RSPO P&C GROUP CERTIFICATION AUDIT REPORT

(LEBIJAYA SDN. BHD.)

Audit Application Number:	PC25-002594
Audit Type:	Annual Surveillance Audit 2
Date of Audit:	16 Dec 2024 - 19 Dec 2024
Audit Report Number:	01
Revision Number:	0
Audit Report Date	27 Mar 2025

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1. Certification Body Background

1.1 Description of Certification Body

Certification Body Information	
Name of Certification Body	SIRIM QAS International Sdn Bhd
Address of Certification Body (Accredited Office)	Building 4, SIRIM Complex, No. 1 ,Persiaran Dato' Menteri, Section 2, P.O. Box 7035, 40911 Shah Alam, Selangor, Malaysia.
Background of the 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 27 September 2024 (accredited since 2014)
Phone Number (Accredited Office)	(603) 5544 6119
Websites	https://www.sirim-qas.com.my
Contact Person Name	Kamini Sooriamoorthy
Email	kamini@sirim.my
Accreditation Information	
ASI Code	ASI-ACC-065
Technical Scope	RSPO P&C, RSPO SCC
Geographical Scope	Malaysia and Indonesia
Accredited Since	27 September 2024 (accredited since 2014)

2. Organisation Details and Certification Scope

2.1.Organisational Overview

Management Unit Information ***Note: Management Unit refers to unit of certification***	
Name of Management Unit/s	Lebijaya Sdn. Bhd.
Address of the Management Unit/s	CL 095332228, Litang, Kinabatangan Sabah, Malaysia
Country	Malaysia
Websites	
Description of the Management Unit	Lebijaya Sdn Bhd (hereafter known as LSB) is a private company located in Kinabatangan District. LSB established on 9 November 1996. The plantation started the palm oil planting in the year of 2001. LSB is located two ways about 70 km from Lahad Datu town and from Kampung Paris and it also can be assessed through both the government road and estate roads. All of the crops are sent to the Tomanggong POM and Jeroco 2 POM (which is owned by Hap Seng). The estate is currently 100% oil palm planting, and the management is headed by a new Estate Manager. Within the CU of Lebijaya, the land has been fully developed before the year of 2005. Hence, New Planting Requirements of the RSPO P&C standard is therefore not applicable.
Management Representative Name	Roseni Tan
Management Representative Designation	Managing Director
Management Representative Email	lebijaya@yahoo.com

2.2.RSPO Membership Information

RSPO Membership Information	
RSPO Membership No.	1-0297-20-000-00
Name of RSPO Member	LEBIJAYA SDN. BHD.
Member Since	30 APRIL 2020

2.3.Certificate Information

Certificate Information	
Certificate No.	RSPO-PC 00135
prisma Document Reference Number	*(N/A until June 2025)*
RSPO PalmTrace ID No.	RSPO_PO1000011247
prisma Trading ID	TA25-016952
Scope of Certification	Production of Sustainable Fresh fruit Bunch
Supply Chain Model	☒ Identity Preserved (IP) ☐ Mass Balance (MB)
Applicable Standards / Normative Reference	☒ Principles and Criteria for the Production of Sustainable Palm Oil 2018 ☐ RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard 2020 ☐ RSPO Management System Requirements for Group Certification of FFB Production 2022 ☐ RSPO Rules on Market Communication and Claims 2022
National Interpretation (NI)	Not Applicable
Initial Date of Certification:	17-02-2023 (Date of first RSPO certification)
Effective Date of Certificate:	17-02-2023
Expiry Date of Certificate:	16-02-2028
Name of Peer Reviewer	Only for the case of IC or RC

3. Description of the Management Unit

Information of Group Manager			
Name of Group Manager	**Address of Group Manager**	**GPS Coordinates**	
		Latitude	**Longitude**
LEBIJAYA SDN BHD	KG LITANG BATU 13, JALAN JEROCO, KOTA KINABATANGAN, 90200, KINABATANGAN SABAH	5.3610222	118.5176593
Remarks: To include additional information wherever applicable			

Information of Group Members					
No	**Name of Group Members**	**Address of Supply Bases**	**Type of Supply Bases**	**GPS Coordinates**	
				Latitude	**Longitude**
1	*Add rows as necessary*		Choose an item.		

3.1. Area Statement of the Management Unit

Area Statement of Management Unit									
Name of the Group Members	**Certified Area (Ha)**	**Planted Area (Ha)**			**Unplanted Area (Ha)**				
		Oil palm planted on non peatland	**Oil Palm Planted on Peat**	**Other Crop(s)**	**HCV**	**HCS**	**HCV-HCS**	**Conservation**	**Facilities / Others***
LEBIJAYA SDN BHD	**250**	215.8						15.50	18.70
Add rows as necessary									
TOTAL	**250**	**215.80**						**15.50**	**18.70**
Remarks: To include information wherever applicable									

3.2. Age Profile of the Management Unit

Name of the Group Members	Land size (Ha) by age of the Oil Palm				Production Area (Ha)	Total Planted Area (Ha)
	0 - 3 Phase 1	4-6 Phase 2	7-18 Phase 3	≥19 Phase 4		
LEBIJAYA SDN BHD				215.80	215.80	215.80
TOTAL (ha)				**215.80**	**215.80**	**215.80**
Remarks: To include additional information wherever applicable						

Notes: This age profile range is used based on the common phase of oil palm age as referred in https://www.researchgate.net/publication/327527812.

3.3. Replanting program of the Management Unit (5 Years)

Name of the Group Members	Land area (ha) by year					Total Area (Ha)
	2026	20xy	20xz	20xa	20xb	
LEBIJAYA SDN BHD	215.80					215.80
TOTAL (ha)	215.80					215.80

Notes: 1st year of the replanting program will be the current year of the audit

3.4. Projected Certified Volume for Next License

Information of New License		
Next License Period	Start Date	17-May-2025
	End Date	16-Feb-2026
Projected FFB Volume (MT)	3500	

**There is time extension applied for the current license period.*

3.5. Information of Previous & Current License

Information of License	Previous Year License		Current Year License	
License Period	Start Date	17-May-2023	Start Date	17-May-2024
	End Date	16-May-2024	End Date	16-May-2025
Actual Production Period Reported	From	17-May-2023	From	17-May-2024
	To	16-May-2024	To	16-May-2025
Projected FFB Certified Volume (MT)	3600		3500	
Actual FFB Produced Volume (MT)	1684.05 mt		1770.61	
Actual FFB Volume as RSPO Certified (MT)	1684.05 mt		1770.61	
Actual FFB Volume Sold as Conventional (MT)	0		0	
Actual FFB Volume Sold as Other Scheme Certified (MT)	0		0	
Actual CSPO Credits Volume Sold	0		0	

4. Audit Programme

4.1. Audit Methodology

This assessment is covering the Lebijaya Sdn.Bhd. Estate. This is a single estate owned by an outgrower with a land size of 250 ha. The audit is an on-site audit of Lebijaya Estate and its line site to verify the implementation of the requirement of the certification.

Interviews with the CU's management, employees and other relevant stakeholders were also conducted during the audit.

4.2. Audit Team Member

Name	Role	CAB Auditor Number
Mohd Zulfakar Kamaruzaman	Lead Auditor	ASI17IDGG4 (MZK)
Dzulfiqar Azmi	Auditor	ASI1GIVNPH (DA)
Rozaimee Ab Rahman	Auditor	ASI1AU6HF7 (RAR)

4.3. Audit Plan

Date	Time	CAB Auditor Number	Location	Activity
16 Dec 2024	8.00 – 8.30 am	All Auditor	Lebijaya Site Office at Kampung Litang	▪ Opening Meeting
		ASI17IDGG4 (MZK)		Coverage of assessment: (Social – External, TBP, Metrics Template & HCV) ▪ Site inspection/interview at production area (harvesting, spraying,& etc.) ▪ Interview with external stakeholders i.e. local communities (Kg Litang), government agencies, etc. ▪ Site visit at HCV area ▪ Check Metrics template ▪ Verify Time Bound Plan ▪ 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) ▪ External stakeholders issues & welfare ▪ Training and skill development programs ▪ Interview with Contractor

			Lebijaya	▪ Interview with Villagers ▪ Continuous improvement
		ASI1AU6HF7 (RAR)		Coverage of assessment: (Safety, Environment) ▪ Facilities at workplace inspection (worker quarters, stores, workshop, landfill area, Boundary & etc. ▪ Site inspection/interview at production area – harvesting, spraying, manuring) ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ PPE ▪ 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.
		ASI1GIVNPH (DA)		Coverage of assessment: (Social – Internal, GAP) ▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau& etc. ▪ Site inspection/interview at harvesting, spraying, manuring & etc. ▪ 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. ▪ Interview with Union/workers representatives. ▪ Interview with gender committee, worker representative. ▪ Workers Issues & welfare ▪ Complaints and grievances (internal) ▪ Check Documentation GAP Requirement, Water Management Plan, Business Plan, Replanting Plan, IPM Plans, Chemical Management, Storage, PPE Issuance. ▪ Training and skill development programs ▪ Training and skill development programs Continuous improvement
17 Dec 2024	8.00 am -5.00 pm	ASI17IDGG4 (MZK)		Coverage of assessment: (Social – External, TBP, Metrics Template & HCV) ▪ Site inspection/interview at production area (harvesting, spraying,& etc.) ▪ Interview with external stakeholders i.e. local communities (Kg Litang), government agencies, etc. ▪ Site visit at HCV area ▪ Check Metrics template ▪ Verify Time Bound Plan ▪ 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) ▪ External stakeholders issues & welfare ▪ Training and skill development programs ▪ Interview with Contractor ▪ Interview with Villagers

			Lebijaya	Continuous improvement
		ASI1AU6HF7 (RAR)		Coverage of assessment: (Safety, Environment) ▪ Facilities at workplace inspection (worker quarters, stores, workshop, landfill area, Boundary & etc. ▪ Site inspection/interview at production area – harvesting, spraying, manuring) ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ PPE ▪ 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.
		ASI1GIVNPH (DA)		Coverage of assessment: (Social – Internal, GAP) ▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau& etc.

				▪ Site inspection/interview at harvesting, spraying, manuring & etc. ▪ 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. ▪ Interview with Union/workers representatives. ▪ Interview with gender committee, worker representative. ▪ Workers Issues & welfare ▪ Complaints and grievances (internal) ▪ Check Documentation GAP Requirement, Water Management Plan, Business Plan, Replanting Plan, IPM Plans, Chemical Management, Storage, PPE Issuance. ▪ Training and skill development programs ▪ Training and skill development programs Continuous improvement
18 Dec 2024	8.00 am -5.00 pm	ASI17IDGG4 (MZK)		Coverage of assessment: (Social – External, TBP, Metrics Template & HCV) ▪ Site inspection/interview at production area (harvesting, spraying,& etc.) ▪ Interview with external stakeholders i.e. local communities (Kg Litang), government agencies, etc. ▪ Site visit at HCV area ▪ Check Metrics template ▪ Verify Time Bound Plan ▪ 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)

			Lebijaya	▪ External stakeholders issues & welfare ▪ Training and skill development programs ▪ Interview with Contractor ▪ Interview with Villagers Continuous improvement
		ASI1AU6HF7 (RAR)		Coverage of assessment: (Safety, Environment) ▪ Facilities at workplace inspection (worker quarters, stores, workshop, landfill area, Boundary & etc. ▪ Site inspection/interview at production area – harvesting, spraying, manuring) ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ PPE ▪ 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.

		ASI1GIVNPH (DA)		Coverage of assessment: (Social – Internal, GAP) ▪ Facilities provided at line site inspection (i.e. worker quarters, mosque, surau& etc. ▪ Site inspection/interview at harvesting, spraying, manuring & etc. ▪ 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. ▪ Interview with Union/workers representatives. ▪ Interview with gender committee, worker representative. ▪ Workers Issues & welfare ▪ Complaints and grievances (internal) ▪ Check Documentation GAP Requirement, Water Management Plan, Business Plan, Replanting Plan, IPM Plans, Chemical Management, Storage, PPE Issuance. ▪ Training and skill development programs ▪ Training and skill development programs Continuous improvement

19 Dec 2024	8.00 am – 1.00 pm	ASI1GIVNPH (DA) ASI17IDGG4 (MZK) ASI1AU6HF7 (RAR)	Lebijaya HQ	Auditor continue unfinished Assessment at all Documentation Lebijaya CU

	3.30 pm			Discussion on assessment findings with Management Representative and visited site Plantation / Scheme Manager/CEO
	4.30pm			Closing meeting at the Lebijaya HQ Meeting Room, Lahad Datu End of audit

Notes: Include the number of hours spent at the sample sites for each day of the audit, including the time for the opening and closing meeting

4.4. Changes of the Initial Audit Plan (if applicable)

No Changes

4.5. Sampling Details

Description of Management Unit	Number of Estate/Members	Risk Factor	Result x = (0.8√y) x (z)	Total Sampled
Group Manager	1	N/A	N/A	1
Group Members				
Own Estate	NA	Choose an item	NA	NA
Managed Estate	NA	Choose an item	NA	NA
Scheme smallholders	NA	Choose an item	NA	NA

Notes: Auditing is based on a sampling process of the available information

4.6. Sampling History of Current Certification Cycle

Name of Group Member	Year 1	Year 2	Year 3	Year 4	Year 5
	2022	**2023**	**2024**	**20xx**	**20xx**
Lebijaya Sdn Bhd	☒	☒	☒	☐	☐
Rows (including the tickbox) can be added as necessary	☐	☐	☐	☐	☐

4.7. Audit Team Leader and Audit Team Information

Audit Team Leader: MOHD ZULFAKAR BIN KAMARUZAMAN		
Requirements	**Description**	
At least five (5) years of field experience in the palm oil sector, health and safety, or environmental management. These include experience in HCV and HCS assessment, social auditing, or involvement in human rights activities;	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation in Several companies such KLK, IOI, Tradewinds. He had a certificate of Lead Assessor in ISO 9001, OHS 45001, ISO 4001 and qualified social Auditor under RSPO Training, attended the DLW training in 2022 and worker welfare training in 2021 which is conducted by RSPO. He is a qualified RSPO P&C, RSPO Supply Chain, MSPO Supply Chain and MSPO Lead Auditor.	
A supervised (by a qualified lead auditor) period of training in practical audits against the RSPO P&C and/or RSPO ISH standard, with a minimum of 15 days audit experience in at least three (3) audits;	Had attended training RSPO P&C standard and completed evaluation and qualified as lead auditor RSPO since 2015	
Successfully completed a refresher course for RSPO endorsed P&C lead auditor course every three (3) years after the initial qualification as lead auditor	Successfully completed a refresher course for RSPO endorsed P&C lead auditor course in 2024.	
Audit Team Member(s):		
Requirements	**CAB Auditor Number**	**Description**
Possess a bachelor's degree or tertiary education in related disciplines, such as agriculture, environmental science or social sciences, etc;	Audit Team Leader: ASI17IDGG4 (MZK)	Hold B. Sc. Forestry from Universiti Putra Malaysia (UPM)
	Audit Team Member: ASI1GIVNPH (DA)	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM).
	Audit Team Member: ASI1AU6HF7 (RAR)	Holds a B. Sc. in Agriculture from Universiti Putra Malaysia (UPM)
At least three (3) years of field experience in the palm oil sector, health and safety, or environmental management. These include experience in HCV and HCS assessment, social auditing or involvement in human rights activities	Audit Team Leader: ASI17IDGG4 (MZK)	He had more than 5 years of working experience in the oil palm operation and experience in HCV and HCS assessment auditing since 2015.
	Audit Team Member: ASI1GIVNPH (DA)	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.

	Audit Team Member: ASI1AU6HF7 (RAR)	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation
Successfully completed an RSPO endorsed P&C lead auditor course	Audit Team Leader: ASI17IDGG4 (MZK)	Completed RSPO P&C lead auditor course in 2015 by Wild Asia.
	Audit Team Member: ASI1GIVNPH (DA)	Completed RSPO endorsed P&C lead auditor course in 2018 by Checkmark Training.
	Audit Team Member: ASI1AU6HF7 (RAR)	Completed RSPO P&C lead auditor course in 2017 by Wild Asia.
Successfully completed the 5-day lead auditor course for ISO 9001 or ISO 14001 or ISO 45001.	Audit Team Leader: ASI17IDGG4 (MZK)	Successfully attended 5-day lead auditor course for ISO 9001, ISO 14001 and ISO 45001 in 2015.
	Audit Team Member: ASI1GIVNPH (DA)	Successfully attended Integrated Management System Lead Assessor Course in 2017.
	Audit Team Member: ASI1AU6HF7 (RAR)	Successfully attended Lead Auditor Course for ISO 14001 and OHSAS 18001 in 2016 and ISO 9001 in 2018
Demonstrable understanding of the latest version of RSPO Certification Systems	Audit Team Leader: ASI17IDGG4 (MZK)	Can demonstrate of the latest version of RSPO Certification Systems
	Audit Team Member: ASI1GIVNPH (DA)	Can demonstrate of the latest version of RSPO Certification Systems
	Audit Team Member: ASI1AU6HF7 (RAR)	Can demonstrate of the latest version of RSPO Certification Systems
For auditors auditing the ISH standard, auditors shall additionally be trained on the ISH standard either by the endorsed trainer or RSPO;	Audit Team Leader: ASI17IDGG4 (MZK)	Not audited this.
	Audit Team Member: ASI1GIVNPH (DA)	Not audited this.
	Audit Team Member: ASI1AU6HF7 (RAR)	Not audited this.
For auditors verifying compliance with NPP procedures, auditors shall additionally be trained in the assessment of compliance with	Audit Team Leader: ASI17IDGG4 (MZK)	Not audited this.

FPIC, HCV and HCS requirements in the context of RSPO NPP procedure	Audit Team Member: ASI1GIVNPH (DA)	Not audited this.
	Audit Team Member: ASI1AU6HF7 (RAR)	Not audited this.
A supervised (by a qualified auditor/lead auditor) period of training in practical audit against the RSPO P&C, with a minimum of 10 days of audit experience in at least two (2) audits.	Audit Team Leader: ASI17IDGG4 (MZK)	Had completed and pass evaluation of RSPO lead auditor since 2015.
	Audit Team Member: ASI1GIVNPH (DA)	Had completed and pass evaluation of RSPO lead auditor since 2018.
	Audit Team Member: ASI1AU6HF7 (RAR)	Had completed and pass evaluation of RSPO lead auditor since 2017.
Knowledgeable and experience of the local/regional laws	Audit Team Leader: ASI17IDGG4 (MZK)	Knowledgeable and experience of the local/regional laws
	Audit Team Member: ASI1GIVNPH (DA)	Knowledgeable and experience of the local/regional laws
	Audit Team Member: ASI1AU6HF7 (RAR)	Knowledgeable and experience of the local/regional laws
Knowledgeable in Best Agricultural Practices, and Integrated Pest Management, pesticide and fertiliser use;	Audit Team Leader: ASI17IDGG4 (MZK)	He had more than 5 years of working experience in the oil palm operation and experience in HCV and HCS assessment auditing since 2015.
	Audit Team Member: ASI1GIVNPH (DA)	He had more than 5 years of working experience in the oil palm operation.
	Audit Team Member: ASI1AU6HF7 (RAR)	He had 7 years of working experience in the oil palm operation
Experience in health and safety auditing on the farm/plantation and in the palm oil mill, for example against the ISO 45001 Occupational Health and Safety Management standard;	Audit Team Leader: ASI17IDGG4 (MZK)	He had more than 5 years of working experience in the oil palm operation and experience in HCV and HCS assessment auditing since 2015.
	Audit Team Member: ASI1GIVNPH (DA)	He had more than 5 years of working experience in the oil palm operation.
	Audit Team Member: ASI1AU6HF7 (RAR)	He had 7 years of working experience in the oil palm operation

Experience in handling workers' welfare or social auditing experience, such as experience with the SA8000 or other international sustainability scheme that has the social auditing requirements. The auditor auditing the social requirements shall have successfully attended the internationally recognised social auditing standard training, such as the SA8000, Social Systems (SMETA) Auditor Training or social training recognised by RSPO;	Audit Team Leader: ASI17IDGG4 (MZK)	Attended SA 8000 training in 2018 and SMETA training in 2021 and more than 5 years of working experience in the oil palm operation and auditing social.
	Audit Team Member: ASI1GIVNPH (DA)	Attended SA 8000 training in 2018 and SMETA training in 2021 and more than 7 years of working experience in the oil palm operation and auditing social.
	Audit Team Member: ASI1AU6HF7 (RAR)	Attended SA 8000 training in 2018 and SMETA training in 2021 and more than 5 years of working experience in the oil palm operation and auditing social.
Experience in handling of land rights, gender and indigenous peoples' issues;	Audit Team Leader: ASI17IDGG4 (MZK)	Attended SA 8000 training in 2018 and SMETA training in 2021 and more than 5 years of working experience in the oil palm operation and auditing social.
	Audit Team Member: ASI1GIVNPH (DA)	Attended SA 8000 training in 2018 and SMETA training in 2021 and more than 7 years of working experience in the oil palm operation and auditing social.
	Audit Team Member: ASI1AU6HF7 (RAR)	Attended SA 8000 training in 2018 and SMETA training in 2021 and more than 5 years of working experience in the oil palm operation and auditing social.
Experience in environmental and ecological auditing or assessments, such as experience with High Conservation Value (HCV)/High Carbon Stock (HCS) assessments, organic agriculture or the ISO 14001 Environmental Management Systems standard;	Audit Team Leader: ASI17IDGG4 (MZK)	He had more than 5 years of working experience in the oil palm operation and experience in HCV and HCS assessment auditing since 2015.Successfully attended 5-day lead auditor course for ISO 9001, ISO 14001 and ISO 45001 in 2015.
	Audit Team Member: ASI1GIVNPH (DA)	He had more than 5 years of working experience in the oil palm operation. Successfully attended Integrated Management System Lead Assessor Course in 2017. And he is Lead Auditor for ISO 14001.
	Audit Team Member: ASI1AU6HF7 (RAR)	He had 7 years of working experience in the oil palm operation. Successfully attended Lead Auditor Course for ISO 14001 and OHSAS 18001 in 2016 and ISO 9001 in 2018
Where applicable, knowledge on the ISH context	Audit Team Leader: ASI17IDGG4 (MZK)	Eventhough not audited this, he is already completed ISH Lead Auditor course in Krabi during RSPO Workshop.
	Audit Team Member: ASI1GIVNPH (DA)	Eventhough not audited this, he is already completed ISH Lead Auditor course in Damansara

		during RSPO Lead Auditor Course.
	Audit Team Member: ASI1AU6HF7 (RAR)	Eventhough not audited this, he is already completed ISH Lead Auditor course in Indonesia during RSPO Workshop.
Fluent in one of the main national languages	Audit Team Leader: ASI17IDGG4 (MZK)	Fluent in Malays and English
	Audit Team Member: ASI1GIVNPH (DA)	Fluent in Malays and English
	Audit Team Member: ASI1AU6HF7 (RAR)	Fluent in Malays and English
Knowledgeable in supply chain requirements of the palm oil mill. The auditor performing this task shall have successfully completed the RSPO endorsed SCC lead auditor training course. Note: this does not apply for ISH or Group Certification.	Audit Team Leader: ASI17IDGG4 (MZK)	Had completed RSPO Supply Chain auditor training course in 2016 and experienced auditing supply chain since 2016.
	Audit Team Member: ASI1GIVNPH (DA)	Not Audit
	Audit Team Member: ASI1AU6HF7 (RAR)	Had completed RSPO Supply Chain auditor training course in 2018 and experienced auditing supply chain since 2018.

5. Audit Findings & Results

Requirements		Audit Findings	Audit Findings (Public Summary)	Results
Element 1 (E1): Group entity and group management requirements				
E1.1 The Group Entity shall be legally formed				
E1.1.1:	There shall be documentary evidence of a clearly identified and legal entity. The Group Entity shall: • be a registered organisation as defined by law in the country of registration (e.g. as a • company or an organisation). • be a member of the RSPO • establish the structure of the organisation • appoint a Group Manager (see E1.2)		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E1.1.2	The Group Entity shall have documented membership requirements for the participation of individual members in the Group which will also cover new members. • There shall be documentary evidence that the group members have formally joined the group. • Formal members of the group shall sign an agreement with the Group Manager committing to		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	achieving compliance with the applicable RSPO standards and requirements. • The Group Manager shall keep copies of the agreements and shall demonstrate that each member has received a copy thereof. • The Group Manager shall retain copies for a minimum of five years.			
E1.1.3	The Group Manager shall keep evidence that the nature and structure of the group has been communicated to all members of the Group in an appropriate manner.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E1.2 The Group shall be managed by a Group Manager				
E1.2.1	The appointed Group Manager shall be either an identified legal entity or an individual acting on behalf of the legal entity, i.e. the Group Entity (E1.1.1). The Group Manager shall ensure the Group's compliance with the Group Certification System requirements and is responsible for the preparation and implementation of the Internal Control System (ICS). If the Group Manager is not an individual		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	but an entity: • then the entity shall appoint an individual as management representative; and • there shall be a description of the general structure detailing the positions and responsibilities of all personnel involved.			
E1.2.2	The Group Manager shall be able to demonstrate sufficient resources and capacity for managing the group's performance towards compliance with the RSPO P&C. *Guidance:* *The Group Manager should have the capacity to control, monitor and evaluate all members* *as to their compliance with the RSPO P&C, including communicating with them and visiting* *them at the required frequencies.* *Specifically, the Group Manager should be able to demonstrate the ability to:* • manage the Group Procedures and Documentation known as the ICS. • define Group membership requirements. • ensure compliance with the Group		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	Certification System and RSPO P&C, including any corrective actions raised by the certification body are adequately addressed within the agreed timeframe. • ensure compliance with all other relevant RSPO requirements outlined in Section 1.4, bearing in mind that applicability may depend on an individual grower's plantation size or nature. • demonstrate sufficient resources – i.e. human, financial, physical and other relevant resources – to enable effective and impartial technical and administrative management of the Group.			
E1.2.3	The Group Manager and/or their personnel shall be able to demonstrate competence and knowledge of the latest versions of the: • RSPO P&C and/or applicable National Interpretation • Certification System for the P&C and Independent Smallholder Standard • Group Certification System for FFB production • RSPO IT Platform (PalmTrace) for trading the group's certified		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	products for both physical and credit sales • Internal group procedures and policies			

E1.2.4	E1.2.4 The Group Manager shall provide potential and existing Group members with the following:
	• an explanation of the RSPO certification process.
	• an explanation of the criteria for group membership.
	• an explanation as to the Group Manager's needs and the rights of the certification body to access the group members' documentation and plantations for the purposes of evaluation and monitoring.
	• an explanation of the certification bodies and RSPO requirements with respect to public information.
	• an explanation of any obligations with respect to group membership, such as:
	  • maintenance of information for monitoring purposes;
	  • requirement to conform with conditions or corrective actions issued by the certification body.
			Not Applicable since this is only Small grower audit and the Group is only one members.	☐ Conform
				☐ Major Nonconformity
				☐ Opportunity for Improvement
				☒ Not Applicable (justification required)

	• any costs associated with group membership. • other obligations of group membership.			

Requirements		Audit Findings	Audit Findings (Public Summary)	Results
Element 2 (E2): Internal Control System – Policies and Management				
E.2.1 The Group Internal Control System shall contain documented policies and procedures for operational management				
E2.1.1	The Group Internal Control System shall contain procedures for decision-making and responsibilities within the group (including the authority of the Group Manager).		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E2.1.2	The Group Manager shall manage the Group in a systematic and effective manner by: • identifying the geographical area to be covered by the Group. • preparing, maintaining and documenting the Group management structure • clearly identifying the responsibilities of all individuals employed by the		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	Group Manager • for the running of the Group. • preparing and maintaining the rules of the Group including the criteria for membership and procedures for expulsion and/or sanctions for members that do not comply with the group certification requirements. • organising at least one group meeting annually. • defining the procedure for the initial gap audit which can be a self assessment.			
E2.1.3	The Group Internal Control System shall include an initial gap audit procedure (i.e., baseline assessment and needs for compliance) as a prerequisite for applicants wishing to join the Group. The initial gap audits with existing and any potential new members shall be carried out to assess the following (at least): • Land title or right to use the land can be demonstrated. • No existing land conflict(s). • No plantings have replaced primary forests or affected one		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	or more High Conservation Value (HCV) and High Carbon Stock Area (HCSA) (RSPO P&C 2018, Criteria 7.12) *(Note: In the case of Scheme Smallholders, the company (owning/managing the mill) holds the liability for compensation for any new plantings undertaken since November 2005).* • Existing plantings on peatlands and/or steep terrains. • If there is/are existing planting(s) on peatland, the management regime and status. • No new planting(s) on peat land and/or status of existing planting(s) on peatland. • Status and sources of workers.			
E2.1.4	The Group ICS shall contain procedures for maintaining records for all Group members. Records shall be kept up to date at all times for all Group members.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E2.1.5	The Group Manager shall implement a system to maintain the following central		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform

	records and reports: • List of names and full contact details of group members and applicable method of communication. • Location maps (including geo-location). Area of oil palm in hectares. • Land titles/right of use of the land. • A copy of the signed declaration of the grower becoming a member of the group, including the date. • Unique member registration numbers are assigned to individual members. • The date when the member signed the declaration of intent as stated in the Group Membership Requirements. • Date of leaving the Group if applicable and the reasons why. • Projected and actual FFB production in metric tonnes per annum. • Monitoring and training records.			☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	• Any corrective actions raised and actions taken to meet the requirements for compliance.			
E2.1.6	Relevant group records shall be archived for a minimum of 5 years using an appropriate secure system, and should be kept up to date at all times for Group members.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

Requirements		Audit Findings	Audit Findings (Public Summary)	Results
Element 3 (E3): Internal Control System – Operation				
E3.1 The Group Internal Control System shall develop and implement an internal audit programme of Group members.				
E3.1.1	The Group Manager shall establish, implement and maintain (a) procedure(s) for internal audit. As a minimum the following information shall be included (but not limited to): • The methodology, competence of internal auditors, audit criteria, frequency of internal audits, and addressing non-conformity. • Schedule annual internal audits of all Group members in		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	order to confirm continued conformance with all the Group Certification requirements. • Maintenance of all internal audit records.			
E3.1.2	The Group Manager shall conduct annual internal audits for all group members as planned.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E3.1.3	The Group Manager and the internal auditors shall jointly declare no conflict of interest for the internal audit process.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E3.1.4	The Group Manager shall carry out a risk assessment of Group members to identify an appropriate sampling intensity of Group members for the certification assessment.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E3.2 The Group Internal Control System shall include a system in place to enable the trading of RSPO certified Fresh Fruit Bunches (FFB) produced from the Group.				
E3.2.1	The Group Manager shall document and		**Not Applicable since this is only Small grower audit and the**	☐ Conform

	implement a system for the tracking and tracing of FFB produced by the group members, and intended to be sold as RSPO certified FFB.		**Group is only one members.**	☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E3.2.2	The Group shall produce 100% CFFB and trade under the RSPO Supply Chain System. There shall be a collective Group procedure for the sale of all certified FFB and to ensure that noncertified FFB are not mixed with the certified FFB. Procedural Notes: The Group should not mix the certified FFB with the non-certified one. If CFFB is combined with a non-certified FFB prior to the sale and delivery to a palm oil mill, then the whole FFB cannot be considered as certified. Mill needs to know the volume of certified FFB that are dispatched to the mill. This is done through weighing of the FFB which is normally measured at the mill site. If the certified and non-certified FFB are mixed at the collection point, it will not be feasible for the mill to determine the volume of certified		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	and non-certified FFB. The group can sell CSPO Credits, where the physical FFB will be traded as conventional (noncertified).			
E3.2.3	All sales of FFB originating from the plantations of Group members shall be documented and recorded. • The relevant group members' group identification number • Invoices and receipts (purchase and sale) • Information on transport (i.e., registration number/number plate) • Information on FFB price • Classification of the FFB sold (i.e., RSPO certified or not), FFB volume and destination • Information on geo-location of FFB origins • Proof of ownership status or the right/claim to the land by the grower/smallholder • Where applicable, valid planting/operating/trading license, or if it is part of a cooperative which allows the buying and selling of FFB.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

E3.2.4	The Group Manager shall maintain copies of all documentation and records mentioned in E3.2.3 related to Group CFFB transactions for a minimum period of 5 years.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E3.2.5	Traders of FFB shall be either part of the Group management system following this guidance or be RSPO Supply Chain certified in order to sell certified FFB. If the FFB Trader is RSPO Supply Chain certified, a copy of the certificate shall be provided to the Group Manager.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
E3.2.6	The Group Manager shall ensure that any trading done through a trader shall have clear procedures to ensure that calculations are accurate and that all FFB sold by the trader is traceable back to the Group members. There shall be a contract between the FFB trader and the Group Manager and the FFB trader shall maintain complete purchase and sales records.		**Not Applicable since this is only Small grower audit and the Group is only one members.**	☐ Conform ☐ Major Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

Criterion / Indicator	Audit Findings	Audit Findings (Public Summary)	Results
Principle 1: Behave Ethically and Transparently			
Criterion 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)	Management documents that are specified in the RSPO P&C are made publicly available and shall include (but are not necessarily limited to): • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; Human Rights Policy (Criterion 6.13).		Lebijaya Sdn. Bhd. (LSB) ensures transparency by making environmental, social, and legal information accessible to stakeholders. Publicly available documents include land titles, OSH plans, HCV documents, negotiation procedures, complaint records, RSPO reports, EIA, management plans, and company policies. During the latest external stakeholder meeting, relevant parties, including neighboring estates, smallholders, workers, and the sustainability team from Hap Seng Plantations, were briefed on RSPO principles and criteria. A larger stakeholders meeting, held biennially, covered social impact concerns and mitigation plans. Issues raised were addressed in the company's action plan, with participation from government agencies, plantations, schools, police, and healthcare representatives.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

1.1.2	Information is provided in appropriate languages and made accessible to relevant stakeholders.		Lebijaya Sdn Bhd appointed an Estate Manager to coordinate stakeholder activities and handle complaints. Communication records with authorities are well-documented. Interviews with government agencies and local communities confirmed awareness of Lebijaya's consultation and communication procedures.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
1.1.3 (C)	Records of requests for information and responses shall be maintained.		The records of requests as mentioned in indicator 1.1.2, had been logged in the Communication Record were used for records including authority visits books. As at todate audit, there is no information had been requested.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
1.1.4 (C)	Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.		Lebijaya Sdn Bhd has established and adheres to documented consultation and communication procedures, including a Stakeholder Consultation Procedure SOP dated January 2, 2020. Internal communications encompass records of meetings, briefings, and notices, while external communications are organized in a dedicated file. A survey letter was distributed to stakeholders regarding consultation procedures. No complaints have been received, indicating the effectiveness of these procedures.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.		Lebijaya Sdn Bhd maintains an up-to-date stakeholder list, including government agencies, suppliers, contractors, and neighboring estates. During an audit, random interviews with various government agencies and local communities confirmed the effectiveness of this comprehensive list in facilitating successful consultations.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 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.		Lebijaya Sdn Bhd demonstrates its commitment to integrity through a published Code of Conduct and Business Ethics Policy. This policy is communicated to all workers during induction and awareness briefings. The company recruits workers locally through walk-ins and manages all sourcing and repairs internally without engaging external contractors or suppliers.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.		Lebijaya Sdn Bhd has implemented a Vendor Code of Conduct and Business Ethics applicable to all suppliers and service providers, emphasizing human rights. Compliance is monitored through internal audits guided by a documented procedure. Currently, no contractors are engaged at the estate, reflecting the company's commitment to ethical standards.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

				☐ Not Applicable (justification required)

Principle 2: Operate legally and respect rights - Implement legal requirements as the basic principles of operation in any jurisdiction.				
Criterion 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.		Lebijaya Sdn. Bhd. ensures compliance with legal requirements through a monitored Legal Register. Various licenses and permits are in place, covering operations, trading, and environmental regulations. A non-compliance issue was identified related to energy reporting, resulting in a corrective action requirement. Health and safety assessments, including chemical exposure, noise risk, and medical surveillance, confirm adherence to occupational standards. Waste disposal follows approved regulatory procedures. It seems that the Energy Commission license is subject to non-compliance with "Syarat-Syarat" No.6. This condition requires the license holder to submit monthly generation reports in a specified format to the Suruhanjaya Tenaga (Energy Commission). Failure to meet **this requirement has resulted in the issuance of a Major NCR (Non-Conformance Report) RAR 01 2024.**	☐ Conform ☒ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and		Lebijaya Sdn. Bhd. maintains a Legal Register to ensure compliance with regulatory requirements. The Admin Manager monitors legal updates through industry associations, seminars,	☒ Conform ☐ Major Nonconformity

	also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.		publications, and government sources. Any changes are tracked and communicated across sites, with the latest review covering amendments in environmental and occupational safety regulations.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.		Lebijaya Sdn Bhd maintains its estate boundaries by installing visible markers, such as pegs, especially along perimeters adjacent to neighboring estates and smallholders. These neighbors include Golden Estate, Bukit Mas II Estate of Hap Seng Plantations, IOI UNICO Plantations, and smallholders Mr. Paulus and Mr. Sarifudin.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 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.		Lebijaya Sdn Bhd maintains an updated stakeholder list, including villagers, nearby estates, external mills, NGOs, and government agencies. This list details contact persons, addresses, communication channels, and types of contracted work.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		Lebijaya Sdn. Bhd. (LSB) operates independently without engaging external contractors, as all tasks are performed by in-house workers. These workers are recruited directly through programs such as the Pemutihan Program and hold IMM13 documents, in accordance with the Sabah Immigration Act. Thus, this indicator is not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		Lebijaya Sdn. Bhd. (LSB) operates independently without engaging external contractors, as all tasks are performed by in-house workers. These workers are recruited directly through programs such as the Pemutihan Program and hold IMM13 documents, in accordance with the Sabah Immigration Act. Thus, this indicator is not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.				
2.3.1 (C)	2.3.1 (C) For all directly sourced FFB, the mill requires: ● Information on geo-location of FFB origins ● Proof of the ownership status or the right/claim to the land by the grower/ smallholder ● Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB		There is no mill involved in this small grower certification. Thus, this indicator is not applicable.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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. PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.		There is no mill involved in this small grower certification. Thus, this indicator is not applicable.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

Principle 3: Optimise productivity, efficiency, positive impacts and resilience				
Criterion 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.				
3.1.1 (C)	A business or management plan (minimum three years) shall be documented and includes, where applicable, a jointly developed business case for Scheme Smallholders.		Lebijaya Sdn. Bhd. has developed a three-year Business Management Plan to ensure long-term sustainability and continuous improvement, including replanting the entire estate by 2026. The plan covers planting material quality, FFB production projections, crop yield forecasts, production costs, price forecasts, and financial indicators such as cost-benefit analysis, discounted cash flow, return on investment, revenue projections, and capital expenditure estimates. An annual budget, prepared by the manager and approved by top management, details expenditures and aligns with the business plan for effective management.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.1.2	An annual replanting programme projected for a minimum of five years, is available.		Lebijaya Sdn. Bhd. has developed an annual replanting program aligned with its long-term sustainability objectives and operational efficiency. The management plans to replant the entire 215.80-hectare area by 2026, utilizing high-quality planting materials to enhance productivity and crop yields. The program emphasizes soil preparation, sustainable land management, and adherence to best agricultural practices. This strategic initiative aims to optimize future Fresh Fruit Bunch (FFB) production, reduce long-term maintenance costs, and improve overall plantation performance. Regular monitoring and reviews will ensure the replanting program remains on schedule and achieves its intended outcomes.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken and has agenda with the following minimum items: Results of internal audits Customer feedback Process performance and product conformity Status of preventive and corrective actions Follow-up actions from management reviews Changes that could affect the management system Recommendations for improvement		Lebijaya Sdn. Bhd. conducted a Management Review Meeting (MRM) following internal audits to assess sustainability and compliance. Chaired by the Estate Manager and attended by estate management and the sustainability team, the meeting covered key areas such as SOP adequacy, sustainable agriculture policies, internal audit results, legal compliance, complaints, environmental quality, waste management, energy usage, accident reports, and corrective actions. The management's commitment to transparency and continuous improvement ensures alignment with sustainability practices and regulatory standards.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.				

3.2.1 (C)	The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. Action plans include continual improvement for the following: i. Optimising the yield of the supply base. ii. Reduction in use of pesticides (Criterion 7.2) iii. Environmental impacts (Criteria 3.4, 7.6 and 7.7) iv. Waste reduction (Criterion 7.3) v. Pollution and greenhouse gas (GHG) emissions (Criterion 7.10) vi. Impacts on communities, workers and smallholders (Principle 6) vii. Integrated management of HCV-HCS, peatland and other conservation areas (Criteria 7.7 and 7.12)		Lebijaya Sdn. Bhd. has implemented a continuous improvement action plan to enhance operational efficiency and sustainability. The plan focuses on optimizing agricultural yield, reducing chemical pesticide use through IPM, minimizing environmental impacts, mitigating pollution and greenhouse gas emissions, and improving waste-to-resource initiatives. It also prioritizes fair labor practices, safety compliance, and community engagement. Conservation efforts include managing HCV and HCS areas, peatlands, and ecological zones to protect biodiversity and maintain environmental sustainability.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template before the audit started. The auditor already verified and checked the data and figure given match with their database system.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 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.		LSB has established a comprehensive set of documented manuals and procedures to standardize operations. The Agricultural Manual and MPOB guidelines cover estate activities from nursery to harvesting, while the Safe and Standard Operating Procedures (SSOP) ensure workplace safety with defined measures and PPE requirements. Social SOPs address grievance handling, land dispute management, stakeholder consultation, whistleblower protection, sexual harassment, and worker recruitment. These procedures support operational efficiency, compliance, and fair labor practices.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.3.2	A mechanism to check consistent implementation of procedures is in place.		There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by LSB are internal audits conducted by Hap Seng Plantations Sustainability Team. Internal audit covering MSPO & RSPO internal audit has conducted latest on 21&22/10/2024, 7&8/11/2024, and 13/11/2024. Results from the assessment internal audit recorded 2 Major NCR and 3 Minor NCR. Audit result was reported through Audit Report. Among the audit findings raised were related to stakeholder list, SW management, JCC meeting, legal register, and DLW. The finding was closed by identification of strengths and root causes of nonconformities and implemented the necessary corrective action. Audit report was established and maintained. Management review has been conducted on 22/11/2024 and has been discussed related to status on NCR.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.3.3	Records of monitoring and any actions taken are maintained and available.		On Estate, the estate manager and his subordinates were accountable to check on consistent implementation of procedures. The implementation of procedures was also carried out through:	☒ Conform ☐ Major Nonconformity

			• RSPO/MSPO internal audits by Hap Seng Plantations Sustainability Team, safety and health meetings • routine inspection (workplace inspection) by field staff. • Periodic reporting from estate • On site visits, inspections by estate manager • Assessments by RSPO Audits • Consultation with RSPO team & management. Implementation of these procedures included: • briefing on the SOPs and related documents. • workers were frequently reminded about it during the morning muster. • safe keeping in the administration office for reference. • relevant SOPs, sometimes an abridged version, were displayed at various workstations, e.g. at estate office notice board for easy reference. The LSB has managed and monitored their workers' status compliance against the RSPO requirements such as legality of the workers, appropriate license, employment contract, insurance and wages. Suppliers/Vendors compliance with LSB 'Code of Conduct and Business Ethics Policy was also monitored.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 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		Lebijaya Sdn Bhd (LSB) has conducted Environmental Impact Assessment (EIA) and Social Impact Assessment (SIA) internally for its estate operations. The SIA was completed in January 2019, with the report dated 25/01/2019, and reviewed on 08/11/2024. The EIA was conducted in December 2019 and reviewed on	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	smallholder/outgrower scheme, is documented.		30/11/2024. These assessments evaluated the environmental and social impacts of estate activities, including effects on soil, water, air, pollution control, and land use. Stakeholder consultations were integral to these assessments. An estate-level meeting on 15 January 2022 included 43 participants from various sectors. Follow-up meetings were held on 3 and 22 December 2021 via Zoom due to the COVID-19 pandemic, involving NGOs, government bodies, contractors, suppliers, and neighboring estates. Additionally, a separate consultation with all five estate workers occurred on 23 December 2021. No issues or complaints were raised during these consultations. LSB's stakeholder meetings are coordinated with six neighboring outgrower companies supplying to Hap Seng Plantations' mills, as they share similar stakeholders.	☐ Not Applicable (justification required)
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.		Lebijaya Sdn Bhd (LSB) has conducted internal Environmental Impact Assessment (EIA) and Social Impact Assessment (SIA) to evaluate the effects of its estate operations. The SIA, completed in January 2019 and last reviewed on November 8, 2024, involved 43 stakeholders, including worker representatives, government agencies, suppliers, contractors, and neighboring plantations. The EIA, conducted in December 2019 and reviewed on November 30, 2024, assessed impacts on soil, water, and air, incorporating stakeholder consultations on environmental aspects and land use issues. Stakeholder meetings were held on January 15, 2022, with follow-ups on December 3 and 22, 2021, the latter conducted remotely due to the COVID-19 pandemic. No issues or complaints were raised during these consultations. Additionally, LSB's social and environmental management plans were reviewed in September 2024, involving internal and external stakeholders such as SDSB Enterprise, First Raintree Sdn. Bhd., HSP Bukit Mas Estate, and Ketua Kampung Litang. Feedback was collected via questionnaires, with no negative comments received, indicating	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			general satisfaction with LSB's management measures.	
3.4.3 (C)	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		The Social and Environmental Management and Monitoring Plan was reviewed on November 8 and November 30, 2024, incorporating input from internal and external stakeholders, including worker leaders, government agencies, suppliers, consultants, neighboring plantations, and villagers from Kg. Litang.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 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.		Lebijaya Sdn Bhd (LSB) has established comprehensive employment procedures covering recruitment, selection, hiring, promotion, retirement, and termination, documented in both Bahasa Malaysia and English as of August 20, 2022. These procedures outline processes for walk-in applicants and those supplied by foreign worker agencies, emphasizing non-discriminatory practices based on religion, gender, or nationality, with recruitment decisions based on age, medical fitness, skills, and capabilities. Workers are briefed on these procedures during induction and refresher sessions. Interviews with IMM13 and Indonesian workers confirmed their understanding of the procedures and that no recruitment fees were charged.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.5.2	Employment procedures are implemented and records are maintained.		The company has established comprehensive employment procedures covering recruitment, selection, hiring, promotion, retirement, and termination, documented in both Bahasa Malaysia and English as of August 20, 2022. These procedures ensure a non-discriminatory recruitment process based on age and medical fitness, without bias towards religion, gender, or nationality. New	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			employees are informed of these procedures during induction and regular morning briefings. Interviews with IMM13 and Indonesian workers confirmed their understanding of these policies and that no recruitment fees were charged. The company maintains detailed records demonstrating adherence to these procedures, including application forms, interview assessments, medical reports, identification documents, and employment contracts. Recruitment is primarily conducted through walk-ins, with vacancies communicated via word of mouth and recommendations from estate supervisors. Indonesian workers typically enter Malaysia under the Pas Lawatan Kerja Sementara (PLKS), with the company managing the work pass processing through the appointed agency, Agensi Pekerjaan Sri Kembangan Sdn. Bhd. The company upholds a no recruitment fees policy, covering all associated costs such as levies, medical examinations, visas, and work passes.	
3.6.1 (C)	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		The Occupational Safety and Health (OSH) Policy, established on December 3, 2020, and signed by the Director, is available in both Bahasa Malaysia and English. It was communicated to all employees through briefings on September 6, 2024, and is displayed on estate notice boards. Interviews with various workers confirmed their awareness and understanding of OSH matters. The estate has implemented a Hazard Identification, Risk Assessment, and Risk Control (HIRARC) procedure, following the Department of Occupational Safety and Health (DOSH) Guidelines 2008 . Risk assessments for all operations are conducted annually, with the latest review on January 8, 2024, covering 16 activities,	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			including harvesting, pruning, spraying, and manuring. Control measures have been determined and implemented, with adequate administrative and engineering controls observed during assessments. Specific updates include the risk assessment for road maintenance using an excavator, reviewed on January 8, 2024, resulting in the provision of hearing protection to operators. Similarly, the risk assessment for construction activities was updated on the same date, though no construction was ongoing during the site visit. Additionally, during a site visit to Block 03, harvesters were observed using pool sickle covers, addressing previous non-conformance reports satisfactorily.	
3.6.2 (C)	The effectiveness of the H&S plan to address health and safety risks to people is monitored		The estate has established and implemented an Occupational Safety and Health (OSH) management plan, which includes hazard identification, risk assessment, legal compliance, training programs, emergency procedures, and the use of personal protective equipment (PPE). The plan's effectiveness is monitored through internal audits by Hap Seng Plantation's Sustainability Department and monthly workplace inspections. Actions taken to manage health and safety risks include: Chemical Health Risk Assessment (CHRA): Conducted on 18/02/2020 by Utlus Venture (M) Sdn. Bhd., assessing pesticide applicators, fertilizer applicators, workshop workers, and storekeepers. Medical Surveillance: Workers handling pesticides underwent medical examinations by DOSH-registered Occupational Health Doctors (OHDs) on 05/10/2024, confirming their fitness for chemical handling.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			Noise Risk Assessment: An initial assessment on 29/09/2021 identified noise levels below the 82 dB(A) threshold, complying with the Occupational Safety and Health (Noise Exposure) Regulations 2019. Nonetheless, a generator operator underwent audiometric testing on 04/10/2024, indicating normal hearing. These measures demonstrate the estate's commitment to maintaining a safe working environment and compliance with OSH regulations.	
Criterion 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. Training for workers must cover, at minimum, the following: - the health and environmental risks of pesticide exposure; - recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women); - International and national instruments or regulations that protect workers' health; - Productivity and best management		LSB's 2024 Training Schedule and Matrix include sessions on RSPO Principles and Criteria, conducted by internal managers or Hap Seng Plantation's sustainability team. Topics covered are harvesting, PPE usage, chemical spraying, accident investigation, emergency response, first aid, waste management, fire drills, IPM, COVID preparedness, sexual harassment, HCV awareness, RTE protection, beneficial plants, and new technology.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	practice; - relevant SOPs.			
3.7.2	Records of training are maintained, where appropriate on an individual basis.		The company maintains comprehensive training records, detailing each session's title, attendee names and signatures, trainer identity, and session timing and location. In 2024, the company conducted various training sessions, including HCV Awareness on 23/9/24, First Aid Training on 19/09/2024, Chemical Handling Training on 6/09/2024, and several others. These records ensure effective documentation and monitoring of employee development activities.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

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.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
Criterion 3.8: Supply Chain Requirements for Mills				
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base.			☐ Opportunity for Improvement ☒ Not Applicable (justification required)
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
3.8.4	The mill shall also meet all registration and reporting. Requirements for the appropriate supply chain through the RSPO IT platform		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
3.8.5	Documented Procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	a) Complete and up to date procedures covering the implementation of all elements of the supply chain model requirements b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records) c) Identification of the role of the person having the 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 mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFB's including ensuring no contamination in the IP mill.			
3.8.6	Internal Audit (i) The mill shall have a written procedure to conduct an annual internal audit to determine whether the mill; a) Conforms to the requirements in the RSPO SC requirements for mills and the RSPO Rules on Market Communication and Claims		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	b) Effectively implements and maintains the standard requirements within its organization. (ii) Any con-conformities found as part of the internal audit shall be issued and required 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 mills shall maintain the internal audit records and reports.			
3.8.7	Purchasing and Goods In (i) The mill shall verify and document. The tonnage and sources of certified and the tonnage of non-certified FFB's received. (ii) The mill shall inform the CB immediately if there is a projected overproduction of certified volume (iii) The ill shall have a mechanism in place for handling of non-conforming FFB and/or documents.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	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			☒ Not Applicable (justification required)
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		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	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.			
3.8.10	The mill shall record the names and contact t details of all contractors used for the physical handling of RSPO certified oil palm products.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

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.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
3.8.12	Record Keeping (i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. (ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. (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. (iv) For Mass Balance Module, the mill: a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)			
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

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.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
3.8.16	Registration of Transactions (i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. (ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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.		Not Applicable since this Management is a small grower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

Criterion / Indicator		Audit Findings	Audit Findings (Public Summary)	Results
Principle 4: Respect Community and Human Rights and Deliver Benefits				
Criterion 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 (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		LSB has established a Human Rights Policy dated March 1, 2020, and a Sustainable Agriculture Policy dated August 12, 2020, which includes a clause prohibiting retaliation against Human Rights Defenders. These policies were communicated to staff and workers during morning muster and training sessions on September 6, 2024. Interviews with eight workers confirmed their understanding of these policies.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.		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.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 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.		LSB has implemented comprehensive grievance procedures, including mechanisms to protect whistleblowers, and conducted an external stakeholder meeting on September 11, 2024, confirming the effectiveness of these systems.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.		LSB has established comprehensive grievance procedures, including the 'Procedure for Reporting Complaints and Grievances' and 'Prosedur Aduan' (2020), along with the 'Whistleblower Protection Mechanism' (dated November 2, 2020) to safeguard complainants. These protocols have been effectively communicated to both internal and external stakeholders through meetings and training sessions. Notably, during the external stakeholder meeting on September 11, 2024, which included participants such as neighboring estates, smallholders, internal workers, and the sustainability team from Hap Seng Plantations, a survey on RSPO policies and procedures was conducted. The auditor confirmed that stakeholders understood the grievance resolution system and reported no issues with the company's procedures.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is		LSB has established grievance procedures, including 'Prosedur Melapor Aduan dan Permasalahan' and 'Grievances Procedure – Appendix 1' for staff and workers, as well as 'Prosedur Aduan' (2020) and 'Mekanisme Melindungi Pengadu Terhadap Tatacara	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	available and communicated to relevant stakeholders.		tidak Wajar (Whistleblower)' (dated November 2, 2020) to protect complainants. These procedures have been communicated to all workers and external stakeholders through meetings. The latest external stakeholder meeting on September 11, 2024, involved neighboring estates, smallholders, POM, internal workers, and the sustainability team from Hap Seng Plantations, during which a survey on RSPO policies and procedures was conducted. Auditors verified and confirmed that there are no issues related to the systems developed by the company.	☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		Lebijaya Sdn. Bhd. (LSB) has established comprehensive procedures to address grievances and disputes, including the 'Prosedur Melapor Aduan dan Permasalahan' and 'Grievances Procedure – Appendix 1' for staff and workers, as well as the 'Stakeholders Consultation Procedure – Group Level & Estate Level' dated 7/12/2020. The company utilizes internal and external complaint forms/books to document grievances. Notably, the grievance procedure was updated on 4/1/2022 to allow complainants to select supporters or observers and to provide access to third-party mediators	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.				
4.3.1 (C)	Contributions to community development that are based on the results of consultation with local communities are demonstrated.		Based on information based on SIA documents to indicate that there is or is no any community surround LSB and to indicate the there is or is no any need to contribute to local community development. only smallholder nearby estate and Lebijaya has given Permissions to all small holder to use their road without charges	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 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 the actual legal or customary use of the land are available.		Lebijaya Sdn. Bhd. (LSB) holds undisputed legal ownership of its estate land, as evidenced by verified land titles and tenure history. The land, previously owned by Sabah Land Development, was purchased and developed by LSB in 1999. Original land ownership documents are securely stored at the Central Office in Sandakan, with copies available at the LSB Estate office. The estate, located in the Kinabatangan District, complies with all land title conditions for oil palm cultivation. Specifically, land title CL 095332228 grants LSB a lease for 250 hectares dedicated to oil palm cultivation, valid from January 1, 1999, to December 31, 2097.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include. a) 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.		Lebijaya Sdn Bhd (LSB) has maintained clear and uncontested land ownership since acquiring the land from Sabah Land Development in 1999. The original land titles are securely stored at the Central Office in Sandakan, with copies available at the LSB Estate office. The estate, encompassing 250 hectares designated for oil palm cultivation, operates under the jurisdiction of the Kinabatangan District. Audits and consultations with stakeholders, including local villagers and neighboring plantations, have confirmed the absence of any land disputes. Additionally, both the Lahad Datu Land Department and Sabah Land Development Board have verified the legitimacy of LSB's land ownership.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		Lebijaya Sdn Bhd (LSB) legally acquired land from Sabah Land Development in 1999, with ownership documents verified and copies maintained at both the Central Office in Sandakan and the estate office. Attempts to retrieve prior ownership records were	☒ Conform ☐ Major Nonconformity

	parties (including neighbouring communities where applicable, and relevant authorities).		unsuccessful due to the transaction's age, but officials confirmed no issues with the transfer. Stakeholder interviews, including local villagers and neighboring estates, revealed no land disputes. The estate's land title (CL 095332228) permits oil palm cultivation from January 1, 1999, to December 31, 2097.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements..		As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999 the land was previous owned by Sabah Land Development and LSB has buy and develop the land in 1999. Auditor has make attempt to call the SLDB to found the records of previous land owner and the company stated the transaction happen for more than 20 years ago and the records is non traceable, but the officer stated there is no issue regarding the transaction due to SLDB is for Rural Development and the transaction is legit ,auditor also went through by phone call Mr Shahdan Malik of Lahad Datu Land Department and there is no issue regarding this land as the Lebijaya Sdn Bhd is currently solely owner of this land. The audit team had confirmed that there were no land issues related to previous owners. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan and the copy in the estate was verified by the auditor.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB. Since 1999, the land was previously owned by Sabah Land Development, and LSB purchased and developed the land in that year. The auditor attempted to contact SLDB to find records of the previous landowner. However, the company stated that the transaction occurred more than 20 years ago, and the records are non-traceable. The SLDB officer mentioned that there is no issue	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			regarding the transaction, emphasizing that SLDB focuses on rural development, and the transaction was legitimate. In addition, the auditor contacted Mr. Shahdan Malik of Lahad Datu Land Department, who confirmed that there is no issue regarding the land, and Lebijaya Sdn Bhd is the sole owner. The audit team has confirmed that there are no land issues related to previous owners. All related documentation regarding the land acquisition is stored in LSB HQ Office, Sandakan, and the auditor verified a copy in the estate.	☐ Not Applicable (justification required)
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.		As reported in section 4.4.1 of this checklist, it has been confirmed that the land is legitimately owned by LSB. The land was previously owned by Sabah Land Development until LSB purchased and developed it in 1999. Attempts were made by the auditor to contact SLDB for records of the previous landowner. However, the company indicated that the transaction occurred more than 20 years ago, and the records are not traceable. The SLDB officer stated that there is no issue regarding the transaction, emphasizing SLDB's focus on rural development and confirming the legitimacy of the transaction. Additionally, the auditor contacted Mr. Shahdan Malik of Lahad Datu Land Department, who affirmed that there is no issue regarding this land, and Lebijaya Sdn Bhd is the sole owner. The audit team has verified that there are no land issues related to previous owners. All related documentation regarding the land acquisition is stored at LSB HQ Office, Sandakan, and a copy in the estate was confirmed by the auditor.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 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		According to the Social Impact Assessment (SIA) Report for LSB and the land title, there have been no new plantings established on local peoples' land. The legitimacy of LSB's ownership of the land since 1999 has been verified, and the audit team confirmed the absence of any land issues related to previous owners. Additionally, the audit team conducted interviews with relevant stakeholders, including Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd, and smallholder Mr. Paulus Gondilou. Based on these interviews, it can be concluded that there is no evidence of any land dispute at LSB.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		As reported in section 4.4.1 of this checklist, it has been confirmed that the land is legitimately owned by LSB since 1999. All documentation related to the land acquisition is stored at LSB HQ Office, Sandakan, and a copy in the estate was verified by the auditor. No issues regarding land were identified with villagers, the local community, and neighboring estates. The audit team conducted interviews with relevant stakeholders, including Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd, and smallholder Mr. Paulus Gondilou. Based on these interviews, it can be concluded that there is no evidence of any land dispute at LSB. Therefore, the evidence required under this clause was not available.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	with the unit of certification is signed and ratified by these local peoples. Negotiated agreements should be non-coercive and entered into voluntarily and carried out prior to new operations. b) 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. c) 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.		The audit team has also interviewed relevant stakeholders such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB, Hence the evidence required under this clause was not available.	☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan 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 such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB, Hence the evidence required under this clause was not available.	☐ Not Applicable (justification required)
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.		As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan 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 such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB, Hence the evidence required under this clause was not available.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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..		As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan 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 such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB, Hence the evidence required under this clause was not	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			available.	
4.5.7	New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.		There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including estate as per stated in the land title	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.5.8 (C)	New lands are not acquired in areas inhabited by communities in voluntary isolation.		Not Applicable as follow MYNI	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
Criterion 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.				
4.6.1 (C)	A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.		The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management dated 2nd January 2020. In accordance with the Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the HQ Office LSB. The procedure stipulates the involvement of the respective estate	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

			management, Land Office, NGOs and the affected parties in the negotiation procedures.	☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		In accordance with the 'Grievances Procedure' , 'Prosedur Aduan' 'Prosedur Melapor Aduan dan Permasalahan - Pihak Berkepentingan Luaran dan Dalaman'" dated 1st August 2020 / SOP – Land Dispute Management dated 2nd January 2020, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at visited estate.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.		Not applicable since LSB is consider as Small Grower.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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.		There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

				☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements				
4.7.1 (C)	A mutually agreed procedure for identifying people entitled to compensation is in place.		The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the SOP – Land Dispute Management dated 2nd January 2020". In accordance with the SOP – Land Dispute Management, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the LSB HQ. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.7.2 (C)	A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.		There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB, hence the evidence required under this clause was not available.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.		As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan 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 such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB, Hence the evidence required under this clause was not available.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.				
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.		As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSB since 1999. All the related documentation regarding the land acquisition was kept in LSB HQ Office, Sandakan 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 such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB, Hence the evidence required under this clause was not available.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

4.8.2 (C)	Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.		Land conflict is not present in the area of the unit of certification. The audit team has also interviewed relevant stakeholders such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB, Hence the evidence required under this clause was not available.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).		There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. The audit team has also interviewed relevant stakeholders such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB, Hence the evidence required under this clause was not available.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).		There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders such as the Villagers Ketua Kampung Litang Abdul Hamad Karim, IOI Group Plantation Berhad, Hap Seng Plantations Berhad, Golden Spring Sdn Bhd and smallholder Mr Paulus Gondilou. From the interviews, it can be concluded that there was no evidence of any land dispute at LSB.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Principle 5: Support Smallholder Inclusion				
Criterion 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.		Not Applicable since this Assessment is for Group of Small Grower and no Mill has included.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
5.1.2 (C)	Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.		Not Applicable since this Assessment is for Small Grower and no Mill has included.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
5.1.3 (C)	Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.		Not Applicable since this Assessment is for Small Grower and no Mill has included.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

				☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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.		Not Applicable since this Assessment is for Small Grower and This company are assisted by Hap Seng Plantations.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.		Not Applicable since this Assessment is for Small Grower and no contractor has appointed since all work has been done internally due to money restrictions.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
5.1.6 (C)	Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.		Not Applicable since this Assessment is for Small Grower and no contractor has appointed since all work has been done internally due to money restrictions.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

				☒ Not Applicable (justification required)
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).		Not Applicable since this Assessment is for Small Grower, and LEBIJAYA doesn't have Weighbridge, all weighing has been done by Outsider Mill.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.		Not Applicable since this Assessment is for Small Grower and This company is assisted by Hap Seng Plantations.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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.		Not Applicable since this Assessment is for Small Grower and This company is assisted by Hap Seng Plantations.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

Criterion 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.		Not Applicable since this Assessment is for Small Grower and This company are assisted by Hap Seng Plantations.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder) PROCEDURAL NOTE: The RSPO is currently developing a separate standard for Independent Smallholders.		Not Applicable since this Assessment is for Small Grower and no contractor has appointed since all work has been done internally due to money restrictions.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production..		Not Applicable since this Assessment is for Small Grower and no contractor has appointed since all work has been done internally due to money restrictions.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

5.2.4 (C)	Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.		Not Applicable since this Assessment is for Small Grower, and LEBIJAYA doesn't have Weighbridge, all weighing has been done by Outsider Mill.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.		Not Applicable since this Assessment is for Small Grower and This company is assisted by Hap Seng Plantations.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

Principle 6: Respect Workers Rights and Conditions				
Criterion 6.1: Any form of discrimination is prohibited.				
6.1.1 (C)	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.		Lebijaya Sdn Bhd (LSB) has implemented a Sustainable Agriculture Policy, dated 3 December 2020, approved by the Director, and available in both English and Malay on the company notice board. This policy underscores the company's commitment to equal opportunities in the workplace, ensuring that hiring, remuneration, training access, promotions, terminations, and retirements are based on business needs, job requirements, and individual qualifications, irrespective of factors such as ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age. Interviews with employees revealed no	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			evidence of discrimination, indicating adherence to the policy. At the time of the audit, LSB's workforce included five male workers, one female worker holding IMM13 documentation, and two Indonesian workers (one male and one female). During housing inspections and interviews, workers demonstrated awareness of the policy, which had been communicated during muster briefings, displayed on notice boards in housing areas and offices, and explained during induction courses for new employees.	
6.1.2 (C)	Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees		Lebijaya Sdn Bhd has implemented a Sustainable Agriculture Policy, effective since December 3, 2020, emphasizing equal employment opportunities irrespective of ethnicity, religion, gender, or other factors. This commitment is communicated to employees through various channels, including induction courses and public postings. Interviews and field observations during audits revealed no evidence of discrimination; employment practices such as wage payments, housing provisions, and access to benefits are conducted fairly. Additionally, Indonesian workers confirmed they did not incur any recruitment fees, aligning with the company's ethical recruitment practices	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		Lebijaya Sdn Bhd (LSB) ensures that recruitment, training access, and promotions are based on candidates' skills, capabilities, and medical fitness, following clear procedures and flowcharts. Medical fitness assessments are conducted to confirm suitability for specific roles without being discriminatory; records indicate only "Fit for work" without detailing any medical conditions. This approach aligns with industry standards and legal requirements, as confirmed through worker interviews and audits of personnel files.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

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		Currently, there were 2 female workers at LSB. Feedback from interviewed, there are no pregnant worker at the time of audit. Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		Despite a limited number of female workers, Lebijaya Sdn Bhd (LSB) established a gender committee to raise awareness, address concerns, and explore opportunities for women and dependents. The committee's latest meeting was held on October 25, 2024.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.1.6	There is evidence of equal pay for the same work scope		Interviews with workers at Lebijaya Sdn Bhd (LSB) confirm that they receive equal pay for equal work, with sprayers and harvesters compensated uniformly based on piece rates, adjusted only for factors like palm height. All workers' earnings comply with the Minimum Wages Order 2022, ensuring fair daily and monthly wages.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 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 and explained to them in language they understand.		Lebijaya Sdn Bhd (LSB) ensures compliance with the Minimum Wages Order 2022 and the Sabah Labour Ordinance by providing workers with monthly pay slips that detail their earnings and deductions. Employment contracts and labor laws are presented in languages understood by the workers and explained during the induction process. Interviews and document reviews confirm that workers comprehend their pay slips and receive wages in accordance with legal requirements	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.2.2 (C)	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members		The company ensures fair treatment of its employees by adhering to established procedures for recruitment, training access, and promotions, focusing on skills and medical fitness. Employment contracts, prepared in Bahasa Malaysia, detail terms such as working hours, wages, leave entitlements, and termination conditions. Workers receive monthly pay slips that transparently outline their earnings and deductions, aligning with the Minimum Wages Order 2022 and the Sabah Labour Ordinance. Interviews confirm that employees understand their pay slips and seek clarifications when necessary. Additionally, the company has established a gender committee to address women's issues and promote improvements, despite a limited number of female workers. Overall, there is no evidence of discrimination, and all employees receive equal pay for equal work	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		The company complies with the Sabah Labour Ordinance regarding employment terms and conditions. Employment contracts detail regular working hours (8 hours per day with a 0.5-hour break), overtime arrangements, sick leave, holiday entitlements, maternity leave, reasons for dismissal, and notice periods. Overtime is mutually agreed upon and adheres to legal requirements. Verification through check rolls, payslips, and	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			employment contracts confirms adherence to these standards. Workers receive and understand their payslips, which include comprehensive payment details. Interviews and documentation reviews indicate that workers are remunerated in compliance with the Minimum Wages Order 2022 and the Sabah Labour Ordinance.	☐ Not Applicable (justification required)
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		Lebijaya Sdn Bhd provides its workers with adequate housing, water supplies, medical care, and welfare amenities. The accommodations are in good condition, typically featuring two bedrooms and furnished with essentials such as cupboards, mattresses, pillows, and cooking facilities. Each house accommodates no more than four individuals. Workers have confirmed that the housing and amenities are satisfactory, and maintenance requests are promptly addressed. Weekly housing inspections are conducted by the field supervisor using the "Residential & Utility Buildings Inspection Report," with any identified issues documented and addressed accordingly. Medical facilities are available to workers at the Hap Seng Estate clinic, with arrangements in place for the company to cover treatment costs. Currently, there are no dependents residing on the estate, leading to the closure of the crèche; however, management is committed to reinstating childcare facilities if the need arises in the future.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.		LSB does not have an on-site grocery shop; however, the management facilitates workers' access to food and essentials by collecting their orders and purchasing items from external supermarkets. Workers also obtain groceries from nearby plantation estates, such as Hap Seng's Litang and Bukit Mas Estates, as well as IOI Unico Desa at Harus Abadi Main Division. Additionally, some workers travel to Lahad Datu for their shopping needs. Affordable food options are also	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			accessible at canteens and sundry shops in nearby estates like Litang Estate.	
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: The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist		LSB ensures compliance with the Minimum Wages Order 2022 by providing foreign workers with wages that meet or exceed the mandated RM1,500 per month. Through a prevailing wage assessment conducted in September 2024, it was confirmed that the average wage for foreign workers was RM2,023.47 per worker. This assessment encompasses various components, including wages, paid leave, medical benefits, retirement benefits, bonuses, meals, housing, healthcare facilities, and other welfare amenities. This approach aligns with the company's commitment to offering a decent living wage and upholding fair labor practices.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		At the current employment, core tasks such as harvesting, manuring, and spraying are carried out by permanent and full-time workers. There are no temporary workers or contractor workers were employed at the company.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 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 is available and is explained to all workers in languages that they understand, and is demonstrably implemented		The company has a documented policy on Freedom of Association and the Right to Collective Bargaining, signed on December 3, 2020, available in both Bahasa Malaysia and English. This policy recognizes and respects employees' rights to join trade unions of their choice and to engage in collective bargaining, in accordance with relevant national legislation. The policy was communicated to all workers during a morning muster on September 6, 2024, and implemented during the Workers Representative Committee (Joint Consultative Committee or JCC) meeting on September 17, 2024. The JCC serves as a platform for open communication between workers and management, allowing employees to voice their concerns and opinions freely. Interviews with workers indicated they are aware of their elected representatives and understand their role in advocating for employee benefits.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		Minutes of the JCC meeting dated 17/09/2024 were documented, sighted, and verified. The worker representatives were participatory and included a ethnic leader, women's leader, and men's leader, all of whom were freely elected by the workers. The minutes are documented in the national language and are made available upon request.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		Interviews with the company's workers' representatives revealed that the management did not interfere in the formation of the association. The representatives were freely elected by the workers through a confirmed election process, as corroborated during the interviews. Evidence of the election process and appointment letters was observed, indicating that	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			the representatives encompass individuals representing various genders, nationalities, and ethnicities.	☐ Not Applicable (justification required)
Criterion 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		The formal policy for the protection of children, including the prohibition of child labor and remediation, was established on 03/12/2020 and is publicly displayed on notice boards. The policy emphasizes that individuals under the age of 18 must not be employed in hazardous areas. To ensure awareness and accessibility, the policy is posted on notice boards in the workers' housing areas and the estate office. The company demonstrates its commitment to implementing this policy through its service contracts and supplier agreements, which include strict adherence to child labor regulations.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		There is evidence confirming that the minimum age requirements are met at the company. No evidence was found indicating that the company has employed anyone under the age of 18 years. This was verified by scrutinizing the Workers Master Lists, personal files, employment contracts, and payslips of all workers, where details such as the workers' IC numbers and dates of birth are available. The absence of any indication that the company had employed anyone below the age of 18 years.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

6.4.3 (C)	Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.		Based on documents sighted, interviews and observations, there was no evidence was found indicating that the company has employed anyone below the age of 18 years.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		The unit of certification effectively communicates its commitment to a no-child-labor policy by highlighting the adverse effects of child labor and promoting child protection. This message is conveyed to supervisors, key staff, smallholders, FFB suppliers, and the communities where workers reside. Communication is carried out through external stakeholder consultations, including the morning muster held on 06/09/2024, and was demonstrably reinforced during the JCC meeting on 17/09/2024.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 6.5: Policies and procedures in place to protect workers' rights.				
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		The company implemented a policy to prevent sexual harassment and violence as part of its Sustainable Agriculture Policy on December 3, 2020. This policy is prominently displayed on notice boards in both the company offices and housing areas. It was communicated to employees during a morning muster on September 6, 2024, and further reinforced at the Joint Consultative Committee (JCC) meeting on	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			September 17, 2024. Interviews with workers indicate no reported incidents contradicting this policy to date.	☐ Not Applicable (justification required)
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		The company has established a Sustainable Agriculture Policy, effective December 3, 2020, which includes provisions safeguarding employees' reproductive rights. This policy affirms the company's commitment to respecting employees' autonomy in reproductive health decisions. Interviews with female workers confirmed the policy's implementation, noting entitlements such as 60 days of paid maternity leave and the assignment of lighter duties during pregnancy. These provisions align with Malaysia's Employment Act of 1955, which outlines maternity leave entitlements and protections for pregnant employees. The estate management communicated updates regarding this policy during a meeting on October 25, 2024. Further interviews with female employees indicated their awareness of the policy and its effective execution.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		There is no new mother at the company. Thus, this indicator not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

6.5.4	Grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.		The company has implemented a Grievance Procedure, effective January 4, 2021, available in both English and Malay, detailing processes for addressing concerns from both internal and external stakeholders. The procedure includes flowcharts outlining the grievance process and stipulates that internal grievances should be resolved within seven working days, while external complaints are to be acknowledged within seven working days and resolved within 30 days. Stakeholders can submit grievances via phone, email, letter, or complaint forms, with assurances of anonymity for complainants. In 2024, internal grievances primarily involved requests for housing repairs, all of which were promptly addressed, as confirmed by worker feedback. The grievance procedure and its updates were communicated during external stakeholder consultations on September 22, 2024, a joint session with HSPB groups on December 22, 2021, and internal consultations on September 17, 2024.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 6.6: Work is voluntary and specific labor policy and procedures are implemented.				
6.6.1 (C)	All work is voluntary and following are prohibited: • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment		All workers in the company have entered employment voluntarily via walk in process; it was verified during the interview with IMM13 and Indonesian workers. None were brought in directly from Philippine or Indonesian by the company or employed through recruitment agencies, hence they did not pay any recruitment fees, debt bondage and withholding of wages. The company had not withheld workers identify documents as verified during worker's interviews. Workers also confirmed that there is no involuntary overtime as work is paid on piece rate basis and working hours is limited to 8 hours a day with no work on rest days. They understand that in their contract, if they resign from the company prior to 14 days	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	• Debt bondage • Withholding of wages		of notice, they will not have debt of bondage	
6.6.2 (C)	Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented		The company has implemented a Foreign Workers Policy Statement under its Sustainable Agriculture Policy, dated December 3, 2020. This policy ensures that foreign employees are treated equitably in recruitment, employment terms, and living conditions, explicitly prohibiting contract substitution. A dedicated procedure and flowchart for employing foreign workers have been established and are actively applied, reinforcing the company's commitment to fair treatment and non-discrimination of foreign employees.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 6.7: Appropriate health and safety measures are in place.				
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		The Managing Director of Lebijaya has been appointed as the responsible person for safety and health issues and serves as the chairman of the Occupational Safety and Health (OSH) Committee. She has delegated the duties of OSH coordinator to the Manager or clerk for the implementation of OSH practices within the estate, with all appointed individuals receiving official letters of appointment. Regular meetings between the responsible person and workers to discuss health and safety matters have been satisfactorily maintained. The OSH Committee, established with an organization chart for 2024, includes the Managing Director as chairman and the clerk as secretary. Meetings are held quarterly, with agendas covering the approval of previous minutes, health and safety concerns, accident reports, workplace inspections, and safety programs. The meetings for 2024 were conducted on March 2,	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			May 3, August 2, and November 2.	
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of 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.		The company has implemented a comprehensive Emergency Response Plan (ERP), with procedures and emergency contact numbers displayed on notice boards and muster grounds. The ERP covers scenarios such as fires, accidents, spills, poisonings, and floods. Training sessions on these procedures were conducted for all employees on September 8 and September 19, 2024. During site visits, ERP documentation was observed in key areas like the chemical store, workshop, and lubricant store. Interviews with workers confirmed their understanding of the ERP. First aid kits, regularly checked and replenished by the manager, are available at all workplaces, including harvesting operations, workshops, and storage areas, and contain no expired medications. Accident statistics are maintained satisfactorily and reviewed periodically. Accident and injury records are documented using the Lost Time Accident Frequency Rate (AFR) on a monthly basis. A quarterly review of accident cases is conducted during OSH committee meetings. The OSH Committee, established with the Managing Director as chairman and the clerk as secretary, meets quarterly to discuss health, safety, and welfare concerns, accident reports, workplace inspections, and safety programs. Meetings were held on March 2, May 3, August 2, and November 2, 2024.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.7.3 (C)	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at		The company has implemented a comprehensive safety program that includes continuous training for all staff and workers, such as sprayers, harvesters, and general laborers,	☒ Conform ☐ Major Nonconformity

	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.		focusing on safe working practices and the proper use of Personal Protective Equipment (PPE) relevant to their specific job functions. PPE is provided based on Hazard Identification, Risk Assessment, and Risk Control (HIRARC) evaluations and Standard Operating Procedures (SOPs), with issuance records confirming distribution to appropriate personnel. For instance, on 07/08/2024, a driver received earplugs and safety shoes; on 01/08/2024, a harvester was given a sickle cover; and on 01/05/2024, a harvester received Wellington boots. During site visits to harvesting operations and upkeep activities, workers were observed wearing suitable PPE, including face masks, respirators, goggles, rubber boots, nitrile/cotton gloves, aprons, and hard hats, ensuring coverage for all potentially hazardous tasks. The condition and lifespan of PPE items were found to be satisfactory, and interviews with workers indicated their understanding of when to replace PPE, either upon reaching the expiry date or when damaged or rendered ineffective. This approach aligns with industry best practices, emphasizing the importance of proper PPE selection, provision, maintenance, and training to ensure worker safety and compliance with occupational health standards.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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 national law or by the unit of certification where national law does not offer protection		The company provides comprehensive medical care and accident insurance for all employees. Work-related injuries or illnesses are covered under a policy with Chubb Insurance Malaysia Berhad, valid until 24/10/2025, specifically covering five general workers. Additionally, the company is registered with the Social Security Organization (SOCSO) under employer code F9700010084A, ensuring employees are protected under Malaysia's social security schemes. These measures demonstrate the company's commitment to employee welfare and compliance with national labor regulations.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics		The occupational injuries are recorded using Lost Time Accident (LTA) metrics. Based on JKKP 8 form dated 18/01/2024, sighted there is zero accident and 47272 total hours work for year 2024 was recorded or declared in the JKKP 8 via MyKKP System.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Principle 7: Protect, Conserve and Enhance Ecosystems and the Environment				
Criterion 7.1: IPM plans are implemented and monitored to ensure effective pest control.				
7.1.1 (C)	IPM plans are implemented and monitored to ensure effective pest control.		The estate employs Integrated Pest Management (IPM) strategies to control pests such as leaf-eating insects and rats. These strategies include regular monitoring and the establishment of beneficial plants like *Turnera subulata*, which attract natural predators to manage pest populations. Census records indicate minimal outbreaks of pests, with rat damage averaging less than 2%. The estate maintains detailed records of beneficial plantings and pest monitoring to ensure effective pest control measures.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		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.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

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 ap prior approval of government authorities. [For NI to define process]		No record of using fire as pest control in the LSB, verification by interview and site verification.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.				
7.2.1 (C)	Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.		The estate adheres to the Agricultural Manual's guidelines for pesticide application, specifically outlined in Section 2.0: Integrated Pest Management and Section 4.0: Upkeep of Mature Oil Palms. Pesticides such as Glyphosate, Metsulfuron methyl, Triclopyr, and 2,4-D Amine are used selectively to target specific pests, weeds, and diseases, with measures in place to minimize effects on non-target species. In line with the LSB Sustainable Agriculture Policy dated 03/12/2020, the estate enforces a strict no-paraquat policy. The use of other Class 1 chemicals, like metamidophos and monocrotophos, is permitted only under strict supervision and in critical situations, such as severe outbreaks, following the Highly Toxic Pesticides Regulations 1996 under the Pesticides Act 1974, and with authorization from relevant authorities	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		LSB had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, cost books. Records of pesticides used were available for	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			verification.	☐ Not Applicable (justification required)
7.2.3 (C)	Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.		Based on chemical register dated 03/01/2024 and site visit, no prophylactic use of pesticides used in the estate.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.		Not applicable because LSB doesn't used pesticides Class 1A or Class 1B. This was justified through chemical register and site visit at chemical store. Based on pesticides usage records also, there was no evidence on Class 1A or 1B used.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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 unexceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: a) Judgment of the threat and verify why		The estate continued to use only pesticides which are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. a) The review of the chemical register concluded that all pesticides used were of class III & class IV. The use of paraquat had been prohibited in the estate. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions had been used. Records, verified, of pesticides issued/used	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application 7.2.5 e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.		revealed no Class 1A or 1B had been used. This was also confirmed with all workers.	
7.2.6 (C)	Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		The estate has the SSOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. Observed during site visit, the PPE provided to the operators such as google, face respirator, nitrile hand glove, rubber boot and apron. Additionally, the operators involved with pesticides have been given training regarding the usage safety and health issue and proper way for chemical application by the estate manager and chemical supplier with knowledge on chemical handling and applications. During site visit at store was found that all precautions materials such as MSDS were available with national languages, Latest training on pesticides/chemical handling was carried out as per below: • MSDS training on 06/09/2024 • Triple rinse & Chemical mixing training on 06/09/2024 • Spraying training on 18/09/2024 • Manuring training on 18/09/2024	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

7.2.7 (C)	Storage of all pesticides is in accordance with recognised best practices.		The estate has implemented Standard Safe Operating Procedures (SSOP) for the use of Personal Protective Equipment (PPE) during work activities, particularly for pesticide application. Workers are provided with appropriate PPE, including goggles, face respirators, nitrile gloves, rubber boots, and aprons, with damaged equipment promptly replaced and issuance records maintained. Training sessions on chemical handling and application are conducted by the estate manager and chemical suppliers to ensure workers are well-informed about safety protocols. Safety Data Sheets (SDS) are available in the national language at storage facilities. Recent training sessions include MSDS training on 06/09/2024, Triple Rinse & Chemical Mixing training on 06/09/2024, Spraying training on 18/09/2024, and Manuring training on 18/09/2024. These measures align with the Department of Occupational Safety and Health (DOSH) Malaysia's Guidelines on the Use of Personal Protective Equipment Against Chemicals Hazards, 2005.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.		The estate has implemented responsible disposal practices for pesticide containers, adhering to established procedures that include triple rinsing, puncturing, and environmentally safe disposal methods to prevent contamination of water sources and safeguard human health. Detailed records of usage and disposal are meticulously maintained. The estate collaborates with the Department of Environment (DOE)-approved contractor, Pentas Flora (Sabah) Sdn Bhd, for the disposal of scheduled wastes, specifically SW 305 (spent lubricating oil), SW 409, and SW 410. The most recent disposal occurred on 15/12/2024. Additionally, monthly declarations to the DOE are submitted, with the latest verified submission on 21/10/2024.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.9 (C)	Aerial spraying of pesticides is prohibited,		Aerial spraying was not practices by LSB. There was no	

	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.		evidence to show that aerial spraying was carried out	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.10 (C)	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.		A Chemical Health Risk Assessment (CHRA) was conducted on 18/02/2020 by Utlus Venture (M) Sdn. Bhd., with assessor Kumares Arumugham (DOSH registration no. HQ/17/ASS/00/38). This assessment covered four work units: Pesticides Applicator, Fertilizer Applicator, Workshop Worker, and Pesticides & Fertilizer Storekeeper. Workers involved with pesticides underwent medical surveillance on 05/10/2024 at Klinik Mabello (Jeroco) Sdn. Bhd., overseen by Dr. Mohamad Fikri Zanal Abidin (OHD registration no. HQ/16/DOC/00/557), and at Klinik Elopura Sdn Bhd, under Dr. Shaji A/L Prathap Gopal (DOSH registration no. HQ/12/DOC/00/259). The results confirmed that all workers were fit to handle chemicals.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.11 (C)	No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.		Pregnant and breast-feeding women are not allowed to work with pesticides and hazardous chemicals in LSB. This instruction was tabulated in SSOP Chemical Spraying and OSH USECH Regulation 2000, Medical Removal Protection No.28 3b. There was no evidence of pregnant and breast-feeding women sprayers performed spraying activity in the estate. Workers interviewed were aware that pregnant and breast-feeding women should not handle chemicals. Auditor also interview with sprayers they have a medical surveillance once a year.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner				
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		Waste management and disposal plan to avoid or reduce pollution had been documented. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution during routine operation. In estate, domestic waste from the housing area is well managed and all domestic wastes are disposed at landfill sited in the estate area. Sighted the there is no practice of open fires within LSB. Monitoring is done weekly in both domestic waste collection areas and in landfill sites (block 05)	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		LSB has established a comprehensive Standard Operating Procedure (SOP) for waste disposal, documented in the "Waste Management Plans" reviewed on 30/11/2024. This plan encompasses the documentation and identification of various waste products, including scheduled wastes, domestic wastes, clinical wastes, and recyclable materials such as metal, tins, plastics, bottles, and mill wastes. In alignment with the Environmental Quality (Scheduled Wastes) Regulations 2005, the estate ensures that scheduled wastes are properly stored and disposed of through Department of Environment (DOE) approved contractors, such as Pentas Flora (Sabah) Sdn Bhd, with the latest disposal recorded on 15/12/2024. Doe Malaysia+2Doe Malaysia+2ewaste.doe.gov.my+2 For pesticide containers, LSB adheres to established procedures by implementing triple rinsing, after which the containers are pierced and stored prior to disposal. Records of usage and disposal are meticulously maintained. Each household is provided with dustbins, and domestic waste is collected weekly and disposed of at a designated landfill located	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			at Block 05. Site visits to the landfill area confirmed that only domestic waste, such as food waste, is disposed of there. Additionally, dedicated dustbins and recycling areas are established near the housing complexes, promoting proper waste segregation and recycling practices. No evidence of non-compliance with waste management procedures was observed in the housing areas, indicating effective implementation of the waste management plan.	
7.3.3	The unit of certification does not use open fire for waste disposal.		During site visit at LSB, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at LSB has been disposed via landfill located at block 5	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 7.4: Practice maintain soil fertility at, or where possible 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.		LSB has implemented Standard Operating Procedures (SOPs) across its operations, with summaries displayed at relevant locations and full documents available for review. These SOPs, including the updated Safe and Standard Operating Procedures (SSOP) from January 2022 and the Agricultural Manual, guide activities related to safety, health, environmental quality, and employee practices. Dissemination of these procedures occurs through morning briefings and training sessions, ensuring staff and workers are well-informed. Field inspections and worker interviews confirm adherence to these SOPs, emphasizing Good Agricultural Practices (GAP) and a commitment to safety,	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			health, and environmental stewardship. Additionally, LSB manages soil fertility by monitoring fertilizer applications annually, guided by organizational SOPs. The fertilizer application process involves agronomists conducting leaf sampling to assess nutrient levels, followed by calculations to determine appropriate fertilizer inputs to maintain or enhance soil fertility.	
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.		LSB conducts periodic tissue and soil sampling to monitor nutrient status and inform fertilizer recommendations. Leaf sampling is performed annually, while soil sampling occurs every five years. The most recent soil sampling took place on September 11, 2020, and the latest leaf sampling on September 29, 2023, providing data for the 2025 fiscal year's fertilizer plans. These sampling processes are managed by experts from the HSP Agronomy Department. Regular leaf and soil nutrient analyses are essential for diagnosing fertilizer requirements in oil palm cultivation, as they help monitor soil health by tracking changes in organic carbon and total nitrogen.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.		LSB had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field. No EFB application was applied in FY 2023 and 2024.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.4.4	Records of fertiliser inputs are maintained.		LSB has deferred fertilizer applications in preparation for the 2026 replanting, aligning with standard agronomic practices that recommend adjusting Manuring based on the plantation's developmental stage. This approach ensures that nutrient management is tailored to the specific needs of the replanting	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

			process, promoting optimal soil health and resource efficiency. Documentation of previous fertilizer inputs is maintained and will be updated post-replanting when Manuring resumes.	☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 7.5: Practices minimise and control erosion and degradation of soils				
7.5.1 (C)	Maps identifying marginal and fragile soils, including steep terrain, are available.		During the field visit and the soil maps provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in LSB. As per the Soil Maps, the soil series were Kinabatangan and Kretam.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.5.2	There is no extensive replanting of oil palm on steep terrain.		No replanting until the year of 2026 based on replanting program provided. Based on slope map dated 03/01/2020 prepared by HSP Agronomy Department, there was no steep terrain (greater than 25°) in LSB.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.5.3	There is no new planting of oil palm on steep terrain.		Based on the audit findings, there have been no new plantings or developments at LSB. Consequently, there is no need for soil suitability maps or soil surveys to establish the long-term suitability of the land for oil palm cultivation	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 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.		Based on the audit findings, it was confirmed that there were no new planting or new development of areas at LSB. Hence, there was no need for soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation was required.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		There were no marginal and fragile soils in the LSB.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure		LSB had a management strategy for palm oil cultivation, taking into account the soil surveys and topographic information in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information was provided and reviewed by the auditors.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

				☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 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.		Not applicable. Based on soil map dated 03/01/2020, prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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 Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		Not applicable. Based on soil map dated 03/01/2020, prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
7.7.2 (C)	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		Not applicable. Based on soil map dated 03/01/2020, prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).			☒ Not Applicable (justification required)
7.7.3 (C)	Subsidence of peat is monitored, documented and minimised.		Not applicable. Based on soil map dated 03/01/2020, prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
7.7.4 (C)	A documented water and ground cover management programme is in place.		Not applicable. Based on soil map dated 03/01/2020, prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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 time frame 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		Not applicable. Based on soil map dated 03/01/2020, prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG. PROCEDURAL NOTE: PLWG and the Smallholder Interim			

	Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]			
7.7.6 ©	All existing plantings on peat are managed according to the *'RSPO Manual on Best Management Practices (BMTs) for existing oil palm cultivation on peat', version 2 (2018)* and associated audit guidance.		Not applicable. Based on soil map dated 03/01/2020, prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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', version2 (2018) and associated audit guidance.		Not applicable. Based on soil map dated 03/01/2020, prepared by HSP Agronomy Department and site visit, there was no peat soil in the LSB.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.				

7.8.1 (C)	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: 7.8.1a. The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. 7.8.1 b. Workers have adequate access to clean water		The estate has a comprehensive Water Management Plan, reviewed on November 30, 2024, detailing water sources, usage, potential threats, action plans, and timelines. Sungai Sikok is monitored quarterly, with water samples analyzed by the accredited HSP Plantations Central Laboratory. Sampling results from February and May 2024 indicated that most parameters met the National Water Quality Standards for Malaysia, except for elevated turbidity and total suspended solids (TSS) in May, likely due to prior rainfall and flooding. Additionally, the estate provides each worker with 24 bottles of 1.5 liters of clean drinking water monthly, ensuring consistent access to potable water.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.8.2	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).		LBS had begun to reduce use of pesticides since August 2021. There is small river (Sg Sikok) passing through Lebijaya Sdn Bhd property, as sighted in the map and verified in the field (block 03 and Block 4). Additionally, steps were taken not to contaminate man-made water courses. For example, grass along water ways were let to grow and slashing maintained when needed.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		Not applicable since this Management is a outgrower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

7.8.4	Mill water use per tonne of FFB is monitored and recorded.		Not applicable since this Management is a outgrower company, No Mill involved in this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
Criterion 7.9: **Efficiency of fossil fuel use and the use of renewal energy is optimized.**				
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported.		The estate's Fossil Fuel Management Plan, reviewed on November 30, 2024, addresses diesel usage for Fresh Fruit Bunch (FFB) transport and fertilizer application, with documented environmental impacts and mitigation measures. Monthly monitoring from 2022 to 2024 indicates a decline in total diesel consumption: **2022:** 23,268 liters **2023:** 22,523 liters **2024:** 21,653 liters However, the diesel usage per metric ton of FFB has increased, suggesting reduced efficiency. This trend may be due to decreased FFB production and indicates a need for strategies to enhance fuel efficiency relative to production output.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions				
7.10.1 (C)	GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.		The Lebijaya Sdn. Bhd. had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. The input data FY2023 have been verified and checked. The input data as per Appendix 2: Greenhouse Gas (GHG) Reporting Summary.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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 (following the RSPO GHG Assessment Procedure for New Development).		Auditors has verified through checking the www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to the estate area. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Lebijaya Sdn. Bhd. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
7.10.3 (C)	Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.		The estate's Environmental Impact Assessment and Pollution Prevention Plan identifies greenhouse gas emissions sources, including land conversion, crop sequestration, fertilizer application, N_2O emissions from fertilizers, and fuel consumption. To mitigate these emissions, the estate has	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			implemented measures such as maintaining buffer zones to prevent chemical activities near sensitive areas, utilizing bunds as secondary containment to prevent leachate, and placing skid tanks within bunded areas to further control potential leaks. These initiatives are part of a broader strategy to minimize environmental impact and are subject to ongoing monitoring to ensure their effectiveness.	☐ Not Applicable (justification required)
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area.				
7.11.1 (C)	Land for new planting or replanting is not prepared by burning.		During site visit there was no new planting or replanting at LSB.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.		Estate has established fire prevention and control measures as per procedure SSOP “Pelan Tindakan Menghadapi Kebakaran” sighted a training has been conducted by estate manager to employees and mandore on 08/09/2024.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		Engages with adjacent stakeholders on fire prevention has been conducted and briefed during external stakeholder meeting conducted on 22/09/2024 involved relevant stakeholders such as neighbouring estate or smallholders, POM, internal workers and sustainability team from Hap Seng	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

			Plantations were briefed on all the RSPO principles and criteria and fire prevention.	☐ Opportunity for Improvement ☐ Not Applicable (justification required)
PROCEDURAL NOTE for 7.12 The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard. The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems. High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards. Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs). The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available. **Criteria 7.12:** Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.				
7.12.1 (C)	Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.		There has been no new land clearing at LSB since November 2015, rendering this indicator not applicable	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

7.12.2 (C)	HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.		he auditor reviewed the High Conservation Value (HCV) and High Carbon Stock Approach (HCSA) Assessment Report for Lebijaya Sdn Bhd, prepared by the Sustainable Unit of Hap Seng. The assessment, conducted from December 16 to 20, 2019, was finalized on December 30, 2019, and subsequently reviewed on November 30 in both 2023 and 2024. An elephant movement corridor was identified within the Lebijaya estate. To address this, a meeting with the Wildlife Department on June 7, 2022, led to the implementation of specific measures to manage and mitigate human-elephant interactions. These measures include contacting the Wildlife Department for assistance when needed, installing signboards to raise awareness among estate workers, conducting worker training sessions on safety protocols and wildlife management, and performing regular patrols along the reserve boundary to monitor and deter illegal activities. Additionally, a potential HCV4 area was identified, specifically the river buffer zone for Sungai Sikok. Lebijaya has maintained and managed this buffer zone in line with recommendations provided by the Wildlife Department. Such buffer zones are crucial for protecting water quality and biodiversity, serving as natural filters for pollutants and providing habitat connectivity. Lebijaya Sdn Bhd has demonstrated a strong commitment to conservation by implementing measures to safeguard both the identified rare, threatened, and endangered (RTE) areas and HCV sites. Key priorities include ongoing monitoring, continuous worker engagement, and strict adherence to recommended management practices.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

7.12.2 b)	Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		Not Applicable since there is no new Planting available at Lebijaya as per verified by the Auditor during this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
7.12.3 (C)	In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies. PROCEDURAL NOTE for 7.12.3: There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC		Not Applicable since there is no new Planting available at Lebijaya as per verified by the Auditor during this Assessment.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

	and HCV requirements.			
7.12.4 (C)	Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).		The High Conservation Value (HCV) and High Carbon Stock Approach (HCSA) Assessment Report for Lebijaya Sdn Bhd, prepared by Hap Seng's Sustainable Unit, identified a Bornean Pygmy Elephant movement corridor within the estate. To manage human-elephant interactions, measures such as contacting the Wildlife Department, installing awareness signboards, providing worker training, and conducting regular boundary patrols were implemented. Additionally, a river buffer zone for Sungai Sikok was designated as a potential HCV area and is maintained accordingly. The estate prohibits worker entry and indiscriminate spraying in these areas, installs appropriate signage, prohibits illegal hunting, and conducts annual worker training on RTE species. The Annual HCV Management Plan, updated on 30th November 2024, outlines these conservation measures.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		There were no local communities living nearby with Lebijaya Sdn Bhd. So, this indicator was not applicable with this CU.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

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.		Lebijaya Sdn Bhd (LSB) has developed an action plan based on an assessor's evaluation, resulting in the HCV Management Plan 2024, updated on 30 November 2024. This plan demonstrates LSB's commitment to protecting High Conservation Value (HCV) areas and discouraging illegal or inappropriate hunting, fishing, or collecting activities. During a site review, evidence showed that signage prohibiting hunting had been erected at the estate's border, and patrols by the mandore were implemented to control illegal activities. Additionally, LSB conducted training on HCV and wildlife for staff and field workers on 27 September 2024 and established a disciplinary measure titled 'Dilarang Memburu' (Hunting Prohibited).	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.		Lebijaya Sdn Bhd (LSB) has implemented several measures to protect High Conservation Value (HCV) areas and manage interactions with wildlife, particularly the Bornean Pygmy Elephant. Following the HCV-HCSA Assessment conducted in December 2019, LSB identified an elephant movement corridor within its estate. In response, a meeting with the Wildlife Department on June 7, 2022, led to the adoption of specific strategies, including contacting the department for assistance, installing awareness signboards, training workers on safety protocols, and conducting regular patrols along the reserve boundary to deter illegal activities. To further safeguard these areas, LSB updated its HCV Management Plan on November 30, 2024, emphasizing the protection of HCV 4 areas and the prevention of illegal hunting, fishing, or collecting activities. Evidence from site reviews indicates that hunting prohibition signage has been erected at	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			estate borders, and mandore-led patrols are actively monitoring for illegal hunting. Additionally, LSB conducted HCV and wildlife training for staff and field workers on September 27, 2024, and established a disciplinary measure titled 'Dilarang Memburu' (Hunting Prohibited) to reinforce its commitment to conservation. Monthly monitoring of Rare, Threatened, or Endangered (RTE) areas is systematically carried out, with records from late 2024 demonstrating consistent oversight. These activities are documented in the 'Lebijaya HCV and RTE Monthly Checklist,' ensuring ongoing evaluation and management of conservation efforts within the estate.	
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.		Not applicable since there is no new land clearing	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)

6. Summary of Audit Findings

Summary of nonconformities and opportunities for improvement				
Principle/Requirement	**Major**	**Minor**	**Opportunities for Improvement**	**Total No Findings**
System Requirements for Group Management				
Element 1: Group Entity and Group Management requirements				
Element 2: Internal Control System – Policies and management				
Element 3: Internal Control System – Operations				
RSPO Principle & Criteria (P&C)				
Principle 1: Behave Ethically and Transparently				
Principle 2: Operate legally and respect rights - Implement legal requirements as the basic principles of operation in any jurisdiction.	1			**1**
Principle 3: Optimise productivity, efficiency, positive impacts and resilience *(Includes IP and/or MB Module)*				
Principle 4: Respect Community and Human Rights and Deliver Benefits				
Principle 5: Support Smallholder Inclusion				
Principle 6: Respect Workers Rights and Conditions				
Principle 7: Protect, Conserve and Enhance Ecosystems and the Environment				
Systems Document				
Total	**1**			**1**

7. Nonconformity(ies) Issue in this Audit

Indicator Number	2.1.1
Nonconformity Number	RAR 01 2024
Nonconformity Category	☒ Major Nonconformity ☐ Minor Nonconformity
Recurring Nonconformity	☐ Yes ☒ No
Date of Nonconformity Issued	19 Dec 2024
Nonconformity Issued To *(when more than one site/member)*:	
Deadline:	☒ 3 months from date of closing meeting ☐12 months from date of closing meeting
Mode of Nonconformity Closure	☐ Onsite ☒ Off-site
Standard Reference	RSPO P&C MYNI 2019
Nonconformity Statement: Noncompliance with energy commission of Sabah (electrical supply enactment 2024) requirement.	
Evidence: During the documentation review at Lebijaya Sdn Bhd, It seems that the License from Energy Commission of Sabah, with license number ECOS/E/LEP1/D5CE99B7, valid until 25/08/2025 for a capacity of 10 kW, is subject to non-compliance with "Syarat-Syarat" No.6. This condition requires the license holder to submit monthly generation reports in a specified format to the Suruhanjaya Tenaga (Energy Commission).	
Root Cause Analysis	Lebijaya management miss out to report due to Process Gaps of information or Communication Issues from Estate management with the authorities regarding the new ECOS system from Suruhanjaya Tenaga. Lebijaya Management also had Limited staffing that could have contributed to the failure to submit reports on time.
Correction(s)	Estate management already submit monthly generation reports to the Suruhanjaya Tenaga (Energy Commission) for month November 2024 and December 2024 on 07th January 2025. **Refer Attachment 1**
Corrective Action Implemented *(including any evidence submitted)*	Estate Management has appointed PIC to monitor Legal requirement and will report by monthly every closing month to prevent this issue from happening again and will check by Estate Manager by monthly basis.
Date of Response	07 Feb 2025
Audit Team Review *(including any evidence reviewed)*	Auditor has thoroughly reviewed the submitted evidence, including monthly generation reports to the Suruhanjaya Tenaga (Energy Commission) for November 2024,

	December 2024, January 2025, and February 2025, along with the appointment letter of the Person in Charge (PIC) for monitoring legal compliance. Based on this verification, the evidence is deemed sufficient to address the non-compliance, leading to the closure of this NCR.
Audit Team Representative *(Name and Role)*	Mohd Zulfakar bin Kamaruzaman Lead Ausitor
Status of Nonconformity	☒ Closed ☐ Open
Date of Closure:	19 Mar 2025

Add tables as necessary

8. Opportunity for Improvement (OFI) Issue in this Audit

Indicator/requirement Number	
Opportunity for Improvement Number	
Date of Opportunity for Improvement Issued	
Opportunity for Improvement Issued To *(when more than one site/member)*:	
Standard Reference	
Opportunity for Improvement Statement:	

Add tables as necessary

9. Nonconformities raised in the previous audit

Indicator/requirement No	Nonconformity Number	Evidence Observed / Nonconformity Raised	Auditee Response Correction / Corrective Action	Verification of Correction/ Corrective Action	Conclusion /Status
3.6.1	**RAR 01 2023**	Requirement: 3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. Finding: certain operation are not risk assessed and not implemented to identify H&S issues Objective evidence: 1.risk control for hearing (noise) for activities road maintenance using an excavator was not yet identified and given to operator, sighted no issuance of earmuff or ear plug to the operator since January 2020 as per PPE issuance record book. 2.Risk Assessment for activity construction (new housing or	Root cause: The Certification Unit miss-out risk assess and monitor on health and safety issue for activities road maintenance using an excavator because of the machine are rarely used, construction activities and activities after harvesting or storage of harvesting tools due to lack of knowledge the clerk in charge of the HIRARC. Correction: 1. The certification unit will immediately assess and monitor on health and safety issue for activities road maintenance using an excavator, construction activities and activities after harvesting or storage of harvesting tools and include to the HIRARC. 2. The certification unit has provide training to all workers regarding the HIRARC on	Risk assessment on all activities as per above have been carried out and control measures determined. On overall performance, OSH administrative controls implementation as well as engineering control equipment was found adequate during the assessment. risk control for hearing (noise) for activities road maintenance using an excavator was has been updated and reviewed on 08/01/2024 identified and PPE given to operator, sighted issuance of	**Closed**

		maintenance) was not yet to be identified. 3.Risk Assessment for activities after harvesting or storage of harvesting tools not yet identified, during site visit at housing area was sighted harvesting pool with no sickle cover were left on the ground near the housing complexes	(25/01/2024) and give ear plug to the operator. Corrective Action: The Estate Manager will review the HIRARC by yearly basis to ensure all news activities fully risk assess and monitor on health and safety issue and provide training by yearly basis with support from safety and health officer from Hap Seng Sustainability teams	earmuff or ear plug record and implementation or usage of PPE by the operator . 1. Risk Assessment for activity construction (carpenter) also were updated and reviewed on date 08/01/2024, during site visit there was no construction at the site. Risk Assessment for activities after harvesting were updated and reviewed on date 08/01/2024, during site visit at housing area and harvesting activities at block 03 was sighted harvesting pool sickle cover were usage by harvester. Thus, previous NCR was satisfactory closed.	
7.3.2	RAR 02 2023	Requirement: 7.3.2 Proper disposal of waste material, according to procedures that are	Root cause:	During site visit at land fill area was found only domestic	**Closed**

		fully understood by workers and managers, is demonstrated. Finding: disposal of waste material was not demonstrated and accordance as per procedure. Objective evidence: During site visit at housing complex's (Block D) was sighted domestic waste such as bottle, food waste, etc was not managed accordingly and has been throw at the back of housing areas.	The Certification Unit lack of awareness about the domestic waste need to manage as per procedure. Correction: The certification unit has conducted training on (25/01/2024), regarding the procedure of Domestic waste to all workers and assess their understanding on the training. Corrective Action: The Estate Manager will conduct the training by yearly basis and include the training into the training program. with support from Hap Seng Sustainability teams	waste such as food waste were disposed in there. Meanwhile SW has been disposed through DOE contractor. Also were verified at housing complex area were sighted dedicated dustbin were located near the housing and also recycle areas also were established in the housing areas. No evidence of non-compliance of waste management procedures in the housing areas, thus, previous NCR was satisfactory closed	

10. Stakeholder Consultation Process

CB should ensure that all relevant stakeholders are consulted. The relevant stakeholders include but are not limited to statutory bodies, indigenous peoples, local communities (including women representatives, and displaced communities), workers and workers' organisations (including migrant workers), smallholders, and local and national NGOs.

Date of public announcement made: Only for the case of IC or RC

Summary of stakeholder's comments and the CB's responses and findings are presented in the table below:

10.1 For Audit Report

No	Consulted Stakeholders *Name of Stakeholders*	Date of Consultation/ Comment Received	Method of Consultation/Comment received	Feedback/Comments/Issue Raised Received from Stakeholders	CB's Responses
	Add rows as necessary	DD Mmm YYYY	*E.g. public announcement*		*E.g. Status of the issue raised*

10.2 For Public Summary Report

No	Consulted Stakeholders *(Type of Stakeholders)*	Date of Consultation/ Comment Received	Method of Consultation/Comment received	Feedback/Comments/Issue Raised Received from Stakeholders	CB's Responses
1	JKKKK Kampung Litang	17 Dec 2024	Interview face to face	The villagers have no issues with Lebijaya, as the plantation and the village are located quite far apart. Only 2–3 villagers have land near Lebijaya. However, during the meeting, no issues were raised by the affected villagers; in fact, they expressed	No issues, as this is positive comment.

				satisfaction because Lebijaya allows them to use the plantation road without any charges. Overall, they have no issues with Lebijaya.	

Summary of workers interviewed, and the CB's responses and findings are presented in the table below:

Total Workers in the Unit of Certification			**8**	
Sampled Worker Consulted/Interviewed in This Audit			**8**	
No	**Type of Workers Consulted/Interviewed**	**Interview Method**	**Feedback/Comments/Issue Raised Received from Worker**	**CB's Responses**
1	Oil Palm Harvesters	Site interviews	No issues	NA
2	General workers	Site interviews	No issues	NA
3	Piece rated workers	Site interviews	No issues	NA

Consultation with Previous Land User

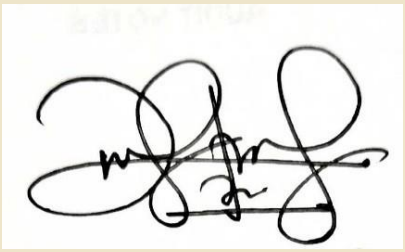
Total Identified Previous Land User in the Unit of Certification			Not applicable.	
Sampled Previous Land User in this audit				
Name of Previous Land User	**Contact Details (address/telephone/email)**	**Total Area (Ha)**	**Date of Consultation**	**Result of Discussion with Previous Land User**
Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.

11. Audit Conclusion & Recommendations

Audit findings	
☐	No nonconformity recorded.
☐	Minor nonconformity recorded. A corrective action plan has been accepted. Verification of the nonconformity(ies) to be carried out in the next audit.
☒	Major nonconformity recorded. Evidence of implementation of the corrective actions have been accepted by the audit team. The nonconformity(ies) have been satisfactorily closed out.
Recommendation	
☐	Certification (Initial Certification)
☒	Continue certification (Annual Surveillance Audit)
☐	Renewal for certification (Recertification)
☐	Not recommended for certification. Reason: (*Please provide the reason/ justification)*

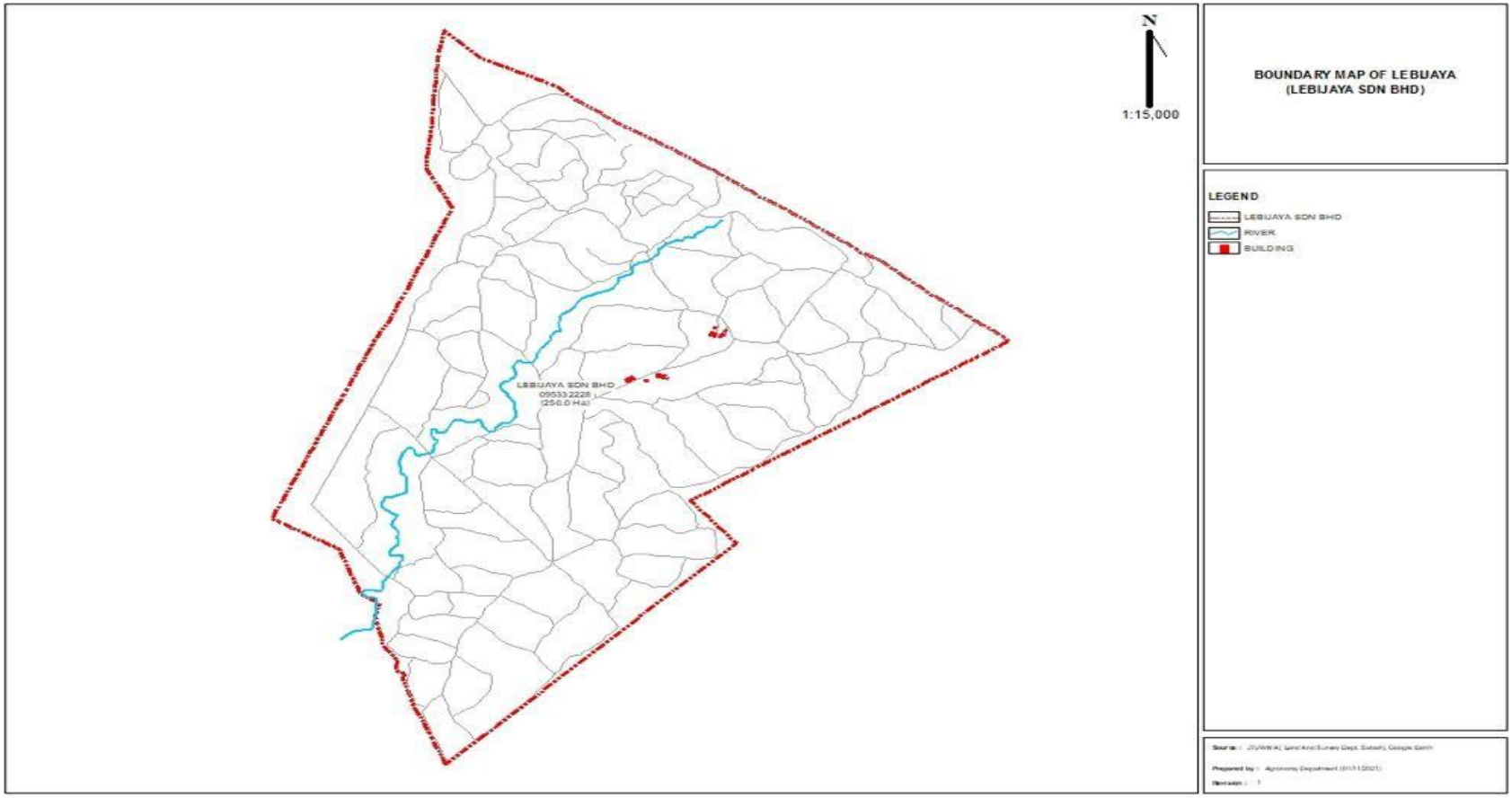
12. Acknowledgment of Internal Responsibility and Formal Sign-off Assessment Findings

Signing by the Management Unit		
I the undersigned, being the most senior management representative of the operation seeking or holding certification, agree with the contents and audit findings presented in this document. Furthermore, I confirm the following: · Acceptance of responsibility in execution of the instructions given. · That this company was made aware that the recommendation of the Audit Team is tentative; pending review and decision by the Certification Decision Maker assigned by the CB. · That during the closing meeting all agenda items were covered by the Audit Team Leader.		
Acknowledge by:		 Signature
Name	ROSENI TAN	
Position	DIRECTOR	
Date	13/05/2025	

Signing by the Audit Team Leader		
I, the undersigned, being the Audit Team Leader, confirm that this report accurately reflects the findings and proceedings of the closing meeting. Furthermore, I affirm that the summary of the findings presented in this report is a true and accurate representation of the actual findings of the Audit Team.		
Acknowledge by:		 Signature
Name	MOHD ZULFAKAR BIN KAMARUZAMAN	
Position	LEAD AUDITOR	
Date	27 Mar 2025	

Signing by the Certification Decision Maker		
I, the undersigned, being the Certification Decision Maker, confirm that the information and conclusions contained in this report have been prepared in good faith and that the certification decision has been made based upon this information.		
Acknowledge by:		 Signature
Name	Kamini Sooriamoorthy	
Position	Section Head, FAF	
Date	2/4/2025	

Appendix 1: Location Map Unit of Certification and Group Member



i.e figure: Map of Unit of Certification

Appendix 2: Greenhouse Gas (GHG) Reporting Summary

The GHG emissions produced by the Unit of Certification (POM and its supply bases) in the period of January 2023 until December 2024 have been calculated using the RSPO PalmGHG Calculator (version 4). The assessment team had verified the data input in the PalmGHG Calculator against operations records. The Certification Unit has selected the following options from the PalmGHG Calculator when preparing inputs for the GHG emissions calculations:

☒ Apply Full Version

☐ Exclude LUC Emissions

The summary of the Net GHG emitted in January to December 2023 for Lebijaya Sdn Bhd base are as following:

1. Summary of Emissions

Description	tCO_2eq/t product
CPO	0
PK	0
PKO	0
PKE	0

Extraction	tCO_2e/t product
OER	0
KER	0

2. Summary of Plantation/Field Emissions and Sink

Land Use	Ha
OP Planted Area	215.80
OP Planted on Peat	0
Conservation (Forested)	0
Conservation (Non-Forested)	0
Total	**0**

Production	t/year
FFB Processed	0
CPO Produced	0

	Own Crop		Group		3rd Party		Total
	tCO_2e	tCO_2e/ tFFB	tCO_2e	tCO_2e/ tFFB	tCO_2e	tCO_2e/ tFFB	
Land Conversion	2131.38	9.88	1.02	0.00	0.00	0.00	2131.38
CO_2 Emission from Fertilizer	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N_2O Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fuel Consumption	76.61	0.35	0.04	0.00	0.00	0.00	76.61
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Crop Sequestration	-2020.26	-9.35	-0.97	0.00	0.00	0.00	-2020.26
Sequestration in Conservation Area	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**187.72**	**0.87**	**0.09**	0.00	0.00	0.00	**187.72**

**Note: Includes both estates and smallholders (delete whichever not applicable)*

3. Summary of Mill Emission and Credits

	tCO_2	tCO_2e/t FFB
Emission		
POME	0	0
Fuel Consumption	0	0
Grid Electricity Utilization	0	0
Credit		
Export of Excess Electricity to Housing & Grid	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	0	0

4. Palm Oil Mill Effluent (POME) Treatment

Description	%
Diverted to	0
Divert to anaerobic digestion	0

5. POME Diverted to Anaerobic Digestion

Description	%
Diverted to anaerobic pond	0
Diverted to methane capture (Flaring)	0
Diverted to methane capture (electricity generation)	0