RSPO P&C CERTIFICATION AUDIT REPORT

(BOUSTEAD PLANTATIONS BHD - NAK BUSINESS UNIT)

Audit Application Number:	PC25-002591
Assessment Type:	Recertification
Date of Audit:	07/04/2025 – 12/04/2025
Audit Report Number:	1
Revision Number:	0
Audit Report Date	11/07/2025

Table of Contents

1. Certification Body Background 4
   1.1 Description of Certification Body 4
2. Organisation Details and Certification Scope 5
   2.1. Organisational Overview 5
   2.2. RSPO Membership Information 5
   2.3. Certificate Information 6
3. Description of the Management Unit 7
   3.1. Area Statement of the Management Unit 9
   3.2. Age Profile of the Management Unit 10
   3.3. Replanting Programme of the Management Unit (5 Years) 11
   3.4. Name FFB Supplier Supplying FFB to the Mill (Certified FFB) 12
   3.6 Projected Certified Volume for Next License 14
   3.7 Information of Previous & Current License (Identity Preserved) 15
   3.8 Information of Previous & Current License (Mass Balance) 17
4. Audit Programme 19
   4.1. Audit Methodology 19
   4.2. Audit Team Member 19
   4.3. Audit Plan 20
   4.4. Changes of the initial audit plan (if applicable) 26
   4.5. Sampling Details 27
   4.6. Sampling History of Current Certification Cycle 28
   4.7. Audit Team Leader and Audit Team Information 28
5. Audit Findings & Results 33
6. Summary of Audit Findings 109
7. Nonconformity(ies) Issue in this Audit 111
8. Opportunity for Improvement (OFI) Issue in this Audit 117
9. Status of Nonconformities Previously Identified and Opportunity for Improvement 118
10. Stakeholder Consultation Process 122
    11.1 For Audit Report 122
    11.2 For Public Summary Report 122
    11.3 Summary of workers interviewed, and the CB's responses and findings are presented in the table below: 126
    11.4 Consultation with Previous Land User 129
11. Time Bound Plan 130
12. Requirements on Multiple Management Unit 135

13. Requirements for Uncertified Management Units 138
14. Audit Conclusion & Recommendation 142
15. Acknowledgment of Internal Responsibility and Formal Sign-off Assessment Findings 143
Appendix 1: Location Map Unit of Certification and Supply bases 145
Appendix 2: History of the changes in the current certification cycle. 147
Appendix 3: Greenhouse Gas (GHG) Reporting Summary 148

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, 40700 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 IQ Net, 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 28 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 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	Boustead Plantations Berhad
Address of the Management Unit/s	Boustead Nak Business Unit No. 69, 90009 Sandakan Sabah
Country	Malaysia
Websites	Bousteadplantations.com.my
Description of the Management Unit	The Nak Certification Unit (hereafter referred to as Nak CU) is one of the business units under the Boustead Plantations Bhd (BPB), which is also known as Boustead Nak Business Unit. The CU comprises of the Nak Palm Oil Mill (Nak POM) and three supply bases i.e., Nak Estate, Resort Estate and Sutera Estate. All of the estates were fully owned by BPB. The Nak POM has a mill capacity of 40 mt/hr. All the estates have been fully developed before 2005. Boustead Nak BU has ISO 9001 quality management system certification besides RSPO P&C and Supply Chain. Boustead Nak BU has changed their supply chain model from IP to MB. Starting from 15 May 2019, the POM started to receive, and process certified and non-certified crops.
Management Representative Name	Mitah Binti Limpu
Management Representative Designation	Sustainability Executive
Management Representative Email	mitah@bplant.com.my

2.2.RSPO Membership Information

RSPO Membership Information	
RSPO Membership No.	1-0012-04-000-00
Name of RSPO Member	Boustead Plantations Berhad
Member Since	11-01-2004

2.3.Certificate Information

Certificate Information	
Certificate No.	RSPO-PC 00120
prisma Document Reference Number	*(N/A until June 2025)*
prisma Trading Account ID	TA25-016976
Scope of Certification	Production Of Sustainable Crude Palm Oil And Palm Kernel Using The Mass Balance (MB) Supply Chain Model
Supply Chain Model	☐ Identity Preserved (IP) ☒ Mass Balance (MB)
Applicable Standards / Normative Reference	☒ RSPO 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)	Malaysia National Interpretation
Initial Date of Certification:	16-05-2015
Effective Date of Certificate:	16-05-2020
Expiry Date of Certificate:	15-05-2025
Name of Peer Reviewer	Harso Yuli Antena

3. Description of the Management Unit

Information of Palm Oil Mill					
Name of Palm Oil Mills	**prisma Site Business ID**	**Address of Palm Oil Mill**	**Mill's capacity (MT/hour)**	**GPS Coordinates**	
				Latitude	**Longitude**
Nak Palm Oil Mill	ML25-001279	KM 5, Off 19th Mile, Labuk Road, Locked Bag No 69,90009 Sandakan, Sabah	40 Mt/hour	5.9000' N	117.8552' E
Remarks: Not applicable					

Information of Supply Bases					
Name of Supply Bases	**prisma Supply Base ID**	**Address of Supply Bases**	**Type of Supply Bases**	**GPS Coordinates**	
				Latitude	**Longitude**
Nak Estate	SB25-005196	Mile 19, 27KM Labuk Road, 90009 Sandakan, Sabah	Own/Managed Estate	5.9028’ N	117.8522’ E
Sutera Estate	SB25-005927	Off Mile 45, 68 km Lahad Datu Road, Sandakan, 90009 Sabah.	Own/Managed Estate	5.6964’ N	117.7842’ E
Resort Estate	SB25-005526	KM 100 Sandakan Road, 90009 Sandakan, Sabah.	Own/Managed Estate	5.6545’ N	117.3662’ E

3.1. Area Statement of the Management Unit

Area Statement of Supply Bases									
Name of Supply Base	**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**
Nak Estate	1,357.94	1,305.30	0.00	0.00	0.00	0.00	0.00	0.00	52.64
Sutera Estate	2,191.99	2,087.80	0.00	0.00	0.00	0.00	0.00	0.00	104.19
Resort Estate	1,123.91	1,060.30	0.00	0.00	0.00	0.00	0.00	0.00	63.61
TOTAL	**4,673.84**	**4,453.40**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**220.44**

Remarks:

Nak Estate – Reduction of 28.16 ha due to reconciliation of the estate map with the land title.

Sutera Estate – Increase of 5.51 ha due to reconciliation of the estate map with the land title. A double-counting of land acquisition occurred following updates from Jabatan Tanah & Ukur in 2021.

Resort Estate – Increase of 0.01 ha due to reconciliation with the land title.

3.2. Age Profile of the Management Unit

Name of the Supply Base	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		
Nak Estate	333.00	383.40	318.30	270.60	972.30	1,305.30
Sutera Estate	0.00	482.90	1,302.40	302.50	2,087.80	2,087.80
Resort Estate	0.00	353.60	706.70	0.00	1,060.30	1,060.30
TOTAL (ha)	**333.00**	**1,219.90**	**2,327.40**	**573.10**	**4,120.40**	**4,453.40**
Remarks: Not 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 Programme of the Management Unit (5 Years)

Name of the Supply Base	Land area (ha) by year					Total Area (Ha)
	2025	2026	2027	2028	2029	
Nak Estate	0.0	0.0	111.1	84.4	75.1	270.6
Sutera Estate	0.0	0.0	0.0	0.0	0.0	0.0
Resort Estate	0.0	0.0	0.0	0.0	0.0	0.0
TOTAL (ha)	**0.0**	**0.0**	**111.1**	**84.4**	**75.1**	**270.6**

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

3.4. Name FFB Supplier Supplying FFB to the Mill (Certified FFB)

Name of other FFB Suppliers	Type of FFB Suppliers	Certified Status	GPS Coordinates		FFB received by the mil (MT)
			Latitude	Longitude	
Nak Estate	Own Estate	RSPO Certified	5.9028’ N	117.8522’ E	13,152.89
Sutera Estate	Own Estate	RSPO Certified	5.6964’ N	117.7842’ E	35,510.33
Resort Estate	Own Estate	RSPO Certified	5.6545’ N	117.3662’ E	22,017.42
Ladang Tabung Tentera Sabah	Diverted Crop	RSPO Certified	05^0 9.80’ N	117^0 46.75’ E	253.78
Sg Segamaha Estate	Diverted Crop	RSPO Certified	05^0 12.18' N	117^0 48.50' E	879.55
Bukit Segamaha Estate	Diverted Crop	RSPO Certified	05^0 12.55' N	117^0 45.57' E	815.46
G&G Estate	Diverted Crop	RSPO Certified	05^0 9.90' N	117^0 46.65' E	302.91
				TOTAL	**72,968.15**

3.5 Name FFB Supplier Supplying FFB to the Mill (Un-Certified FFB)

Name of other FFB Suppliers	Type of FFB Suppliers	GPS Coordinates		FFB received by the mil (MT) *During the current license period
		Latitude	Longitude	
Not Applicable				
			TOTAL	

3.6 Projected Certified Volume for Next License

Information of New License		
Next License Period	Start Date	16/05/2025
	End Date	15/05/2026
Projected Certified FFB Volume (MT)	99,975	
Average Production Yield (MT/ Ha)	22.53	
Projected CSPO Certified Volume (MT)	Identity Preserved	NA
	Mass Balance	21,306
Projected CSPK Certified Volume (MT)	Identity Preserved	NA
	Mass Balance	2,999
Oil Extraction Rate (OER) (%)	21.30	
Kernel Extraction Rate (KER) (%)	3.0	

3.7 Information of Previous & Current License (Identity Preserved)

-NOT APPLICABLE-

Name of Palm Oil Mill				
Information of License	**Previous Year License**		**Current Year License**	
License Period	Start Date		Start Date	
	End Date		End Date	
Actual Production Period Reported	From		From	
	To		To	
Projected FFB Certified Volume (MT)				
Actual production of FFB (MT)				
Projected CSPO Certified Volume (MT)				
Actual CSPO Production Volume (MT)				
Actual CSPO Volume Sold as RSPO Certified (MT)				
Actual CSPO Volume Sold as Conventional (MT)				
Actual CSPO Volume Sold under Other Scheme (MT)				
Total Actual CSPO Volume Sold (MT)				
Actual CSPO credits sold (where applicable)				

Projected CSPK Certified Volume (MT)		
Actual CSPK Production Volume (MT)		
Actual CSPK Volume Sold as RSPO Certified (MT)		
Actual CSPK Volume Sold as Conventional (MT)		
Actual CSPK Volume Sold under Other Scheme (MT)		
Total Actual CSPK Volume Sold (MT)		

3.8 Information of Previous & Current License (Mass Balance)

Name of Palm Oil Mill	**NAK PALM OIL MILL**			
Information of License	**Previous Year License**		**Current Year License**	
License Period	Start Date	16/05/2023	Start Date	16/05/2024
	End Date	15/05/2024	End Date	15/05/2025
Actual Production Period Reported	From	16/05/2023	From	16/05/2024
	To	15/05/2024	To	31/03/2025
Projected FFB Certified Volume (MT)	75,978.00		80,501.68	
Actual production of FFB (MT)	75,827.30		72,968.15	
Projected CSPO Certified Volume (MT)	16,230.75		17,307.86	
Actual CSPO Production Volume (MT)	15,878.44		15,384.00	
Actual CSPO Volume Sold as RSPO Certified (MT)	12,697.21		10,975.74	
Actual CSPO Volume Sold as Conventional (MT)	2,930.47		4,353.54	
Actual CSPO Volume Sold under Other Scheme (MT)	-		-	
Total Actual CSPO Volume Sold (MT)	15,627.68		15,329.28	
Actual CSPO credits sold (where applicable) (MT)	NA		NA	

Projected CSPK Certified Volume (MT)	2,291.40	2,637.00
Actual CSPK Production (MT)	2,043.10	2,001.84
Actual CSPK Volume Sold as RSPO Certified (MT)	2,005.93	1,850.18
Actual CSPK Volume Sold as Conventional (MT)	37.17	0.00
Actual CSPK Volume Sold under Other Scheme (MT)	0.00	0.00
Total Actual CSPK Volume Sold (MT)	2043.10	1,850.18

4. Audit Programme

4.1. Audit Methodology

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

4.2. Audit Team Member

Name	Role	CAB Auditor Number
Rohazimi Mat Nawi (RMN)	Lead Auditor	ASI1P4D2WW
Rozaimee Ab Rahman (RAR)	Auditor	ASI1AU6HF7
Dzulfiqar Azmi (DA)	Auditor	ASI1GIVNPH
Mohd Zulfakar Kamaruzaman (MZK)	Auditor	ASI17IDGG4

4.3. Audit Plan

Date	Time	CAB Auditor Number	Location	Activity
07/04/2025	0900 am -1700 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Nak POM	Opening Meeting – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader. Briefing on RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. Logistics discussion to the sites to be visited. RMN ▪ Site inspection at production and nonproduction area i.e. kernel plant, loading ramp, storage tank, kernel bunker, boiler, mill workshop, scheduled wastes store, chemical store, water treatment plant, effluent pond, clinic and laboratory. ▪ Site inspection at workers quarters and housing facilities i.e. mill canteen ▪ Documents review related to environments aspect such as EIA, scheduled wastes records, final discharge report, stake sampling reports, etc. ▪ Documents review related to Environmental aspect such as Environmental impact assessment & management plan, Waste management, Water management, fuel efficiency and GHG. DA ▪ Witness of mill best and safety practices. ▪ Interview with boilerman, production operator. ▪ Interview with hospital assistant ▪ Interview with representative from OSH committees ▪ Documents review related to safety aspect and mill best practices reports such as safety meetings, accident records, CHRA, medical surveillance, NRA, audiometric report, mill performance monitoring report, business plan, etc. RAR • Site visit and assessment on Supply Chain Implementation including the: Model used, General Chain of Custody, System Requirements for the supply chain, Purchasing and goods in, Outsourcing activity, Sales and goods out, Processing, Claims.

				MZK ▪ Mill Boundary, adjacent and neighbouring land use ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with contractors, supplier, etc ▪ Consultation with relevant government agencies ▪ Training and skill development programs
08/04/2025	0900 am -1700 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Resort Estate	RMN ▪ Site inspection at nonproduction area i.e. workshop, scheduled wastes store, chemical store, water treatment plant, effluent pond, clinic and laboratory. ▪ Site inspection at workers quarters and housing facilities i.e. mill canteen ▪ Documents review related to environments aspect such as EIA, scheduled wastes records, final discharge report, stake sampling reports, etc. ▪ Documents review related to Environmental aspect such as Environmental impact assessment & management plan, Waste management, Water management, fuel efficiency and GHG. DA ▪ Site inspection at harvesting Block PR 2017C and selective weeding PR 2016D ▪ Witness of GAP and safety practices. ▪ Legal compliance such licenses and permits. ▪ Interview with respective site visit workers. ▪ Interview with representative from OSH committees ▪ Documents review related to safety aspect and Estate best practices reports such as safety meetings, accident records, CHRA, medical surveillance, NRA, audiometric report, mill performance monitoring report, business plan, etc. ▪ Documents review related to good agriculture practices such as estate performance monitoring report, fertilizers recommendations, harvesting interval records, soil maps, terrains maps, business plan, replating program, etc. ▪ RAR ▪ Site inspection at workers quarters and housing facilities i.e. sundry shop, creche ayah, CLC, Humana, estate clinic.

				▪ Interview with harvesters and general workers from Local, Indonesian nationalities. ▪ Interview with representative JCC, gender committee. ▪ Documents review related to social aspect such as social impact assessment & management plan, workers and contractors' files, complaint and grievances files, housing inspection records, etc.) <u>MZK</u> ▪ Interview with external stakeholders' consultations i.e. representative from local communities from Kampung Ulu Sapi. ▪ Interview with supplier and contractors ▪ Documents review related to social external and HCV aspect i.e. land titles, social impacts assessment and management plan, stakeholders minutes meetings, local sustainable development, support smallholder inclusion, complaints and grievances, external stakeholder's issues & welfare, HCV assessment and management plan.Training and skill development programs
09/04/2025	0900 am -1700 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Sutera Estate	<u>RMN</u> ▪ Site inspection at nonproduction area i.e. workshop, scheduled wastes store, chemical store, water treatment plant, effluent pond, clinic and laboratory. ▪ Site inspection at workers quarters and housing facilities i.e. mill canteen ▪ Documents review related to environments aspect such as EIA, scheduled wastes records, final discharge report, stake sampling reports, etc. ▪ Documents review related to Environmental aspect such as Environmental impact assessment & management plan, Waste management, Water management, fuel efficiency and GHG. <u>DA</u> ▪ Site inspection at Harvesting Block PR2019E and Loose Fruit Collection Block PM2007A ▪ Witness of GAP and safety practices. ▪ Legal compliance such licenses and permits. ▪ Interview with respective site visit workers. ▪ Interview with representative from OSH committees ▪ Documents review related to safety aspect and Estate best practices reports such as safety meetings, accident records, CHRA, medical surveillance, NRA, audiometric report, mill performance monitoring report, business plan, etc.

				▪ Documents review related to good agriculture practices such as estate performance monitoring report, fertilizers recommendations, harvesting interval records, soil maps, terrains maps, business plan, replating program, etc. ▪ <u>RAR</u> ▪ Site inspection at workers quarters and housing facilities i.e. sundry shop, creche ayah, CLC, Humana, estate clinic. ▪ Interview with harvesters and general workers from Local, Indonesian nationalities. ▪ Interview with representative JCC, gender committee. ▪ Documents review related to social aspect such as social impact assessment & management plan, workers and contractors' files, complaint and grievances files, housing inspection records, etc.) <u>MZK</u> ▪ Interview with external stakeholders' consultations i.e. representative from local communities from Kampung Toniting. ▪ Interview with supplier and contractors ▪ Documents review related to social external and HCV aspect i.e. land titles, social impacts assessment and management plan, stakeholders minutes meetings, local sustainable development, support smallholder inclusion, complaints and grievances, external stakeholder's issues & welfare, HCV assessment and management plan.Training and skill development programs
10/04/2025	0900 am -1700 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Nak Estate	<u>RMN</u> ▪ Site inspection at nonproduction area i.e. workshop, scheduled wastes store, chemical store, water treatment plant, effluent pond, clinic and laboratory. ▪ Site inspection at workers quarters and housing facilities i.e. mill canteen ▪ Documents review related to environments aspect such as EIA, scheduled wastes records, final discharge report, stake sampling reports, etc. ▪ Documents review related to Environmental aspect such as Environmental impact assessment & management plan, Waste management, Water management, fuel efficiency and GHG. <u>DA</u>

				• Site inspection at Harvesting – Block PM2001A, Selective Weeding – Block PM2002C and Raking Palm Circle – Block PM2017A ▪ Witness of GAP and safety practices. ▪ Legal compliance such licenses and permits. ▪ Interview with respective site visit workers. ▪ Interview with representative from OSH committees ▪ Documents review related to safety aspect and Estate best practices reports such as safety meetings, accident records, CHRA, medical surveillance, NRA, audiometric report, mill performance monitoring report, business plan, etc. ▪ Documents review related to good agriculture practices such as estate performance monitoring report, fertilizers recommendations, harvesting interval records, soil maps, terrains maps, business plan, replating program, etc. ▪ <u>RAR</u> ▪ Site inspection at workers quarters and housing facilities i.e. sundry shop, creche ayah, CLC, Humana, estate clinic. ▪ Interview with harvesters and general workers from Local, Indonesian nationalities. ▪ Interview with representative JCC, gender committee. ▪ Documents review related to social aspect such as social impact assessment & management plan, workers and contractors' files, complaint and grievances files, housing inspection records, etc.) <u>MZK</u> ▪ Interview with external stakeholders' consultations i.e. representative from local communities from Kampung Segaliud and Kampung Sg Tiram. ▪ Interview with supplier and contractors ▪ Documents review related to social external and HCV aspect i.e. land titles, social impacts assessment and management plan, stakeholders minutes meetings, local sustainable development, support smallholder inclusion, complaints and grievances, external stakeholder's issues & welfare, HCV assessment and management plan.Training and skill development programs

11/4/2025	0900 am -1700 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Nak POM	Continue unfinished areas <u>RMN</u> ▪ Documents review related to environments aspect such as EIA, scheduled wastes records, final discharge report, stake sampling reports, etc. ▪ Documents review related to Environmental aspect such as Environmental impact assessment & management plan, Waste management, Water management, fuel efficiency and GHG. <u>DA</u> ▪ Witness of GAP and safety practices. ▪ Legal compliance such licenses and permits. ▪ Documents review related to safety aspect and Estate best practices reports such as safety meetings, accident records, CHRA, medical surveillance, NRA, audiometric report, mill performance monitoring report, business plan, etc. ▪ Documents review related to good agriculture practices such as estate performance monitoring report, fertilizers recommendations, harvesting interval records, soil maps, terrains maps, business plan, replating program, etc. <u>RAR</u> ▪ Interview with general workers from Local, Indonesian nationalities. ▪ Interview with representative JCC, gender committee. ▪ Documents review related to social aspect such as social impact assessment & management plan, workers and contractors' files, complaint and grievances files, housing inspection records, etc.) <u>MZK</u> ▪ Interview with external stakeholders' consultations i.e. representative from local communities from Kampung Ulu Tiram ▪ Interview with supplier and contractors ▪ Documents review related to social external and HCV aspect i.e. land titles, social impacts assessment and management plan, stakeholders minutes meetings, local sustainable development, support smallholder inclusion, complaints and grievances, external stakeholder's issues & welfare, HCV assessment and management plan.Training and skill development programs
12/4/2025	0900 am -1200 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Nak Estate	Continue unfinished areas Audit team discussion Preparation of audit findings Verification on previous audit findings

				Closing meeting

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 change to initial audit plan.

4.5. Sampling Details

Description of Management Unit	Number of Estate/Members/Mills	Risk Factor	Result x = (√y) x (z)	Total Sampled
Mill	One	N/A	N/A	1
Own/Managed Estates	Three	Low Risk	3	3
Scheme Smallholder	NA	Choose an item	NA	NA
Scheme Outgrower	NA	Choose an item	NA	NA
Independent Outgrower	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 (Mill/ Supply Base / Scheme Smallholder)	Year 1	Year 2	Year 3	Year 4	Year 5
	2021	2022	2023	2024	2025
Nak POM	☒	☒	☒	☒	☒
Nak Estate	☒	☒	☒	☒	☒
Resort Estate	☒	☒	☒	☒	☒
Sutera Estate	☒	☒	☒	☒	☒

4.7. Audit Team Leader and Audit Team Information

Audit Team Leader: Rohazimi Mat Nawi (RMN)	
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;	Had more than 5 years in the palm oil sector, health and safety, environmental management and other sustainability audit such as MSPO.
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 and RSPO ISH standard and completed evaluation and qualified as lead auditor RSPO since 2020.

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 refresher course for RSPO endorsed P&C lead auditor course every three (3) years after the initial qualification as lead auditor in 2023.	
Audit Team Members: **Mohd Zulfakar Kamaruzaman (MZK)** **Dzulfiqar Azmi (DA)** **Rozaimee Ab Rahman (RAR)**		
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;	*ASI1P4D2WW (RMN)*	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia
	ASI1GIVNPH (DA)	Holds a B.SC. (Hons) in Plantation Technology and Management from Mara Technological University (UiTM).
	ASI17IDGG (MZK)	Hold B. Sc. Forestry from University Putra Malaysia
	ASI1AU6HF7 (RAR)	Holds a B. Sc. of Agriculture from 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	*ASI1P4D2WW (RMN)*	Had more than 5 years in the palm oil sector, health and safety, or environmental management auditing since 2015.
	ASI1GIVNPH (DA)	He had more than 7 years of working experience in the oil palm operation and experience in social auditing since 2017.
	ASI17IDGG (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.
	ASI1AU6HF7 (RAR)	He had 7 years of working experience in the oil palm operation.
Successfully completed an RSPO endorsed P&C lead auditor course	*ASI1P4D2WW (RMN)*	Completed RSPO endorsed P&C lead auditor course in 2020 by Chemark Training and passed refresher in 2023.
	ASI1GIVNPH (DA)	Completed RSPO endorsed P&C lead auditor course in 2018 by Chemark Training and passed refresher in 2024.
	ASI17IDGG (MZK)	Completed RSPO endorsed P&C lead auditor course in 2015 by Wild Asia and passed refresher in 2024.
	ASI1AU6HF7 (RAR)	Completed RSPO endorsed P&C lead auditor course in 2017 by Chemark Training and passed refresher in 2024.
Successfully completed the 5-day lead auditor course for ISO 9001 or ISO 14001 or ISO 45001.	*ASI1P4D2WW (RMN)*	Successfully attended Integrated Management System lead assessor course in 2015.
	ASI1GIVNPH (DA)	Successfully attended Integrated Management System lead assessor course in 2017.
	ASI17IDGG (MZK)	Successfully attended 5-day lead auditor course for ISO 9001, ISO 14001 and ISO 45001 in 2015.

	ASI1AU6HF7 (RAR)	Successfully attended 5-day lead auditor course for ISO 9001, ISO 14001 and ISO 45001 in 2016, 2018.
Demonstrable understanding of the latest version of RSPO Certification Systems	*ASI1P4D2WW (RMN)*	Can demonstrate of the latest version of RSPO Certification Systems
	ASI1GIVNPH (DA)	Capable of demonstrating knowledge and application of the latest version of the RSPO Certification Systems.
	ASI17IDGG (MZK)	Capable of demonstrating knowledge and application of the latest version of the RSPO Certification Systems.
	ASI1AU6HF7 (RAR)	Capable of demonstrating knowledge and application of the latest version of the RSPO Certification Systems.
For auditors verifying compliance with NPP procedures, auditors shall additionally be trained in the assessment of compliance with FPIC, HCV and HCS requirements in the context of RSPO NPP procedure	*ASI1P4D2WW (RMN)*	This has not been audited and is deemed not applicable.
	ASI1GIVNPH (DA)	This has not been audited and is deemed not applicable.
	ASI17IDGG (MZK)	This has not been audited and is deemed not applicable.
	ASI1AU6HF7 (RAR)	This has not been audited and is deemed not applicable.
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.	ASI1GIVNPH (DA)	Had completed and pass evaluation of RSPO auditor since 2020.
	ASI17IDGG (MZK)	Had completed and pass evaluation of RSPO lead auditor since 2015.
	ASI1AU6HF7 (RAR)	Had completed and pass evaluation of RSPO lead auditor since 2015.
Knowledgeable and experience of the local/regional laws	*ASI1P4D2WW (RMN)*	Knowledgeable and experience of the local/regional laws
	ASI1GIVNPH (DA)	He possesses extensive knowledge and experience in understanding, interpreting, and applying local and regional laws.
	ASI17IDGG (MZK)	He possesses extensive knowledge and experience in understanding, interpreting, and applying local and regional laws.
	ASI1AU6HF7 (RAR)	He possesses extensive knowledge and experience in understanding, interpreting, and applying local and regional laws.
Knowledgeable in Best Agricultural Practices, and Integrated Pest Management, pesticide and fertiliser use;	*ASI1P4D2WW (RMN)*	Had more than 5 years of working experience in the palm oil mill operation
	ASI1GIVNPH (DA)	He has over 5 years of working experience in oil palm operations.
	ASI17IDGG (MZK)	He has over 5 years of working experience in oil palm operations.
	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;	*ASI1P4D2WW (RMN)*	Had more than 5 years of working experience in the oil palm operation and auditing health and safety
	ASI1GIVNPH (DA)	He has over 5 years of extensive experience in oil palm operations and auditing health and safety practices.

	ASI17IDGG (MZK)	He has over 5 years of extensive experience in oil palm operations and auditing health and safety practices.
	ASI1AU6HF7 (RAR)	He has over 5 years of extensive experience in oil palm operations and auditing health and safety practices.
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;	*ASI1P4D2WW (RMN)*	Not audit
	ASI1GIVNPH (DA)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, demonstrating a strong understanding of ethical practices and compliance with social standards.
	ASI17IDGG (MZK)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, demonstrating a strong understanding of ethical practices and compliance with social standards.
	ASI1AU6HF7 (RAR)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, demonstrating a strong understanding of ethical practices and compliance with social standards.
Experience in handling of land rights, gender and indigenous peoples' issues;	*ASI1P4D2WW (RMN)*	Not audit.
	ASI1GIVNPH (DA)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, handling of land rights, gender and indigenous peoples' issues.
	ASI17IDGG (MZK)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, handling of land rights, gender and indigenous peoples' issues.
	ASI1AU6HF7 (RAR)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, demonstrating a strong understanding of ethical practices and compliance with social standards.
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;	*ASI1P4D2WW (RMN)*	Experience in auditing ISO 14001 Environmental Management Systems standard since 2016.
	ASI1GIVNPH (DA)	He has experience auditing the ISO 14001 Environmental Management Systems standard since 2019.
	ASI17IDGG (MZK)	He holds a B.Sc. in Forestry from Universiti Putra Malaysia and has extensive experience in auditing High Conservation Value (HCV) and High Carbon Stock (HCS) assessments, as well as organic agriculture practices.
	ASI1AU6HF7 (RAR)	This criterion and indicator have not been audited.

Fluent in one of the main national languages	*ASI1P4D2WW (RMN)*	Fluent in Bahasa Malaysia and English.
	ASI1GIVNPH (DA)	He is fluent in both Bahasa Malaysia and English.
	ASI17IDGG (MZK)	He is fluent in both Bahasa Malaysia and English.
	ASI1AU6HF7 (RAR)	He is fluent in both Bahasa Malaysia 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.	*ASI1P4D2WW (RMN)*	Not audited.
	ASI1GIVNPH (DA)	He completed the RSPO Supply Chain Auditor training course in 2024 and has been auditing supply chains since then.
	ASI17IDGG (MZK)	He completed the RSPO Supply Chain Auditor training course in 2016 and has been auditing supply chains since then.
	ASI1AU6HF7 (RAR)	He completed the RSPO Supply Chain Auditor training course in 2019 and has been auditing supply chains since then.

5. Audit Findings & Results

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);		The Nak Business Unit (BU) continued to implement the procedure for responding to any communication. The records of communication were identified and maintained in different files depending on the stakeholder. The CU continued to use the internet to disseminate public information, where details relating to land titles, safety and health plans, pollution prevention plans, and the procedure for complaints and grievances are accessible through Boustead Plantations Berhad's website at http://www.bousteadplantations.com.my/home.html. However, during this assessment, it was found that land titles were not made publicly available, particularly concerning newly acquired land belonging to Nak Business Unit. Therefore, a **Major NCR MZK 01 2025** was raised.	☐ Conform ☒ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	• Public summary of certification assessment report; Human Rights Policy (Criterion 6.13).			
1.1.2	Information is provided in appropriate languages and made accessible to relevant stakeholders.		It was noted that Boustead has revised their website, http://www.bousteadplantations.com.my/home.html to include all management documents	☒ 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 communication were identified and maintained in different files depending on the stakeholder.	☒ 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.		The consultation and communication procedures were documented. This document was sighted during the audit. An examination of the records kept in the internal and external communication files found that the estates and mill followed the procedures and manuals developed by the company. In the case of internal communications, records of meetings, briefings and memos were sighted. Notices and posters / pamphlets observed displayed on noticeboards at the office and the muster ground were also used as a means of internal communication. Regular morning briefings were used by the management to communicate policies, procedures, rules and regulations and other information to its employees. In the case of external communications, they were mainly in the form of correspondence, which were kept in the External Communication File.	☒ 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.		Stakeholder list FY 2024/2025 was established in both mill and estate on 1/11/2024. Stakeholder such as local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list. Nominated representative with contact number and address was sighted.	☒ 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.		A Policy for ethical conduct is available known as 'Code of Ethics & Conduct'. Based on interviews with sampled contractors including manpower service providers, evidence is available that the Code of Ethics are being implemented. The Policy was also explained to external stakeholders during stakeholder meetings	☒ 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.		The system in place to monitor compliance and implementation of the Policy is via internal audits and integrity pledges signed by contractors.	☒ 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.		The unit of certification complies with all applicable legal requirements, as evidenced by valid licenses, permits, competent personnel, environmental and occupational health assessments, and documented monitoring activities across all estates and the palm oil mill, demonstrating adherence to statutory obligations and industry best practices.	☒ 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 also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.		The CU has documented the Legal & Other Requirements Register (LORR), covering all necessary regulatory requirements, which were made available during the assessment. The CU actively tracks any changes to applicable laws, by PIC from the Sustainability and Safety Department (SSD) designated as the person responsible for monitoring legal updates and communicating these changes to all sites.	☒ Conform ☐ Major Nonconformity ☐ 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.		The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection confirmed that they were clearly marked and maintained.	☒ 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.		A list of contracted parties is maintained.	☒ 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.		There is evidence that agreements with third parties contain clauses on meeting applicable requirements. However, it was found that Resort Estate has appointed Menara Jernih Sdn Bhd as FFB Transporter to the Mill. However, there is insufficient evidence that Resort Estate has performed legal due diligence to Menara Jernih Sdn Bhd prior renewal of contract agreements for year 2025. **Therefore, Previous Minor NEA 01 2024 has upgraded to Major NCR MZK 01 2025**.	☐ 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.		All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons.	☒ 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		The evidence of the current document is available in 'OCP Suppliers'. At present the mill only possesses the valid MPOB licenses and OCP Land Title for all the directly source FFB as verified by the auditor. There is no issues regarding Land, License and the map clearly indicates the location of area for all three suppliers.	☒ 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.		For all indirectly sourced FFB at Nak POM, there is the evidence the Nak POM obtains geo-location of FFB origins, evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder.	☒ 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 ☐oped business case for Scheme Smallholders.		The CU has a yearly budget prepared by the management and approved by top management that indicates the business plan on an annual basis. This annual budget specifies the details of the expenditure through better and more sustainable 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.		The CU had a Long-Range Replanting Program up to FY2034. The program was reviewed annually.	☒ 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		The Management Review Meeting was held in combination with a operating units for the entire CU and complexes chaired by the Head of Sabah Region. The latest management review was carried out on 14/12/2024. The agenda discussed conform with standard requirements.	☒ 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)		The action plan for continuous improvement was implemented, based on consideration of the main social impacts and environmental of the unit of certification. The CU is currently focusing on housing repair and housing upgrade as per compliance with National Laws.	☒ 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 organization had updated RSPO metrics template and input data and verified accordingly.	☒ 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.		The CU has developed and documented several manuals for its use. Among them were: • Standard Operating Procedure (SOP) • Oil Palm Circulars (OPC) • Safe Work Procedure • OSHA Manual, Occupational Safety and Health Guidelines • Procedure for the training entitled Sustainability Guidelines:	☒ 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.		Among the mechanisms to ensure consistent implementation of procedures is the conducting of internal audits and Planting Advisor Report.	☒ 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.		The implementation of SOP is monitored daily by the field staff and Assistant Managers with an overall overview by the Managers. The monitoring is done via supervision and records maintenance.	☒ Conform ☐ Major Nonconformity

				☐ 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 smallholder/outgrower scheme, is documented.		There are no new plantings or operations within NAK CU.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ 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.		Nak Business Unit has maintained its documented Social Impact Assessment. The SIA was done by the Sustainability and Safety Department. Both internal and external stakeholders were consulted during the assessment. The inputs from stakeholders meeting has been included in the SIA management plan 2025. The environmental aspect and impact analysis (EIA) for all the estate operations are documented and revised annually. The mill and estates have continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan and Environmental Management Program.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

				☐ Not Applicable (justification required)
3.4.3 (C)	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		The social management and monitoring plan was implemented, reviewed and updated regularly in a participatory way. Specific issues related to revising of SIA Management Plan such as discussion about main activities such as replanting, transporting, safety and health, land conflict, access right, facilities and amenities provided was highlighted in the revising social management plan. Nak CU had established and maintained Environmental Management Plan and monitoring plan been implemented are verified during the audit.	☒ 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.		BPB has developed series of procedures on employment and well documented. The procedures are been explained to workers and made available.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.5.2	Employment procedures are implemented and records are		Based on the review of workers' personal files and interviews conducted, evidence was available that employment records were maintained, and employment procedures implemented.	☒ Conform

	maintained.		The company maintains records of all appointments and processes leading to the appointments.	☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.6.1 (C)	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. HIRARC Register had been established, documented and implemented at all Operating Units (OU) as means to identify hazards, analyse and assess its associated risk and then apply the suitable control measures and reviewed at a minimum once a year if accidents occur or changes in operations.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.6.2 (C)	The effectiveness of the H&S plan to address health and safety risks to people is monitored		Occupational health and safety (OHS) 2025 management plan for CU had been established. Safety executive carried out safety requirements checking via Internal Audit. Other than that, the workplace inspection was carried out on a monthly basis to ensure all H&S plan was done effectively. The operating units also had series of monitoring program such as CHRA, Medical Surveillance and Audiometric test and all had been conducted accordingly.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

				☐ Not Applicable (justification required)
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 practice; - relevant SOPs.		The operating units visited have conducted a comprehensive training needs analysis for all employees, management, and contractors. The training needs were categorized for management, employees, and contractors, and have been systematically programmed.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

3.7.2	Records of training are maintained, where appropriate on an individual basis.		Records of training are being maintained and available during the audit.	☒ 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.		Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).	☒ 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		Not applicable since the POM used MB supply chain model.	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	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 (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 may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base.		Nak POM has continued to maintain Mass Balance model.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ 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.		As in Table 3.5 in the body text.	☒ 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		The mill had registered through RSPO IT Platform as per below: Prisma license id Nak: LIC25-00005447	☒ 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: 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		The Supply Chain and traceability Procedure, SOP no: SSD/01/SCT-01 effective date 09/09/2022 (revision : 1), the said procedure was sighted and found all elements of the RSPO Supply Chain standard were covered	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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 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-		As describe under para 4.1.5 SOP, Supply Chain and traceability procedure, revision no 1 dated 09/09/2022 which is follow the RSPO Supply Chain Certification Standard Revision 2022 requirements and explicit internal audit procedure, revision no 2, revised date: 24/05/2022. Internal audit conducted and zero findings has been raised.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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.		Sighted sample FFB consignment note, among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as *"RSPO & MSPO Mass Balancing Records for Oil Mills"* has recorded the tonnage of certified FFB and non-certified FFB. *No* over production as the mill apply for extensions volume. NAK have also established a procedure in place for handling non-conforming oil palm products as per stated in SOP, Supply Chain and traceability procedure, revision no 1 dated 09/09/2022, 4.3.2 – delivery of CPO and PK, appendix M – procedure for off specification products.	☒ 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 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		Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, Nak POM has deliver certified materials to end buyer which comply to standard requirement.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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			
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		Nak POM outsource transportation of certified product (CPO & CPK) to end buyer. There is addendum contract document between NPOM and the transporters) stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. The RSPO Supply Chain procedure has been trained to the contractor. Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post	☒ 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 details of all contractors used for the physical handling of RSPO certified oil palm products.		List of contact person for both transporters were made available and up to date in the List of Stakeholders updated on 06/01/2025	☒ 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.		No new contractor has been used for physical handling of RSPO certified volume.	☒ 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		All records related to RSPO SC were maintain minimum for 3 years as per procedure Supply Chain and traceability procedure – 4.1.4 record keeping. Sample records were available and well maintained.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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 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		Nak POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER).	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	their own extraction rates based upon past experience, documented and applied it consistently.			☐ 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.		These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.	☒ 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	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
3.8.16	Registration of Transactions		Documented procedures related to sales and goods out were sighted and found adequate.	☒ Conform

	(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		The registration of transaction being carried out by Group Plantation Marketing subordinate using the RSPO Member ID of RSPO_PO1000002706 Remove RSPO Certified volume has been verified during actual period April 2024 to March 2025, balance certified volume will be removed at the end of license period.	☐ 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.	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. NPOM does not use RSPO corporate logo as well as trademark logo.	NPOM does not use RSPO corporate logo as well as trademark logo.	☒ 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.		The policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. .	☒ 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.		NAK CU has a mutually agreed system open to all affected parties, to resolve disputes in an effective, timely and appropriate manner. System available as Complaint/ Suggestion Flowchart and implemented accordingly.	☒ 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.		Found the system was understood by the affected parties, including the illiterate parties. The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting.	☒ 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 available and communicated to relevant stakeholders.		Nak CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders through stakeholders meeting as evidenced by Internal and External Stakeholders' meetings.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ 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.		The system used by the Nak CU in resolving disputes and grievances exists in the procedure called "Grievance Procedure (Workers (Estates and Mill), Public, Aborigines and others", "Flowchart for Grievance/Complaint (workers, Public and others)" and "Flowchart for Grievance/Complaint to higher authority".	☒ 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.		There is evidence that contributions to community development was provided based on consultations. Beside that NAK BU also hire staff and workers from the nearby villagers as their CSR	☒ 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.		Documents showing legal ownership history of land tenure and the actual legal or customary use of the land are available. During verification found slight change of land hectarage and raised as Major NCR. Refer indicator 1.1.1.	☐ 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.		As reported in 4.4.1 of these checklists, it has been verified that the land is legitimately owned by Boustead Nak CU since 1990. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.	☒ 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		As reported in 4.4.1 of these checklists, it has been verified that the land is legitimately owned by Boustead Nak CU since 1990. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.	☒ Conform ☐ Major Nonconformity

	mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).			☐ 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..		Not applicable	☐ 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.		Not applicable	☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ 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.		Not applicable	☐ 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		Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak CU and the audit team had confirmed that there were no land issues related to previous owners.	☒ 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.		Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak CU and the audit team had confirmed that there were no land issues related to previous owners.	☒ 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 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.		Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak CU and the audit team had confirmed that there were no land issues related to previous owners.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ 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.		Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak CU and the audit team had confirmed that there were no land issues related to previous owners.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ 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.		Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak CU and the audit team had confirmed that there were no land issues related to previous owners.	☒ 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..		Based on Social Impact Assessment (SIA) Report for Nak CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Nak CU and the audit team had confirmed that there were no land issues related to previous owners.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.5.7	New lands will not be acquired for plantations and mills after 15		There were no new lands acquired for plantation and mills after 15/11/2018.	☐ Conform

	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.			☐ 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	☐ 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.		It has been verified that the land is legitimately owned by Nak CU. All the related documentation regarding the land acquisition was kept in BPB HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ 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.		Established *'Prosedur Aduan/Masalah"* and 'Stakeholder Engagement/ Negotiation" at Nak CU include Handling of Boundaries Disputes, calculating and distributing fair and gender-equal compensation (monetary or otherwise). However, there was no issue/case related to this indicator	☒ 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.		There were no scheme small holdings at Nak CU	☒ 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.		A procedure for identifying legal, customary or user rights, and compensation process is incorporated in the BPB's Sustainability Policy established by the BPB's HQ. However, the requirement in this indicator does not apply to Nak CU at present.	☒ 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.		The *'Prosedur Aduan/Masalah"* and 'Stakeholder Engagement/ Negotiation" at Nak CU include Handling of Boundaries Disputes, calculating and distributing fair and gender-equal compensation (monetary or otherwise) are documented and available to affected parties.	☒ 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.		It has been verified that the land is legitimately owned by Nak CU.	☒ 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.		It has been verified that the land is legitimately owned by Nak CU.	☒ 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.		The Auditors had confirmed that there was no land claim and user right conflict at Nak CU hence, this Indicator is not applicable.	☒ 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).		The Auditors had confirmed that there was no land claim and user right conflict at Nak CU hence, this Indicator is not applicable.	☒ 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).		The Auditors had confirmed that there was no land claim and user right conflict at Nak CU hence, this Indicator is not applicable.	☒ 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.		So far, there have been no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.	☒ 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.		Nak regularly explains the FFB pricing to the smallholders (FFB suppliers) as an attachment to the monthly invoice.	☒ 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.		At Nak POM, fair FFB pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base. This was confirmed by the feedback from representatives of FFB suppliers	☒ 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		The requirement of this Indicator is not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	applicable.			
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.		The contractors' representatives had confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.	☒ 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.		The contractors interviewed confirmed that payments are made in a timely manner, namely within 7 to 10 days of invoice.	☒ 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).		Weighing Equipment in Nak POM has been calibrated on yearly basis.	☒ 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.		Boustead Plantations Nak BU supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders who holds the certificates, and who holds and sells the certified material.	☒ 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.		A grievance mechanism which respects anonymity and protects complainants is in place at the Boustead Nak BU as per the Grievances Process, Grievances Procedure ", and " Consultation and Grievances Communication Procedure Internal/External" and Land Dispute compensation and calculation procedure	☒ 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		Boustead Plantations Nak BU supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders who holds the certificates, and who holds and sells the certified material.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	certification.			☐ 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.		Boustead Plantations Nak BU supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders who holds the certificates, and who holds and sells the certified material.	☒ 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..		Nak CU is ready for consultation to interested smallholders (irrespective of type and outside the supply base) including women or other partners to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	☒ 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.		Based on available record at the CU, no smallholders outside the supply base had shown interest to contact Nak CU for consultation.	☒ 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.		Nak CU regularly reviews on progress of the smallholder support programs.	☒ 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.		BPB have implemented Sustainability Policy Statement signed by Chief Executive Officer on 25/09/2024. The policy was be guided by the commitments spelt out in the para 2- under respecting human right were stated promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of race, nationality, religion, or gender, and practice no contract substitution.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

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		Evidence is available that no employee has been discriminated against.	☒ 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		Review of the 93 workers files sampled during this audit demonstrated that medical fitness is one the required elements for job selection. Despite that, the practice is not considered as discrimination since it is important to know if the worker is fit for the job. The registration cards of the workers do not specifically state any illness.	☒ 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		There was no evidence that pregnancy tests are being conducted as a discrimination measures.	☒ 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		The gender committees throughout the BPSB CU are known as the 'Persatuan Komuniti Wanita'. Membership comprises female employees and the employees' wives. Based on interviews of the committee members and review of meeting minutes, the	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	improvements for women.		Committees main activities are to provide awareness to its members on issues of concern as well as opportunities and improvements for women.	☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.1.6	There is evidence of equal pay for the same work scope		BPSB has defined wages for each job scopes which is reviewed annually as per "Increase of Daily Rated and Piece Rate Payments to Meet Minimum Wage Requirements". These rates are in accordance with the Minimum Wage Order. Wages for different workers may be higher depending on experience and years of service, position, and technical nature of the job scope. Evidence is available that sampled workers receive equal pay for equal work regardless of gender, nationalities etc	☒ 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.		The employment contract is drafted according to the Sabah Labor Ordinance Cap.67. Both local and foreign employment adopt the same contract. As Sabah State has not recognized the Malaysian National Union for Plantation Workers, no collective agreements are in place. Sample of workers' employment contract were reviewed to confirm contracts are in Bahasa Malaysia. In general, the workers understood the basic employment terms.	☒ 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		Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. Payroll documents, namely the pay slip, also give accurate information on compensation for all work done. However during the document review conducted at the estates and mill, samples of workers' monthly payslips and check rolls were examined for the month of March 2025 (Estates) and October 2024 (POM). The review revealed instances of non-compliance with the relevant policies and regulatory requirements as outlined in the Boustead Sustainability Policy, Workers' Employment Contract, the Minimum Wages Order 2024, and the Employment Act (Section 104(7)). Hence Major NCR RAR 01 2025 raised.	☐ 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		NAK BU has demonstrated compliance to Sabah Labour Ordinance.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ 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		Evidence is available that the NAK BU provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	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			☐ 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.		NAK BU was able to demonstrate that efforts are taken to improve workers' access to adequate, sufficient and affordable food.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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		The CU provided a decent living wage for both local and foreign workers based on prevailing wages assessment methodology. It includes wage, paid leave, mandatory/medical, retirement benefits, donations service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. In absence of DLW, the management conducted Prevailing Wage Assessment based on check-roll worker for period of the year 2024 & 2025.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist			
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		All the estates and mill employ full-time employees.	☒ 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 published statement recognizing freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) was available in the Sustainability Policy Statement.	☒ 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		Although there were no official trade unions in Sabah operating within the NAK CU, workers had appointed their own representatives to sit on the Workers Representative Committee. The Workers Representative Committee (JCC) is comprised of worker and management representatives. Minutes of the Workers Representative Committee meetings were documented, sighted and verified as follows: The JCC implemented for the employees to speak freely, and the meeting will be conducted once every 3 months.	☒ 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		Workers' representatives that sit in the Joint Consultative Committee (JCC) have been independently and freely elected by the workers themselves. No evidence of any management interference was observed.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ 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 prohibition of child labour and remediation was in place under Sustainability Policy Statement signed by Chief Executive Officer.	☒ 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		The records of employment documentation verified including the Employee Master Lists and sample personal particulars confirmed that minimum age requirements of above 18 years old met for all the workers employed in all operating units within Boustead Nak CU.	☒ 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 that the Mill employ 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,		The company has a no child labour policy which is displayed on the company's noticeboards. The policy has been communicated to them at their morning musters. Also, during stakeholders' consultations with the communities and third-party contractors, they did confirm the policy has been shared with them and communicated to their understanding.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	FFB suppliers and communities where workers live			☐ 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 policy to prevent sexual and all other forms of harassment and violence has been implemented under Sustainability Policy.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ 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		BPB has developed a Sustainability Policy dated 25/09/2024 where provides protection of reproductive rights of all workers.	☒ 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		Management has assessed the needs of new mothers, in consultation with the new mothers.	☒ 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.		BPB has established Grievance Procedure dated 01/03/2022. The procedure outlines respecting anonymity and protects complainants where requested.	☒ 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 • Debt bondage • Withholding of wages		Based on documentation review, interviews conducted with workers of various work scope both at the estate and mill, and observations made, there is no evidence that workers are in a forced employment.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.6.2 (C)	Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented		BPB has established foreign workers policy statement under Sustainability Policy. Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers.	☒ 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		Estate and Mill Managers have been appointed as the persons responsible for overseeing safety and health matters and serve as the Chairpersons of the OSH Committees. OSH Committee meetings are conducted quarterly.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		Procedures for accidents and emergencies have been established. During interviews with sampled workers, it was noted that all workers understand these procedures. First aid training was conducted annually, and records training was sighted and reviewed. Master list of first aid box of all estates and POM which is available at the office was checked and verified. Accident statistics were being maintained in a satisfactory manner and periodically reviewed.	☒ 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 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		During field inspections of harvesting operations, manuring operations, circle spraying, circle raking, and other activities, it was observed that workers were consistently wearing appropriate PPE. The cost of PPE is fully covered by the management. Sanitation facilities are optimize used by the workers.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	clothing.			
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		Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4).	☒ 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		Occupational injuries are recorded using Lost Time Accident (LTA) metrics via monthly accident key performance indicator (KPI) to Safety Manager and Form JKKP 8.	☒ 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 IPM Plan at Nak CU, dated 10 January 2025, has been implemented and is actively monitored to ensure effective and sustainable pest control.	☒ 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.		This is not practiced in the visited estate. None of 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]		It was identified that there is no use of fire for the pest control at the estates.	☒ 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 justification for the use of pesticides has been properly documented. The selection of chemical products is based on their specificity to the targeted pest, weed, or disease, as outlined in the company Standard Operating Procedures (SOPs).	☒ 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.		All three (3) Estates in Nak CU, continued to maintain records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients applied per ha.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

				☐ 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.		The estates have implemented a long-term chemical reduction plan where they are currently monitoring the usage of chemicals monthly to ensure reduction of chemical use in the long run.	☒ 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.		There was no evidence of prophylactic use of pesticides except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practised for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOPs.	☒ 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 this is a major threat b) Why there is no other alternative which		it was noted that all pesticides used are of class II, III, IV. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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.			
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 CU had records showing that pesticides were handled, used and applied by trained persons and as per the SDS of the pesticide. Training including refresher sessions were provided to the workers involved in such activities to ensure a continued understanding of chemicals / hazard.	☒ 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.		In Nak CU, all pesticides were stored in accordance with the legal requirement.	☒ 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.		Empty chemical container classified as SW 409 and disposed to DOE's license contractor.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.9 (C)	Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.		Aerial spraying of pesticides is not a practice in Nak CU.	☒ 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.		Specific annual medical surveillance for pesticide operators was documented and action to treat related health conditions was demonstrated	☒ 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.		Medical screening for woman workers involved in chemical handling and application was conducted monthly. Latest medical screening conducted indicated none were found pregnant.	☒ 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.		The Estates and Mill had established and maintained the waste and pollution management plan 2025. Waste management plan was implemented accordingly	☒ 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.		The Scheduled Waste Procedure SSD/02/SW-02, revision 2, effective date 03/01/2023 has been established and maintained. Based on site visit at Scheduled waste store and documented information were well demonstrated and managed by competence person.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.3.3	The unit of certification does not use open fire for waste disposal.		During sites visit was confirmed the CU does not used open fire to dispose all the waste items.	☒ 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.		NAK CU continued to implement the good agriculture practices as contained in SOPs, to manage soil fertility, to optimise yield and minimise environmental impacts.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.		Periodic foliar and soil sampling have been carried out by Applied Agricultural Resources Sdn. Bhd. (AAR), and the results have formed part of the basis for fertilizer input recommendations. These periodic tissue and soil samplings are essential to monitor changes in nutrient status over time. Annual foliar sampling is conducted to assess key nutrients,	☒ 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		All estates have continued to implement a nutrient recycling strategy. Palm fronds are systematically pruned, stacked, and left to decompose in the field, contributing to the natural recycling of nutrients. Additionally, empty fruit bunches (EFB) are applied at a rate of 40 tons per hectare per year, arranged in single layers between palm rows. Records of EFB applications, along with corresponding field maps, were made available to the auditors	☒ Conform ☐ Major Nonconformity

	inorganic fertilisers.		for verification. Liquid POME was applied through land irrigation using sprinkler systems,	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.4.4	Records of fertiliser inputs are maintained.		All three estates have continued to maintain comprehensive records of fertilizer inputs. Fertilizer application programs and relevant documentation were made available to the auditors for verification.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ 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.		Across the three estates, Resort, Sutera, and Nak, maps identifying marginal and fragile soils, including areas of steep terrain, have been prepared by Applied Agricultural Resources Sdn. Bhd. (AAR).	☒ 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.		it is confirmed that there were no extensive replanting of oil palm on steep terrain or new development of areas at all estates.	☒ 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.		It is confirmed that there were no new planting of oil palm on steep terrain at all estates.	☒ 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.		All estates in NAK CU, to demonstrate the long-term suitability of land for palm oil cultivation, had conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain,	☒ 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.		No marginal and fragile soil areas were observed during the visit.	☒ 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		All 3 Estates in in NAK CU, Resort, Sutera and Nak, had used soil and topographic maps prepared by AAR to plan their drainage roads and other infrastructures.	☒ 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.		No peat areas were observed during the visit.	☒ 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).		No peat areas were observed during the visit.	☒ 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 line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		No peat areas were observed during the visit.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

				☐ Not Applicable (justification required)
7.7.3 (C)	Subsidence of peat is monitored, documented and minimised.		No peat areas were observed during the visit.	☒ 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.		No peat areas were observed during the visit.	☒ 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		No peat areas were observed during the visit.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with 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			☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]			
7.7.6 (C)	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.		No peat areas were observed during the visit.	☒ 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.		No peat areas were observed during the visit.	☒ 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		NAK CU Mill and estates had established its Water Management Plan 2025 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption. CU does not restrict access to clean water or contribute to pollution of water used by communities and monitoring of water quality conducted in timely manner. At all estate and mill visited the water management action plan and procedure "Sampling of drinking water and river water quality" doc no: SSD/04/SDR-01, was established to ensure drinking water adheres to health and safety quality standards set by ministry of health. Frequency of Water sampling (drinking water) has been set minimum twice per year.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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).		The water course and wetland are being protected and bind with company sustainability policy item 1.2 which stipulated comply with "Jabatan Saliran dan Garis Panduan Saliran' including RSPO guidelines. Site visit at sampled buffer zone shown that both buffer zone are well maintained and no sign of chemical activities has been occurred	☒ 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.		Mill had recorded BOD below 100 Mg/L which complied with legal obligations as per "Jadual Pematuhan".	☒ 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.		The water usage monitoring is made and recorded on a monthly basis.	☒ 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 Environmental Aspect and Impact activities report for 2025 which reflected on improving efficiency of the use of fossil fuels and to optimize renewable energy. The document was reviewed/updated on Jan 2025. The data monitoring for year 2024 been verified by the auditor.	☒ 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 GHG emissions produced by the Unit of Certification (POM and its supply bases) in the period of 01/01/2024 until 31/12/2024 have been calculated using the RSPO PalmGHG Calculator (version 4).	☒ 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).		Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Nak CU.	☒ 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.		An assessment of all polluting activities has been conducted and monitored	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

				☐ Opportunity for Improvement ☐ 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.		Visit to the replanting area at Nak Estate during on-site assessment confirmed no open burning conducted.	☒ 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.		Each operating unit within CU establishes its own Fire Fighting Team as part of its Emergency Response Team to attend to any emergency fire as well for fire prevention and control measures for the areas managed.	☒ 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.		Each operating unit within CU engages with adjacent stakeholders on fire prevention and control measures during external stakeholder meeting.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ 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.		It was confirmed that no land clearing at NAK BU since Nov 2005.	☒ 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		The report “High Conservation Value & Social Impact Assessment Boustead Plantations, Sabah, Malaysia” was showed to the audit team. The HCV assessment had also identified the rare, threatened and endangered species (RTEs). During this Recertification Assessment auditor has sighted that there is no HCV has been declared by the Assessor at NAK BU due to previous total HCV area for this CU is 6.90Ha belong to Ladang Tabung Angkatan	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.		Tentera Sabah, and this Estate has been taken under Segamaha BU Complex, Thus HCV Area has been reduced to 0 Ha.	☐ 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.		The requirement in this indicator does not apply to Nak CU.	☒ 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		The requirement in this indicator does not apply to Nak CU due to not applicable for MYNI	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC 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 HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations.	☒ 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		There were no local communities living nearby with Nak CU only surrounding with small grower and Plantation Estate	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	involvement in the maintenance and management of these conservation areas.			
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.		A training programme for year 2025 was available.	☒ 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.		Nak CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the HCV Area. It was noted that AP has been monitoring surrounding the estate to control everything including any illegal activities.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		It was confirmed that no land clearing at Nak CU since Nov 2005.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

6. Summary of Audit Findings

6.1 Positive and noteworthy findings

No.	Positive finding
1	Good cooperation and commitment from all the operating units and HQ team.

6.2 Non-conformities and opportunities for improvement

Summary of nonconformities and opportunities for improvement under the RSPO Principles & Criteria				
Principle	**Major**	**Minor**	**Opportunities for Improvement**	**Total No Findings**
Principle 1: Behave Ethically and Transparently	1	-	-	1
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	1	-	-	1
Principle 7: Protect, Conserve and Enhance Ecosystems and the Environment	-	-	-	-
Certification Systems Document	-	-	-	-
Total	3	-	-	3

7. Nonconformity(ies) Issue in this Audit

Indicator Number	1.1.1
Nonconformity Number	MZK 01 2025
Nonconformity Category	☒ Major Nonconformity ☐ Minor Nonconformity
Recurring Nonconformity	☐ Yes ☒ No
Date of Nonconformity Issued	12/04/2025
Nonconformity Issued To *(when more than one site/member)*: Sutera Estate, Nak Estate and Resort Estate	
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**
Nonconformity Statement: Management documents such as Land Title are not made publicly available.	
Evidence: There is Newly acquired land which is belong to Nak Business Unit (, however the Land Title was not made publicly available to the auditor before the audit, as there is increase and reduction hectarage from: Sutera Estate – Increase of 5.51 ha Resort Estate – Increase of 0.01 ha Reduction: Nak Estate – Reduction of 28.16 ha	
Root Cause Analysis	1. Sutera Estate: Increase of 5.51 ha due to reconciliation of the estate map with the land title. A double counting of land acquisition occurred following updates from Jabatan Tanah & Ukur in 2021. 2. Resort Estate: Previously, the estate recorded land area using one decimal place. To match the format used in the land title, it now uses two decimal places. As a result, the area appears to have increased by 0.01 ha due to the change in rounding precision, not due to an actual change in land size. 3. Nak Estate: Reduction of 28.16 ha due to reconciliation of the estate map with the land title
Correction(s)	Obtain confirmation regarding land title area from the Land Management Department.
Corrective Action Implemented *(including any evidence submitted)*	The estate shall continue to disclose area statements using two decimal places for consistency with land title documentation and notify the certification body (CB) of any subsequent changes to the land title accordingly.

Date of Response	05/07/2025
Audit Team Conclusion *(including any evidence reviewed)*	Sighted communication between land department and estate management finalizing actual certified areas.
Status of Nonconformity	☒ Closed ☐ Open
Date of Closure:	10/7/2025

Add tables as necessary

Indicator Number	2.2.2
Nonconformity Number	MZK 02 2025
Nonconformity Category	☒ Major Nonconformity ☐ Minor Nonconformity
Recurring Nonconformity	☒ Yes ☐ No
Date of Nonconformity Issued	12/04/2025
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**
Nonconformity Statement: Insufficient evidence of legal due diligence towards contractor.	
Evidence: It was found that Resort Estate has appointed Menara Jernih Sdn Bhd as FFB Transporter to the Mill. However, there is insufficient evidence that Resort Estate has performed legal due diligence to Menara Jernih Sdn Bhd prior renewal of contract agreements for year 2025	
Root Cause Analysis	Resort Estate have established Committee Supplier Evaluation to conduct the evaluation for contractor. Due diligence was conducted concurrently with the evaluation. However, the due diligence checklist was not comprehensive, thus, it did not cover all the necessary areas to properly evaluate the contractors.
Correction(s)	Revise the due diligence checklist to include key criteria such as PPE issuance, compliance with relevant labour laws or ordinances, and required competencies or training. Next, estate to conduct due diligence on the FFB transport using the updated checklist.
Corrective Action Implemented *(including any evidence submitted)*	Review due diligence checklist on an annual basis or where required, to ensure contractor's compliance with state and national regulations.
Date of Response	10/07/2025
Audit Team Conclusion *(including any evidence reviewed)*	Due diligence checklist verified. Inside the checklist, total 15 criteria been monitored by the estate management such as minimum wages, mandatory salary deduction and PPE issuance. This was found adequate to close the NCR.

Status of Nonconformity	☒ Closed ☐ Open
Date of Closure:	11/7/2025

Indicator Number	6.2.2
Nonconformity Number	RAR 01 2025
Nonconformity Category	☒ Major Nonconformity ☐ Minor Nonconformity
Recurring Nonconformity	☐ Yes ☒ No
Date of Nonconformity Issued	12/04/2025
Nonconformity Issued To *(when more than one site/member)*: Nak POM, Resort Estate & Sutera Estate	
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**
Nonconformity Statement: Non-compliance with Minimum Wages Order 2024 and Excessive Working Hours	
Evidence: During the document review conducted at the estates and mill, samples of workers' monthly payslips and check rolls were examined for the month of March 2025 (Estates) and October 2024 (POM). The review revealed instances of non-compliance with the relevant policies and regulatory requirements as outlined in the Boustead Sustainability Policy, Workers' Employment Contract, the Minimum Wages Order 2024, and the Employment Act (Section 104(7)). Details of the non-compliance findings are summarized below: (Minimum Wages) A MEMO (warning letter) was sighted, issued by the employer to workers for uncompleted working hours and unfinished tasks. The MEMO documented the workers' actual time in and out, averaging 0.5 working days, and was acknowledged and signed by both employer and employee. However, based on interviews with chief clerk and verification of their payslips, it was identified that the PIMACS system is currently unable to record partial working days. As a result, any day with less than full working hours is still registered as 1 full working day in the system. This discrepancy has led to misalignment between actual worked time and recorded attendance, and subsequently inaccurate wage calculations, as outlined in the examples below:	

Month / March 2025	
Resort Estate • Albertus Lali – total Rm 809.87, day working = 19 days. Harvester = RM 42.63 / day • Antonius Manek – total rm 741.43, day work 17 days-harvester = RM 43.61 / day • Iwan – total 1087.38, day work 18 days – harvester = RM60.41 / day • Faridah – 595.37, day work 15 days- GW = RM39.69 / day • Subaidah Bt rajju, - 965.80, day work 19 – GW =RM50.83 / day • Astika – 737.59, day work 18 days – GW = RM40.98 / day	Sutera Estate • Bayu Bin Sapian – total 1154.48, day work 18- driver tractor =RM64.18 / day • Nur adila – total 467.70, day work 16- manuring = RM29.23 / day • Husni – total 302.83, day work 18- manuring = RM16.82 / day • Rafina – total 254.37, day work 14- manuring = RM18.17 / day • Erwin- 594.72, day work 16 –sprayer = RM37.17 / day • Aldasit Bin Silok – 683.36 -day work 18 – sprayer =RM 37.96 / day • Nuraini bt Jamal – 762.57- day work 18 – sprayer = RM42.37 / day • Bunga – 572.72, day work 17 – sprayer = RM 33.69 / day • Risdayanti bt Darwis – 285.87 – day work 17 – lf = RM 16.82 / day • Nurshimah Bt Iskandar – 1012.70, day work 19 – lf = RM53.30 / day • Irjuliani Bt Irfan – 466.38, day work 18 – l/f = RM25.91 / day

NaK POM
(Excessive Working Hours)

Month / October 2024	
Azizuan Jasli – ramp attendant :3/10/24 = 17 hours :6/10/24=17 hours :8/10/24=16 hours :23/10/24=19 hours :24/10/24=15 hours :27/10/24=17 hours	Rudy Bulati – ramp attendant :3/10/24 = 13 hours :6/10/24 = 16 hours :10/10/24=13 hours :14/1024=14 hours :20/10/24=18 hours :24/10/24=13 hours :29/10/24=14 hours

Root Cause Analysis	1. The worker did not complete 8 hours of work or their assigned tasks, resulting in low productivity and failure to meet minimum wage requirements. Although worker did not reach the 8 hours of working hours in the PIMACS system will record 1 day. 2. The excessive working hours were primarily due to the unusually high volume of FFB received during the

	month, totaling 9,415.06 metric tons. Which was the highest recorded for the year 2024. This figure represents a 20.4% increase compared to the second highest month, December 2024, which had 7,820.66 metric tons. The surge in FFB inflow was not matched with appropriate adjustments in manpower or shift planning, leading to the over-reliance on existing workers to handle the operational demand.
Correction(s)	1. Immediately inform the IT Department and Plantation Operations Department regarding the unavailability of key in the 0.5 days on PIMACS. The wages calculation was revised by key in the actual days work using excel format since the past month record cannot be edited. 2. Work schedules were quickly revised to ensure no one works more than 12 hours a day, including overtime. Shift rotations were adjusted to spread the workload more evenly and reduce pressure on specific staff during busy periods. To ease manpower shortages at the FFB ramp, support staff were temporarily reassigned. Estate workers who usually help with grading can be sent to the ramp when needed, especially during peak times. This helps keep operations running smoothly while staying within labor rules.
Corrective Action Implemented *(including any evidence submitted)*	1. Plantation Operations come out with circular of Daily Working Hour Requirement for Wage Entitlement calculation in line with Minimum Wages Order 2025, MAPA-NUPW Collective Agreement (Peninsular Malaysia), Labour Ordinance (Sabah Cap. 67), and Labour Ordinance (Sarawak Cap. 76). Field staff must record any worker with incomplete working hours in the check roll book. The check roll clerk will then enter the manday accordingly in the PIMACS system, based on the recorded working hours. 2. Mill implemented a new Overtime Monitoring and Control Procedure, effective immediately: a. Introduction of Overtime Log Sheet: i. Each department head is required to fill out an Overtime Log Sheet if any worker is planned to work beyond regular working hours. ii. The log sheet must be submitted to the mill office before 4:00 PM on the same day. b. Details Required in the Log Sheet: i. Name of the worker assigned for overtime. ii. Start time and expected finish time of the overtime. iii. Specific task or activity to be completed during the overtime period. c. Overtime Limitation: i. The total overtime must not exceed 4 hours, to comply with the legal maximum of 12 working hours per day (8 hours regular + 4 hours overtime). d. Approval and Verification:

	i. The Mill Manager or Assistant Manager will review and evaluate the submitted log sheets. ii. Overtime will only be approved if deemed necessary and reasonable based on the task described. e. Work Continuation Protocol: i. If a task requires more than 4 hours to complete, the department head must arrange for another worker or a second shift team to continue the task, ensuring that no individual exceeds the permitted daily working limit.
Date of Response	10/07/2025
Audit Team Conclusion *(including any evidence reviewed)*	Verified company internal circular dated 4/7/2025 addressed details on the daily working hour requirement for wage entitlement including PIMACS system recording. This circular been display at company office notice board. Check roll book been recorded uncomplete 0.5 as per evidence submitted and can key in inside the PIMACS. Established overtime form for Mill verified and sighted monitoring of overtime hours well recorded inside the forms.
Status of Nonconformity	☒ Closed ☐ Open
Date of Closure:	11/7/2025

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

Indicator Number	Not Applicable
Opportunity for Improvement Number	
Date of Opportunity for Improvement Issued	DD Mmm YYYY
Opportunity for Improvement Issued To *(when more than one site/member)*:	
Standard Reference	
Opportunity for Improvement Statement:	

Add tables as necessary

9. Status of Nonconformities Previously Identified and Opportunity for Improvement

Indicator No	Nonconformity No	Evidence Observed / Nonconformity Raised	Auditee Response Correction / Corrective Action	Verification of Correction/ Corrective Action	Conclusion /Status
2.2.2	NEA 01 2024	Finding: Insufficient evidence of legal due diligence towards contractor. Objective evidence: It was noted that Resort Estate has appointed Xin Lok Yean Trading as sundry shop owner. However, there is insufficient evidence that Resort Estate has performed legal due diligence to Xin Lok Yean Trading prior renewal of contract agreements	Correction: Revise the due diligence checklist to include essential criteria covering Legal, Operational, Human Resource, and Environmental aspects. Next, Resort Estate conducts due diligence to sundry shop contractor. Corrective action: Review due diligence checklist, biennial basis or where required, to ensure contractor's compliance with state and national regulations.	Evidence of legal due diligence carried out include getting the vendors to sign the undertaking to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption. However, It was found that Resort Estate has appointed Menara Jernih Sdn Bhd as FFB Transporter to the Mill. However, there is insufficient evidence that Resort Estate has performed legal due diligence to Menara Jernih Sdn Bhd prior renewal of contract agreements for year 2025.	Previous Minor NEA 01 2024 has upgraded to Major NCR MZK 01 2025.

2.3.2	MZK 02 2024	Finding: For all indirectly sourced FFB at Nak POM, There is no evidence the Nak POM obtains geo-location of FFB origins, Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, One or more supporting documents for claims, Valid MPOB license. Objective evidence: During Document and Record Verification at NAK POM, There is no evidence the Nak POM obtains geo-location of FFB origins, Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, One or more supporting documents for claims , Valid MPOB license for PA TECH, Bongkol Sawit Sdn Bhd, Koperasi Penanaman Sawit Mampan and Cahaya Sawit Jaya.	Corrective Action: Correction: Revise Outside Crop Purchase Procedure by including the requirement for external FFB supplier to complete the Sustainability Pledge and FFB Supplier Information Form. Next, Head of Marketing Department to issue an internal memo to all Mills and Marketing Department. Corrective action: Nak Mill to communicate all required RSPO requirements, including this indicator, to external FFB suppliers for upcoming engagement, if any	For all indirectly sourced FFB at Nak POM, there is the evidence the Nak POM obtains geo-location of FFB origins, evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, One or more supporting documents for claims, valid MPOB license for PA TECH, Bongkol Sawit Sdn Bhd, Koperasi Penanaman Sawit Mampan and Cahaya Sawit Jaya.	Minor NCR MZK 02 2024 has been closed.
7.8.1b	RAR 01 2024	Finding: Water management plan and procedure were not implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. Objective evidence:	Correction: Conduct sampling to check the presence of Total coliforms and E.coli only. Next, upon receiving the sampling result, discuss the result and develop an action plan to ensure that the water quality is complying standard quality.	Verification on test resulted for all estates and mill, all the water qualities are complied.	*Minor NCR RAR 01 2024* effectively closed.

<table>
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<td>At Resort Estate, latest treated water analysis was identified as not complying with standard quality (after treatment) as shown below:
<table><tr><th>Parameter</th><th>Results</th><th>Standard quality</th></tr><tr><td>Total coliforms</td><td>130</td><td>ND</td></tr><tr><td>E.coli</td><td>13</td><td>ND</td></tr></table>Procedure "Sampling of Drinking Water and River Water Quality," document number SSD/04/SDR-01, was not followed, as stated in SOP number 4.3 – Water Sampling – 4.3.1 (a) for drinking water. It is specified that in circumstances where water quality is poor or unstable, such as the presence of E.coli in water, sampling should be conducted more frequently (i.e., twice per month) until the parameters are safe to use and meet the required standards.</td>
<td>Corrective action: Appoint a suitable person in-charge to monitor the implementation of the Procedure "Sampling of Drinking Water and River Water Quality".</td>
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<td>7.8.2</td>
<td>MZK 01 2024</td>
<td>Finding: Water courses and wetlands was not fully protected, including not well maintaining and restoring appropriate riparian and other buffer zones was not in line with ‘RSPO Manual on BMPs for the management and rehabilitation of riparian reserves’ (April 2017).

Objective evidence:
1)During site inspection at Nak Estate/Nak POM sighted trace of</td>
<td>Correction:
1) Immediately issue a memo prohibiting chemical spraying activities near ETP area to all mill workers. Next, conduct training on managing riparian reserves for the ETP Attendant.
2) Demarcate the pond riparian reserves by installing signages and paint oil palm trees within the pond riparian reserves. After that, issue a memo prohibiting chemical spraying on pond riparian reserves to sprayer gang.</td>
<td>Root cause accepted. Assessor has verified the evidence training has been done to newly recruited workers, picture of signages installing and buffer zones marking within the pond riparian reserves. memo</td>
<td>No recurrence. Effectively Closed</td>
</tr>
</table>

		chemical spraying activities was carried out at the Nak POM Settling Pond No 2 Fence nearing to buffer riparian reserves. 2)During site inspection at Resort Estate Pond No 5 near to Block PR2020E, sighted trace of chemical spraying activities was carried out at the Pond Riparian reserves to tackle the woodies and weeds.	Corrective action: 1) To include training on managing ETP riparian reserves in the Training Needs Analysis (TNA) for the ETP Attendant and conduct the training on annual basis. 2) To monitor the spraying activities at block PR202E and prohibit spraying on pond riparian reserves.	prohibiting chemical spraying on pond riparian reserves to sprayer gang and monitoring form records for sprayer gang. The assessor found that all of the evidence is enough to close this NCR.	

Indicator No	Opportunity for Improvement Number	Opportunity for Improvement Statement:	Verification / Follow-up actions:
-Not Applicable-			

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: 21 FEBRUARY 2025

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

11.1 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

11.2 For Public Summary 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
	Employees / Workers Organizations (local / foreign / ~~Orang Asli workers~~ / male & female)	*7-12/4/2025*	Site interviewed	Based on interviews conducted with mill and estates workers, including both local and Indonesian workers, involving both male and female employees engaged in various work scopes.	The management has effectively implemented human rights values in compliance with international laws and industry best practices. During this audit, no issues related to social

				a. Daily rated workers confirmed that they receive a minimum wages per month. For piece-rated workers, so long they have achieved their target, they too will get a minimum wage. They receive their salaries before 7th of every month. However sighted that the payment and recording system PIMACS did not allig actual working time and payment. *Hence Major NCR RAR 01 raised.* b. Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between. *c.* Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. However found that excessive overtime occurred at mill. Hence *Major NCR RAR 01* raised. d. Foreign workers are not subjected to any recruitment fee. Foreign workers kept their own passports and will only return the passport to office for renewal. e. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts.	aspects, including labor rights, workplace discrimination, or ethical treatment of workers, were identified. The company has established proper mechanisms to ensure fair wages, safe working conditions, non-discriminatory policies, and grievance resolution processes. Additionally, workers have access to proper accommodation, medical facilities, and channels to voice their concerns without fear of retaliation. This demonstrates the management's commitment to supporting social responsibility and ethical labor practices.

				f. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence applied by the employer. g. Samples of payslips were also examined and verified to ensure that workers were being paid in accordance with the requirements stipulated under the Minimum Wages Order 2024 and the Sabah Labour Ordinance. The workers sampled for verification.	
2	Worker representative	7-12/4/2025	Site interviewed	All local and Indonesian workers confirmed that their leaders were freely elected by the workers themselves. No issues were reported by the workers during the audit. In the event of any issues, they stated that they would discuss them with management, who would then take appropriate action to resolve the matter. There were no indications of discrimination, as all workers are treated equally by the management. Overtime work is offered on a voluntary basis.	No issues on management and continuously communicate with foreign and local workers during JCC meeting on annual basis. Any issue raised will be registered and follow up using SIA action plan.
3	Gender committee representative	7-12/4/2025	Site interviewed	They stated that management treats female workers equally to male workers, including in job opportunities and promotions, based on performance and capability. They also confirmed that no cases of discrimination, sexual harassment,	Reviewed records of meeting minutes for gender committee verified the discussion been recorded. Onsite interview confirmed no discrimination and sexual harassment

				or domestic violence have been reported. Additionally, they are aware of the reporting channels should any such cases occur in the estate.	lodged by female workers and minutes.
4	Villagers / Local communities (including women representatives, displaced communities)	7-12/4/2025	Site interviewed	The audit team has interviewed relevant stakeholders such as the representative from (Kg Segaliud (Matasan Matakhir), Kg Toniting (Louisee Japri) Kg Sungai Tiram (Rozaimi) and Kg Ulu Sapi (Simpor Ripin), Kwantas, Tong Hup, Felda, Wilmar, Gagah Makmur Estate, Andi Amin Estate, Greenfingers Estate and Segaliud Estate. From the interviews, it can be concluded that there was no evidence of any land dispute at Boustead Nak CU with their neighbouring private oil palm estates and villagers.	A review of the meeting minutes from the external stakeholders' consultation, confirms that external stakeholders attended the meeting, and no negative feedback or grievances were raised.
5	Suppliers	7-12/4/2025	Site interviewed Public Consultation	All suppliers, contain specific clauses on meeting applicable legal requirements as verified through online vendor and the ABC Policy which apply to all contractors for due diligence and meeting legal requirements.	Reviewed due diligence document is available together with ABC Policy form signed by both parties. No issues of late payment based on the records verified.
6	Government agencies / Statutory bodies	21/02/2025	Public Consultation	No stakeholders were present on-site, as the invitation letter did not receive any responses	Noted on the information and no further issue.

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

Total Workers in the Unit of Certification			**471**	
Sampled Worker Consulted/ Interviewed in This Audit			**79**	
No	**Type of Workers Consulted/ Interviewed**	**Interview Method**	**Feedback/Comments/Issue Raised/ Received from Workers**	**CB's Responses**
1	Employees / Workers Organizations (local / foreign / ~~Orang Asli workers~~ / male & female)	Small Group	Based on interviews conducted with mill and estates workers, including both local and Indonesian workers, involving both male and female employees engaged in various work scopes. h. Daily rated workers confirmed that they receive a minimum wages per month. For piece-rated workers, so long they have achieved their target, they too will get a minimum wage. They receive their salaries before 7th of every month. However sighted that the payment and recording system PIMACS did not allig actual working time and payment. *Hence Major NCR RAR 01 raised.* i. Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between. *j.* Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. However found that excessive	The management has effectively implemented human rights values in compliance with international laws and industry best practices. During this audit, no issues related to social aspects, including labor rights, workplace discrimination, or ethical treatment of workers, were identified. The company has established proper mechanisms to ensure fair wages, safe working conditions, non-discriminatory policies, and grievance resolution processes. Additionally, workers have access to proper accommodation, medical facilities, and channels to voice their concerns without fear of retaliation. This demonstrates the management's commitment to supporting social responsibility and ethical labor practices.

			overtime occurred at mill. Hence *Major NCR RAR 01* raised. k. Foreign workers are not subjected to any recruitment fee. Foreign workers kept their own passports and will only return the passport to office for renewal. l. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts. m. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence applied by the employer. Samples of payslips were also examined and verified to ensure that workers were being paid in accordance with the requirements stipulated under the Minimum Wages Order 2024 and the Sabah Labour Ordinance. The workers sampled for verification.	
2	Worker representative	Individual	All local and Indonesian workers confirmed that their leaders were freely elected by the workers themselves. No issues were reported by the workers during the audit. In the event of any issues, they stated that they would discuss them with management, who would then take appropriate action to resolve the matter. There were no	No issues on management and continuously communicate with foreign and local workers during JCC meeting on annual basis. Any issue raised will be registered and follow up using SIA action plan.

			indications of discrimination, as all workers are treated equally by the management. Overtime work is offered on a voluntary basis.	
3	Gender committee representative	Small group	They stated that management treats female workers equally to male workers, including in job opportunities and promotions, based on performance and capability. They also confirmed that no cases of discrimination, sexual harassment, or domestic violence have been reported. Additionally, they are aware of the reporting channels should any such cases occur in the estate.	Reviewed records of meeting minutes for gender committee verified the discussion been recorded. Onsite interview confirmed no discrimination and sexual harassment lodged by female workers and minutes.

11.4 Consultation with Previous Land User – Not Applicable

Total Identified Previous Land User in the Unit of Certification				
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**
Add rows as necessary			DD Mmm YYYY	

11. Time Bound Plan

Name of the Management Unit	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status	Plan Year for Certification	Actual Certification Year	New Proposed Year for Certification
Boustead Rimba Nilai Sdn Bhd – Sungai Jernih Business Unit	Malaysia	Sungai Jernih Palm Oil Mill	N/a	Certified	No record	2011	N/a
		Sungai Jernih Estate	2,695.7000	Certified	No record	2011	N/a
		Bebar Estate	2,340.6000	Certified	No record	2011	N/a
		Tabung Tentera Terengganu Estate	1,810.7000	Certified	No record	2011	N/a
Boustead Gradient Sdn Bhd – Boustead Nak Business Unit	Malaysia	Nak Palm Oil Mill	N/a	Certified	No record	2016	N/a
		Nak Estate	1,386.1000	Certified	No record	2016	N/a
		Sutera Estate	2,200.7000	Certified	No record	2016	N/a
		Resort Estate	1,135.1000	Certified	No record	2016	N/a
Boustead Estates Agency Sdn Bhd – Trong Business Unit	Malaysia	Trong Palm Oil Mill	N/a	Certified	No record	2017	N/a
		Taiping Rubber Plantations (TRP) Estate	1,382.8000	Certified	No record	2017	N/a
		Malaya Estate	906.2000	Certified	No record	2017	N/a
		Bukit Mertajam Estate	3,044.9000	Certified	No record	2017	N/a
		Stothard Estate	983.1000	Certified	No record	2017	N/a

Name of the Management Unit	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status	Plan Year for Certification	Actual Certification Year	New Proposed Year for Certification
		Kuala Muda Estate	1,519.5000	Certified	No record	2017	N/a
		Batu Pekaka Estate	968.7000	Certified	No record	2017	N/a
Boustead Emastulin Sdn Bhd – Segaria Business Unit	Malaysia	Segaria Palm Oil Mill	N/A	Certified	No record	2018	N/a
		Segaria	4,746.2000	Certified	No record	2018	N/a
Boustead Plantations Berhad – Telok Sengat Business Unit	Malaysia	Telok Sengat Palm Oil Mill	N/A	Certified	No record	2019	N/a
		Telok Sengat Estate	3,680.0000	Certified	No record	2019	N/a
		Chamek Estate	816.9000	Certified	No record	2019	N/a
		Kulai Young Estate	670.5000	Certified	No record	2019	N/a
Boustead Plantations Berhad – Segamaha Business Unit	Malaysia	Segamaha Palm Oil Mill	N/A	Certified	No record	2019	N/a
		Sungai Segamaha Estate	3,244.5000	Certified	No record	2019	N/a
		Bukit Segamaha Estate	2,415.5000	Certified	No record	2019	N/a
		G&G Estate	2,409.8000	Certified	No record	2019	N/a
		Tabung Tentera Sabah Estate	2,023.0000	Certified	No record	2019	N/a

Name of the Management Unit	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status	Plan Year for Certification	Actual Certification Year	New Proposed Year for Certification
Boustead Plantations Berhad – Lepan Kabu Estate	Malaysia	Lepan Kabu Estate	2,015.4000	Certified	2024	2024	N/A
Boustead Plantations Berhad – Eldred Bekoh Certification Unit	Malaysia	Eldred Estate	1,827.3000	Certified	2024	2024	N/A
		Bekoh Estate	1,226.1000	Certified	2024	2024	N/A
Rimba Nilai Business Unit	Malaysia	Rimba Nilai Palm Oil Mill	N/A	Not Certified	2026		N/A
		Sungai Sungai 1 Estate	1,973.1000	Not Certified	2026		N/A
		Sungai Sungai 2 Estate	2,342.3000	Not Certified	2026		N/A
		Sungai Sungai 3 Estate	1,755.6000	Not Certified	2026		N/A
		Lembah Paitan Estate	1,373.7000	Not Certified	2026		N/A
		Kawananan Estate	2,585.1000	Not Certified	2026		N/A
Tawai Business Unit	Malaysia	Boustead Tawai Palm Oil Mill	N/A	Not Certified	2026		N/A
		Boustead Tawai 1 Estate	1,792.4000	Not Certified	2026		N/A
		Boustead Tawai 2 Estate	3,232.7000	Not Certified	2026		N/A

Name of the Management Unit	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status	Plan Year for Certification	Actual Certification Year	New Proposed Year for Certification
		Boustead Pertama Estate	2,703.9000	Not Certified	2026		N/A
		Boustead Sapa Payau Estate	1,240.2000	Not Certified	2026		N/A
		Boustead Ruku Ruku Estate	3,196.2000	Not Certified	2026		N/A
		Boustead Lokan Estate	2,565.1000	Not Certified	2026		N/A
		Boustead Lokan Baru Estate	1,873.9000	Not Certified	2026		N/A
Kanowit Tinjar Business Unit	Malaysia	Boustead Pelita Kanowit Oil Mill	N/A	Not Certified	2026		N/A
		Jih Estate	2,936.4000	Not Certified	2026		N/A
		Bawan Estate	1,794.4000	Not Certified	2026		N/A
		Pedai Estate	3,421.6000	Not Certified	2026		N/A
		Mapai Estate	2,467.1000	Not Certified	2026		N/A
		Kelimut Estate	3,444.5000	Not Certified	2026		N/A

Name of the Management Unit	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status	Plan Year for Certification	Actual Certification Year	New Proposed Year for Certification
		Loagan Bunut Palm Oil Mill	N/A	Not Certified	2026		N/A
		Loagan Bunut Estate	12,522.1200	Not Certified	2026		N/A

12. Requirements on Multiple Management Unit

Requirement	Findings/Compliance
A time bound plan for certifying all its management units and/or entities, including the units where the organisation has management control and no or minor shareholding has been established by the certification unit.	Yes
Was the time bound plan submitted during the initial audit?	Yes
Does the time bound plan contain a current list of all estates and mills?	Yes
Does the time bound plan include the certification of all estates and mills within five years after obtaining RSPO membership?	Yes

Are there any new acquisitions of land done by the certification unit since the last audit? If YES, is the time bound plan updated to indicate that the newly acquired land is to be certified within a three-year timeframe?	The CU has not undertaken any new land acquisitions since the previous audit.
If there are any deviations from these maximum periods, did the Unit of Certification request approval from the RSPO Secretariat?	Boustead Plantations have deviations for certifying uncertified unit from year 2021 to 2023 ,2024 and 2026. The RSPO Time Bound Plan Revision Template was submitted to RSPO secretariat approved on date 18/01/2024. The new TBP revision was endorsed by RSPO.
Has the CB verified the progress of the time bound plan established by the Unit of Certification during the annual surveillance audit? *Note: If the CB conducting the surveillance audit differs from the CB that initially accepted the time bound plan, the latter CB must assess the appropriateness of the time bound plan at the time of its first involvement and will only verify its continued appropriateness thereafter.*	Yes
Is there any revision made to the time bound plan? If YES, has the revised time bound plan been reviewed by the CB? *Note: Changes to the time bound plan are allowed only if the organisation can provide evidence to the CB that these changes are justified.*The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or Chamber of Commerce (or equivalent).	Boustead Plantations have deviations for certifying uncertified unit from year 2021 to 2023 ,2024 and 2026. The RSPO Time Bound Plan Revision Template was submitted to RSPO secretariat approved on date 18/01/2024. The new TBP revision was endorsed by RSPO.

Are there any isolated lapses in the implementation of a time bound plan? If YES, a minor non-compliance shall be raised.	No
Is there any evidence of fundamental failure to proceed with the implementation of the plan? If YES, a major non-compliance shall be raised.	No

13. Requirements for Uncertified Management Units

Requirement	Findings/Compliance
Is there any replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3 since 1st January 2010? If YES, did the CB verify that it complies with the RSPO New Planting Procedure (NPP)? *Note: For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB*	Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile evidenced that there was no new planting and no new development of area observed.
Are there any land conflicts reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member? If YES, has it been resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.? *Note: In case of issues related to land conflicts identified by the CB, details of the status/ progress to resolve such matters shall be clearly explained.*	It is confirmed that land conflict was resolved through FPIC processes which facilitates compliance with requirement of RSPO, accordance to: • Criteria 4.4 – on adequate participation and negotiated agreements (Sighted PMC minutes of meeting) • Criteria 4.6 – on land acquisition whereby the right to use the land is demonstrated. (Refer Memorandum of Consent (MOC) between NCR Landowners & LCDA (as Managing Agent), (Refer Joint Venture Agreement (JVA) between Boustead Plantations Berhad, BPB and Pelita Holding Sdn Bhd (PHSB) to develop land into oil palm plantation) • Criteria 4.7 – on mutual agreement for identifying people entitled to compensation is in place. • Criteria 4.8 – on the condition of land use as per land title to show evidence that necessary action has been taken to resolve the conflict with relevant parties. These were reviewed - MRRS: Q-021053- 05/2012; Q-02-105405/2012; Q-01-282-06/2012. (Refer www.kehakiman.gov.my/judgment/file/Q-02-1053-052012) and application no. 08(f)-449-09/2014(Q) Appellate Jurisdiction); The management of BPKSB have conforms & respect all parties by adopting FPIC to protects community rights and investors from risks. In addition, those mechanism is part of best practice standards and requirement of RSPO.

	There was also Series of External Audit through MSPO Certification on their uncertified unit being made: a) Rimba Nilai (Sugut) CU (10-15/03/2024) b) Tawai CU (14-18/06/2024) c) Loagan Bunut & Kanowit CU (11-15/11/2024) The audit was conducted against MSPO Certification Requirements.
Is there any labour dispute reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member? If YES, is it being resolved through a mutually agreed process, per RSPO P&C criterion 4.2? *Note: In case of an issue related to labour dispute identified by the CB, details of the status/ progress to resolve such matter shall be clearly explained.*	Series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit was conducted as reported above. a) The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. b) There was no case of labour dispute reported in the internal audit report. The management also has established grievances, compliant, and disputes mechanism which is open to all affected parties and ensures anonymity of complainant. There is "Carta Organisasi Panel Aduan" (Panel of Complaint Committee) to handle complaint or grievance, including related to gender issues. The management had taken prudent action by conduct engagement and recommended action plans to: a) Improved communication and engagement (PMC Meeting-With present of LCDA, Land Survey, BPKSB b) Personnel, BEA), MCCM Meeting, Estate Management Meeting) c) Review communication and consultation as well as complaint and grievance procedures. Trained staff and create awareness among stakeholder on the Procedures (RSPO UBU Internal Assessment)
Is there any legal non-compliance reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member? If YES, has it been addressed through measures consistent with the requirements of RSPO P&C criterion 2.1?	At this time the company has not identified or declared any legal non-compliances occurring at these units. The company has pre-pared an internal report for each estate area based on self-assessment (internal audit) to verify compliance of uncertified management units to this requirement. No NPP carried out to date as the company has not carried out any new plantings.

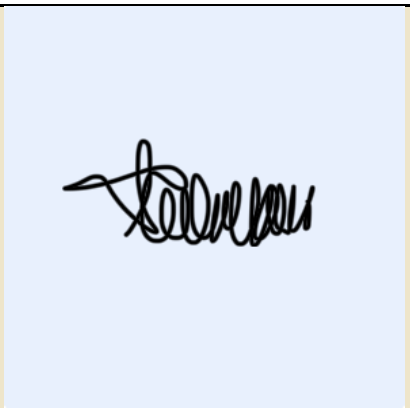
Note: In case of an issue related to legal non-compliance identified by the CB, details of the status/ progress to resolve such matter shall be clearly explained.	
Has a positive assurance statement been provided based on their self-assessment (i.e., internal audit) regarding the requirements for Un-Certified Management Units?*Note:* *1. This would necessitate evidence of the self-assessment for each requirement.* *2. A POSITIVE ASSURANCE statement is MANDATORY to indicate the outcome of self-assessment.*	Based on statement in (a) to (d) above, the CU has assessed the condition of their uncertified unit and has stated full commitment to comply with all relevant requirements as specified above. a) Sighted the series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit as conducted and reported accordingly. The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. b) Evidence of audit attendance list, audit checklist & report were made available to auditor as the supporting evidence. c) Verification through www.globalforestwatch.com, GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting and no new development of area was observed. d) With this, it can be concluded that the positive assurance made was justified.
Did the CB conduct targeted stakeholder consultation (including consultation with the relevant NGO's) to evaluate the compliance related to Requirements on the Un-Certified Management Unit?	Yes, the CB conducted targeted stakeholder consultations, including engagement with relevant NGOs, to assess compliance with the requirements for the Un-Certified Management Unit.

Did the CB conduct desktop study on the Un-Certified Management Unit to identify risk of any potential non-compliances? *Note: (e.g. relevant complaints, labour disputes, land conflicts)*	Yes, the CB conducted a desktop study on the Un-Certified Management Unit to identify potential risks of non-compliance. Thus far, no risks have been identified.
Based on the result of the desktop study, did the CB decide to perform further stakeholder consultation or field inspection to assess the risk of any potential non-compliance with the requirements (as necessary)?	There is no potential non-compliance with the requirements.

14. Audit Conclusion & Recommendation

Audit finding	
☐	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)*

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

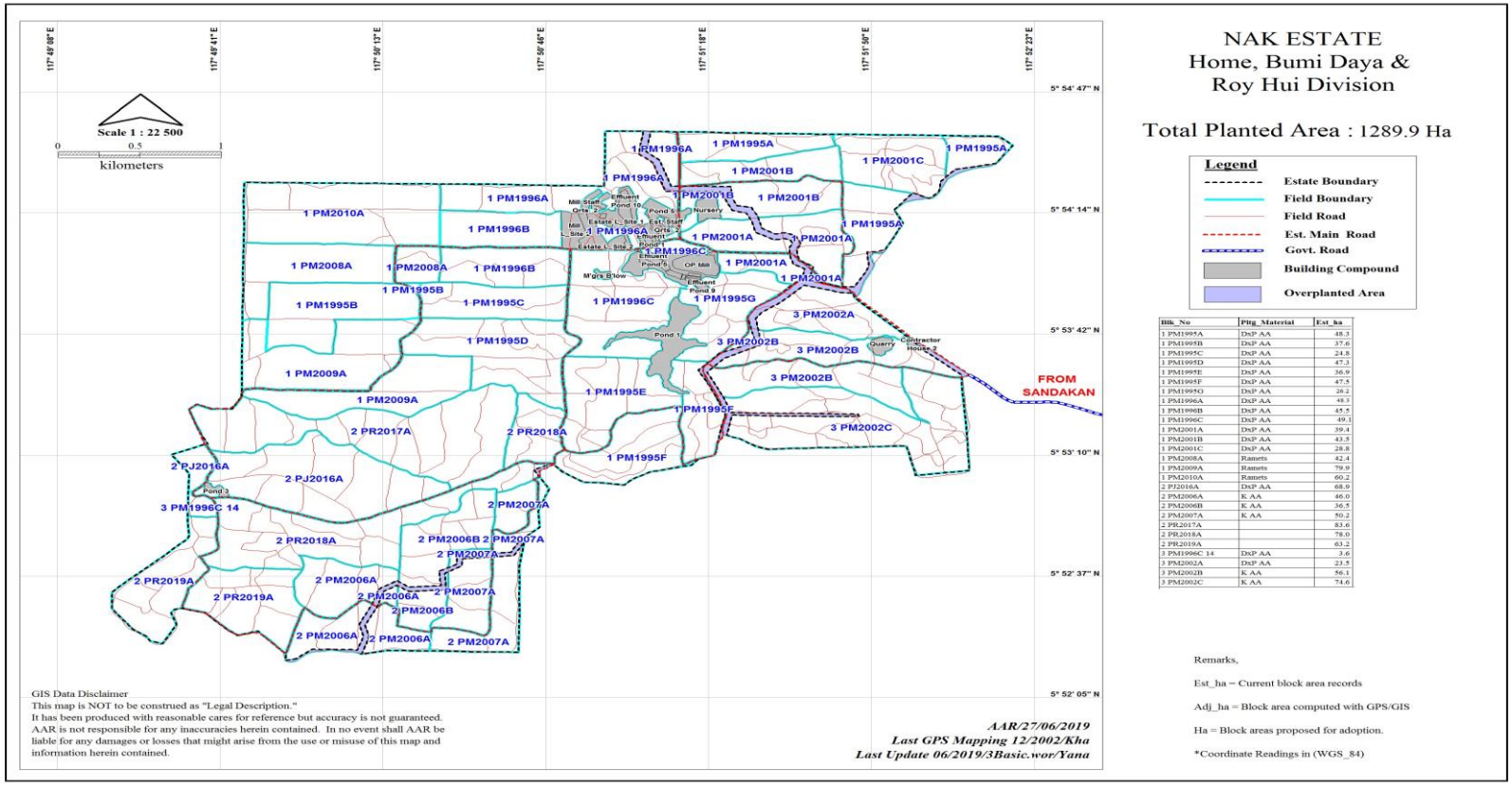
Signing by the Management Unit		
I the undersigned, being the most senior management representative of the operation seeking or holding certification, agree with the contents and audit findings presented in this document. Furthermore, I confirm the following: · Acceptance of responsibility in execution 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.		
Acknowledged by:		 Signature
Name	FARIDAN HJ OTHMAN	
Position	REGIONAL HEAD SABAH REGION	
Date	07/08/2025	

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.		
Acknowledged by:		
Name	Rohazimi Bin Mat Nawi	
Position	Audit Team Leader	
Date	7/7/2025	 Signature

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.		
Acknowledged by:		
Name	Kamini Sooriamoorthy	
Position	Section Head	
Date	20/07/25 (Reviewed) 8/8/2025 (Approved)	 Signature

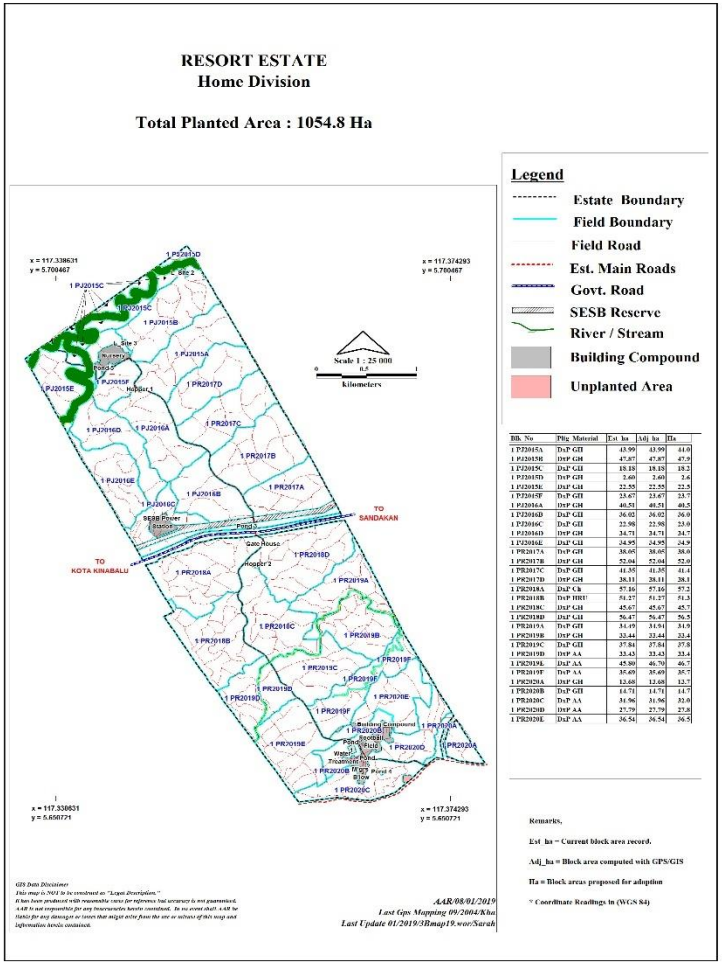
Appendix 1: Location Map Unit of Certification and Supply bases

Nak Estate and Nak POM (within Nak Estate)

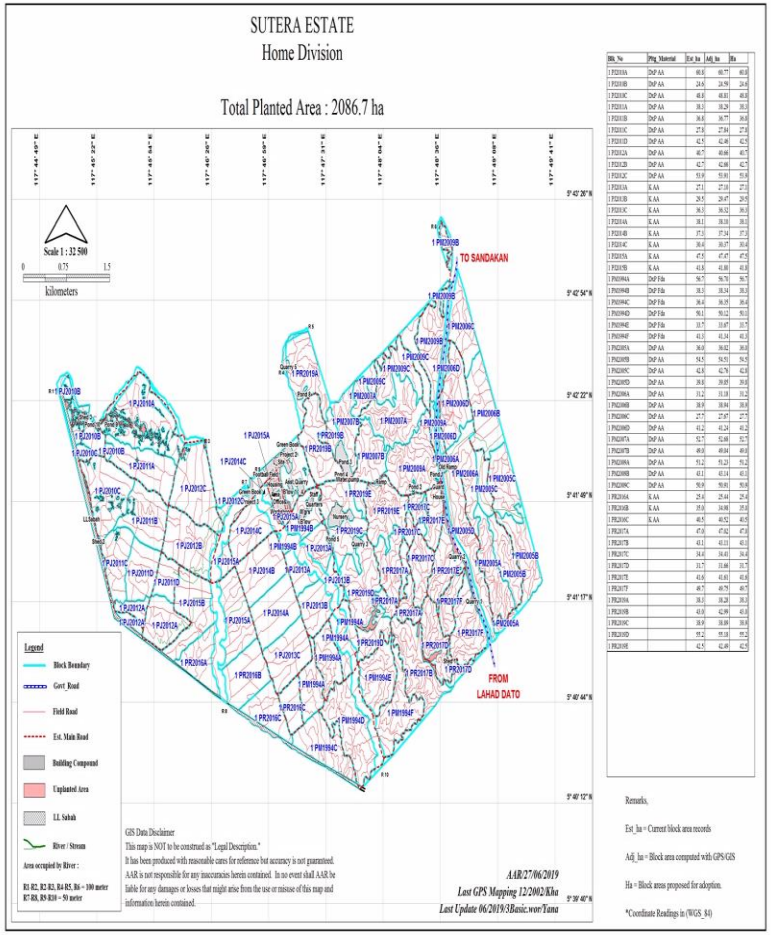


Blk_No	Pltg_Material	Est_ha
1 PM1995A	DxP AA	48.3
1 PM1995B	DxP AA	37.6
1 PM1995C	DxP AA	24.8
1 PM1995D	DxP AA	47.3
1 PM1995E	DxP AA	36.9
1 PM1995F	DxP AA	47.5
1 PM1995G	DxP AA	26.2
1 PM1996A	DxP AA	48.1
1 PM1996B	DxP AA	45.5
1 PM1996C	DxP AA	49.1
1 PM2001A	DxP AA	39.4
1 PM2001B	DxP AA	43.5
1 PM2001C	DxP AA	28.8
1 PM2008A	Ramets	42.4
1 PM2009A	Ramets	79.9
1 PM2010A	Ramets	60.2
2 PJ2016A	DxP AA	68.9
2 PM2006A	K AA	46.0
2 PM2006B	K AA	36.5
2 PM2007A	K AA	50.2
2 PR2017A		83.6
2 PR2018A		78.0
2 PR2019A		63.2
3 PM1996C 14	DxP AA	3.6
3 PM2002A	DxP AA	23.5
3 PM2002B	K AA	56.1
3 PM2002C	K AA	74.6

Resort Estate



Sutera Estate



Appendix 2: History of the changes in the current certification cycle

Assessment Type	Date of Audit	Changes
Recertification	07/04/2025	Nak Estate – Reduction of 28.16 ha due to reconciliation of the estate map with the land title. Sutera Estate – Increase of 5.51 ha due to reconciliation of the estate map with the land title. A double-counting of land acquisition occurred following updates from Jabatan Tanah & Ukur in 2021. Resort Estate – Increase of 0.01 ha due to reconciliation with the land title. Total HCV area not applicable to Nak CU.

Appendix 3: Greenhouse Gas (GHG) Reporting Summary

1. The GHG emissions produced by the Unit of Certification (POM and its supply bases) in the period of 01-2024 until 12-2024 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:
2. ☒ Apply Full Version
3. ☒ Exclude LUC Emissions
4. The summary of the Net GHG emitted in 12-2024 for Nak POM and supply base are as following:
5. **Summary of Emissions**

Description	**tCO_2eq/t product**
CPO	3.05
PK	3.05
PKO	0.00
PKE	0.00

Extraction	**tCO_2e/t product**
OER	21.04
KER	2.58

6. Summary of Plantation/Field Emissions and Sink

Land Use	Ha
OP Planted Area	13827.00
OP Planted on Peat	0
Conservation (Forested)	79.20
Conservation (Non-Forested)	0
Total	**13,906.20**

Production	t/year
FFB Processed	73,540.42
CPO Produced	15,473.00

	Own Crop		Group		3rd Party		Total
	tCO_2e	tCO_2e/ tFFB	tCO_2e	tCO_2e/ tFFB	tCO_2e	tCO_2e/ tFFB	
Land Conversion	38580.96	0.54	83018.00	36.87	0.00	0.00	121598.97
CO_2 Emission from Fertilizer	4095.14	0.06	7333.39	3.26	0.00	0.00	11428.53
N_2O Emission	3256.98	0.05	6149.24	2.73	0.00	0.00	9406.22
Fuel Consumption	1285.46	0.02	2984.79	1.33	0.00	0.00	4270.25
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Crop Sequestration	-36569.63	-0.51	-75127.69	-33.36	0.00	0.00	-111697.32
Sequestration in Conservation Area	0.00	0.00	-726.26	-0.32	0.00	0.00	-726.26
Total	**10648.92**	**0.15**	**23631.47**	**10.49**	0.00	0.00	**34314.17**

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

7. Summary of Mill Emission and Credits

	tCO_2	tCO_2e/t FFB
Emission		
POME	17251.74	0.23
Fuel Consumption	1357.25	0.02
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	**18608.99**	**0.25**

8. Palm Oil Mill Effluent (POME) Treatment

Description	%
Diverted to compost	0.00
Divert to anaerobic digestion	100

9. POME Diverted to Anaerobic Digestion

Description	%
Diverted to anaerobic pond	100
Diverted to methane capture (Flaring)	0.00
Diverted to methane capture (electricity generation)	0.00