and muster briefing which may requires action to be taken. Included in the SIA Management Plan was the person in-charge, timeframe, the current status of previous issues either it was adequately addressed and follow-up action if required. Mill had established Environmental Management Plan with latest review in Jan 2024 to mitigate the negative impact identified inside EIA register. Sighted during site visit, mill personnel had effectively implemented all the mitigation and sample records on Oil trap record cleaning updated with latest cleaning conducted in Feb 2024.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	Yes	BPB has developed Human Resources & Administration Workforce Management Unit Procedure: ▪ Recruitment and Employment of Local Worker ▪ Quota Application (Peninsular Region) ▪ Job Order (Peninsular Region) ▪ Work Permit Renewal (Peninsular Region) ▪ Check-Out Memo (Peninsular Region) The recruitment process was clearly stated in the procedure where the recruitment was based on age, medical fitness etc. There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessities etc. Meanwhile, promotion process is available for the local & foreign workers in the Limits of Authorities (LOA).
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	Based on the review of workers' personal files and interviews conducted, evidence was available that employment records were maintained, and employment procedures implemented. These documents included application form, interview records, medical test

Clause	Indicators	Comply Yes/No	Findings
			results, copies of identification document (passport, IC), employment contracts and letters of offer. For local workers, application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees, while the for foreign workers, it will be managed by Human Resources & Administration Workforce Management Unit. The company maintains records of all appointments and processes leading to the appointments.
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 hazard identification, risk assessment and risk control (HIRARC) procedure were established. The Nak CU have conducted the risk assessment on all its operations as well as determining their control measures. DOSH HIRARC Guideline 2008 was used by the BPB with consultation input from respective estate Assistant Manager (Estate and Mill) to guide them in developing the Register. Besides HIRARC and CHRA associated mitigation plans such as use of PTW, valid Certificated Equipment and Machineries, employment of Competent Person and for those entering confined space health clearance certificate from DOSH-Registered OHD were undertaken by the Operating Unit assessed. There are no new activities in both mill and estates.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people are monitored.	Yes	The effectiveness of the H&S has been conducted by routine workplace inspection. The mill also will review their HIRARC in case occurrence of accident. Based on the interview and records, only one case accident happens at Oil room in Jan 2023 and mill had review HIRARC for oil room within the same month. Record of workplace inspection has been verified. Mill own workplace inspection conducted quarterly with latest in Feb 2024. This workplace inspection conducted by established team consist of staff and workers from selected stations. The result from workplace inspection then been discussed during safety and health meeting.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	Yes	Formal training programs for 2024 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. The training plan for each operating unit were established covered staff, workers, pregnant women, etc. A training need identification matrix has been established with target dates for the training identified.
	3.7.2 Records of training are maintained, where appropriate, on an individual basis.	Yes	The training program for 2023-2024 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. A training identification matrix has been established with target months for the implementation.

Clause	Indicators	Comply Yes/No	Findings
	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	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Annual training programmed was established for year 2024. Among training conducted as per below: • Training plan for FFB pricing to smallholder & estate conducted in Jan & Feb 2024. • SCCS SOP training for critical point areas i.e., security guard, laboratory, weighbridge clerk) in Feb 2024. • SCCS & traceability training in June 2023.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	Yes	Not applicable since the POM used MB supply chain 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 the Mass Balance model. Nak POM obtained certified FFB from owned estate such as: ▪ Nak Estate ▪ Resort Estate ▪ Sutera Estate Non certified from outside crop • PA Tech • Bongkol Sawit Sdn Bhd

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
			• KOP Penanam Sawit Mampan • Cahaya Sawit Jiwa
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 cert. report. This figure represents the total volume of certified oil palm product that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent ASA report.	Yes	As in Table 4 in the body text.
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	Member Details: Boustead Gradient Sdn Bhd - Boustead Nak Business Unit Nak Palm Oil Mill, Locked Bag No. 69, Sandakan, Sabah, 90009, Malaysia Parent Company: Boustead Plantations Berhad, 28th Floor, Menara Boustead 69, Jalan Raja Chulan 50200 Kuala Lumpur Malaysia, Kuala Lumpur, Wilayah Persekutuan, 50200, Malaysia The mill meet all registration and reporting requirements for the appropriate supply chain thru the RSPO IT platform.

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 and traceability Procedure, the said procedure was sighted and found all elements of the RSPO Supply Chain standard were covered which included: 4.0 procedures / instruction manual 4.1 requirement for supply chain management system -4.1-sustainability policy 4.1.2 – management representative 4.1.3-roles and responsibility 4.1.4 – record keeping 4.1.5 – internal audit 4.1.6 – management review 4.2 resources management 4.2.1 – competency and training 4.3 traceability procedures 4.3.1 – delivery of FFB 4.3.2 – delivery of CPO & PK 4.4 supply chain models 4.4.1 -IP or SG 4.4.2 – MB 4.5 reclassification of mill supply chain 4.6 material accounting system (fixed inventory) 4.7 outsourced activities 4.8 claims 4.9 complaint and grievances 4.10 registration of transaction The revised procedure has addressed that for palm products despatch i.e. CPO and PK, need to perform quality test on individual consignment. Sighted Training was conducted Among training conducted as per below: • Training plan for FFB pricing to smallholder & estate conducted. • SCCS SOP training for critical point areas (for: security guard, laboratory, weighbridge clerk). • SCCS & traceability training. The Manager has the overall responsibility and authority over the implementation of the supply chain requirements in the Nak POM. It was noted Manager has assigned assistant engineer to ensure the implementation of supply chain procedure met the RSPO requirements. Interviewed with relevant person in-charge at critical control point was revealed they are understood on the RSPO standard requirements which requires no mixing of RSPO certified and non RSPO certified material.

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 4.1.5 SOP, Supply Chain and traceability procedure, which is follow the RSPO Supply Chain Certification Standard Revision 2022 requirements and explicit internal audit procedure. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2022 requirements. • RSPO internal audit was conducted by internal appointed auditors. There are zero NC & OFI for SCCS. • Audit Attendance sheet, audit plan, audit notes, was sighted by auditor. • Documented procedure has defined management review will be conducted once a year • Management review meeting (combine RSPO SC and MSPO traceability and MSPO SCCS) • Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation). • Previous meeting – was highlighted • Changes • Recommendation for improvement – improve the established system Improvement of the effectiveness of the management system and its processes
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 and Outsider noncertified Crop from Gagah Makmur 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 Gagah Makmur for the month of May 2022 – February 2023. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Verified through NPOM weighing system called 'Boustead Management System (BMS)*' and random sample of weighbridge ticket from.* Monitoring records titled as *"RSPO & MSPO Mass Balancing Records for Oil Mills"* has recorded the tonnage of certified FFB and non-certified FFB. *No* over production as the mill applies for extensions volume. NAK have also established a procedure in place for handling non-conforming oil palm products as per stated in SOP, Supply Chain and traceability procedure, delivery of CPO and PK, appendix M – procedure for off specification products.

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 delivered certified materials to only one end buyer.

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 outsources transportation of certified products (CPO & CPK) to end buyer. There is addendum 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 been trained to the contractor in Jan 2024, together with the RSPO & MSPO & governmental regulation meeting conducted by Marketing Department from HQ. 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 was made available and up to date in the List of Stakeholder. And was updated in Jan 2024.
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	For year 2024 no new contractor has been used for physical handling of RSPO certified volume.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	Yes	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up to date. .
	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 3 years as per procedure Supply Chain and traceability procedure – 4.1.4 record keeping. Sample CPO & PK dispatch note since Jan 2019 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	Yes	• NPOM had continued to keep record and balances of all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table 'Mass Balance Record for Oil Mills'. • The records of the volume purchased (input) and claimed (output) over a period of 12 months was updated in 'Mass Balance Records for Oil Mill'. • The Mass Balance Record for Oil Mills –Nak POM indicated both positive balances for the certified CPO and palm kernel.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).		• With respect to the delivery of PK, randomly selected weighbridge tickets issued by Nak POM during the months of March 2023 to February 2024 were verified. All weighbridge tickets issued had indicated the status of the CPO and PK (RSPO MB).
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. They have updated the system based on input provided by NPOM (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.)
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified	Yes	Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket.

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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 RSPO IT platform		The registration of transaction being carried out by Group Plantation Marketing. Mill receives copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in). Remove RSPO Certified volume has been verified during actual period May 2022 to February 2023, for period March 2023 to February 2024 balance certified volume will be remove at the end of license period.
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	Yes	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. NPOM does not use RSPO corporate logo as 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 on 02/12/2019 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.

Clause	Indicators	Comply Yes/No	Findings
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	As at time of audit, it was confirmed that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Yes	NAK CU has 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. Personnel had been appointed at all Estate and Mill for handling grievance/complaints and social issues as evidenced by sighted appointment letters and established Organization chart of Grievance/Complaints Committees for 2023. Anonymity of complainants and Whistleblowers are ensured under BPB's "Whistleblowing Policy", "Whistleblowing Procedure" and the "Code of Ethics and Conduct" which provides an avenue to direct the grievances to Nak CU authority and even higher BPB management. Grievance/Complaints can be channelled through toll-free numbers, email, fax, or letters to the Sustainability Unit at HQ.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Yes	Based on documentation of stakeholders and interviewed carried out, it was found that the system was understood by the affected parties, including the illiterate parties. The procedure for complaint/grievance resolution was 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. Verified during the audit Past complaint received from workers about house defects, date of action taken to rectify the defects which was usually within 48 hours of complaints being lodged, and acknowledgement by the complainants.
	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 "Grievance Procedure (Workers (Estates and Mill), Public, Aborigines and others", "Flowchart for Grievance/Complaint (workers, Public and others)" and "Flowchart for Grievance/Complaint to higher authority". The Mill and Estates within Nak CU each have its own Internal Complaint Book and External Communication Book. Forms were provided for grievance and complaints from stakeholders. In accordance with the procedure, the anonymity of complainants and whistle-blowers will not be revealed to third parties. Interview with workers (Sprayer, Harvester, Manure, AP, General Workers) they understand the procedure dispute and grievance procedure dated 02/01/2020 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.

Clause	Indicators	Comply Yes/No	Findings
4.3 The CU contributes to local SD as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Yes	There is evidence that contributions to community development was provided based on consultations. Sighted sampled CSR activities at Nak units included donations and job opportunities for surrounding villagers.
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 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 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 subleased 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 titles which are from several company Boustead 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.
	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.		

Clause	Indicators	Comply Yes/No	Findings
	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 participatory mapping involving affected.	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. The audit team has interviewed relevant stakeholders and it can be concluded that there was no evidence of any land dispute at Boustead Nak CU with their neighbouring private oil palm estates and villagers.
	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.

Clause	Indicators	Comply Yes/No	Findings
	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 institutions.	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 were 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. The audit team has also interviewed relevant stakeholders and it can be concluded that there was no evidence of any land disputes between at Nak CU with local communities and neighbouring estates.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	Yes	
	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.	Yes	

Clause	Indicators	Comply Yes/No	Findings
	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.		
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water 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 were 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. The audit team has also interviewed relevant stakeholders and it can be concluded that there was no evidence of any land disputes between at Nak CU with local communities and neighbouring estates.
	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	
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	
	4.5.7 New lands are not acquired for plantations and mills after 15 Nov 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 includes mill and estates as per stated in the land title. The requirement in this indicator does not apply to Nak CU.

Clause	Indicators	Comply Yes/No	Findings
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. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land dispute at Nak CU.
	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 outcome of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demo that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	A procedure for identifying legal, customary or user rights, and compensation process is 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 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

Clause	Indicators	Comply Yes/No	Findings
rights, subject to their FPIC and negotiated agreements.	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.
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 doc process of FPIC.	Yes	
	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 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 mechs.	Yes	
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs.	Yes	

Clause	Indicators	Comply Yes/No	Findings
	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.	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.

Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	Fresh Fruit Bunches were supplied from Boustead Plantations Berhad owned estates, which are Nak Estate, Sutera Estate and Resort Estate and Uncertified FFB from Boustead Estate which is currently not certified under RSPO Tawai BU (Sungai Ruku-Ruku Estate, Sapa Payau Estate, Tawai Estate, Pertama Estate). So far, there have been no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	Nak regularly explains the FFB pricing to the smallholders (FFB suppliers) as an attachment to the monthly invoice. The calculation of FFB pricing as in the SECOND SCHEDULE was also included as attachment to the FFB Supplier Agreements. Monthly FFB price is also presented in detail and displayed at the notice board near the Nak POM weighbridge.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and doc.	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 interviewed during the audit.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	Yes	At Nak CU, there are records kept of parties, including women and independent representative organizations assisting smallholders 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.

Clause	Indicators	Comply Yes/No	Findings
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	Interviews were conducted with contractors and suppliers, and the representatives 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	The 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 to confirm the said statement.
	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 in Aug 2023, and Sutera on Feb 2024.
	5.1.8 The unit of certification supports Independent Smallholders with cert., where applicable, ensuring mutual agreements between the CU and the smallholders on who runs the ICS who holds the certificates, and who holds and sells the certified material.	Yes	Boustead Plantations Nak BU supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders who holds the certificates, and who holds and sells the certified material. For the current practice Nak BU has invited the nearby smallholder for training and meeting regarding MSPO and RSPO in Sept 2023. Boustead Plantations Nak BU has encouraged the smallholder to certify with RSPO, but smallholder don't want to join due to financial constraint. It has been confirmed through interview with them.
	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 their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Yes	Boustead Plantations Nak BU supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders who holds the certificates, and who holds and sells the certified material. For the current practice Nak BU has invited the nearby smallholder for the training and meeting regarding MSPO and RSPO in Sept 2023 (all Nak CU Estate and POM). Boustead Plantations Nak BU has encouraged the smallholder to certify with RSPO, but smallholder don't want to join due to financial constraint. It has been confirmed through an interview with them.
	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, organizational and managerial	Yes	Boustead Plantations Nak BU supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders who holds the certificates, and who holds and sells the certified material. For the current practice Nak BU has invited the nearby smallholder to the training and meeting regarding MSPO and RSPO, as mentioned above.

Clause	Indicators	Comply Yes/No	Findings
	competencies, and specific elements of RSPO certification.		
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	Nak CU is ready for consultation to interested smallholders 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 records at the CU, no smallholders outside the supply base had shown interest in contacting Nak CU for consultation.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	Based on available record at the CU, no smallholders outside the supply base had shown interest to contact Nak CU for consultation. No record specifically on pesticide handling for Scheme Smallholders was carried out.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Nak CU regularly reviews on progress of the smallholder support programs. However, based on available records 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, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	BPB have implemented Group Sustainability Policy Statement signed by Chief Executive Officer. The policy was be guided by the commitments spelt out in the para 2.2 under respect human right were stated promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of race, nationality, religion, or gender, and practice no contract substitution. BPB according to the statement, also will facilitate opportunities for advancement for their employees, especially women by removing barriers to progress and respecting reproductive and maternal rights. The Group Sustainability Policy statement was communicated through a morning briefing to all local and foreign. Based on interview sessions with sampled local and foreign workers, sampled external stakeholders, all of them are aware of the company's policy commitment and implementation. The policy is also publicly displayed on the notice board in the housing area and office. Furthermore, it is explained during the induction course for newly arrived workers.

Clause	Indicators	Comply Yes/No	Findings
	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 review, which included employment contracts, workers' pay slips, and interviews with sampled local and foreign workers at POM, there was no evidence of any forms of discrimination. Employment contracts and pay slips revealed that local workers receive the same rate of pay as foreign workers, along with housing allocations and the ability to enjoy the same benefits such as medical coverage and use of amenities. Overtime was given to all workers without prejudice based on caste, gender, race, or nationality. Workers are allowed to transfer workstations by obtaining approval from management if they feel unfit for the work assigned. Additionally, there is 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	BPB has developed Foreign Workers Procedure and Employment of Local Workers Procedure to explain the procedure of recruitment of local and foreign workers. The procedures provide clear flowcharts from recruitment, retirement until termination. Review of the workers files sampled during this audit demonstrated that medical fitness is one the required elements for job selection. Despite that, the practice is not considered as discrimination since it is important to know if the worker is fit for the job. The registration cards of the workers do not specifically state any illness. The cards only state "Fit for work". In addition to that, the company pledges to a Sustainability Policy where the company will ensure all the workers recruited will be treated equally without discrimination based on nationalities, caste, religion and etc. Medical fitness will be checked prior to work to ensure fitness to the work.
	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	Based on interview held with representatives of Gender Committee members and sampled female workers at Nak Palm Oil Mill, pregnancy tests are not conducted on discriminatory manner and health screenings are conducted only when legally mandated (when handling chemicals). However, during audit, there was no women employees were handling chemicals and 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	The Group Sustainability Policy Statement covers the commitment facilitating the opportunity for advancement of women at all levels in our organization and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. BPB has introduced the new Terms of Reference (TOR) for Gender Committee. In this new TOR, more definitive roles, and responsibilities as well as governance structure and programs were added in. Gender committee has been established in each operating unit at Nak CU. Gender committee meeting was conducted and meeting minutes available.The discussion in the meeting minutes among others were complaints and grievance procedure, suggestions, and planned activities in 2024, activities to raise awareness, identify and address issues of concern among women communities. There was no issue related to sexual harassment

Clause	Indicators	Comply Yes/No	Findings
			or violence reported as seen in the meeting minute. Besides, WhatsApp group was established as an alternative method to monitor if there is issue.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	BPB has implemented the Group Sustainability Policy Statement signed by the Chief Executive Officer. The commitments spelt out in the policy as in para 2.2 under respect human rights where it states that promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination. Evidence is available that sampled workers receive equal pay for equal work.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	Yes	The employment contract is drafted according to the Sabah Labor Ordinance Cap.67. Both local and foreign employment adopt the same contract. As Sabah State has not recognized the Malaysian National Union for Plantation Workers, no collective agreements are in place. At the estates, the piece rate pricing is published on notice board. Sample of workers' employment contract were reviewed to confirm contracts are in Bahasa Malaysia. Bahasa Malaysia language is deemed appropriate and sufficient as generally the workers of the certified units are either local, Indonesian or Philippines who understand Bahasa Malaysia. Furthermore, as stated in the employment contract, it is the responsibility of the company to explain the terms of employment and the company regulations before signing the employment contracts. In general, the workers understood the basic employment terms. The documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. 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 such as passport deduction), net salary, annual leave and medical leave taken, etc. It was verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order 2022 and Sabah Labour Ordinance. Pimacs System databases, which use as importance tool for extracting reconciliation for labour position i.e payslips, checkroll data, employee profile and also account reconciliation for month end closing every month.
	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	Yes	Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2022, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the contract agreement. Payroll documents, namely the pay slip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled pay slips that wages were paid in

Clause	Indicators	Comply Yes/No	Findings
	all work performed. This includes a form of record for work done by family members.		compliance with national legal requirements.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	Yes	The employment contract is drafted according to the Sabah Labor Ordinance Cap.67. Both local and foreign employment adopt the same contract. As Sabah State has not recognized the Malaysian National Union for Plantation Workers, no collective agreements are in place. At the estates, the piece rate pricing is published on notice board. There is evidence of legal compliance as per contract agreement such as regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. The working hours as per contract agreement were, working hours at 48 hours per week. For overtime, it has been mutually agreed upon between the management and workers and met the legal requirements. Overtime will be offered when there is additional job and no discrimination observed. Permits from the Department of Labour were sighted during the onsite audit. Based on interview sampled female workers (especially mother), medical assistant, and verification of pay slip, confirmed that workers with medical certificates are given a paid medical leave, and female workers are given 2 months paid maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	Yes	Evidence is available that NAK CU provides adequate housing, sanitation facilities, water and electricity supplies, medical, educational and welfare amenities to its employees. Houses are provided rent free to all workers being them local or foreign workers. Generally, each house has 2 bedrooms, 1 living room, 1 toilet and 1 kitchen and accommodates between 2 to 4 workers or a family. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate's premises. To ensure that the worker's quarters are in good condition and maintain their cleanliness, a linesite inspection was performed weekly by EHA or Staff in-charge. Monthly visit by VMO was also performed accordingly. Septic tank has been installed for each housing and properly maintained by the management. Water supply was extracted from pond and treated by the management. The sample for drinking water was sent accordingly to ensure non-detected E.coli. For foreign workers, CLC has been established which the teachers are appointed by Indonesian Government and assisted by local teacher provided by estates and government school for local workers. Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall. Estate's clinic are available where free medical treatment is provided to all workers and their dependents. Linesite inspection was conducted weekly by the Medical Assistant or Staff in charge and using the Housing Weekly Inspection Checklists.

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td></td><td>6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</td><td>Yes</td><td>The management has ensured access to adequate, sufficient and affordable food by providing sundry shop or canteen facility to workers within the estate’s area which sells items such as cooking oil, eggs, flour, rice, vegetables, frozen food such as fish, meat, prawn etc. Prices of certain basic items are monitored regularly by the management to ensure the price of the item sold is within an acceptable range. The workers interviewed informed us that the items sold are adequate and reasonably priced considering the distance to the nearest shop. Items purchased can be either paid in cash or on credit.</td></tr>
<tr><td></td><td>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 an equivalent basket of goods, is stipulated in Collective Bargaining Agreements, this should be used as the foundation for the gradual implementation of the living wage payment.
• The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation
Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</td><td>Yes</td><td>The CU provided a decent living wage for both local and foreign workers based on prevailing wages assessment methodology. It includes wage, paid leave, mandatory/medical, retirement benefits, donations service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. In absence of DLW, the management conducted Prevailing Wage Assessment based on check-roll worker for period of the year 2024.

<table>
<tr><th>Total Value of Prevailing Wage</th><th>Local Worker (RM)</th><th>Foreign worker (RM)</th></tr>
<tr><td>Nak POM</td><td>3452.00</td><td>3221.00</td></tr>
<tr><td>Resort Estate</td><td>2331.00</td><td>2300.00</td></tr>
<tr><td>Sutera Estate</td><td>2331.00</td><td>2285.00</td></tr>
<tr><td>Nak Estate</td><td>2200.00</td><td>2218.50</td></tr>
</table>
</td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings
	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	There is evidence that permanent, full-time employment was used for all core work in all operating units. Verified at the time of audit, employment types according to core work activities and temporary/seasonal activities has been identified accordingly. This were cross verified with the workers master list, employment contract, site visit and interview with sample workers.
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	The published statement recognizing freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) was available in the Group Sustainability Policy. Stated in clause 2.1.2, that the management respect freedom of association and right to collective bargaining as long as compliance with local regulations. The policy was publicly available in the company's website and displayed on the notice board at all operating units. Since there is no legal and registered union, the management has taken initiative to established workers representative committee as part of commitment in freedom of association. The policy was explained to all workers during morning muster and demonstrably implemented in the Workers Representative Committee (JCC). The JCC implemented for the employees to speak freely, and the meeting will be conducted once every 3 months. Interviews with workers reveal that 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 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 (JCC) is comprised of worker and management representatives. Minutes of the Workers Representative Committee meetings were documented, sighted 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	Interviewed with the workers' representatives in Nak POM, confirmed that the management did not interfere in the formation of the association. All of them were elected freely by the workers via election.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Yes	The formal policy for the protection of children, including prohibition of child labour and remediation was in place under Group Sustainability Policy Statement. The policy emphasized that the company is committed to ensure all workers and children safety are protected and all employment are within the minimum age limit and in compliance with national regulations and state ordinance. The policy was communicated directly during various meeting with both internal and external stakeholders of mill and estate within Boustead Nak CU and indirectly via website.

Clause	Indicators	Comply Yes/No	Findings
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	Yes	The records of employment documentation verified including the Employee Master Lists and sample personal particulars confirmed that minimum age requirements of above 18 years old met for all the workers employed in all operating units within Boustead Nak CU. The computerized PIMACS Database System able to verify and screen the age of employees upon data entry.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	Based on documents sighted, interviews and observations, there was no evidence that the Mill employed anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' particulars and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	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	The company has a no child labour policy which is displayed on the company's noticeboards. Interview with sampled workers indicates the policy has been communicated to them at their morning musters. Also, during stakeholders' consultations with the communities and third-party contractors, they did confirm the policy has been shared with them and communicated to their understanding. In addition, Nak CU has been issued a Sustainability Policy Pledge by Vendor that is to be signed by all contractors, suppliers and vendors. The Pledge states that the undersigned has read, understood and will comply to The Vendor Code of Business Conduct and BPB Sustainability Policy.
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	The policy to prevent sexual and all other forms of harassment and violence has been implemented under the Group Sustainability Policy and Anti-Harassment Policy statement. The policy was displayed prominently on the notice boards at the estates offices and communicated to all levels of the workforce. As per stated in the policy, the management is committed to prohibit any sexual and harassment in all operating units in Boustead Plantations Berhad which is documented in the "Procedure of Managing Sexual Harassment in the Workplace". It states that where any cases of sexual/harassment that has been reported will be investigated through domestic inquiry that clearly outline in clause 5.0. In the procedure too mentioned types of harassment which are physical conduct of sexual nature, verbal conduct of sexual nature, nonverbal conduct of sexual nature and sex-based conduct. Verified during the audit, there is no evidence or acts that contradict to this policy and procedure were observed or happened and this were confirmed during interview session with female workers/staffs and representative from gender committee during the audit at the CU.

Clause	Indicators	Comply Yes/No	Findings
	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	BPB has developed a Group Sustainability Policy where provides protection of reproductive rights of all workers. The Labour Standard specifies that the company recognizes the rights of employees to reproduction and reproductive health, including the right to make decisions on reproduction. Based on interviews with the sampled workers, there is evidence that this standard is being implemented where female workers are entitled to 60 days paid maternity leave, and pregnant women are given light work to do.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	Yes	Management has assessed the needs of new mothers, in consultation with the new mothers. The assessment was performed by EHA and supported by The Gender Committee. In addition, flow chart procedure such as “Carta Aliran Pengurusan Ibu Mengandung”, “Carta Aliran Pengurusan Ibu Bersalin” and Carta Aliran Pengurusan Imunisasi Bayi” was adhered to implement the assessment. The actions are taken to address the needs that have been identified. Adequate space and paid breaks were provided to enable mothers with infants 24 months or younger to breastfeed or express and store breast milk with privacy.
	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	BPB has established Grievance Procedure. The procedure outlines respecting anonymity and protects complainants where requested. In addition, Managing Sexual Harassment in the Workforce was established as guideline and procedure actions to be taken if any case reported. The timeline for each of the stages was outlined in the procedure. A complaint panel was established to handle any complaint in the estate and mill. The grievance procedure was communicated during morning muster and gender committee meeting. Interviewed with the sampled female workers and gender committee chairman, confirmed that they are aware of the complaint procedure and informed that there is no case of sexual harassment and violence reported.
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	Yes	Based on interviews with the workers, and observations made, the following were found: Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Interview with workers states that passport has been kept by the workers themselves. It has been confirmed during site visit to line site where passport has been kept at their house in a safety locker provided by management. The passport will only be surrender to the management when it is due for permit renewal. Charging of recruitment fee: Workers are not charged any recruitment fees. This is clearly stated in the contracts between Boustead Plantations Berhad with the recruitment agents from Indonesia. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees.

Clause	Indicators	Comply Yes/No	Findings
	employment • Debt bondage • Withholding of wages		Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free to decline any offers for overtime work. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no debt has been given to the workers. The is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement. Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by cash and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers` wages has been withhold. It has been further confirmed through interview.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	BPB has established a foreign workers policy statement under Sustainability Policy that mentioned, all foreign 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. The procedure has been implemented for any employment related with foreign workers. The company implemented no contractor substitution and no discrimination to the foreign workers. Besides, the company also comply with Minimum Wage Order Malaysia and provided orientation to the workers to brief them on the language, safety, regulations in Malaysia and culture. Decent housing was provided to the foreign workers.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	Yes	Estate Managers were appointed as responsible person(s) for safety and health issues and chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the Assistant Manager for the downline implementation of OSH practices in the estates and mill. All identified committees were officially given a letter for such an appointment. Besides, the representatives of employees in the safety and health committee were able to represent the various sections of a place of work. OSH Committee meetings are held once in three months. Minutes of the meeting were reviewed during the audit.
	6.7.2 Accident and emergency procedures	Yes	The procedures for accidents and emergencies have been established. There is formation

Clause	Indicators	Comply Yes/No	Findings
	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.		of ERP Team & ERP for all the identified incidences. Besides that, the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They include emergencies relating to earthquake, fire, chemical spillage, flood, animal attack/poison, COVID 19 and accident at workplace. Fire drill training was conducted to all estates to create awareness and emergency response to all workers. Each estate has their own first aid and is trained by competency consultant. The certificate of competency first aided is valid for 3 years. Master list of first aid box of all estate which is available at the office was checked and verified. Observed that, first aid box is well provided for all the field mandores whose involved in harvesting, manuring, spraying works, etc. The content of the first box which is held by harvesting, manuring and spraying mandores was verified. The contents such as bandage, gauze, triangular bandage, cotton wool, plaster, handy plaster, flavin lotion, antiseptic cream, surgical gloves, and scissor were well equipped. The stock of first aid boxes is regularly checked and refilled, when necessary, by an estate Hospital Assistant. Telephone numbers and names of the members of the ERT were communicated to all employees and displayed at noticeboards. Telephone numbers of the PIC, Police Station, Fire Brigade, and Government Clinic were also included. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury records were recorded using Lost LTA metrics. A quarterly review on accident cases was carried out during the quarterly OSH committee meeting.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	Yes	All staff and workers, such as storekeepers, harvesters, and sprayers/manurers, received continuous training in safe working practices, including SSOPs for PPE related to their job functions. PPE was provided to workers based on HIRARC and SSOP recommendations appropriate for their job positions or hazardous operations. During field inspections at Harvesting Operations, Manuring Operations, and Circle Spraying Operations, it was observed that workers were wearing PPE such as face masks, respirators, goggles, harvesting shoes, rubber boots, nitrile/cotton gloves, aprons, and safety helmets/straw hats to cover all potentially hazardous operations. The condition of each PPE item and its validity lifespan was found to be good. Records of PPE issued, and acknowledgments of receipt are maintained individually for all categories of workers at estates. In addition to basic PPE, appropriate PPE is also provided for workers assigned to dangerous operations such as work at height and in confined spaces. The cost of PPE is borne by the management. Interviews conducted during the site visit at all estates indicated that workers understood and approved of the management bearing the cost of all PPEs. They also understood the importance of always using the required PPE during work and the proper storage and disposal methods of PPE.

Clause	Indicators	Comply Yes/No	Findings
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	Yes	Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4). Sighted sampled monthly payment contribution made to SOCSO on Form 8A for foreign and local workers at the estates was available for reviewed.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	Occupational injuries are recorded using Lost Time Injury (LTI) metrics via monthly data of estate safety performance. Sighted the Nak CU has maintained and updated the LTI Summary by monthly basis. For accidents records 2023, The CU managed to submit the JKKP 8 form to DOSH before 31/01/2024.

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	IPM plans at Nak CU was implemented and monitored to ensure effective pest control. Pests and disease highlighted in the Agronomist Report. The objectives are: ▪ Minimise or possibly elimination of significant threats caused by pests to the palm's growth health and safety of workers, staff and the public in general. ▪ Prevention or minimize of loss or damage to palms and yield by pests. ▪ Increase flora and fauna in the estate environment. ▪ To ensure effective monitoring and early warning of pest incidence in the plantings. ▪ To achieve insects' biological equilibrium as possibly can.
	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	Plan to prevent and monitor the spread of species referenced in the Global Invasive Species Database and CABI.org (if any). This is not practiced in the visited estate. None of the 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	It was identified that there is no use of fire for the pest control at the estates.

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td rowspan="5">7.2
Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</td><td>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.</td><td>Yes</td><td>Justification of the use of pesticides had been documented. 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 updated periodically. The registers were updated in January 2024. The chemical used in the estates as captured from the chemical register among others as listed below.
<table>
<tr><th>No.</th><th>Chemical name</th><th>Class</th><th>No.</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>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.</td><td>Yes</td><td>All three (3) Estates in Nak CU, 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.</td></tr>
<tr><td>7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</td><td>Yes</td><td>The estates have implemented a long-term chemical reduction plan where they are currently monitoring the usage of chemicals monthly to ensure reduction of chemical use in the long run. Paraquat was eliminated. In its place, alternatives such as Glyphosate and Glufosinate Ammonium were used instead. The estates also have implemented an IPM Plan to further reduce the use of pesticides. Sighted during the site visit the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at intended areas.</td></tr>
<tr><td>7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</td><td>Yes</td><td>There was no evidence of prophylactic use of pesticides except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practiced for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOPs.</td></tr>
<tr><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</td><td>Yes</td><td>The CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register January 2024, it was noted that all pesticides used are of class II, III, IV. 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 had been used.</td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings
	validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:		
	7.2.5a Judgment of the threat and verify why this is a major threat.		
	7.2.5b Why there is no other alternative which can be used.		
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.		
	7.2.5d What is the process to limit the negative impacts of the application.		
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.		
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers. Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	Yes	The CU had records showing that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. The staffs and workers such as the storekeepers, sprayers, manurers and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. Pesticide applications were guided by Oil Palm Circular (OPC), Safe Work Procedure (SWP), CHRA and by SDS supplied by the manufacturer. The SWP/OPC/CHRA had included a chemical register list, which indicates the purpose of usage (intended target), hazards signage, trade and generic names. The SOP procedure also had written justifications. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Training including refresher sessions were provided to the workers involved in such activities to ensure a continued understanding of chemicals / hazard. Records showed that pesticides were handled, used and applied by trained personnel and as per the SDS of the pesticide.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised	Yes	In Nak CU, all pesticides were stored in accordance with the legal requirement, in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and

Clause	Indicators	Comply Yes/No	Findings
	best practices.		Regulations as well as recommendation by manufacturer as per applicable SDS. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e. storekeeper. The stores in the estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. The fertilizers were well stacked. The stores are equipped with showers, wash area and a PPE storage area. Adequate Safety Signage have been placed at both internal and external of the building. A proper premixing area with eye wash facilities and bathing area is available at the estates. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities were continually implemented for empty pesticide containers. The activities were carried out at a concrete pond of 3 levels. Empty pesticide containers observed were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	With the exception that some empty agrochemical containers were recycled for premixing pesticides for onward delivery to field, the rest of the empty chemical containers were triple rinsed, pierced and stored in the schedule waste store. Empty chemical container classified as SW 409 and disposed to DOE's license contractor.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	Aerial spraying of pesticides is not a practice in Nak CU. There was no evidence to show that such a method being used in all estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site inspection.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	Specific annual medical surveillance for pesticide operators was documented and action to treat related health conditions was demonstrated. From the results, all workers fit to handle chemical.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or	Yes	Medical screening for woman workers involved in chemical handling and application was conducted monthly. The latest medical screening conducted indicated none were found pregnant. During the site visit the female chemical handlers and manurer were interviewed and they mentioned that they are not

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td></td><td>breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</td><td></td><td>pregnant no breastfeeding. Nak POM and their supply bases do not have persons under the age of 18 working in the premises.</td></tr>
<tr><td>7.3
Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</td><td>7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</td><td>Yes</td><td>The Estates and Mill had established the waste and pollution management plan 2024 as shown below. The PIC and time frame was also shown in the management plan
<table>
<tr><td></td><td>Activities</td><td>Source</td><td>Waste /Pollution</td><td>Affected Environment</td></tr>
<tr><td>1</td><td>Gen store</td><td>Petrol oil, lubricant</td><td rowspan="2">Spillage & contamination</td><td rowspan="2">Land, water</td></tr>
<tr><td></td><td></td><td>Chemical</td></tr>
<tr><td>2</td><td>SW store</td><td>Scheduled waste</td><td>All type of SW</td><td>Environmental</td></tr>
<tr><td>3</td><td>office</td><td>Domestic/office waste</td><td>paper plastic</td><td rowspan="3">Land, water</td></tr>
<tr><td></td><td></td><td>Toilet & kitchen</td><td>sewage</td></tr>
<tr><td>4</td><td>Workshop</td><td>Used oil & grease</td><td>Spillage</td></tr>
<tr><td></td><td></td><td>Metal waste</td><td rowspan="2">Wastage</td><td rowspan="2">Deficit natural resources</td></tr>
<tr><td></td><td></td><td>Oil drum/tank</td></tr>
<tr><td>5</td><td>Labour line</td><td>Domestic waste</td><td>Solid waste</td><td rowspan="2">Land, water</td></tr>
<tr><td></td><td></td><td>Toilet/kitchen waste</td><td>sewage</td></tr>
</table>
<table>
<tr><td>.</td><td>Activities</td><td>Source</td><td>Prevention</td><td>Action Plan</td></tr>
<tr><td rowspan="2">1</td><td rowspan="2">Gen store</td><td>Petrol oil, lubricant</td><td rowspan="2">Keep items in designated area i.e. bund 110% of capacity</td><td rowspan="2">Establish recovery procedure - accidental spillage. Kit available</td></tr>
<tr><td>Chemical</td></tr>
<tr><td>2</td><td>SW store</td><td>Scheduled waste</td><td>Comply to EQA requirement</td><td>Dispose as SW & maintain record.</td></tr>
<tr><td rowspan="2">3</td><td rowspan="2">office</td><td>Domestic/office waste</td><td rowspan="2">Implement recycling of waste Provide bins</td><td rowspan="3">Continuous education on environmental issues and program.</td></tr>
<tr><td>Toilet & kitchen</td></tr>
<tr><td rowspan="3">4</td><td rowspan="3">Workshop</td><td>Used oil & grease</td><td>Display signboards & provide litter bins</td></tr>
<tr><td>Metal waste</td><td rowspan="2">Collect discarded materials for recycling</td><td rowspan="2">Provide training on recycling</td></tr>
<tr><td>Oil drum/tank</td></tr>
<tr><td>5</td><td>Labour line</td><td>Domestic waste</td><td>Display signboards & provide litter bins</td><td>Provide training on recycling</td></tr>
<tr><td>5</td><td>Labour line</td><td>Toilet & kitchen waste</td><td>Ensure no accidental spillage</td><td>Cease using facilities in event of non-functional</td></tr>
</table>
</td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings
	7.3.2 Proper disposal of waste material, according to proc. that are fully understood by workers and managers, is demonstrated.	Yes	The CU has implemented the Scheduled Waste Procedure which has been established. Collection of SW is made by registered contractors, inventory of SW has been reported to DOE by monthly basis sighted latest submission and domestic waste disposed at land fill area.
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	The site visit confirmed that the CU does not use open fire to dispose of all the waste items. All the waste has been disposed through land fill areas. The landfills were located away from water sources. Site visits verify compliance of landfill areas.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	Yes	NAK CU continued to implement the good agriculture practices as contained in SOPs, to manage soil fertility, to optimize yield and minimize 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, was carried based on the recommendation made by the Applied Agricultural Resources Sdn. Bhd. Annual fertilizer recommendations were made based on annual foliar sampling. The fertilizer application program was monitored using program sheets, bin cards, Field Cost book and Fertilizer Quality Assessment by Applied Agricultural Resources Sdn. Bhd.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	Periodic foliar and soil sampling were carried out by the Applied Agricultural Resources Sdn. Bhd. and its result formed part of the basis for the fertilizers input recommendation. Periodic tissue and soil sampling were carried out to monitor changes in nutrient status. Annual foliar sampling for the nutrients N, P, K, Mg, Ca & B. Foliar samplings and Soil samplings were carried out in Feb & May 2023.
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches, Palm Oil Mill Effluent, palm residues and optimal use of inorganic fertilisers.	Yes	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.
	7.4.4 Records of fertiliser inputs are maintained.	Yes	All 3 Estates continued to maintain records of fertiliser inputs. Records of programs and applications of fertilisers were made available to auditors. Records showed that the main fertiliser programmed apply in 2024 were AABN20LDM, AS, BRP, Fertibor, KS, MOP, OPCom50B for mature palm and AABN20 for immature palm. The average application fertilizer per palm for the year around 10.50kg to 12.00kg. The estates 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.
7.5 Practices minimise and control erosion and degradation of	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes	On the 3 Estates, Resort, Sutera & Nak, maps identifying marginal and fragile soils, including steep terrain, had been prepared by AAR.

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td rowspan="3">soils.</td><td></td><td></td><td>The soil series in the estates were classified as follows as 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>13</td><td></td><td>Soil Type A</td><td></td></tr>
</table>
There were no problematic soils (e.g. podzols and acid sulphate soils) on NAK CU. The estates maintained the following maps and documents for proof of recognized legal rights. Documents were sighted and verified.</td></tr>
<tr><td>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.</td><td>Yes</td><td>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.</td></tr>
<tr><td>7.5.3 There is no new planting of oil palm on steep terrain.</td><td>Yes</td><td>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.</td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings
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 CU, 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 were prepared by the AAR and updated in 2018 were made available. This was to consider in plans and operations. Periodic foliar and soil sampling were carried out by the AAR and its result formed part of the basis for the fertilizers input recommendation.
	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 CU, 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.	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. Furthermore, 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. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance.	Yes	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.
	7.7.3 (C) Subsidence of peat is monitored, documented and min.	Yes	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
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	This is not applicable as there is no peat soil 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.	Yes	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	Yes	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
	Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.		
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	Yes	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	NAK CU Mill /estates had established its Water Management Plan 2024 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as; a) Implementation of rainwater harvest, b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level. c) daily monitoring of bund / scheduled maintenance d) Establishment of *mucuna bracteata* to prevent erosion, e) Side drain at field road to control water, frond stacking, f) Enhancement of ground vegetation at bare ground area. g) Monitoring of water usage h) Water consumption and contingency plan during water shortage, dry spell or severe water pollution. The CU had implemented water managements plans which covered: a) Water shortage contingencies b) Water pollution prevention / Reduce wastage

<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>c) Identification & management of waste waters
d) Monitoring rainfall / Regular water quality analysis.</td></tr>
<tr><td></td><td>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</td><td>Yes</td><td>Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. The following evidence was checked and verified.</td></tr>
<tr><td></td><td>7.8.1b Workers have adequate access to clean water.</td><td>No</td><td>At all estate visited the water management action plan and procedure “Sampling of drinking water and river water quality”, was established to ensure drinking water adheres to health and safety quality standards set by ministry of health. Frequency of Water sampling (drinking water) has been set minimum twice per year.
Noted that for the treated water, which has been supplied by water treatment plant, water analysis was carried out by 6 monthly. 2 off spec has been identified for Escherichia coli and total coliforms. In accordance with the procedure, the sampling should be conducted more frequently (i.e., twice per month) until the parameters are safe to use and meet the required parameter. This was not carried out, hence #Minor NCR RAR 01 2024 has been raised.</td></tr>
<tr><td></td><td>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).</td><td>No</td><td>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 practices are guided by a policy “Polisi Perlindungan Cerun & Zon Penampan Sungai” and the buffer zones established are as follows:
<table>
<tr><th>No</th><th>River width</th><th>Buffer zone</th><th>No</th><th>River width</th><th>Buffer zone</th></tr>
<tr><td>1</td><td>> 40 meters</td><td>50 meters</td><td>4</td><td>5 – 10 meters</td><td>10 meters</td></tr>
<tr><td>2</td><td>20 – 40 meters</td><td>40 meters</td><td>5</td><td>< 5 meters</td><td>5 meters</td></tr>
<tr><td>3</td><td>10 – 20 meters</td><td>20 meters</td><td>-</td><td>-</td><td>-</td></tr>
</table>
The signboards were displayed accordingly at the site where applicable. During the field visit there were no spraying activities or signs left in the visited areas. However, it was found that:
1) During site inspection at Nak Estate/Nak POM sighted trace of chemical spraying activities was carried out at the Nak POM Settling Pond No 2 Fence nearing to buffer riparian reserves.
2) During site inspection at Resort Estate Pond No 5 near to Block PR2020E, sighted trace of chemical spraying activities was carried out at the Pond Riparian reserves to tackle the woodies and weeds. Thus, Major NCR MZK 01 2024 has been raised</td></tr>
</table>

<table>
<tr><th>Clause</th><th>Indicators</th><th>Comply Yes/No</th><th>Findings</th></tr>
<tr><td></td><td>7.8.3 Mill effluent is treated to be in compliance with national regs. Discharge quality of mill effluent, especially BOD, is regularly monitored.</td><td>Yes</td><td>Mill had used biological treatment by using pond system to treat mill effluent. The flow are using gravity from buffer pond until reaches final discharge point with specific holding time and pond capacity signages available at all ponds. Mill had reported on effluent discharge parameter on quarterly basis. Based on all the reports, mill had recorded BOD below 100 Mg/L.</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.</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 for 2024. The document was reviewed/updated on Jan 2024. 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>Utilization of solar sources</td></tr>
</table></td></tr>
<tr><td>7.10
Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</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>GHG data for FY 2023 as per below:
<table>
<tr><th>Description</th><th>tCO_2e/tProduct</th><th colspan="2">Mill Extraction Rate</th></tr>
<tr><td>CPO</td><td>1.79</td><td>OER</td><td>21.26</td></tr>
<tr><td>PK</td><td>1.79</td><td>KER</td><td>2.76</td></tr>
</table>
<table>
<tr><th>Land Use</th><th>Ha</th></tr>
<tr><td>OP Planted on Mineral Soil</td><td>4164.60</td></tr>
<tr><td>OP Planted on Peat Soil</td><td>0</td></tr>
<tr><td>Total oil palm planted area</td><td>4164.60</td></tr>
</table></td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings

Conservation (forested)	0
Conservation (non-forested)	0

Mill Emission

Emission source	tCO2e	tCO2e/tFFB
POME	22021.17	0.28
Fuel consumption	1306.20	0.02
Grid electricity utilisation	0.00	0.00
Credits		
Export of excess electricity to housing & grid		
Sale of PKS	0.00	0.00
Sale of EFB	0.00	0.00
Total	23327.37	0.29

Plantation / field emission

	Own		
Emission sources	tCO2e	tCO2e/ha	tCO2e/FFB
Land Conversion	39204.31	9.41	0.51
CO2 Emissions from Fertiliser	4230.23	1.02	0.05
N2O Emissions from Peat	0	0	0
N2O Emissions from Fertiliser	3277.78	0.79	0.04
Fuel Consumption	1133.78	0.27	0.01
Peat Oxidation	0	0	0
Sinks			
Crop Sequestration	-37386.11	-8.98	-0.49
Conservation Sequestration	0	0	0
Total	**10459.99**	**2.51**	**0.14**

Palm Oil Mill Effluent (POME) Treatment

Diverted to compost	0%
Diverted to anaerobic digestion	100%

<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>Diverted to Anaerobic Digestion<table><tr><td>Diverted to anaerobic pond</td><td>100%</td></tr><tr><td>Diverted to methane capture (flaring)</td><td>0%</td></tr><tr><td>Diverted to methane capture (electricity generation)</td><td>0%</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. Among others the significant environmental receptors for the estates and mill operations were:<table><tr><th></th><th>Environmental Receptors</th><th>Source</th></tr><tr><td>1</td><td>Air</td><td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke & gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td></tr><tr><td>2</td><td>Water</td><td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td></tr><tr><td>3</td><td>Land</td><td>Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td></tr></table></td></tr>
<tr><td>7.11
Fire is not used for</td><td>7.11.1 (C) Land for new planting or replanting is not prepared by</td><td>Yes</td><td>There was no land preparation in NAK CU by burning ever since Boustead Plantations Berhad practiced zero burning as per the policy. BPB had also stated their Zero Burning Policy in the “Polisi</td></tr>
</table>

Clause	Indicators	Comply Yes/No	Findings
preparing land and is prevented in the managed area.	burning.		Kemampanan BPB" Item 1.5.1. Sighted the signages "*Dilarang Membakar*" were clearly erected and no evidence of open burning.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	This is established in the ERP procedure. Therein containing a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill The procedure was formalized by the Sustainability Department for use in all operating units in Nak CU Estates and mills. Training related to fire drills are conducted annually.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	All stakeholders being briefed in the respective stakeholders' meetings. In addition, Boustead Plantations Berhad extended their zero Burning Policy to their neighbors. Among of fire prevention mechanism has been used by cu such as: a) On the ground fire prevention team b) Fire control team and facilities c) Firefighting action and simulation activities d) Signboard of fire awareness e) Compliance to RSPO/MSPO requirement including zero burning engagement f) Basic understanding of MSPO/RSPO the no open burning
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	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 7 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
	7.12.2a For existing plantations	Yes	

Clause	Indicators	Comply Yes/No	Findings
protected or enhanced.	with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 Nov 2018, the current HCV assessment of those plantations remains valid.		(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 52 species of bird at Sutera Estate, 23 species at Resort Estate and 41 species of bird at Nak Estate. There is also a Yearly Summary monitoring Assessment conducted by The PIC Every Estate which is result from monitoring program.
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 Nov 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 Nov 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring reqs. 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.	Yes	The HCV Assessment report indicated that there are 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, and continuous monitoring for HCVs area. The estates have established HCV action plan titled ‘Pelan HCV’. The estate planned to maintain the HCV area by: • Repair Fence • Regular briefing • Demarcation HCV Area • Allow natural vegetation • Planted signage and boundary Marking • Periodic visit and monitoring HCV Area • Collaboration with all stakeholders to ensure no illegal hunting • Demarcation HCV Area

Clause	Indicators	Comply Yes/No	Findings
	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 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.	Yes	A training programme for the year 2024 was available. An awareness training like morning briefing has been conducted by Assistant Manager from Nak, Sutera and Resort to all workers. There is also appointment letter for PIC on HCV for all estates. 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. The 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 is 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 require 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. And the new Revision planning to certify 2024-2026 Samples TBP as per below: Rimba Nilai Business Unit 2024 -2026 The company plans to certify the certification unit in 2023, however the Land Liability Disclosure (LLD) studies discovered potential noncompliance at the certification unit. As a result, a Land Use Change Assessment (LUCA) is required to confirm the violation. The Company planned to carry out LUCA in 2024. The company is in the midst of engaging an ALS-certified consultant to undertake LUCA. Taking into consideration the time required to finish LUCA, the Concept Note is expected to be issued in 2025. As a result, the Company's goal to certify with the RSPO was shifted from 2023 to 2026. Tawai Business Unit -2024 -2026 The certification unit is projected to be certified by 2024. However, the existing HCV report does not meet the RSPO P&C standard because it was prepared by a non-ALS-accredited consultant. As a result, the Company plans to re-conduct the HCV and SIA in order to meet the RSPO P&C requirement. The HCV and SIA were scheduled to take place

				in 2024. Following that, Land Liability Disclosure (LLD) to be conducted in 2024 as well. If there is a potential of noncompliance, LUCA will be undertaken in 2025. Finally, the RSPO initial certification is scheduled for 2026. <u>Kanowit Business Unit-2024 -2026</u> The company plans to defer the certification for Kanowit Tinjar until 2026. This decision is to allow the completion of Land Liability Disclosure (LLD) in 2024, and if needed, the implementation of LUCA in 2025, with the ultimate goal of obtaining RSPO certification in 2026. Furthermore, Requests for Proposals (RFP) have been issued for all assets in Sarawak. The disposal process has been initiated and is currently awaiting a potential buyer. <u>Loagan Bunut Business Unit 2024 -2026</u> The company plans to defer the certification for Kanowit Tinjar until 2026. This decision is to allow the completion of Land Liability Disclosure (LLD) in 2024, and if needed, the implementation of LUCA in 2025, with the ultimate goal of obtaining RSPO certification in 2026. Furthermore, Requests for Proposals (RFP) have been issued for all assets in Sarawak. The disposal process has been initiated and is currently awaiting a potential buyer. Sighted the submission of “RSPO TBP Revision Template to RSPO and it has been approved by RSPO on 18/1/2024.
	(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	Yes	There was revision of the time-bound plan being updated on 18/01/2024.

		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 eq.);		Details as per attachment 6. This is due to 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; 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.	Yes	Boustead Plantations have deviations for certifying uncertified unit from year 2021 to 2023 ,2024 and 2026. The RSPO Time Bound Plan Revision Template was submitted to RSPO secretariat approved on date 18/01/2024. The new TBP revision was endorsed by RSPO.
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 Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	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.
	(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 Plantations 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. 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,	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

		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		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;	Yes	
		• Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.	Yes	
		• Desktop study e.g. web check on relevant complaints	Yes	
		• If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.	Yes	
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	Yes	As of this audit, Boustead Plantations Berhad is 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 are described as per attachment 6. BPB 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.
	(g)	Failure to address any outstanding	Yes	As of this audit, Boustead Plantations Berhad is still on track and follow

		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 Certification Systems.		the requirement of uncertified requirement units, Further information can be obtained from Boustead ACOP. The details of the Time Bound Plan are described as per attachment 6. BPB 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 *<u>AUDITORS' GUIDE:</u>* *1. Identify (and document) the identification of the previous users and owners of the land;* *2. Identify (i.e., locate a written copy of) the agreements/promises made at the time of the relevant land transfers and/or land use agreements;* *3. Determine whether the previous users/owners can now be contacted, and do so, as applicable;* *4. Interview the previous owners/users to assess whether the land transfer and land use agreements were entered into with their free, prior, informed consent;* *5. Evaluate whether there is ongoing compliance with the agreements (e.g., if promises were made at the original transfer date, to transfer developed land back to communities at a later date, were these promises kept in full?);* *6. Identify and follow up any disputes.*	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

P & C Indicator	Specification Major/Minor	Detail Non-conformances	*Root Cause & Corrective Action* Taken by the CU	Verification Statement by Auditors
2.2.2 NEA 01 2024	Minor	Requirement: 3.4.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available. Finding: Insufficient evidence of legal due diligence towards contractor. Objective evidence: It was noted that Resort Estate has appointed xx as sundry shop owner. However, there is insufficient evidence that Resort Estate has performed legal due diligence to the appointment prior renewal of contract agreements.	The root cause: Resort Estate have established Committee Supplier Evaluation to conduct the evaluation for contractor. Due diligence was conducted concurrently with the evaluation. However, the due diligence checklist was not comprehensive, thus, it did not cover all the necessary areas to properly evaluate the contractors. Correction: Revise the due diligence checklist to include essential criteria covering Legal, Operational, Human Resource, and Environmental aspects. Next, Resort Estate conducts due diligence to sundry shop contractor. Corrective action: Review due diligence checklist, biennial basis or where required, to ensure contractor's compliance with state and national regulations.	Corrective action plan accepted. **Status: Open** The effectiveness of the corrective action plan will be verified during next audit
2.3.2 MZK 02 2024	Minor	Requirement: 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. Finding: For all indirectly sourced FFB at Nak POM, there is no evidence the Nak POM obtains 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. Objective evidence: No evidence of information gathering for indirectly sourced FFB for Nal POM.	The root cause: The four FFB suppliers were engaged by the Marketing Department at the Head Office in year 2023. The requirement of this indicator was not communicated to the external FFB Suppliers. However, as at day of audit, all of the external FFB suppliers have stopped supplying FFB to Nak Mill. Corrective Action: Correction: Revise Outside Crop Purchase Procedure by including the requirement for external FFB supplier to complete the Sustainability Pledge and FFB Supplier	Corrective action plan accepted. **Status: Open** The effectiveness of the corrective action plan will be verified during next audit

			Information Form. Next, Head of Marketing Department to issue an internal memo to all Mills and Marketing Department. Corrective action: Nak Mill to communicate all required RSPO requirements, including this indicator, to external FFB suppliers for upcoming engagement, if any	
7.8.1b RAR 01 2024	Minor	Requirement: 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: 7.8.1b Workers have adequate access to clean water. Finding: Water management plan and procedure were not implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. Objective evidence: At Resort Estate, latest treated water analysis was identified as not complying with standard quality (after treatment), but no repeating tests were carried out. This is not in compliance with the "Sampling of Drinking Water and River Water Quality," was not followed, as stated in SOP number 4.3 – Water Sampling – 4.3.1 (a) for drinking water. It is specified that in circumstances where water quality is poor or unstable, such as the presence of E.coli in water, sampling should be conducted more frequently (i.e., twice per month) until the parameters are safe to use and meet the required standards.	The root cause: No dedicated person in-charge was appointed to monitor the implementation of the Procedure "Sampling of Drinking Water and River Water Quality" which just recently was put into effective. Correction: Conduct sampling to check the presence of Total coliforms and E.coli only. Next, upon receiving the sampling result, discuss the result and develop an action plan to ensure that the water quality is complying standard quality. Corrective action: Appoint a suitable person in-charge to monitor the implementation of the Procedure "Sampling of Drinking Water and River Water Quality".	Corrective action plan accepted. **Status: Open** The effectiveness of the corrective action plan will be verified during next audit
7.8.2 MZK 01 2024	Major	Requirement: 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).	Root cause: 1) The newly recruited worker responsible for overseeing operations at effluent treatment pond (ETP) has not undergone formal training in managing the riparian reserves	Root cause accepted. Assessor has verified the evidence training has been done to newly recruited workers, picture of signages installing and buffer zones marking within the pond riparian reserves.

		Finding: Water courses and wetlands was not fully protected, including not well maintaining and restoring appropriate riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). Objective evidence: 1) During site inspection at Nak Estate/Nak POM sighted trace of chemical spraying activities was carried out at the Nak POM Settling Pond No 2 Fence nearing to buffer riparian reserves. 2) During site inspection at Resort Estate Pond No 5 near to Block PR2020E, sighted trace of chemical spraying activities was carried out at the Pond Riparian reserves to tackle the woodies and weeds.	adjacent to the ETP area. 2) The last tree and the pond riparian reserves are situated closely together. No signs or markers was demarcated to clearly indicate that no chemical activities should be carried out near pond area at block PR2020E. Consequently, spraying activities were done up to the pond riparian reserves. Correction: 1) Immediately issue a memo prohibiting chemical spraying activities near ETP area to all mill workers. Next, conduct training on managing riparian reserves for the ETP Attendant. 2) Demarcate the pond riparian reserves by installing signages and paint oil palm trees within the pond riparian reserves. After that, issue a memo prohibiting chemical spraying on pond riparian reserves to sprayer gang. Corrective action: 1) To include training on managing ETP riparian reserves in the Training Needs Analysis (TNA) for the ETP Attendant and conduct the training on annual basis. 2) To monitor the spraying activities at block PR202E and prohibit spraying on pond riparian reserves.	memo prohibiting chemical spraying on pond riparian reserves to sprayer gang and monitoring form records for sprayer gang. The assessor found that all of the evidence is enough to close this NCR. **Status: Closed**

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
6.1.5	Major	Requirement: 6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. Finding: The gender committee in Nak CU was not in place specifically on opportunities and improvements for women. Objective evidence: Based on several minutes of meetings at Nak CU, there was no discussion about opportunities and improvements for women. Moreover, there is no dedicated budget was provided to the committee to execute the opportunities and improvements for women.	Verified during the audit, a specific amount of budget has been allocated for the committee as a means to promote opportunities and improvements for women. Various short classes by external training provider were invited to teach the committee member new skills such as baking classes, handcrafting, cooking, sewing etc as a chance for them to improve themselves and to gain some income. It was also noted that some of the committee members have started selling home-based foods and drinks in front of their houses. Based on interview with the Chairman of the committee at Sutera Estate, Resort Estate and Nak Estate, there was no issue related to sexual harassment or violence reported as seen in the meeting minute. Besides, WhatsApp group was established as an alternative method to monitor should there is any issue. Interview with the chairman too confirmed their willingness to carry their duties and understood of their roles. As such, the previous year major non-conformance DA 01 2023 was satisfactorily closed. Meetings or activities to be conducted once every 3 months or whenever necessary according to the new TOR. Meeting was conducted and seen the last meeting minutes dated 11/03/2024 in Nak POM. Among the input discussion in the minutes are complaint and grievance, raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. **Status : Closed**
7.3.1	Major (Recurrence)	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: Waste management plan was not implemented accordingly. Objective evidence: Domestic waste i.e bottles, drums, plastic waste, etc has been	During site visit at all estates and POM was sighted Waste management plan was implemented accordingly such as: • Domestic waste i.e bottles, drums, plastic waste, etc has been storage at recycle waste bin or store • Each house at line site provided with bin • Domestic waste has been collected 3-4 times per week **Status : Closed**

		left unattended at back of washing bay area, back of scrap iron area, back of water treatment plan area, and at back of water pump area.	
6.2.7	Minor	Requirement: 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. Finding: Permanent, full-time employment is used for all core work performed and casual, temporary and day labour is limited to jobs that are temporary or seasonal by the unit of certification yet to be identified. Objective evidence: There is no evidence of documentation for identification of permanent, full-time employment is used for all core work performed by the unit of certification. In addition, casual, temporary and day labour is limited to jobs that are temporary or seasonal also not been identified.	There is evidence that permanent, full-time employment was used for all core work in all operating units. Verified at the time of audit, employment types according to core work activities and temporary/seasonal activities have been identified accordingly. This were cross verified with the workers master list, employment contract, site visit and interview with sample workers. **Status : Closed**
6.3.2	Minor	Requirement: 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. Finding: Certain issue highlighted in the minutes of meetings between the unit of certification with workers representatives was not fully addressed. Objective evidence: 1. Based on minutes of meetings dated 12/02/2022, 05/09/2022 and 19/12/2022, sighted same issue highlighted i.e., requesting welfare amenities such as futsal/badminton/takraw court. The POM management already budgeted the amenities under CAPEX budget provision for FY 2023. However, the budget was carried forward for FY 2024 by the top	Based on minutes of meetings dated 14/02/2023, 27/05/2023, and 05/03/2024, as well as interviews with the workers' representative and chairman, it was confirmed that previous issues highlighted, such as requesting welfare amenities like futsal, badminton, and takraw courts, AGT allowance, increment, and clinic facilities, were resolved by POM management. The workers revealed they are satisfied with the management's decisions to address the issues accordingly. **Status : Closed**

		management. However, during interview with sampled workers representative at Nak POM, this issue still highlighted to the auditor and remain unsolved by the mill manager due to discretion from the top management. 2. Certain issues especially on AGT allowance, increment and on clinic facilities still highlighted to the auditor and remain unsolved by the mill management.	

ATTACHMENT 6 – Timebound Plan [Received 1/08/2024]

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	Certification Status (Certified / Not certified)	REVISION OF THE TBP *(Only applicable when revision is made)*		
					Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC
Lepan Kabu	Malaysia	Lepan Kabu	Km 88.8, Jln Kota Bharu – Gua Musang, 18000 Pahi, Kuala Krai, Kelantan	Not Certified	Yes	2024	The company aims to certify Lepan Kabu by 2023. However, the appointment process for the certification body (CB), which began in October 2023, concluded only in December 2023. The initial certification audit is already done and Lepan Kabu CU Has been certified by Intertek in May 2024
Eldred Bekoh	Malaysia	Eldred	K/B No 102 86500 Bekok, Segamat, Johor.	Not Certified	Yes	2024	The company aims to certify Eldred Bekoh by 2023. However, the ongoing appointment process for the certification body (CB), initiated in October 2023, is still pending completion
Eldred Bekoh	Malaysia	Bekoh	K/B 505 Bekoh Estate 84900 Tangkak Johor	Not Certified	Yes	2024	
Rimba Nilai Business Unit	Malaysia	Rimba Nilai Palm Oil Mill	90100 Sugut, Sabah.	Not Certified	Yes	2026	The Company originally plan to certify the certification unit in 2022 and have initiated the process of appointing certification body for the certification unit, however, the certification unit is pending for Land Liability Disclosure. Hence, process of appointing certification stopped.The Company have submitted Land Liability Disclosure for the certification unit to RSPO for review. Due to insufficient data information, Land Liability Disclosure is still pending in January 2023.

Rimba Nilai Business Unit	Malaysia	Sungai Sungai 1	90100 Sugut, Sabah.	Not Certified	Yes	2026	The company plans to certify the certification unit in 2023, however the Land Liability Disclosure (LLD) studies discovered potential noncompliance at the certification unit. As a result, a Land Use Change Assessment (LUCA) is required to confirm the violation. The Company planned to carry out LUCA in 2024. The company is in the midst of engaging an ALS-certified consultant to undertake LUCA. Taking into consideration the time required to finish LUCA, the Concept Note is expected to be issued in 2025. As a result, the Company's goal to certify with the RSPO was shifted from 2023 to 2026.
Rimba Nilai Business Unit	Malaysia	Sungai Sungai 2	90100 Sugut, Sabah.	Not Certified	Yes	2026	
Rimba Nilai Business Unit	Malaysia	Sungai Sungai 3	90100 Sugut, Sabah.	Not Certified	Yes	2026	
Rimba Nilai Business Unit	Malaysia	Lembah Paitan	90100 Sugut, Sabah.	Not Certified	Yes	2026	
Rimba Nilai Business Unit	Malaysia	Kawananan	90100 Sugut, Sabah.	Not Certified	Yes	2026	
Tawai	Malaysia	Tawai Palm Oil Mill	KM 75, Telupid-Beluran Road, Locked Bag No.69, 89100, Telupid, Sabah.	Not Certified	Yes	2026	The certification unit is projected to be certified by 2024. However, the existing HCV report does not meet the RSPO P&C standard because it was prepared by a non-ALS-accredited consultant. As a result, the Company plans to re-conduct the HCV and SIA in order to meet the RSPO P&C requirement. The HCV and SIA were scheduled to take place in 2024. Following that, Land Liability Disclosure (LLD) to be conducted in 2024 as well. If there is a potential of noncompliance, LUCA will be undertaken in 2025. Finally, the RSPO initial certification is scheduled for 2026.

Tawai	Malaysia	Tawai 1	KM 75, Telupid-Beluran Road, Locked Bag No.69, 89100, Telupid, Sabah.	Not Certified	Yes	2026	The certification unit is projected to be certified by 2024. However, the existing HCV report does not meet the RSPO P&C standard because it was prepared by a non-ALS-accredited consultant. As a result, the Company plans to re-conduct the HCV and SIA in order to meet the RSPO P&C requirement. The HCV and SIA were scheduled to take place in 2024. Following that, Land Liability Disclosure (LLD) to be conducted in 2024 as well. If there is a potential of noncompliance, LUCA will be undertaken in 2025. Finally, the RSPO initial certification is scheduled for 2026.
Tawai	Malaysia	Tawai 2	KM 75, Telupid-Beluran Road, Locked Bag No.69, 89100, Telupid, Sabah.	Not Certified	Yes	2026	
Tawai	Malaysia	Pertama	KM 113, Jalan Telupid – Sandakan 89300 Telupid, Sabah.	Not Certified	Yes	2026	
Tawai	Malaysia	Sapa Payau	KM 108, Jln. Telupid – Sandakan 89320 Telupid, Sabah.	Not Certified	Yes	2026	
Tawai	Malaysia	Ruku Ruku	Km108, Jln. Telupid – Sandakan 89320 Telupid, Sabah.	Not Certified	Yes	2026	
Tawai	Malaysia	Lokan	89320 Telupid, Sabah.	Not Certified	Yes	2026	
Tawai	Malaysia	Lokan Baru	89320 Telupid, Sabah.	Not Certified	Yes	2026	

Kanowit Tinjar	Malaysia	Kanowit Palm Oil Mill	Jalan Nibong – Tada, Kanowit, 96000 Sibu, Sarawak.	Not Certified	Yes	2026	The company plans to defer the certification for Kanowit Tinjar until 2026. This decision is to allow the completion of Land Liability Disclosure (LLD) in 2024, and if needed, the implementation of LUCA in 2025, with the ultimate goal of obtaining RSPO certification in 2026. Furthermore, Requests for Proposals (RFP) have been issued for all assets in Sarawak. The disposal process has been initiated and is currently awaiting a potential buyer.
Kanowit Tinjar	Malaysia	Jih	KM 11.5, Jalan Nibong – Tada, Kanowit, 96000 Sibu, Sarawak.	Not Certified	Yes	2026	
Kanowit Tinjar	Malaysia	Bawan	KM28 Jln Tuah, Off Nibong Tada, 96000 Sibu. Sarawak.	Not Certified	Yes	2026	
Kanowit Tinjar	Malaysia	Pedai	Jln Tuah, Off Nibong Tada, 96000 Sibu. Sarawak.	Not Certified	Yes	2026	
Kanowit Tinjar	Malaysia	Mapai	KM34 Jln Sg Mapai Off Nibong Tada, 96000 Sibu. Sarawak.	Not Certified	Yes	2026	
Kanowit Tinjar	Malaysia	Kelimut	Kanowit, Sarawak.	Not Certified	Yes	2026	
Kanowit Tinjar	Malaysia	Loagan Bunut Palm Oil Mill	Ulu Teru, Jalan Long Lama, 98300 Baram, Sarawak.	Not Certified	Yes	2026	
Kanowit Tinjar	Malaysia	Loagan Bunut	Lot 5,12,15 Tinjarland District, Ulu Teru, Jalan Long Lama, 98300 Baram, Sarawak.	Not Certified	Yes	2026	