RSPO P&C CERTIFICATION AUDIT REPORT

Bukit Mas Palm Oil Mill
Hap Seng Plantations (River Estates) Sdn. Bhd. – Sungai Segama Group of Estates
Hap Seng Plantations (Ladang Kawa) Sdn. Bhd. – Kawa Estate and Hap Seng Estates

Audit Application Number:	PC25-002973
Assessment Type:	Annual Surveillance Audit 3
Date of Audit:	17 March 2025 - 21 March 2025
Audit Report Number:	1
Revision Number:	0
Audit Report Date	22 June 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 6
   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 of Other FFB Supplier Supplying FFB to the Mill 12
   3.5. Projected Certified Volume for Next License 14
   3.6. Information of Previous & Current License (Identity Preserved) 15
   3.7. Information of Previous & Current License (Mass Balance) 16
4. Audit Programme 17
   4.1. Audit Methodology 17
   4.2. Audit Team Member 17
   4.3. Audit Plan 18
   4.4. Changes of the Initial Audit Plan (if applicable) 23
   4.5. Sampling Details 24
   4.6. Sampling History of Current Certification Cycle 25
   4.7. Audit Team Leader and Audit Team Information 25
5. Audit Findings & Results 30
6. Summary of Audit Findings 104
7. Nonconformity(ies) Issue in this Audit 105
8. Opportunity for Improvement (OFI) Issue in This Audit 109
9. Nonconformities Raised in the Previous Audit 110
10. Stakeholder Consultation Process 111

Summary of workers interviewed, and the CB's responses and findings are presented in the table below: 115

Consultation with Previous Land User 116

11. Time Bound Plan 117

12. Requirements on Multiple Management Unit 118

13. Requirements for Uncertified Management Units 120

14. Audit Conclusion & Recommendations 123

15. Acknowledgment of Internal Responsibility and Formal Sign-off Assessment Findings 124

Appendix 1: Location Map Unit of Certification and Supply bases 126

Appendix 2: Greenhouse Gas (GHG) Reporting Summary 129

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 IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia. SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & ISO 45001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 28 September 2024 (accredited since 2014).
Phone Number (Accredited Office)	603-5544 6448
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	Worldwide for SCCS (excluding China), Malaysia and Indonesia for P&C
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	Bukit Mas Palm Oil Mill Hap Seng Plantations (River Estates) Sdn. Bhd. – Sungai Segama Group of Estates Hap Seng Plantations (Ladang Kawa) Sdn. Bhd. – Kawa Estate and Hap Seng Estates
Address of the Management Unit/s	Off 40KM, Jalan Jeroco, 91109 Lahad Datu, Sabah, Malaysia.
Country	Malaysia
Websites	https://www.hapsengplantations.com.my/
Description of the Management Unit	The Bukit Mas Certification Unit (CU) is a subsidiary of Hap Seng Plantations Holdings Berhad (HSPHB) and is collectively known as the Sungai Segama Group of Estates. The Bukit Mas Palm Oil Mill (POM) has a processing capacity of 45 metric tonnes of fresh fruit bunches (FFB) per hour. The estates under this CU include Bukit Mas Estate and Sungai Segama Estate, both of which are managed by Hap Seng Plantations (River Estates) Sdn. Bhd. In addition, the Kawa Estate comprising the Apas Claremont Division, Tasek Division, and Muul Hill Divisions covers a total area of 1,275.74 hectares. Of this, 99.38 hectares are under Hap Seng Plantations (Ladang Kawa) Sdn. Bhd., while the remaining 1,176.36 hectares are owned by Future Golden Development Sdn. Bhd., a related company that is also managed by Hap Seng Plantations (Ladang Kawa) Sdn. Bhd. The Hap Seng Estate (Tiku Division) falls under Hap Seng Properties Sdn. Bhd. but is similarly managed by Hap Seng Plantations (Ladang Kawa) Sdn. Bhd. It is worth noting that most of the land in the Tiku Division has been acquired for property development purposes. The CU has ISCC EU/MeSTI/Halal/HACCP/MSPO certification beside of RSPO P&C and Supply Chain.
Management Representative Name	Kee Keow Chong
Management Representative Designation	General Manager – Agronomy
Management Representative Email	keekc@hapseng.com

2.2.RSPO Membership Information

RSPO Membership Information	
RSPO Membership No.	1-0098-11-000-00
Name of RSPO Member	HAP SENG PLANTATIONS HOLDINGS BERHAD
Member Since	02 September 2005

2.3.Certificate Information

Certificate Information	
Certificate No.	RSPO-PC 00142
prisma Document Reference Number	*(N/A until June 2025)*
RSPO PalmTrace ID No.	RSPO_PO1000000185
prisma Trading Account ID	TA25-017055
Scope of Certification	Production of Sustainable Crude Palm Oil and Palm Kernel Using Identity Preserved Supply Chain Model.
Supply Chain Model	☒ Identity Preserved (IP) ☐ Mass Balance (MB)
Applicable Standards / Normative Reference	☒ Principles and Criteria for the Production of Sustainable Palm Oil 2018 ☒ RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard 2020 ☐ RSPO Management System Requirements for Group Certification of FFB Production 2022 ☐ RSPO Rules on Market Communication and Claims 2022
National Interpretation (NI)	Malaysia National Interpretation
Initial Date of Certification:	24 May 2012
Effective Date of Certificate:	24 May 2022
Expiry Date of Certificate:	23 May 2027
Name of Peer Reviewer	N/A

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**
Bukit Mas POM	TA25-017055	KM40, Jalan Jeroco Off Mile 13, Lahad Datu – Sandakan Highway, Kinabatangan, Sabah.	45 MT/Hour	5° 20' 14.281" N	118° 28' 25.104" E
Remarks: This Management Unit was new client transferred from another Certification Body.					

Information of Supply Bases					
Name of Supply Bases	**prisma Supply Base ID**	**Address of Supply Bases**	**Type of Supply Bases**	**GPS Coordinates**	
				Latitude	**Longitude**
Bukit Mas Estate	SB25-003825	KM40, Jalan Jeroco Off Mile 13, Lahad Datu - Sandakan Highway, Kinabatangan, Sabah	Own/Managed Estate	5° 19' 01.928" N	118° 27' 46.294" E
Sungai Segama Estate	SB25-005913	KM40, Jalan Jeroco Off Mile 13, Lahad Datu - Sandakan Highway, Kinabatangan, Sabah	Own/Managed Estate	5° 19' 02.421" N	118° 27' 47.331" E
Kawa Estate	SB25-004479	Off KM 10, Jalan Apas, 91008 Tawau, Sabah	Own/Managed Estate	4° 21' 52.222" N	118° 02' 18.679" E
Kawa Estate (under Future Golden Development)	SB25-004479	Off KM 10, Jalan Apas, 91008 Tawau, Sabah	Own/Managed Estate	4° 21' 52.222" N	118° 02' 18.679" E
Hap Seng Estate (Tiku Division)	SB25-004324	Batu 8, 91008, Tawau, Sabah, Malaysia	Own/Managed Estate	4° 17' 59.823" N	117° 57' 42.314" E

Remarks:

1) Bukit Mas Estate and Sungai Segama Estate under Hap Seng Plantations (River Estates) Sdn. Bhd.
2) Kawa Estate comprising of Apas Claremont Division, Tasek Division and Muul Hill Division (99.38 ha under Hap Seng Plantations (Ladang Kawa) Sdn. Bhd. and the remaining 1176.36 ha under Future Golden Development Sdn. Bhd, a related party company which is managed by Hap Seng Plantations (Ladang Kawa) Sdn. Bhd.)
3) Hap Seng Estate (Tiku Division) (under Hap Seng Properties Sdn. Bhd. but managed by Hap Seng Plantations (Ladang Kawa) Sdn. Bhd.)

3.1. Area Statement of the Management Unit

Area Statement of Supply Bases									
Name of the 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**
Bukit Mas Estate	4733.00	4258.00	0.00	0.00	78.70	0.00	0.00	0.00	396.30
Sungai Segama Estate	5174.00	4484.50	0.00	0.00	141.70	0.00	0.00	0.00	547.80
Kawa Estate	99.83	99.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kawa Estate (under Future Golden Development)	1176.36	1100.04	0.00	0.00	4.08	0.00	0.00	0.00	72.24
Hap Seng Estate (Tiku Division)	668.50	86.00	0.00	0.00	0.00	0.00	0.00	0.00	582.50
TOTAL	**11851.69**	**10028.37**	**0.00**	**0.00**	**224.48**	**0.00**	**0.00**	**0.00**	**1598.84**

Remarks:

No changes from the previous report.

Almost the entire area of Hap Seng Estate (Tiku Division) has been released for property development, as detailed below:

- 122.37 hectares released in January 2006
- 296.61 hectares released in January 2006
- 37.00 hectares released in December 2015
- 89.00 hectares released in June 2017

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		
Bukit Mas Estate	1,185.00	0.00	0.00	3,073.00	3,073.00	4,258.00
Sungai Segama Estate	1,093.50	1,005.56	1,813.50	571.94	3,391.00	4,484.50
Kawa Estate	0.00	0.00	0.00	99.83	99.83	99.83
Kawa Estate (under Future Golden Development)	0.00	0.00	0.00	1,100.04	1,100.04	1,100.04
Hap Seng Estate (Tiku Division)	0.00	0.00	0.00	86.00	86.00	86.00
TOTAL (ha)	**2,278.50**	**1,005.56**	**1,813.50**	**4,930.81**	**7,749.87**	**10,028.37**
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	
Bukit Mas Estate	266.50	284.00	423.50	319.50	314.50	**1,608.00**
Sungai Segama Estate	448.80	0.00	0.00	0.00	0.00	**448.80**
Kawa Estate	0.00	0.00	0.00	0.00	0.00	**0.00**
Kawa Estate (under Future Golden Development)	124.00	0.00	0.00	0.00	0.00	**124.00**
Hap Seng Estate (Tiku Division)	0.00	0.00	0.00	0.00	0.00	**0.00**
TOTAL (ha)	**839.30**	**284.00**	**423.50**	**319.50**	**314.50**	**2,180.80**

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

3.4. Name of other FFB Supplier Supplying FFB to the Mill

Name of other FFB Suppliers	Type of FFB Suppliers	Certified Status	GPS Coordinates		FFB received by the mil (MT)
			Latitude	Longitude	
Sungai Segama	Agents	RSPO Certified	5°19'02.421"N	118°27'47.331"E	61356.49
Bukit Mas	Agents	RSPO Certified	5°19'01.928"N	118°27'46.294"E	61771.04
Kawa (Including Apas)	Agents	RSPO Certified	4° 21' 52.222"N	118° 2' 18.679"E	18568.66
Kawa-Hap Seng Properties	Agents	RSPO Certified	4° 17' 59.823"N	117° 57' 42.314"E	1904.44
Tomanggong	Diverted Crop	RSPO Certified	5°24'01.900"N	118°39'51.704"E	43625.28
Litang (Including Wecan)	Diverted Crop	RSPO Certified	5°19'31.607"N	118°34'28.304"E	3360.29
Tagas (Including Tampilit)	Diverted Crop	RSPO Certified	5°21'47.301"N	118°38'14.200"E	17367.89
Batangan (Including Kretam)	Diverted Crop	RSPO Certified	5°24'43.704"N	118°26'59.803"E	2839.86
Lutong	Diverted Crop	RSPO Certified	5°21'55.601"N	118°26'26.201"E	1475.76
Kapis	Diverted Crop	RSPO Certified	5°26'34.303"N	118°24'51.001"E	1622.94
Spark Glory Sdn. Bhd.	Agents	RSPO Certified	5°18'52"N	118°34'34"E	822.33
Harus Abadi Sdn. Bhd.	Agents	RSPO Certified	5°44'04.4"N	118°54'11.1"E	5946.06

First Raintree Sdn. Bhd.	Agents	RSPO Certified	5°35'34.91"N	118°52'98.90"E	339.91
LKM Trading	Independent Smallholder (ISH)	RSPO Certified	5°18'31.89"N	118°29'53.51"E	924.92
Lebihjaya Sdn. Bhd.	Agents	RSPO Certified	5°36'08.150"N	118°51'71.160"E	196.66
Bukit Kretam Sdn. Bhd.	Agents	RSPO Certified	5°49'50.320"N	118°56'29.830"E	1890.06
				TOTAL	**224012.59**

3.5. Projected Certified Volume for Next License

Information of New License		
Next License Period	Start Date	24 May 2025
	End Date	23 May 2026
Projected Certified FFB Volume (MT)	164,812.00	
Average Production Yield (MT/ Ha)	21.27	
Projected CSPO Certified Volume (MT)	Identity Preserved	33,293.00
	Mass Balance	0.00
Projected CSPK Certified Volume (MT)	Identity Preserved	8,406.00
	Mass Balance	0.00
Oil Extraction Rate (OER) (%)	20.20	
Kernel Extraction Rate (KER) (%)	5.10	

3.6. Information of Previous & Current License (Identity Preserved)

Name of Palm Oil Mill	**Bukit Mas POM**			
Information of License	**Previous Year License**		**Current Year License**	
License Period	Start Date	24 May 2023	Start Date	24 May 2024
	End Date	23 May 2024	End Date	23 May 2025
Actual Production Period Reported	From	24 May 2023	From	24 May 2024
	To	23 May 2024	To	21 March 2025
Projected FFB Certified Volume (MT)		281,078.00		251,840.00
Actual production of FFB (MT)		249,494.79		224,012.59
Projected CSPO Certified Volume (MT)		55,683.30		50,525.16
Actual CSPO Production Volume (MT)		51,318.73		49,706.61
Actual CSPO Volume Sold as RSPO Certified (MT)		50,647.16		49,706.61
Actual CSPO Volume Sold as Conventional (MT)		0.00		0.00
Actual CSPO Volume Sold under Other Scheme (MT)		0.00		0.00
Total Actual CSPO Volume Sold (MT)		50,647.16		49,706.61
Actual CSPO credits sold (where applicable)		0.00		0.00
Projected CSPK Certified Volume (MT)		12,850.38		12,845.13
Actual CSPK Production Volume (MT)		12,771.93		10,583.96
Actual CSPK Volume Sold as RSPO Certified (MT)		11,311.34		10,571.52
Actual CSPK Volume Sold as Conventional (MT)		0.00		0.00
Actual CSPK Volume Sold under Other Scheme (MT)		0.00		0.00

3.7. Information of Previous & Current License (Mass Balance)

Name of Palm Oil Mill				
Information of License	**Previous Year License**		**Current Year License**	
License Period	Start Date	DD Mmm YYYY	Start Date	DD Mmm YYYY
	End Date	DD Mmm YYYY	End Date	DD Mmm YYYY
Actual Production Period Reported	From	DD Mmm YYYY	From	DD Mmm YYYY
	To	DD Mmm YYYY	To	DD Mmm YYYY
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) (MT)				
Projected CSPK Certified Volume (MT)				
Actual CSPK Production (MT)				
Actual CSPK Volume Sold as RSPO Certified (MT)				
Actual CSPK Volume Sold as Conventional (MT)				
Actual CSPK Volume Sold under Other Scheme (MT)				

Add tables as necessary

4. Audit Programme

4.1. Audit Methodology

The audit covered the one palm oil mill and three of its supply bases. The sampling methodology applies for supply base 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 3 supply base covered during the audit is Kawa Estate, Bukit Mas Estate and Sungai Segamaha. The audit included an on-site audit to the estates and mill to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, local communities, FFB supplier to Bukit Mas POM cum neighbouring smallholders, contractors and other relevant stakeholders were also conducted during the audit.

4.2. Audit Team Member

Name	Role	CAB Auditor Number
Dzulfiqar Azmi	Lead Auditor	ASI1GIVNPH
Mohd Zulfakar Kamaruzaman	Auditor	ASI17IDGG4
Nor Ezani Ahmad	Auditor	ASI1YW2A6T
Rozaimee Ab Rahman	Auditor	ASI1AU6HF7

4.3. Audit Plan

Date	Time	CAB Auditor Number	Location	Activity
17 March 2025	08.00 am - 06.00 pm	ASI1GIVNPH ASI17IDGG4 ASI1YW2A6T ASI1AU6HF7	Kawa Estate Kawa Estate (under Future Golden Development) Hap Seng Estate (Tiku Division)	Opening Meeting for Bukit Mas Certification Unit. Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader. Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative. Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited. ASI1GIVNPH (DA) ▪ Site inspection Tiku Division sighted Harvesting and loose fruit collection at Block 2007. ▪ Site inspection at workers quarters and housing facilities i.e. sundry shop ▪ Interview with harvesters and general workers from Local, Indonesian nationalities. ▪ Interview with representative JCC, gender committee. ▪ Documents review related to environments aspect such as EIA, scheduled wastes records, waste mgt. plan, GHG, etc.) ASI1YW2A6T (NEA) ▪ Site inspection Kawa Estate (under Future Golden Development) sighted Mull Hill Division Harvesting Block 2919 and Circle Racking Block 2915. ▪ Site inspection at HCV area. ▪ Site inspection at workers quarters and housing facilities i.e. sundry shop, 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.)

				ASI17IDGG4 (MZK) / ASI1AU6HF7 (RAR) ▪ Site inspection at the Kawa Estate, sighted Harvesting operation at Block 9814, Manuring at Block 9810. ▪ Site inspection at riparian reserved at Block 2920. ▪ Site inspection at water treatment plant, scheduled wastes store, chemical stores, lubricant store, tractor washing bay area, workshop. ▪ Interview with harvesters and general workers from Local, Indonesian nationalities. ▪ Interview with external stakeholders' consultations i.e. representative from local communities from Kampung Bukit Quoin. ▪ Interview with supplier and contractors ▪ Documents review related to safety aspect such as OSH plan, safety meetings, accident records, CHRA, medical surveillance, NRA, audiometric report, 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. ▪ 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. **Travel to Plantation Central Office (PCO) in Lahad Datu Lahad Datu.**
18 March 2025	08.00 am - 06.00 pm	ASI1GIVNPH ASI17IDGG4 ASI1YW2A6T ASI1AU6HF7	Sungai Segama Estate	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited. ASI1GIVNPH (DA) ▪ Site inspection at OP Nursery. ▪ Site inspection at estate facilities i.e. water treatment plant, scheduled wastes store, chemical stores, lubricant store, tractor washing bay area, workshop, etc. ▪ Interview with facilities operators. ▪ Interview with Indonesian nationalities. ▪ Interview with representative JCC, gender committee.

				▪ Documents review related to environments aspect such as EIA, scheduled wastes records, waste mgt. plan, GHG, etc.) ASI1YW2A6T (NEA) ▪ Site inspection at Harvesting Block 2016A and Circle Spraying Block S20B. ▪ 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.) ASI17IDGG4 (MZK) / ASI1AU6HF7 (RAR) ▪ Site inspection at Harvesting Block S24A, Manuring Block RP17A. ▪ Site inspection at Replanting area at Block RP25/03, RP25/04 ▪ Site inspection at riparian reserved at Riparian reserve at Block 20H6. ▪ Site inspection at HCV area. ▪ Interview with harvesters and general workers from Local, Indonesian nationalities. ▪ Interview with external stakeholders' consultations i.e. representative from local communities from Kampung Litang. ▪ Interview with supplier and contractors ▪ Documents review related to safety aspect such as OSH plan, safety meetings, accident records, CHRA, medical surveillance, NRA, audiometric report, 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. ▪ 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.

19 March 2025	08.00 am - 06.00 pm	ASI1GIVNPH ASI17IDGG4 ASI1YW2A6T ASI1AU6HF7	Bukit Mas Estate	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited. ASI1GIVNPH (DA) ▪ Site inspection at estate facilities i.e. water treatment plant, scheduled wastes store, chemical stores, lubricant store, tractor washing bay area, workshop, etc. ▪ Interview with facilities operators. ▪ Interview with representative JCC, gender committee. ▪ Documents review related to environments aspect such as EIA, scheduled wastes records, waste mgt. plan, GHG, etc.) ASI1YW2A6T (NEA) ▪ Site inspection at Harvesting Block BM01 and Circle Spraying Block BM99. ▪ 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.) ASI17IDGG4 (MZK) / ASI1AU6HF7 (RAR) ▪ Site inspection at Harvesting Block B96A, Manuring Block L96E and Planting LCC at Block RP25/02. ▪ Site inspection at riparian reserved at Block 98A1. ▪ Site inspection at HCV area. ▪ Interview with harvesters and general workers from Local, Indonesian nationalities. ▪ Interview with external stakeholders' consultations i.e. representative from local communities from Kampung Litang. ▪ Interview with supplier and contractors ▪ Documents review related to safety aspect such as OSH plan, safety meetings, accident records, CHRA, medical surveillance, NRA, audiometric report, 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. ▪ 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.
20 March 2025	08.00 am - 06.00 pm	ASI1GIVNPH ASI17IDGG4 ASI1YW2A6T ASI1AU6HF7	Bukit Mas POM	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited. ASI1GIVNPH (DA) 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. ASI1AU6HF7 (RAR) ▪ Site inspection at nonproduction area i.e. 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 ▪ Interview with mill workers from various workstations ▪ Interview with representative NUPW, gender committee, social dialog. ▪ Interview with non-production operators ▪ Interview with representative from EPMC committees ▪ Documents review related to environments aspect such as EIA, scheduled wastes records, final discharge report, stake sampling reports, etc. ▪ 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. ASI17IDGG4 (MZK) ▪ Site inspection at production area i.e. boiler station, sterilizer station, kernel station, etc. ▪ 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.
21 March 2025	08.00 am - 06.00 pm	ASI1GIVNPH ASI17IDGG4 ASI1YW2A6T ASI1AU6HF7	Bukit Mas POM / Bukit Mas Estate	Continue the assessment and verification of outstanding issues to ensure full compliance. The auditor will clearly communicate to the auditee the required documents, records, and any corrective actions needed. Closing Meeting. Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager.

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

4.4. Changes of the initial audit plan (if applicable)

No changes of the 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	1	N/A	N/A	All mills shall be audited.
Own/Managed Estates	4	Low Risk	1.2	4
Scheme Smallholder		Choose an item		
Scheme Outgrower		Choose an item		
Independent Outgrower		Choose an item		

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
	2023	2024	2025	20xx	20xx
Bukit Mas POM	☒	☒	☒	☐	☐
Bukit Mas Estate	☒	☒	☒	☐	☐
Sungai Segama Estate	☒	☒	☒	☐	☐
Kawa Estate	☒	☒	☒	☐	☐
Kawa Estate (under Future Golden Development)	☒	☒	☒	☐	☐
Hap Seng Estate (Tiku Division)	☒	☒	☒	☐	☐

4.7. Audit Team Leader and Audit Team Information

Audit Team Leader: Dzulfiqar Azmi (DA)	
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 social human right management.
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)** **Nor Ezani Ahmad (NEA)** **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;	ASI1GIVNPH (DA)	Holds a B.SC. (Hons) in Plantation Technology and Management from Mara Technological University (UiTM).
	ASI1YW2A6T (NEA)	Possessed B. Sc. (Hons) in Conservation Biology and Master's in Science (Advancement of Biodiversity) from University Malaysia Sabah.
	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	ASI1GIVNPH (DA)	He had more than 7 years of working experience in the oil palm operation and experience in social auditing since 2017.
	ASI1YW2A6T (NEA)	She had 3 years of working experience in the oil palm plantation sector specialized in sustainability and auditing experience in HCVF and social issues in the oil palm operation 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	ASI1GIVNPH (DA)	Completed RSPO endorsed P&C lead auditor course in 2018 by Chemark Training.
	ASI1YW2A6T (NEA)	Completed RSPO endorsed P&C lead auditor course in 2020 by Chemark Training.
	ASI17IDGG (MZK)	Completed RSPO endorsed P&C lead auditor course in 2015 by Wild Asia.
	ASI1AU6HF7 (RAR)	Completed RSPO endorsed P&C lead auditor course in 2017 by Chemark Training.
Successfully completed the 5-day lead auditor course for ISO 9001 or ISO 14001 or ISO 45001.	ASI1GIVNPH (DA)	Successfully attended Integrated Management System lead assessor course in 2017.
	ASI1YW2A6T (NEA)	Successfully attended 5-day lead auditor course for ISO 9001, and ISO 45001 in 2020.
	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	ASI1GIVNPH (DA)	Capable of demonstrating knowledge and application of the latest version of the RSPO Certification Systems.
	ASI1YW2A6T (NEA)	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	ASI1GIVNPH (DA)	This has not been audited and is deemed not applicable.
	ASI1YW2A6T (NEA)	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.	ASI1YW2A6T (NEA)	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	ASI1GIVNPH (DA)	He possesses extensive knowledge and experience in understanding, interpreting, and applying local and regional laws.
	ASI1YW2A6T (NEA)	She 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;	ASI1GIVNPH (DA)	He has over 5 years of working experience in oil palm operations.
	ASI1YW2A6T (NEA)	She had 3 years of working experience in the oil palm plantation sector specialized in sustainability and auditing experience in HCVF and social issues in the oil palm operation since 2017.
	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	ASI1GIVNPH (DA)	He has over 5 years of extensive experience in oil palm operations and auditing health and safety practices.

against the ISO 45001 Occupational Health and Safety Management standard;	ASI1YW2A6T (NEA)	She 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;	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.
	ASI1YW2A6T (NEA)	She attended SA 8000 training in 2020. She 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;	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.
	ASI1YW2A6T (NEA)	She attended SA 8000 training in 2020. She 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, 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	ASI1GIVNPH (DA)	He has experience auditing the ISO 14001 Environmental Management Systems standard since 2019.

Conservation Value (HCV)/High Carbon Stock (HCS) assessments, organic agriculture or the ISO 14001 Environmental Management Systems standard;	ASI1YW2A6T (NEA)	This criterion and indicator have not been audited.
	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	ASI1GIVNPH (DA)	He is fluent in both Bahasa Malaysia and English.
	ASI1YW2A6T (NEA)	She 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.	ASI1GIVNPH (DA)	He completed the RSPO Supply Chain Auditor training course in 2024 and has been auditing supply chains since then.
	ASI1YW2A6T (NEA)	This criterion and indicator have not been audited.
	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		The Bukit Mas CU demonstrated its commitment to transparency by maintaining a procedure for stakeholders to request information on environmental, social, or legal matters through various channels, including forms, verbal and written requests, and by making relevant documents publicly accessible both online and at estate and mill offices. The CU continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Hap Seng Plantations Holdings Berhad website at https://www.hapsengplantations.com.my/.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	(Criterion 8.1); • 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.		The CU maintains active engagement with various stakeholders and demonstrates compliance with RSPO criteria by providing accessible management documents on its website, managing information requests through a structured communication procedure, and keeping detailed records of interactions and regulatory inspections.	☒ 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 CU maintains records of information requests and stakeholder feedback in line with its communication procedure, ensuring timely responses and inclusive consultations through documented internal and external meetings, with outcomes systematically recorded in SIA and EIA action plans to support continuous improvement and regulatory compliance.	☒ 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 company continues to implement its Consultation and Communication procedures through various levels of Joint Consultative Committee (JCC) meetings group, estate, and worker level ensuring stakeholder engagement, documentation of feedback, and grievance handling, with appointed representatives managing communication and logbooks maintained for transparency and follow-up.	☒ 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.		Each estate and mill maintains and annually updates a comprehensive stakeholder list containing contact details of various relevant parties, including government agencies, NGOs, neighboring estates, local communities, and service providers, with the most recent updates completed in January 2025.	☒ 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.		The company upholds its ethical standards through established policies on conduct and anti-bribery, communicated to all employees and contractors during inductions and briefings, and enforced through contractual agreements to ensure compliance, integrity, and transparency in all business dealings.	☒ 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 company ensures compliance with its ethical policies through regular internal audits conducted by the HSP Sustainability Team and HQ, with contractors and vendors signing the ABC Policy, while guidance on raising concerns or reporting violations is communicated to workers and stakeholders during briefings and meetings.	☒ 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 maintains a comprehensive Legal Register for estates and mills, supported by regular internal compliance evaluations and a structured mechanism for monitoring legal updates, led by the Sustainability Team through various credible sources with the most recent review on 12 February 2025 reflecting updates to key employment-related legislation.	☒ 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.		Bukit Mas CU continues to implement its boundary management procedure with mapped and monitored boundary pillars across all estates, maintaining 547 marked pegs as of January 2024, with physical demarcation such as painted fencing and trenching observed during the audit, and no planting found beyond estate boundaries.	☒ 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.		List of contractor parties were maintained at Estates and Mill at the Bukit Mas CU. These were all maintained and updated accordingly. The list contain details of the stakeholders, addresses and contact details. Updated on January 2025.	☒ 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.		All contracts, including those related to the supply of fresh fruit bunches (FFB), contain specific clauses requiring compliance with applicable legal requirements. Third parties are able to demonstrate adherence to these clauses.	☒ 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 Minor Job Contracts at Bukit Mas CU include clauses prohibiting child, forced, and trafficked labour, with compliance to employment laws verified in agreements with contractors such as Amiruddin bin Malilang, Kwan Brother Enterprise, KY Enterprise, Kejuruteraan Megah Maju Sdn Bhd, and Pakarmax Electrical Sdn Bhd, covering work conducted using Hap Seng-owned machinery and materials.	☒ 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		All Fresh Fruit Bunches are supplied from Bukit Mas CU owned estates which are certified to RSPO. There is no third-party FFB sent to the BMPOM. Thus, this Indicator was not applicable to Bukit Mas CU.	☒ 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.		All Fresh Fruit Bunches are supplied from Bukit Mas CU owned estates which are certified to RSPO. There is no third-party FFB sent to the BMPOM. Thus, this Indicator was not applicable to Bukit Mas CU.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Principle 3: Optimise productivity, efficiency, positive impacts and resilience
Criterion 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.

3.1.1 (C)	A business or management plan (minimum three years) shall be documented and includes, where applicable, a jointly developed business case for Scheme Smallholders.		The CU has established and implemented its commitment towards long term sustainability and improvements through a “Forecast Summary for Revenue & Capital Expenditure FY2026 to FY2028”. The business management plan shows the quality of planting materials FFB, FFB and CPO, crop projection, cost of production, price forecast, financial indicators such as cost benefit, discounted cash flow, return on investment, revenue and capital expenditure is projected. The CU have 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 replanting programme for Bukit Mas CU, outlined in the “Replanting Programmed SSGOE 2025–2033” and last revised on 18 September 2023, focuses solely on Bukit Mas Estate for 2026–2029, with annual reviews and progress monitored by estate units and Head Office, subject to final approval by the Chief Executive and oversight by the Plantation Management Committee.	☒ 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 latest Management Review for Bukit Mas CU and its complexes, chaired by the General Manager – Group Plantations and General Manager – Agronomy, was held between 28 November and 2 December 2024, addressing key topics such as SOP adequacy, internal audit results, legal compliance, and environmental performance, with internal audit findings and corrective actions reviewed in preparation for the upcoming RSPO audit in March 2025.	☒ 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 CU maintains updated social and environmental impact assessments along with an action plan aligned with RSPO P&C, focusing on continuous improvement in yield optimization, pesticide reduction, environmental mitigation, waste minimization, pollution and GHG control, community support, and the management of HCV and HCS areas.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.		The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template before the audit started. The auditor already verified and checked the data and figure given match with their database system.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.				
3.3.1 (C)	Standard Operating Procedures (SOPs) for the unit of certification are in place.		The CU maintains and regularly updates comprehensive manuals and SOPs for both estates and the mill, most recently revised on 06 March 2025 to ensure operational efficiency, safety, and regulatory compliance, with additional procedures addressing social matters such as grievance handling, stakeholder consultation, recruitment, and workplace conduct.	☒ 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.		The estates and mill maintain structured mechanisms to ensure consistent implementation of SOPs through daily records, supervisory oversight, scheduled inspections, agronomic assessments, and internal audits, though a gap in safety procedure enforcement was identified—specifically, the improper use of Wellington boots by tractor drivers, leading to ***Minor NCR MZK 01 2025*** for not addressing the risk of lower knee injuries due to unsuitable footwear.	☐ 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 SOPs across the estates and mill is closely monitored through daily supervision by field staff and Assistant Managers, supported by comprehensive record-keeping and monthly reporting via the MOVEX database, while regular workplace inspections at the mill ensure safety, operational compliance, and identification of improvement areas across all critical stations.	☒ 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.		Although no new plantings or operations have been initiated, the CU conducted updated Social and Environmental Impact Assessments on 12 and 20 March 2025, involving consultations with stakeholders including contractors, suppliers, government agencies, NGOs, neighboring estates, local communities, workers' representatives, and the gender committee to evaluate and manage potential impacts.	☒ 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.		The Environmental Impact Assessment (EIA), last reviewed on 20 February 2025, comprehensively evaluated environmental risks such as agrochemical use, contamination, and human settlement disturbances, while the Social Impact Assessment (SIA), last updated on 12 March 2025, outlined key social aspects; however, ***Minor NCR NEA 01 2025*** was raised due to insufficient evidence that stakeholder concerns such as electricity access at Kawa Estate and entry requests from Kg. Litang residents and teachers were adequately reviewed and incorporated into the SIA action plans.	☐ 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 and environmental management and monitoring plans were implemented and reviewed with stakeholder input, incorporating feedback and defined actions, although some social issues lacked participatory development, while environmental reviews showed no major concerns, and both estate and mill operations continued applying mitigation	☒ Conform ☐ Major Nonconformity

			measures based on established impact assessments.	☐ 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.		Employment procedures, including recruitment, promotion, termination, and retirement, are governed by an SOP dated 8 May 2024 and employment contracts, with no recruitment fees charged to workers and all hires, both local and foreign, conducted on a walk-in basis without agency involvement.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.5.2	Employment procedures are implemented and records are maintained.		A review of workers' contracts and personal files confirmed that recruitment, hiring, promotion, retirement, and termination procedures are implemented in line with established guidelines, with records properly maintained, promotions based on performance, retirements and terminations duly documented, and no evidence of discrimination found during interviews.	☒ Conform ☐ 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 Occupational Safety and Health Policy, revised on 20/02/2025 and signed by the Chief Executive, emphasizes a safe and healthy work environment for all personnel and business partners, with the policy communicated organization-wide and supported by a comprehensive HIRARC Register developed according to DOSH guidelines, covering 51 estate activities and 34 mill processes, regularly reviewed through OSH Committee meetings, and complemented by administrative and engineering controls, CHRA mitigation measures, and compliance with legal requirements for equipment, competent persons, and confined space entry.	☒ 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		The 2024/25 Occupational Health and Safety (OHS) management plan for the CU was established and covered key aspects such as hazard identification, legal compliance, training, emergency procedures, and PPE usage, with internal audits and monthly inspections conducted to ensure effectiveness, and previous concerns regarding hot water in emergency eye wash stations were addressed by replacing piping with HDPE and installing rooftop covers, satisfactorily closing the prior OFI.	☒ 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 2025 formal training program, prepared in December 2024 and implemented at Bukit Mas CU, covers RSPO P&C requirements including supply chain and traceability, with targeted training for employees and contractors on job skills, best management practices, and operational procedures across estate and mill activities, supported by regular on-the-job assessments to ensure comprehension and effectiveness.	☒ 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.		The formal training program for the year 2025 was prepared in December 2024 for the new financial year. They were sighted available at Bukit Mas CU, All of the trainings record done were made available to 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.		Training on Supply Chain requirements has been conducted on 01/07/2024, 25/11/2024. The training has been conducted by Assistant Mill Engineer to AP, weighbridge operator, accountant clerk, lab operator. The intention on this training was to create awareness on understanding on supply chain requirement.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 3.8: Supply Chain Requirements for Mills				
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.		Bukit Mas Palm Oil Mill (BPOM) receives only certified FFB from its own estates, other group estates, three RSPO-certified outgrowers, and one certified independent smallholder, with no FFB from uncertified sources, ensuring that only CSPO and CSPK are stored, in accordance with the traceability system outlined in the Chain of Custody.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified		Not applicable, as the CU is applying the IP module.	☒ Conform

	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.			☐ 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.		The company has established a projected certified volume for CPO and PK based on FFB production from its estates, as outlined in Table 2.5, and document verification shows that actual production remains below the certified volume as of the audit date.	☒ 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		Document verification confirmed that all transactions have been properly registered through the RSPO IT platform, with details including confirmed shipments of CSPO and CSPK under the Identity Preserved model to respective buyers, ensuring compliance with the required supply chain procedures.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.5	Documented Procedures The mill shall have written procedures		BPOM has implemented a documented and up-to-date procedure titled *Standard Operating Procedures for Supply*	☒ Conform

	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 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.		*Chain & Traceability* (SOP/COC/003, Issue 04), reviewed on 20 June 2023, which comprehensively outlines all elements of the supply chain model including traceability, delivery, dispatch, and sales of CSPO and CSPK, with training conducted for relevant personnel and oversight assigned to the appointed Senior Mill Manager supported by designated critical control point staff.	☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.6	Internal Audit (i) The mill shall have a written procedure to conduct an annual internal audit to determine whether the mill;		The company follows an internal audit procedure revised on 10/07/2019, with the latest audit conducted on 25–26/11/2024 by the sustainability team, which found no nonconformities against SCCS requirements but identified four nonconformities under RSPO P&C, all of which were addressed and closed by	☒ Conform ☐ Major Nonconformity

	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-conformities shall be subject to management review at least annually. The mills shall maintain the internal audit records and reports.		17/12/2024, with results reviewed during a management review on 02/12/2024 and all records properly maintained.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
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.		BPOM sources all its FFB exclusively from certified estates within the same CU, other group estates, three RSPO-certified outgrowers, and one certified independent smallholder, with no uncertified sources involved, and implements a traceability system supported by consignment notes and the LAK weighing system to verify certified tonnage and supplier credentials, with all transactions clearly recorded and compliant with RSPO requirements.	☒ 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		Document verification confirmed that the company has fulfilled all RSPO supply chain requirements, with certified product deliveries accompanied by complete documentation such as	☒ Conform

	certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation): a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number		delivery orders, sales contracts, and weighbridge tickets clearly indicating the supply chain model, certificate number, and unique identification, and transactions to buyers like KLK Premier Oils, Lahad Datu Edible Oils, and Intercontinental Specialty Fats properly recorded and compliant with the Identity Preserved model.	☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.9	Outsourcing Activities (i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification. (ii) The mill shall ensure the following:		Bukit Mas Palm Oil Mill has outsourced the transportation and storage of CSPO and CSPK to Chong Shu Min Trading and POIC Bulk Terminal Sdn. Bhd. through signed and enforceable agreements that define legal ownership, require compliance with RSPO SCCS, and grant audit access to certification bodies, with the mill maintaining a documented control system, regular monitoring, and proper communication of contractor details to the CB, although the outsourced facilities deemed low risk were not visited during the current audit but are recommended for review in the next.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.			
3.8.10	The mill shall record the names and contact t details of all contractors used for the physical handling of RSPO certified oil palm products.		The company has a list of contractors (used for the processing or physical handling of certified oil palm products) with names and contact details. The company has listed contractors such as Chong Shu Min Trading Sdn. Bhd. and POIC Bulk Terminal Sdn. Bhd. The company updated the list of contractors on 15/01/2025.	☒ 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.		There have been no new contractors engaged for handling RSPO-certified oil palm products, and BPOM has informed the CB on 25/11/2024 regarding existing contractors Chong Shu Min Trading Sdn. Bhd. and POIC Bulk Terminal Sdn. Bhd. with complete contact details provided, leading to the satisfactory closure of the previous Major NCR.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.12	Record Keeping (i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. (ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. (iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of		The mill has established and implemented record-keeping procedures aligned with RSPO Supply Chain Certification Standard requirements, including a five-year retention period as stated in SOP/COC/003 (Issue 04, reviewed 20 June 2023), with the Senior Mill Manager responsible for maintaining records, and real-time systems in place to track FFB input and CSPO/CSPK production and sales in accordance with approved RSPO conversion ratios (OER 20.13%, KER 4.82%), with data accuracy verified by the auditor and the previous OFI satisfactorily closed.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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 their own extraction rates based upon past experience, documented and applied it consistently.		BPOM processes only certified crops, with processing outputs tracked based on actual Oil Extraction Rate (OER) and Kernel Extraction Rate (KER), which are monitored daily and monthly using the Monthly Production Report – Physical Movement template, showing YTD figures of 18.94% OER and 4.58% KER as of February 2025 to ensure accuracy and performance monitoring.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.			☒ 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.		BPOM has a documented Traceability procedure outlined in Chapter 1 of its Standard Operating Procedure for Traceability, detailing the management of certified palm product separation, while Chapters 3 and 4 address measures to prevent contamination during transport and storage from non-certified materials.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.16	Registration of Transactions (i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. (ii) Remove: RSPO certified volumes sold under different scheme or as		Based on document verification, the company has registered all transactions through the RSPO IT platform, including confirmed shipping records such as a 500.99 mt CSPO delivery under the Identity Preserved model to Intercontinental Specialty Fats Sdn. Bhd. on 17/01/2025, with all required transaction details properly recorded.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform			
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.		Bukit Mas Palm Oil Mill has made a business-to-business claim for Identity Preserved CPO and PK and this claim is in accordance with the RSPO Rules on Market Communications and Claims.	☒ 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.		Hap Seng Plantations Holdings Berhad has established a comprehensive Human Rights Policy, aligned with international standards and last updated on 15 August 2023 to include protection for Human Rights Defenders, with commitments to prevent any form of retaliation or rights violations, communicated across all levels of the workforce and external stakeholders through briefings, meetings, stakeholder engagements, and induction sessions, with interviews confirming worker awareness and public display of the policy at operational sites.	☒ 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.		The company has an established and documented grievance mechanism including procedures for staff, workers, and whistleblowers aligned with the UN Guiding Principles on Business and Human Rights, ensuring transparency, stakeholder involvement, and protection of complainant anonymity if requested, with no whistleblowing cases reported since the last audit and confirmation of awareness and understanding among both internal and external stakeholders through interviews.	☒ 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.		Based on interviews with internal and external stakeholders, including illiterate and foreign workers, it was confirmed that the grievance procedure is well understood, having been communicated through briefings, morning musters, JCC, gender committee meetings, and stakeholder consultations, with translators assisting during initial duty reporting for foreign workers.	☒ 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.		Bukit Mas CU ensures that all parties to a grievance are kept informed of its progress and outcome within the agreed timeframe, with evidence of communication provided during stakeholder briefings held on 16/12/2024 (BMPOM and Bukit Mas Estate), 30/01/2025 (Kawa), 14/01/2025 (Sungai Segama Estate), and 08/03/2025 (Bukit Mas Estate), involving both internal and external stakeholders through separate and joint sessions.	☒ 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.		Bukit Mas CU has an established grievance resolution system outlined in the procedure *'Prosedur Melapor Aduan dan Permasalahan'* and *'Grievances Procedure – Appendix 1'* (Ref#: HSPSB P1 1120, dated 31/03/2018), with internal and external complaint forms/books available at each mill and estate, primarily used by employees for housing-related issues, and no external complaints recorded; the procedure, updated on 18/07/2020, also allows complainants to be supported by individuals or groups, or to request a third-party mediator.	☒ 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.		Bukit Mas Group of Estates has demonstrated its commitment to community development through initiatives based on consultations with local communities, including water supply to Kampung Litang during drought, grass cutting at SK Litang, religious facilities, government clinic and police station, transportation for workers, boundary repairs with smallholders, and donations to CLC Ladang Sungai Kawa, alongside Hap Seng Management's ongoing support for sustainability by offering free consultations to surrounding smallholders, resulting in the successful RSPO certification of four small growers and two smallholders.	☒ 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.		The company's land ownership remains unchanged and is substantiated through valid land titles across Bukit Mas, Sungai Segama, Litang, and Kawa Estates—held under The River Estates Sdn. Bhd. and Hap Seng Plantations (Ladang Kawa) Sdn. Bhd.—with clearly defined tenure periods and designated use for agricultural crops, while historical transitions in ownership did not necessitate title name changes.	☒ 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.		There are no recognized legal, customary, or user rights conflicts with external parties, no ongoing land disputes, and the last dispute in 2017 with a Litang villager was amicably resolved through documented meetings and agreements, with the land now officially gazetted as a cemetery and no further claims reported.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.4.3 (C)	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring		The company holds legal maps for all estates based on land permits, with no identified customary or user rights claims or ongoing land disputes, so no maps of recognized external rights are required.	☒ Conform ☐ Major Nonconformity

	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..		No recognized legal, customary, or user rights claims or ongoing land disputes with external parties exist across all estates, making this indicator 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.		No recognized legal, customary, or user rights claims or ongoing land disputes with external parties exist across all estates, making this indicator not applicable.	☒ Conform ☐ 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.		No recognized legal, customary, or user rights claims or ongoing land disputes with external parties exist across all estates, making this indicator 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		The company has not conducted any new plantings since November 2005; therefore, this indicator is not applicable.	☒ 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		The company has not conducted any new plantings since November 2005; therefore, this indicator is not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	process of consultation and negotiation.			
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements should be non-coercive and entered into voluntarily and carried out prior to new operations. b) Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. c) Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.		The company has not conducted any new plantings since November 2005; therefore, this indicator is not applicable.	☒ 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		The company has not conducted any new plantings since November 2005; therefore, this indicator is not applicable.	☒ Conform ☐ Major Nonconformity

	and water provisioning options are considered. There is transparency of the land allocation process.			☐ 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.		The company has not conducted any new plantings since November 2005; therefore, this indicator is not applicable.	☒ 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..		The company has not conducted any new plantings since November 2005; therefore, this indicator is not applicable.	☒ 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 November 2018 as a result of recent (2005 or later) expropriations in the national interest		The company has not conducted any new plantings since November 2005; therefore, this indicator is not applicable.	☒ Conform ☐ Major Nonconformity

	without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.			☐ 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.		The company has not conducted any new plantings since November 2005; therefore, this indicator is 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.		The company's Land Dispute Management Procedure, last revised in December 2020, outlines a process for investigating and resolving land claims involving initial settlement by the Plantation Advisory Department, escalation to the Group Compliance Department if needed, and consultations with relevant authorities and experts to determine compensation; the last dispute in 2017 with a Litang villager was resolved amicably following this procedure, supported by a registered valuer's confirmation and a signed agreement in 2019, with the disputed land later gazetted as a cemetery and no further claims reported.	☒ 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.		There have been no cases of land disputes since 2017 and no cases where compensation has been given. Therefore, this indicator is not applicable.	☒ 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 have been no cases of land disputes since 2017 and no cases where compensation has been given. Therefore, this indicator is not applicable.	☒ 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 have been no cases of land disputes since 2017 and no cases where compensation has been given. Therefore, this indicator is not applicable.	☒ 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.		No recognized legal, customary, or user rights claims or ongoing land acquisitions or disputes exist across all estates, making this indicator not applicable.	☒ 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.		No recognized legal, customary, or user rights claims or ongoing land acquisitions or disputes exist across all estates, making this indicator not applicable.	☒ 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.		No recognized legal, customary, or user rights claims or ongoing land acquisitions or disputes exist across all estates, making this indicator not applicable.	☒ 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.		An interview with a local community representative confirmed no ongoing land disputes in the company's operational area, with the last dispute in 2017 involving a Litang villager resolved amicably through the Land Dispute Management Procedure, supported by a registered valuer's survey and a 2019 agreement acknowledging company ownership; the land was later gazetted as a cemetery in 2020, and no further claims have been made, with the claimant having relocated.	☒ 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.		An interview with a local community representative confirmed no land dispute in the company area. The last dispute occurred in 2017 (see Indicator 4.8.1. for details).	☒ 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		There has been no evidence of acquisition through dispossession or forced abandonment of customary and user rights before the current operations. The last land dispute occurred in 2017 (see Indicator 4.8.1. for details).	☒ Conform

	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).			☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).		There has been no land dispute since 2017 (see Indicator 4.8.1. for details). However, the company has a Land Dispute Management Procedure revised December 15, 2020, and a revised version of the previous procedure dated March 10, 2016 (see Indicator 4.6.1. for details).	☒ 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.		FFB prices for 2024 and 2025 are publicly accessible at the BPOM office and are communicated monthly to smallholders, with the latest pricing mechanism posted on 3/3/2025.	☒ 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.		Bukit Mas Palm Oil Mill has communicated the FFB pricing via display at the weighbridge, agreement and through the payment vouchers.	☒ 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.		The Oil Palm Fruit Purchase Agreement between Hap Seng Plantations (River Estates) Sdn. Bhd. and LKM Trading, effective from 1 August 2020 with automatic yearly renewal, outlines a detailed FFB pricing formula based on MPOB average prices, applicable deductions, extraction rates by palm age, and includes a certified FFB incentive, with no complaints recorded regarding the pricing.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
5.1.4 (C)	Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.		The Oil Palm Fruit Purchase Agreement between Hap Seng Plantations (River Estates) Sdn. Bhd. and LKM Trading, effective from 1 August 2020 with automatic yearly renewal, remains valid, while Spark Glory, considered a smallholder by estate size, does not require financial assistance due to the owner's diverse business interests, and is being supported by Hap Seng Plantations in pursuing RSPO certification.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.		Oil Palm Fruit Purchase Agreement between Hap Seng Plantations (River Estates) Sdn. Bhd. and Spark Glory, LKM Trading is valid from 1 August 2020 and therein shall continue automatically on a yearly basis.	☒ 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.		Evidence was available that agreed payments are made in a timely manner. Example FFB Statement of Account for December 2023, and Payment Voucher dated 10 January 2024 for December 2023 were sighted. Calculation and deduction stated accurately.	☒ 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).		The weighbridges at Bukit Mas Palm Oil Mill and Ladang Kawa (Kawa and Hap Seng Estate) have been calibrated annually, with valid certificates issued by Metrology Corporation Malaysia Sdn. Bhd. and maintenance by LAK Weighing System Sdn. Bhd., confirming compliance with required standards.	☒ 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		Hap Seng Management supports independent smallholders in obtaining certification by providing free consultation and assessments, and while surrounding smallholders prefer to certify independently rather than through an Internal Control System (ICS), several including Spark Glory, Harus Abadi, Lebijaya, Bukit Kretam, and LKM Trading are already RSPO	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.		certified, with Khoo Chin Hung and LPC Plantation currently in the certification process.	☐ 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.		The company has established formal procedures for handling complaints and grievances, including a whistleblower mechanism to protect complainants' anonymity and ensure transparency and accountability in addressing concerns raised by staff and workers.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains				
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.		Support is provided to surrounding smallholders and growers through ongoing engagement, including efforts to improve livelihoods and facilitate understanding of the certification process, despite their preference for independent certification over joining a coordinated system.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder) PROCEDURAL NOTE: The RSPO is currently developing a separate standard for Independent Smallholders.		Smallholder support programs are implemented to improve livelihoods and build capacity, with free consultation and assessment provided to surrounding smallholders, several of whom have achieved certification, while others are currently in progress.	☒ 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..		Hap Seng gives support to surrounding smallholders and growers to promote legality of their FFB production by given them Free Consultation, Free Assessment, and things related to RSPO and MSPO 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.		While there are no scheme smallholders under this unit, training on pesticide handling has been provided to surrounding smallholders and small growers, with some already RSPO certified and others currently progressing toward RSPO and MSPO certification.	☒ 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.		A stakeholder tracing system has been established, and progress on smallholder support programmes is regularly reviewed and publicly reported, with several surrounding smallholders already RSPO certified.	☒ 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.		The unit adheres to established policies promoting fair and equal treatment in employment, with the policies publicly available, clearly displayed, and communicated to workers through briefings and induction, as confirmed through worker interviews.	☒ 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		The unit demonstrated equal treatment of all employees regardless of background, with no evidence of discrimination found during document reviews and worker interviews, and confirmed consistent employment terms, fair pay, and adherence to policies prohibiting recruitment fees for foreign workers.	☒ 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,		Recruitment and promotion processes are guided by the company's SOP, ensuring selection is based on job-related criteria such as skills, fitness, and qualifications, with clear procedures in place for both local and foreign workers,	☒ Conform ☐ Major Nonconformity

	capabilities, qualities and medical fitness necessary for the jobs available		including documentation, medical checks, and appropriate training based on job requirements.	☐ 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		Pregnancy testing is conducted as a safety measure rather than a discriminatory practice, with affected workers reassigned to non-chemical tasks to prevent health risks, as confirmed through records and interviews.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.1.5 (C)	A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.		Gender Committees are established across all units to promote awareness on social and health-related issues, with active participation from female workers and spouses, regular meetings held, and no reported cases of harassment, as confirmed through interviews and documentation.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.1.6	There is evidence of equal pay for the same work scope		Wages are defined according to job scope and reviewed annually to comply with the Minimum Wage Order 2025, with both piece rate and daily/monthly rates applied, and evidence confirming equal pay for equal work regardless of gender or nationality.	☒ 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.		Pay and employment conditions are well-documented and communicated to workers through contracts and monthly payslips, which clearly outline all entitlements and deductions in compliance with the Minimum Wages (Amendment) Order 2025 and the Sabah Labour Ordinance, with verification conducted across a diverse sample of workers.	☒ 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		Employment contracts prepared in Bahasa Malaysia include all legally required terms such as wages, benefits, working conditions, and termination clauses, with sampled contracts and payslips verified to be valid, current, and reflective of actual compensation, except for one noted non-conformance under Indicator 6.2.3.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.2.3 (C)	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements		The CU has shown partial compliance with the Sabah Labour Ordinance, with verified adherence to standard working hours, leave entitlements, and overtime provisions; however, ***a major non-conformance (NEA 02 2025)*** was raised due to unpaid excess working hours for a crèche worker at Kawa Estate, which violates Section 104(6) of the 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 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		The CU provides free housing and essential facilities in line with the Workers' Minimum Standard of Housing and Amenities Act 1990, including clean water, electricity, recreational and medical services, with weekly inspections conducted to ensure proper upkeep and address any issues raised by the Visiting Medical Officer.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.		The CU has taken measures to ensure workers have access to adequate, affordable food through onsite grocery shops with clearly displayed pricing, regular monitoring, and sufficient stock, with workers confirming the prices are reasonable and access is convenient based on their location.	☒ 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		All sampled workers were paid at or above the minimum wage in accordance with the Minimum Wages Order 2025, with prevailing wages calculated to include both cash earnings and in-kind benefits such as housing, utilities, transportation, education, childcare, and healthcare, resulting in total values ranging from RM3,245.64 to RM4,643.55 across the audited estates.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist			
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		The CU employs only permanent full-time workers, including foreign employees with fixed-term contracts renewable annually based on work permits, with no use of casual, temporary, or day labour.	☒ 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		A formal policy dated 1st March 2019 affirms the CU's recognition of employees' rights to freedom of association and collective bargaining, with the policy publicly displayed and workers confirming awareness of their rights and representatives.	☒ 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		Although there are no trade unions at the CU, workers are represented through the Joint Consultative Committee (JCC) established in each unit, serving as a communication platform between management and workers, with elected representatives, accessible meeting minutes, and at least	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	made available upon request		one meeting held annually.	☐ 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		The workers have elected their own representatives including Ketua Etnik, Ketua Agama, and Ketua Kampung through a nomination and voting process during morning muster, with supporting evidence such as election records, organizational charts, and appointment letters verified during the audit.	☒ 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 CU complies with its Child Labour and Sustainable Agriculture Policies, which strictly prohibit child and forced labour, supported by an SOP outlining clear remediation measures such as awareness training, parental advisories, and appropriate child care or removal from work if a child is found employed.	☒ 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 CU enforces a minimum hiring age of 18 as outlined in its recruitment SOP, with age verification procedures in place and confirmed compliance through interviews, document reviews, and site observations showing no evidence of underage workers.	☒ 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.		Document reviews, interviews, and site observations confirmed that all workers at the Estates and Mill are above 18 years old, with no evidence of underage employment based on verified master lists and field verification.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.4.4	The unit of certification demonstrates communication about its 'no child labour policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live		A No Child Labour Policy, supported by the Sustainable Agriculture Policy, has been implemented and communicated to workers and contractors, with contract clauses and stakeholder engagement in place to ensure no individuals under 18 are employed, as confirmed through verification and interviews.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 6.5: Policies and procedures in place to protect workers' rights.				
6.5.1 (C)	A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce		The CU enforces a Sexual Harassment, Violence and Abuse Policy with clear procedures for reporting, which is well-communicated and accessible across all units, and interviews with women's committee members and female workers confirmed awareness of the policy and grievance mechanism, with no reported incidents.	☒ 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		The CU has implemented and effectively communicated a Policy on Reproductive Rights, dated 2nd September 2015, which supports informed, voluntary family planning decisions and promotes reproductive health, with female workers confirming awareness and understanding of the policy through interviews.	☒ 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		The CU maintains pregnancy and birth records for workers and dependents, with assessments conducted for new mothers upon their return to work—such as the one carried out on 17 February 2025 at Sungai Segama Estate which identified transportation needs but no request for breastfeeding facilities, as mothers can conveniently return home or to the crèche.	☒ 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.		A comprehensive grievance mechanism that ensures anonymity and protection for complainants has been established through various procedures and policies, all of which have been implemented and communicated across the workforce through Morning Muster sessions, JCC meetings, and Gender Committee platforms.	☒ 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 document reviews, worker interviews, and on-site observations at both estate and mill levels, there is no evidence of forced labour, with workers confirming freedom to retain personal documents, absence of recruitment fees, no contract substitution, voluntary overtime, the ability to resign without penalty, and no incidents of debt bondage or wage withholding.	☒ 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		The CU has implemented a Labour Policy for Foreign Workers dated 15 April 2019, supported by a sourcing procedure and post-arrival orientation, ensuring fair treatment, equal working conditions, and no contract substitution, with foreign workers confirming direct walk-in recruitment and awareness of their rights and benefits through interviews and observations.	☒ 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 were appointed as the persons responsible for safety and health matters and chair the OSH Committees, with Assistant Managers assigned as OSH coordinators; quarterly OSH Committee meetings were consistently held across all units, covering key agenda items such as previous minutes, health and safety concerns, accident reports, workplace inspections, and safety programmes.	☒ 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.		The CU has established comprehensive procedures for accidents and emergencies, with Emergency Response Plans (ERP) tailored to various scenarios, regular fire drills, trained first aiders with valid certifications, well-equipped and maintained first aid kits, and clearly displayed emergency contact information, all supported by ongoing training, record-keeping, and quarterly reviews through OSH Committee meetings.	☒ 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 clothing.		The CU ensures all workers receive operational safety training and are provided with appropriate PPE free of charge, with site visits confirming proper PPE use, adequate sanitation facilities for sprayers, ongoing safety education, and machinery equipped with required safety features, including guards and flashback arrestors.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection		Medical care and accident insurance are provided to all local and foreign employees under the Employees' Social Security Act 1969, with SOCSO contributions verified through Form 8A for all units, and no major accidents requiring SOCSO compensation were recorded in 2024, aside from minor medical leave cases compensated by the CU.	☒ 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 monitored using Lost Time Accident (LTA) metrics and reported through monthly KPIs, with Form JKKP 8 for 2024 submitted on time to DOSH via MyKKP System for all units, and accident statistics showing effective management, with Kawa Estate and Bukit Mas POM recording zero lost workdays, while Sg Segama and Bukit Mas Estates reported minimal cases with prompt reviews.	☒ 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 unit continued implementing Integrated Pest Management (IPM) across three estates to control pests, diseases, and invasive species through techniques such as baiting for rats, pheromone traps for beetles, and planting beneficial plants, supported by monthly monitoring, nursery preparation, and annual training for workers.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.		Plan to prevent and monitor the spread of species referenced in the Global Invasive Species Database and CABI.org (if any). This is not practiced in the visited estate. None of the species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with ap prior approval of government authorities. [For NI to define process]		Pest control is guided by a documented manual prohibiting the use of fire, in line with the Zero Burning Policy, with no evidence or need for fire usage observed or reported by workers and staff.	☒ 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 unit applied agrochemicals in accordance with established procedures that ensure proper justification, targeted use, correct dosage, updated chemical registers, and required PPE, with no use of Class I chemicals observed.	☒ 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 estates maintained detailed records of pesticide use, including active ingredients and application data, ensured use only when justified with official registered pesticides, avoided illegal chemicals like paraquat, followed documented spraying and baiting programs, and provided explanations for usage variations based on environmental factors.	☒ 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		All estates minimized agrochemical use by implementing an IPM plan that avoids blanket spraying, maintains beneficial plants to attract natural predators, applies	☒ Conform ☐ Major Nonconformity

	accordance with IPM plans.		insecticides only after threshold levels, sprays weeds only as needed, uses pheromone traps for beetles, and documents pesticide quantities, with potential to enhance rat control through barn owls.	☐ 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.		No prophylactic pesticide use was observed except in immature and young fields where diluted cypermethrin is applied for rhinoceros beetle control as justified by the established pest management policy.	☒ 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 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		All estates used only officially registered pesticides compliant with regulations, exclusively applying Class III and IV chemicals, with no use of prohibited substances like paraquat or highly hazardous pesticides under WHO Class 1A/1B or international conventions, as verified by records and staff confirmation.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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.		Bukit Mas CU maintained records showing that trained staff and workers handled and applied pesticides safely following SDS guidelines and the OPAP manual, supported by regular training, hazard communication, and availability of safety data sheets at all relevant sites.	☒ 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.		Bukit Mas CU stored pesticides and fertilizers in compliance with legal and safety requirements, maintaining secure, ventilated, and well-organized facilities equipped with proper signage, washing and premixing areas, wastewater recycling, and responsible disposal of containers, while ensuring workers understood chemical hazards through multilingual SDS, training, and effective communication.	☒ 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.		All three estates ensured empty pesticide containers were triple rinsed, punctured, securely stored, and disposed of responsibly by a licensed contractor, with verified inventory and consignment records confirming proper management and no risk of contamination to water sources or human health.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.9 (C)	Aerial spraying of pesticides is prohibited,		Aerial pesticide spraying is not practiced in Bukit Mas CU,	

	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.		with no evidence or observations of its use confirmed through site visits and interviews with staff and workers.	☒ 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.		All pesticide operators and recommended workers underwent medical surveillance at Chong Clinic, with reports confirming their fitness to handle chemicals, while some required monitoring and treatment for non-occupational conditions, supported by ongoing health checkups and health talks conducted by the health assistant.	☒ 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.		No persons under 18, pregnant or breastfeeding women, or those with medical restrictions were assigned pesticide-related work in any of the three estates, as confirmed by observations and interviews during the site visits.	☒ 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		The CU established and regularly updates an EIA management and continuous improvement plan to minimize pollution from estate and mill activities by managing various	☒ Conform

	based on toxicity and hazardous characteristics, is documented and implemented.		waste types including organic, maintenance oil, digestive waste, and scheduled waste—through daily disposal, septic systems, and engagement of a licensed contractor for proper scheduled waste handling.	☐ 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 CU documented and implemented a waste management plan to reduce pollution, utilizing mill biomass as boiler fuel, monitoring water and effluent discharge with timely reports to DOE, and managing scheduled waste through licensed contractors with waste stored under 180 days and regular DOE inventory submissions across all estates and mill.	☒ 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 the site visit at all estate and POM, no open burning was observed for waste disposal, with all domestic waste managed through landfill sites at designated blocks in Kawa, Sg Segama, and Bukit Mas Estates.	☒ 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.		The CU maintains long-term soil fertility through annual fertilizer application guided by regular tissue and soil analysis, biomass retention, EFB use, water management, and soft weed maintenance, following detailed SOPs from the OPAP manual, with monitoring by estate staff and agronomists who provide periodic fertilizer recommendations	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

			that are implemented accordingly.	☐ 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 are conducted by the agronomy department to monitor nutrient status and guide fertilizer recommendations, with recent sampling dates for foliar and soil tests recorded for Kawa, Sg. Segama, and Bukit Mas estates.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.		All estates implement a nutrient recycling strategy by applying organic residues like Empty Fruit Bunches (EFB) and Belt Pressed Solid (BPS) alongside inorganic fertilizers to enhance soil health, with significant quantities applied in Sg. Segama and Bukit Mas estates in FY2024 and ongoing applications in FY2025.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.4.4	Records of fertiliser inputs are maintained.		All estates maintained detailed records of fertilizer inputs, applying recommended types such as NK, SOA, MOP, RP, Kieserite, and Borate for mature palms, and CCM55, CCM45, and MIX44 for immature palms, with average applications between 10.5 to 13 kg per palm, and monitored usage through Fertilizer Application Records and Bin Cards, showing substantial fertilizer applied in 2024 and early 2025 across Kawa, Sg. Segama, and Bukit Mas estates.	☒ 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.		Soil and slope maps prepared by the Agronomy Department and verified in early 2025 showed no fragile or marginal soils within the CU, with soil types varying by estate and division, and most land featuring slopes below 10°, indicating stable terrain across Kawa, Bukit Mas, and Sungai Segama estates.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.5.2	There is no extensive replanting of oil palm on steep terrain.		No replanting occurs on steep terrain across all estates, with soil erosion controlled through frond stacking, EFB application, terrace construction, road upkeep, soft vegetation maintenance, and cover crop planting, while old palms on steep slopes in Kawa Estate are planned for future replanting with recommended terracing practices.	☒ 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.		No new planting occurred in all estates within the CU, in compliance with the HSPHB's 2015 "Slope and River Protection" policy, which prohibits development on slopes over 25 degrees and mandates vegetation retention on gentler slopes, as confirmed by interviews with executives, staff, and workers.	☒ 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.		The estates incorporate soil and slope maps into their planning and operations to ensure sustainable palm oil cultivation, avoiding unsuitable areas like steep terrain, with no new plantings observed and no fragile or marginal soils identified in the CU.	☒ 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.		This is not applicable as there is no marginal and fragile soil in all estates, as supported by the soil maps of respective estates. 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 estates had used soil and topographic to plan their drainage and irrigation systems, roads and other infrastructure.	☒ 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.		Auditors had verified through checking the www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to the sampled estates, it is confirmed that there were no new planting or new development of areas at all estates. Furthermore, this is not applicable as there is no peat soil in all estates, as supported by the soil maps of respective estates. 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).		This is not applicable as there is no peat soil in the Kawa Estate, Sg. Segama Estate and Bukit Mas Estate visited, supported by the soil maps of respective estates. 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).		This is not applicable as there is no peat soil in the Kawa Estate, Sg. Segama Estate and Bukit Mas Estate visited, supported by the soil maps of respective estates. 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.		This is not applicable as there is no peat soil in the Kawa Estate, Sg. Segama Estate and Bukit Mas Estate visited, supported by the soil maps of respective estates. 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.		This is not applicable as there is no peat soil in the Kawa Estate, Sg. Segama Estate and Bukit Mas Estate visited, supported by the soil maps of respective estates. 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 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		This is not applicable as there is no peat soil in the Kawa Estate, Sg. Segama Estate and Bukit Mas Estate visited, supported by the soil maps of respective estates. No peat areas were observed during the visit.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	rehabilitated with natural vegetation. PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG. PROCEDURAL NOTE: PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]			
7.7.6 ©	All existing plantings on peat are managed		This is not applicable as there is no peat soil in the Kawa	

	according to the *'RSPO Manual on Best Management Practices (BMTs) for existing oil palm cultivation on peat', version 2 (2018)* and associated audit guidance.		Estate, Sg. Segama Estate and Bukit Mas Estate visited, supported by the soil maps of respective estates. 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.		This is not applicable as there is no peat soil in the Kawa Estate, Sg. Segama Estate and Bukit Mas Estate visited, supported by the soil maps of respective estates. 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		All sampled mills and estates have implemented water management plans, including rainwater harvesting, leakage monitoring, and buffer zones, to prevent pollution and protect water sources. Regular water quality testing by accredited laboratories confirms compliance with environmental standards, with most parameters meeting Class IIB/III limits. Workers have access to clean treated water, monitored monthly for safety. While some elevated levels of dissolved oxygen, suspended solids, and turbidity were observed likely due to natural factors no restrictions or pollution impacts on community water sources were reported.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	to pollution of water used by communities. 7.8.1 b. Workers have adequate access to clean water			
7.8.2	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).		Riparian reserves have been established, surveyed, and protected across all estates. While some existing oil palm trees remain within these reserves in certain areas, no active maintenance (such as weeding or fertilizing) is conducted to minimize disturbance and allow natural regeneration. This approach ensures the long-term ecological function of the buffer zones.	☒ 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.		Treated effluent is allowed to be discharge as waterways. Analysis of the final discharge was carried out on monthly basis. Review of the results indicated that all parameters were within the regulatory limit 20mg/l. Quarterly report was sent to DOE latest on Fourth quarter 04/2024 for period October – December on 09/01/2025.	☒ 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.		Process water is sourced from nearby catchment areas, with efficient usage maintained at 1.37 liters per tonne of FFB in 2024, reflecting improved water conservation compared to 1.43 liters in 2023.	☒ 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 estates and mills actively optimize fossil fuel efficiency and renewable energy use through documented plans, regular monitoring, and initiatives like generator maintenance, fuel usage scheduling, and biomass energy generation. Diesel consumption ratios improved in most estates (e.g., Kawa and Sg Segama reduced usage per tonne of FFB), though Bukit Mas POM saw an increase due to operational adjustments. Data is systematically tracked to drive further energy efficiency improvements.	☒ 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 certification unit's greenhouse gas (GHG) emissions for 2024 were calculated using the RSPO-approved PalmGHG tool, verified against operational records, and found to be accurate. The total emissions amounted to 0.35 tCO_2eq per tonne of CPO & PK produced, reflecting the unit's commitment to monitoring and transparency in sustainability performance. Detailed results are available in the GHG Reporting Summary (Appendix 2).	☒ 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 Bukit Mas CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.10.3 (C)	Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.		The certification unit actively monitors and mitigates greenhouse gas (GHG) emissions from land use, fertilizers, fuel, and peat oxidation through structured environmental assessments and prevention plans. Key initiatives include a biogas plant that converts methane from wastewater into renewable electricity, reducing emissions while powering mill and domestic operations. Rigorous spill prevention measures (e.g., contained chemical storage, bunded tanks) are implemented to minimize environmental risks.	☒ 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.		The certification unit strictly adheres to a zero-burning policy for land preparation, as confirmed during audits of replanting areas in 2024-2025. All cleared palms are sustainably managed through mechanical felling, shredding, and natural decomposition, eliminating fire use while enriching soil health.	☒ 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.		CU had established fire prevention and control measures for the areas under its direct management. Fire emergency procedures were available in adherence to the HSPHB policy on 'Emergency Response' plan. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by Agronomy Dept and amended to tailor to the situation differences in the estates and mills. In the mill, there were water hydrants and valid fire extinguishers at the various operating stations. At Bukit Mas Group of Estates had valid fire extinguishers at the office, worker's quarters, chemical & fertiliser stores, diesel skid tank, etc.	☒ 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.		The unit of certification engages with adjacent stakeholders on fire prevention and control measures way through external communication (stakeholder meeting) conducted on 17/01/2025 (Ladang Kawa Estate) and on 16/12/2024 (Sg Segama Estate, Bukit Mas Estate, and Bukit Mas POM)	☒ 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.		The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.12.2 (C)	HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.		The certification unit maintains strict biodiversity and High Conservation Value (HCV) protections across all estates, with regular assessments (latest review: March 2025) confirming no primary forests or wildlife impacts. Key findings include: 12 conserved HCV areas (9 in SSGOE, 3 in Kawa/Hap Seng), primarily riparian reserves, water catchments, and steep slopes (>25°), with no new planting in these zones. No rare/threatened species observed; estates contain only pockets of semi-natural vegetation. Compliance verified: HCV areas align with RSPO requirements, and past discrepancies in hectare reporting have been resolved. Proactive measures include riparian buffer maintenance,	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			quarry/steep slope preservation, and adherence to zero-deforestation policies.	
7.12.2 b)	Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		Not applicable as there has been no new land clearing after 15 November 2018.	☒ 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		There are no High Forest Cover Landscapes within the estates in this certification unit. Hence this indicator is not applicable. This indicator is also not applicable under 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 certification unit has strictly protected all identified HCV areas with clear management plans and no new plantings in these zones. Key conservation measures include: Riparian Safeguards: No manuring/spraying, tree cutting, or chemical transport across rivers; enrichment planting to boost biodiversity. Anti-Encroachment Rules: Ban on logging, hunting, and poaching, with quarterly patrols to deter illegal activities. Ecological Monitoring: Camera traps for wildlife tracking and expert-led species surveys (e.g., birds, plants). Erosion Control: Planting of vetiver grass and native trees (e.g., Sepat) in vulnerable areas. Plans are reviewed annually (latest: March 2025), with enhancements like increased signage and reforestation of disturbed sites.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.		There are currently no HCV set-asides with the existing rights of local communities that have been identified. As such there are no negotiated agreements with the local communities with regards to the protection of HCVs and rights of local communities.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.		The certification unit maintains strict protections for wildlife in line with its RTE Species Policy (2017), reinforced by regular staff training (latest: January–February 2025). Key measures include: No confirmed RTE species in plantation areas, with ongoing education and monitoring. Camera traps (9 units in Bukit Kibos) document wildlife (e.g., macaques, wild boar, leopard cats), though independent verification of operational cameras remains pending. Monthly patrols and signage ("No Hunting/Fishing") enforce compliance, with disciplinary actions for violations. Zero tolerance for harm to wildlife: No caged birds or chemical use in buffer zones observed. While most sightings involve "Least Concern" species (per IUCN), the estates remain vigilant for RTEs, particularly near forest boundaries.	☒ 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.		The audit team has verified through satellite maps, estate records, and on-site inspections that no new High Conservation Value (HCV) areas, peatlands, or forests have been identified in the SSGOE certification unit since 2018. Key measures include: Regular HCV Reviews: The Agronomy Department and estate management actively monitor and map HCV zones (e.g., steep slopes, streams, forest buffers) to ensure protection. Daily Field Supervision: Staff and executives conduct ground checks, supported by periodic visits from senior management and conservation personnel. Documented Compliance: All HCV monitoring records are maintained in the Environmental Management Plans, with no significant issues reported. Wildlife Monitoring: Rare species sightings (if any) are logged during security patrols and reviewed in management meetings. The estates remain committed to zero expansion into	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			conservation areas, aligning with RSPO Principle 7.12.2.	
7.12.8 (C)	Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.		Not applicable as there has been no land clearing after November 2005.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

6. Summary of Audit Findings

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				
Principle 2: Operate legally and respect rights - Implement legal requirements as the basic principles of operation in any jurisdiction.				
Principle 3: Optimise productivity, efficiency, positive impacts and resilience *(Includes IP and/or MB Module)*		**2**		**2**
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	**1**	**2**		**3**

7. Nonconformity(ies) Issue in this Audit

Indicator Number	3.3.2
Nonconformity Number	MZK 01 2025
Nonconformity Category	☐ Major Nonconformity ☒ Minor Nonconformity
Recurring Nonconformity	☐ Yes ☒ No
Date of Nonconformity Issued	21 March 2025
Nonconformity Issued To *(when more than one site/member)*: Sungai Segama Estate and Bukit Mas 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	A mechanism to check consistent implementation of procedures is in place.
Nonconformity Statement: The mechanism to check consistent implementation of safety procedures was not effectively implemented.	
Evidence: The Safe and Standard Operating Procedures (SSOP) for tractor driver operations do not identify and implemented the risk of using Wellington boots as a potential hazard for the driver. The SSOP only mentions "shoes" for the driver instead of specifying safety footwear. During interviews with tractor drivers from Sungai Segama Estate and Bukit Mas Estate, the auditor found that drivers were using Wellington boots instead of proper safety boots. This footwear is unsuitable, as it can cause lower knee injuries due to frequent clutch use. Drivers also stated that they previously used safety boots, but the management recently replaced them with Wellington boots.	
Root Cause Analysis	Inadequate monitoring of risk assessment by Estate management to identify the risk of using high-cut Wellington boots for tractor drivers.
Correction(s)	Estate management immediately conducted the risk assessment of Wellington boots for tractor drivers.
Corrective Action Implemented *(including any evidence submitted)*	Monthly checking by RSPO officer to ensure the Daily PPE checklist of wearing low-cut Wellington boots by estate driver is in order.
Date of Response	28 May 2025
Audit Team Conclusion *(including any evidence reviewed)*	Root cause accepted. The corrective action plan has been reviewed and found adequate to address Minor Nonconformity. Evidence of the CAP will be verified during the next assessment.
Status of Nonconformity	☐ Closed

	☒ Open
Date of Closure:	01 June 2025

Indicator Number	3.4.2
Nonconformity Number	NEA 01 2025
Nonconformity Category	☐ Major Nonconformity ☒ Minor Nonconformity
Recurring Nonconformity	☐ Yes ☒ No
Date of Nonconformity Issued	21 March 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	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.

Nonconformity Statement:
Insufficient evidence that Social Impact Assessment (SIA) has been developed with participation of affected parties.

Evidence:
The Social Impact Assessment (SIA) Management Action Plans and Continuous Improvement Plan for Sungai Segama Group of Estate was reviewed at the latest on 12th March 2025. However, concerns raised by affected stakeholders were not sufficiently reviewed and addressed. Details are as follows:

1. <u>Kawa Estate</u>
   - Based on documentation review, concerns raised during Internal JCC Meeting held on 30.01.2025 were not captured in the latest revision of SIA document. Consequently, the action plan and current status of the concerns were not available to demonstrate that the issues have been addressed effectively and in a timely manner. A site visit and an interview with the sundry shop owner raised a concern about the electricity schedule, which was turned off during working hours. The owner mentioned difficulties in storing perishable food items and stated that he had no objection to paying extra for electricity charges.

2. <u>Sungai Segama and Bukit Mas Estate</u>
   - A consultation with local surrounding communities was conducted during the JCC Estate Level Meeting on 16.12.2024, and the meeting minutes were verified during the audit. According to the minutes, representatives from Kg. Litang Village requested access to the sundry shop within the housing complex. This request was confirmed during stakeholder

interviews conducted by the audit team. However, the management had not addressed the request. ▪ Additionally, during an interview with representative's teacher from SK Litang, teachers requested access to the main gate after 10:00 PM. The teachers reside in Kg. Litang and require access through the main gate to reach their homes. However, no mechanism in place to facilitate their access, which restricts their movement and does not address the concern raised by the stakeholders.	
Root Cause Analysis	1) Lack of integration between JCC Minutes and SIA review process. concerns raised during JCC meetings were not systematically transferred into the SIA documentation and action plans, leading to gaps in issue tracking and resolution. 2) Absence of formal mechanism to review and update SIA action plans timely, while the SIA is reviewed annually, there is no interim mechanism to capture and update stakeholder concerns raised in-between the annual reviews.
Correction(s)	Update the SIA document (for Kawa, Sungai Segama, and Bukit Mas Estates) to include all concerns raised during the JCC meetings (30.01.2025 and 16.12.2024). Inform relevant stakeholders (e.g., sundry shop owner, community reps, school representatives) that their concerns are acknowledged and steps are being taken to address them. 1) The Management Unit at Kawa Estate immediately provide electricity to sundry shop during operation time (2pm – 8pm). 2) The Management Unit at Sungai Segama Estate & Bukit Mas Estate immediately take action by: a) Putting the phone number of sundry shop at gate near to Kg Litang and Sundry Shop will send their goods to Kg. Litang b) Putting the phone number of Manager Services (PIC of Gate) at HSP Main Gate to request approval access after 10.00pm
Corrective Action Implemented *(including any evidence submitted)*	1) The Sustainability Team to ensure monthly cross-check the social issues for participation of affected stakeholders from feedback/interview form and to ensure Management Unit address the concern. 2) Sustainability Team will monthly monitor to ensure estate address the concern of affected stakeholders in the Social Impact Assessment (SIA) within the timeline after JCC Stakeholder Meeting.
Date of Response	28 May 2025
Audit Team Conclusion *(including any evidence reviewed)*	Root cause accepted. The corrective action plan has been reviewed and found adequate to address Minor Nonconformity. Evidence of the CAP will be verified during the next assessment.
Status of Nonconformity	☐ Closed ☒ Open
Date of Closure:	01 June 2025

Indicator Number	6.2.3
Nonconformity Number	NEA 02 2025
Nonconformity Category	☒ Major Nonconformity ☐ Minor Nonconformity
Recurring Nonconformity	☐ Yes ☒ No
Date of Nonconformity Issued	21 March 2025
Nonconformity Issued To *(when more than one site/member)*: Kawa 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	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.
Nonconformity Statement: Overtime work done by worker was not compensated as per Sabah Labour Ordinance (SLO) section 104(6).	
Evidence: The Kawa Estate has provided a creche facility for its workers with a 1 child minder to take care of the children on a daily basis. A site visit made to the creche facility observed the creche is in clean, safe and child-friendly environment. Based on interviews with Creche Ayah, she stated that her daily working hours are from 5:00 AM to 1:45 PM, which exceeds her normal working hours. However, review of check roll book and pay slip for the month of January, February 2025 and December 2024, the excess hour of work was not compensated in accordance to Sabah Labour Ordinance (SLO) Section 104(6).	
Root Cause Analysis	1) New in charge Manager and payroll personnel were overlooked excess working hours for non-field support staff such as creche workers. 2) The check roll book captured working hours but was not effectively monitored or cross-checked to identify and verify excess working hours.
Correction(s)	1) The operating unit immediately reviews payroll records and compensates the affected worker for all unpaid overtime hours for December, January and February 2025. 2) Create a new schedule for crèche Ayah workers, including working hours details time in out, overtime details, and verification by the manager.
Corrective Action Implemented *(including any evidence submitted)*	1) Implement overtime review system, monthly review of attendance and working hours for all support staff (creche, drivers, etc.) to ensure excess hours are

	properly compensated. 2) The include checklist check internal social compliance audits to prevent recurrence.
Date of Response	28 May 2025
Audit Team Conclusion *(including any evidence reviewed)*	The root cause analysis has been accepted. The auditor has reviewed the attached evidence, which includes: 1) Compensation for unpaid overtime hours for December 2024, January 2025, and February 2025, as showed in the March 2025 payslip with check roll book records 3 months previous before March 2025. 2) The scheduled working hours details such in out times for April 2025, including recorded overtime hours. Based on the evidence provided, the corrective measures implemented are considered effective in addressing the non-compliance findings.
Status of Nonconformity	☒ Closed ☐ Open
Date of Closure:	19 June 2025

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

Indicator Number	
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. Nonconformities raised in the previous audit

Indicator No	Nonconformity No	Evidence Observed / Nonconformity Raised	Auditee Response Correction / Corrective Action	Verification of Correction/ Corrective Action	Conclusion /Status
3.8.11	RSPO 05413	*Requirement:* 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. *Evidence:* POIC Bulk Terminal Sdn. Bhd. began providing storage tanks for CSPO produced by Bukit Mas Palm Oil Mill since October 2023. Records of first dis-patch of CSPO on 2 October 2023 to POIC Bulk Terminal Sdn. Bhd. as stated in the POIC Record Book (CSPO) as well tank reservation agreement (Ref No: POIC/300/2-85/Vol.1/006) dated 29 September 2023 was sighted. However, Bukit Mas Palm Oil Mill did not inform the certification body regarding the name and contact details of POIC Bulk Terminal Sdn. Bhd. prior to this 2nd annual surveillance audit.	*Correction*: The Sustainability Team has immediately notified/informed the Certification Body on 28th March 2024 regarding the name and contact details of out-source transportation (POIC Bulk Terminal Sdn Bhd) that has been used by Bukit Mas Palm Oil Mill for outsource tank of RSPO certified oil palm products (CPO). *Corrective action:* Sustainability Team to yearly audit BPOM to ensure mill management to notify/inform Certification Body for any new out-source contractor used by Hap Seng Plantations Holdings Berhad for handling RSPO certified oil palm products.	There is no new contractor engaged for the physical handling of RSPO-certified oil palm products. The BPOM has informed the CB via email dated 25/11/2024 regarding the existing contractors, namely Chong Shu Min Trading Sdn. Bhd. and POIC Bulk Terminal Sdn. Bhd.	**Closed**

10. Stakeholder Consultation Process

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

Date of public announcement made: N/A (Only for the case of IC or RC)

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

10.1 For Audit Report

No	Consulted Stakeholders *Name of Stakeholders*	Date of Consultation/ Comment Received	Method of Consultation/ Comment received	Feedback/Comments/Issue Raised Received from Stakeholders	CB's Responses

10.2 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
1	Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	17-21 March 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 aspects, including labor rights, workplace discrimination, or

				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. 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, the overtime work done by worker was not compensated as per Sabah Labour Ordinance (SLO) section 104(6). NCR has been 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. 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	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.

				accordance with the requirements stipulated under the Minimum Wages Order 2024 and the Sabah Labour Ordinance. The workers sampled for verification.	
2	Worker representative	17-21 March 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	17-21 March 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, 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.
4	Villagers / Local communities (including women representatives, displaced communities)	17-21 March 2025	Site interviewed	It has been confirmed that there are no land disputes between CU and its neighboring estates, local communites including Kampung Litang, Kampung Bukit Quoin and Bukit Kibos Forest Reserve. No social issues have been reported among estate workers.	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.

				Occasionally, local communities are invited to attend meetings organized by the company, with the most recent one held virtually a few months ago. All stakeholders have been invited to RSPO/MSPO briefings and stakeholder meetings. Interviews with representative from Kampung Litang, Kampung Bukit Quoin, confirmed that there are no user rights issues between the company and the villagers. Additionally, estate and mill operations have not negatively impacted the villagers' livelihoods and have instead contributed to improving them by providing employment opportunities.	
5	Suppliers	17-21 March 2025	Site interviewed	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	17-21 March 2025	Phone interviewed	No stakeholders were present on-site, as the invitation letter did not receive any responses. However, a phone interview with a representative from the Sabah Labour Department (Tawau) confirmed that no social issues have been reported. The representative also confirmed that the new amendments to the Sabah Labour Ordinance will be implemented in May 2025.	Noted on the information and no further issue.
7.	Neighbouring Outgrowers and Smallholders Supplying FFB to BPOM	17-21 March 2025	Site interviewed	Interviews with the owners of Spark Glory Sdn. Bhd. and Harus Abadi Sdn. Bhd. confirmed that they received a premium price for their FFB, HSP for encouraging	HSP's support has positively influenced their participation in sustainability initiatives. The receipt of a premium price for their FFB

				them in continued the sustainability scheme.	further reflects the benefits of supporting smallholders with sustainable practices.

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

Total Workers in the Unit of Certification			**1163**	
Sampled Worker Consulted/ Interviewed in This Audit			**101**	
No	**Type of Workers Consulted/ Interviewed**	**Interview Method**	**Feedback/Comments/Issue Raised/ Received from Workers**	**CB's Responses**
1	Male	Interview at sites	Based on interviews conducted with both male and female workers across various job scopes, it was confirmed that daily-rated workers receive a minimum wages per month. For piece-rated workers, as long as they achieve their targets, they also receive a minimum wages per month. Salaries are paid before the 7th of each month. Workers follow a 6-day workweek with Sunday as the designated rest day. They work eight hours per day with a minimum 30-minute break. Any overtime work is mutually agreed upon between workers and management, with no element of coercion. Foreign workers are not subjected to any recruitment fees. They retain possession of their own passports, which are only submitted to the office when renewal is required.	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 labour 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.
2	Female	Interview at sites		
3	Malaysian workers	Group interview at sites		
4	Indonesian workers	Group interview at sites		

			Both local and foreign workers have the freedom to appoint their own representatives without any interference or influence from the employer. A review of payslips confirmed that workers are paid in accordance with the Minimum Wages Order 2022 and the Sabah Labour Ordinance. Samples of worker records were also examined and verified for compliance.	

Consultation with Previous Land User

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 Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	New Proposed Year for Certification
Hap Seng Plantations (River Estates) Sdn Bhd – Sg Segama Group of Estate Bukit Mas Palm Oil Mill	Malaysia	Bukit Mas Palm Oil Mill	N/A	Certified		2012	
	Malaysia	Sungai Segama Estate	5,174.00	Certified		2012	
	Malaysia	Bukit Mas Estate	4,733.00	Certified		2012	
	Malaysia	Kawa Estate	1,276.19	Certified		2015	
Jeroco Plantation Sdn Bhd Jeroco Palm Oil Mill 1	Malaysia	Jeroco Palm Oil Mill 1	N/A	Certified		2013	
	Malaysia	Lokan Estate	3,155.39	Certified		2013	
	Malaysia	Lutong Estate	2,448.40	Certified		2013	
	Malaysia	Lungmanis Estate	2,200.00	Certified		2013	
	Malaysia	Batangan Estate	3,632.88	Certified		2013	
Jeroco Plantation Sdn Bhd Jeroco Palm Oil Mill 2	Malaysia	Jeroco Palm Oil Mill 2	N/A	Certified		2013	
	Malaysia	Kapis Estate	2,681.00	Certified		2013	
Hap Seng Plantations (River Estates) Sdn Bhd – Tomanggong Group of Estates	Malaysia	Tomanggong Palm Oil Mill	N/A	Certified		2015	
	Malaysia	Tomanggong Estate	2,654.80	Certified		2015	
	Malaysia	Litang Estate	2,648.62	Certified		2015	
	Malaysia	Tagas Estate	2,212.33	Certified		2015	
Pelipikan Estate	Malaysia	Pelipikan Estate	2,091.61	Not Certified	2025		2028
Hap Seng Plantations (River Estates) Sdn Bhd – Tomanggong Group of Estates	Malaysia	Tabin Estate	2,235.30	Not Certified	2025		2028
	Malaysia	Northbank Estate	2,578.91	Not Certified	2025		2028

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.	Applicable
Was the time bound plan submitted during the initial audit?	27 September 2013
Does the time bound plan contain a current list of all estates and mills?	Yes, Hap Seng Plantations (HSP) TBP has included all its operating units. Refer to the Time Bound Plan table.
Does the time bound plan include the certification of all estates and mills within five years after obtaining RSPO membership?	
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 becertified 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?	There have been no deviations from the maximum periods as approved by the RSPO Secretariat dated 22/09/2023.
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.*	An internal partial certification assessment was conducted by the Agronomy and Sustainability Team in February 2024 with no significant changes noted. The two uncertified units remain scheduled for certification by 2025, as stated in the TPB dated 22/09/2023. However, HSP later submitted a revised TBP on 18/03/2025, requesting an extension with deviations until 2028, which is still pending RSPO Secretariat approval. The latest email communication was from the RSPO Secretariat on 20/02/2025 and from HSP on 18/03/2025.
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*	The justification of changes has been highlighted are in the TBP: 1) RSPO Compensation Panel and Certification Unit required time to review/amend the Concept Note and this has delayed the certification.

*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).	2) Frequent changing of RSPO person in-charge of compensation case and need to explain again the detail of Concept Note submitted to RSPO Compensation Panel/RSPO personnel in-charge of compensation matter.
Are there any isolated lapses in the implementation of a time bound plan? If YES, a minor non-compliance shall be raised.	There is no isolated lapses in the implementation of a time bound plan. As per the latest Time-Bound Plan (TBP) dated 22/09/2023, all units are scheduled to be certified by 2025. However, HSP submitted a revised TBP on 18/03/2025, requesting an extension with deviations until 2028, which is currently pending approval by the RSPO Secretariat.
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 fundamental failure to proceed with the implementation of the plan.

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*	There were two occurrences of non-compliances to the RSPO New Planting Procedures within HSPHB raised for Tomanggong Group of Estates in year 2014, with details as follows: 1) Northbank and Tabin: New planting was carried out the area within the company's land title area under Tomanggong group of estates without following the New Planting Proce-dure. Previously the area was a flooded area that was not developed as a plantation area, however the company started development of the area in year 2011 without completing the HCV and SEIA assessment. The LUCA was approved by the RSPO re-viewer as seen from email communication from the RSPO Compensation Executive dated 16 January 2017, which included the reviewer's findings and information that the li-ability calculated by the reviewer is 579.48ha (slightly high-ly than company reported figure of 548.79ha). The RaCP for Northbank and Tabin has been submitted to the RSPO compensation panel for endorsement and has gone through several rounds of review. Hap Seng sent the 5th version of their concept note for RaCP to RSPO on 11th January 2020. As of 13 April 2022, Hap Seng Plantations is still in the progress of reviewing the concept note in discussion with RSPO. 2) Pelipikan Estate: HSPHB declared to RSPO on their liabilities on 28 April 2016 for of area under Pelipikan Estate located at Kota Marudu. This estate has total area of 2091.61ha with 716ha planted after year 2010 that was not done in accordance with the New Planting Procedure. This estate is currently sending to an external mill under Sawit Kinabalu (not owned by HSPHB. The company con-ducted LUCA for this area and first draft submitted to RSPO on 13 May 2016, and completed LUCA on 4th January 2017. As of 28 December 2022, the LUCA is still un-der review by Hap Seng Plantations after receiving feedback from En. Indrawan Suryadi (RSPO GIS Manager) regarding the status of LUCA report and as well as the resolution of the issue of major clarification required (i.e., LUCA image search, classifications, and land cover change analysis, and calculation of the liabilities).
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.*	There are 2 ongoing land dispute cases and one recently closed land dispute case affecting other management units of Hap Seng Plantations (River Estates) Sdn. Bhd. (RESB), which is described in the company's publicly available Annual Report 2015 (available on their company website). The cases are as follows: 1) RESB suit against Mr. Heng Chin Hing who claims be own-er of legal parcel of land held under CL095310017, District of Kinabatangan, State of Sabah measuring approximately 6,454 acres (under Litang estate in Tomanggong Group of Estates) and entered a sales and purchase agreement with another company for the land area. The case has been transferred to the High Court of Sabah & Sarawak on 10 August 2012 2) Suit from Dato Sia Yi Chan filed against RESB where he claims that Mr. Heng Chin Hing had divested his claims and

	3) interests for the same parcel of land to Dato Sia Yi Chan, and hence he was the legal owner of the land and not RESB. The case was heard on 23 October 2012 and 26 November 2012. 4) Write of summons filed against Pelipikan Plantation by 94 Sabahan natives claiming interest and ownership, legal and beneficial in respect of 113 parcels of land which form part of the Pelipikan Sub-Leased Lands. The case was filed on 7 August 2014 in the High Court of Sabah and Sarawak at Kota Kinabalu. For the 1st and 2nd case, it was informed in the company's quarterly update for December 2015 that both cases had been requested to be transferred from the Federal Court to the Sa-bah High Court, and the RESB suits are presently stayed pending determination by the Federal Court of Malaysia on the constitutionality of the transfer of civil suits from West Malaysia to the High Court of Sabah and vice versa. Mr. Sia Yi Chan had also raised a complaint to the RSPO Complaints Panel on 24 November 2015 claiming that Hap Seng Plantations Bhd is illegally occupying his property (River Estates) of 6,454acres in Lahad Datu, Sabah. He has filed a civil suit against Hap Seng; originating summons: BKI-24-127/5-2012 filed on 30.07.2015. The case is being processed under the Kota Kinabalu High Court system. As per the company's latest annual report 2018, the Consolidated RESB Suit was part heard from 13 to 15 September 2017, 20 to 21 September 2017, 12 and 25 October 2017, 24 November 2017, 26 to 27 February 2018, 25 to 26 April 2018, 11 to 14 June 2018, 12 to 14 September 2018, 29 October to 2 November 2018, 7 to 11 January 2019, 28 February 2019 and 8 March 2019 with the case still ongoing. RSPO Secretariat is monitoring the progress of the case. With regards to the 3rd case, the company provided evidence of a consent order by the High Court in Sabah & Sarawak on 15 May 2015, stating that the claims of the 94 land claimants against the company had been struck off and that they are are not entitled to possession of the land titles under dispute. The order also include a restraining order prohibiting the claimants from interfering with the enjoyment and posession of the land titles by the company.
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.*	HSP currently has two uncertified management unit, i.e., Pelipikan Estate and Tabin & Northbank Estate. At this time the company has not identified or declared any labour disputes occurring at these units. The company has prepared an internal report for each estate area dated August 2022 and March 2023 based on self-assessment (internal audit) to verify compliance of uncertified management units to this requirement.

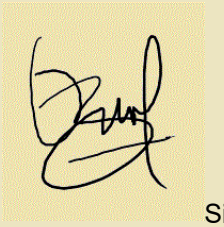
Is there any legal non-compliance reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member? If YES, has it been addressed through measures consistent with the requirements of RSPO P&C criterion 2.1? *Note: In case of an issue related to legal non-compliance identified by the CB, details of the status/ progress to resolve such matter shall be clearly explained.*	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 dated August 2022 and March 2023 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.
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.*	The Agronomy and Sustainability Department has conducted internal audits of the uncertified units and updated their compliance status accordingly. The most recent internal audits were carried out in each operating unit in August 2022 and March 2023. These audits confirmed that a positive assurance statement was provided based on the results of their self-assessments.
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)*

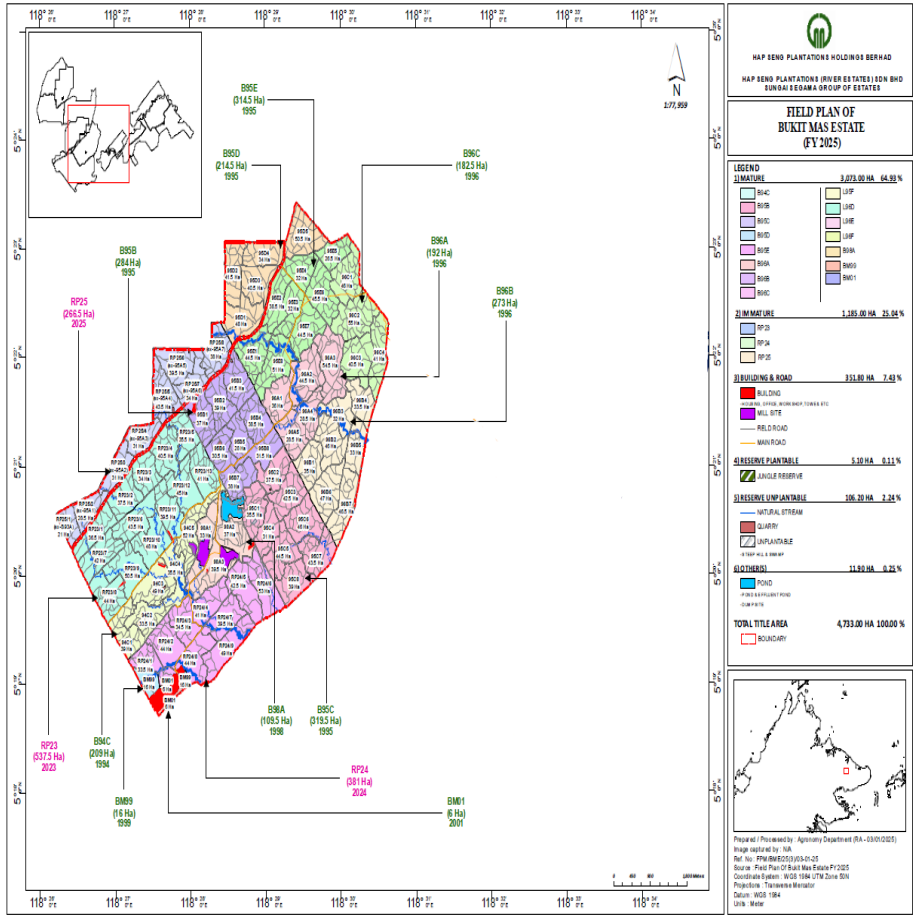
15. Acknowledgment of Internal Responsibility and Formal Sign-off Assessment Findings

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	KEE KEOW CHONG	
Position	GENERAL MANAGER - AGRONOMY	
Date	02 July 2025	

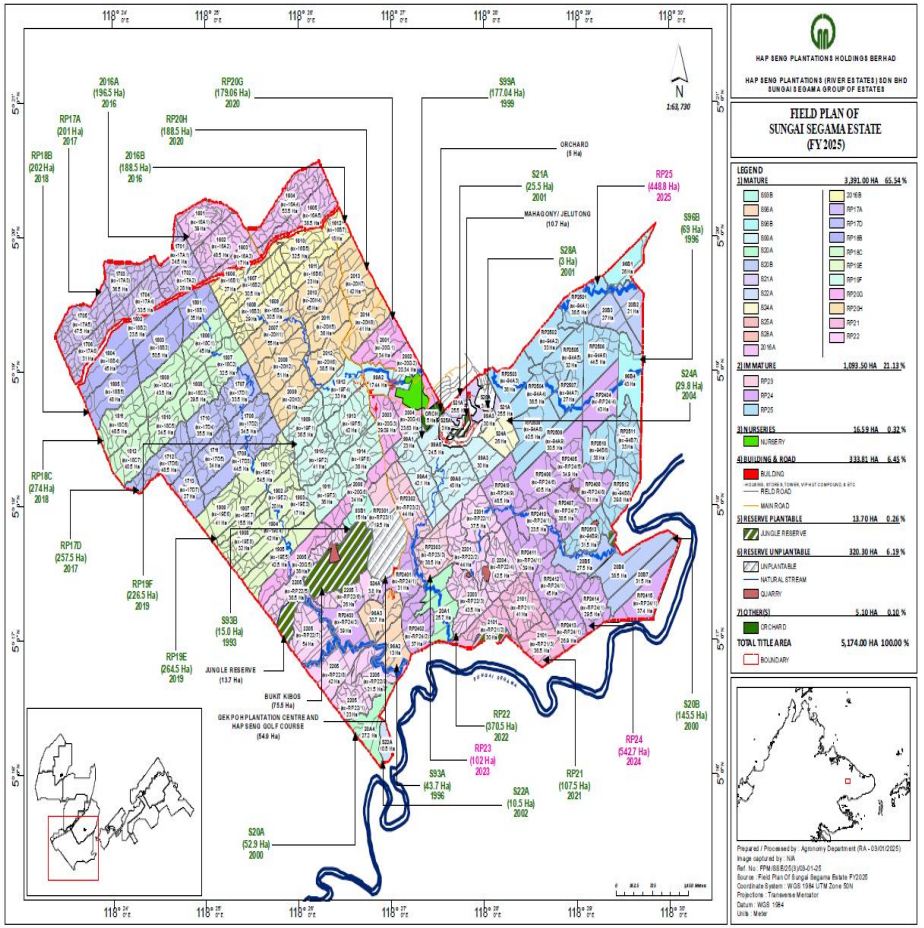
Signing by the Audit Team Leader		
I, the undersigned, being the Audit Team Leader, confirm that this report accurately reflects the findings and proceedings of the closing meeting. Furthermore, I affirm that the summary of the findings presented in this report is a true and accurate representation of the actual findings of the Audit Team.		
Acknowledged by:		
Name	DZULFIQAR AZMI	
Position	LEAD AUDITOR	
Date	19 June 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, FAF	
Date	2/7/2025	 Signature

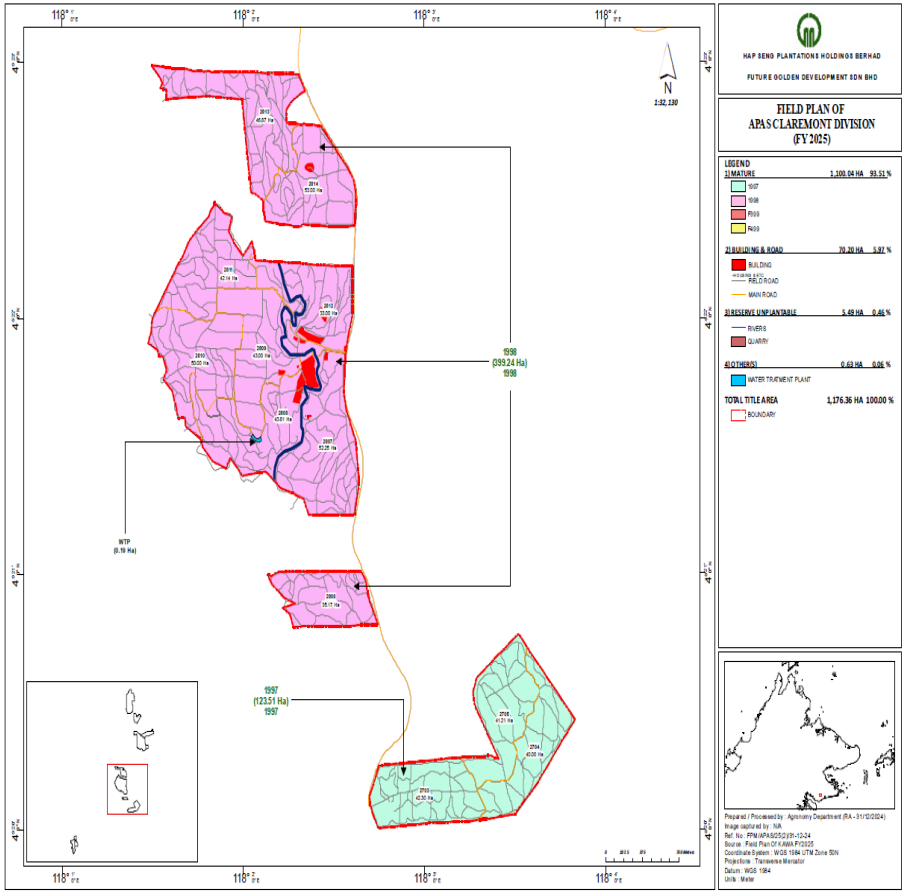
Appendix 1: Location Map Unit of Certification and Supply bases



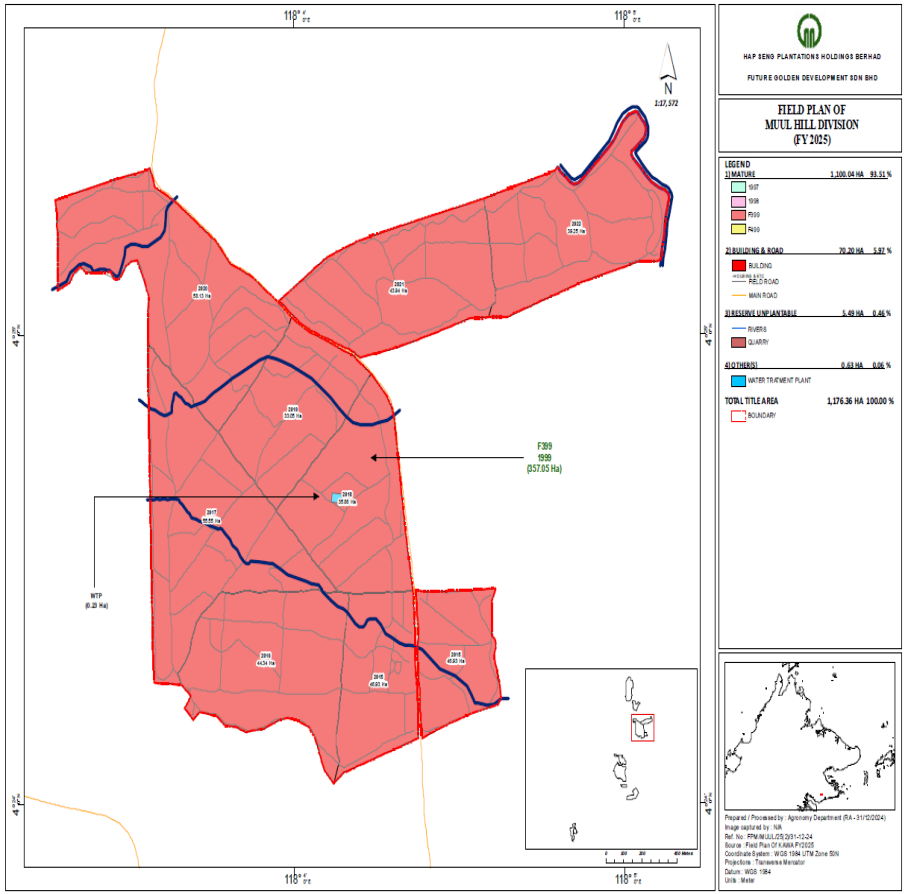
i.e. figure: Map of Bukit Mas Estate and Bukit Mas POM



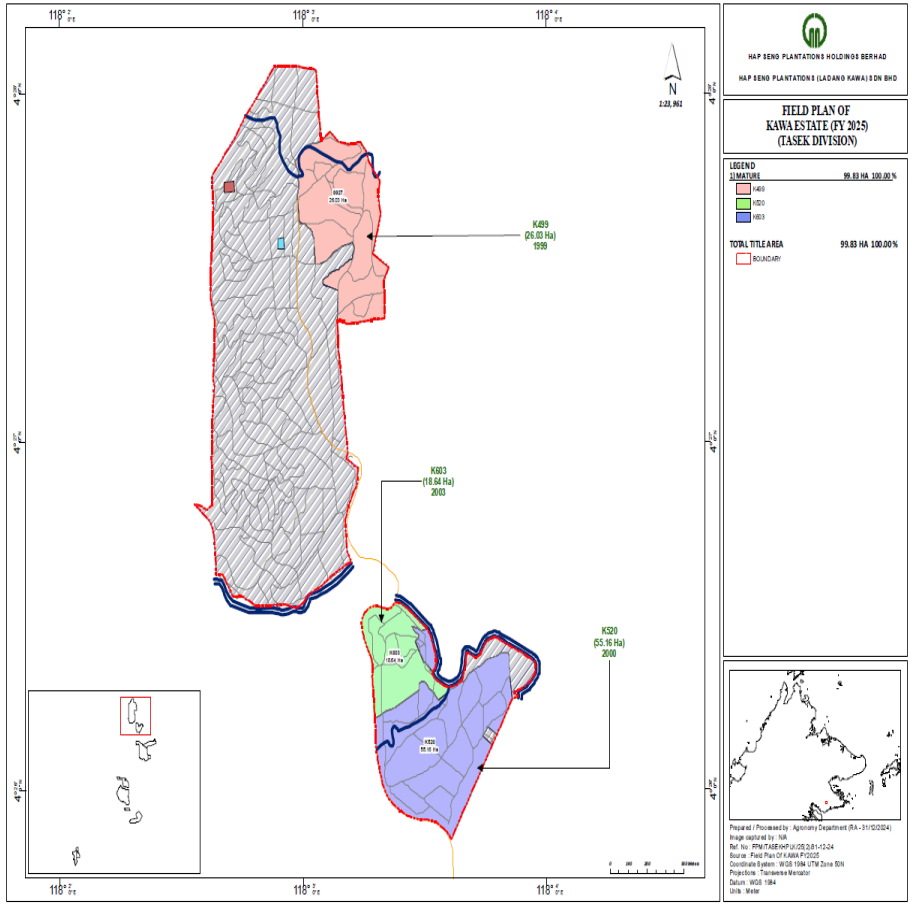
i.e. figure: Map of Sungai Segama Estate



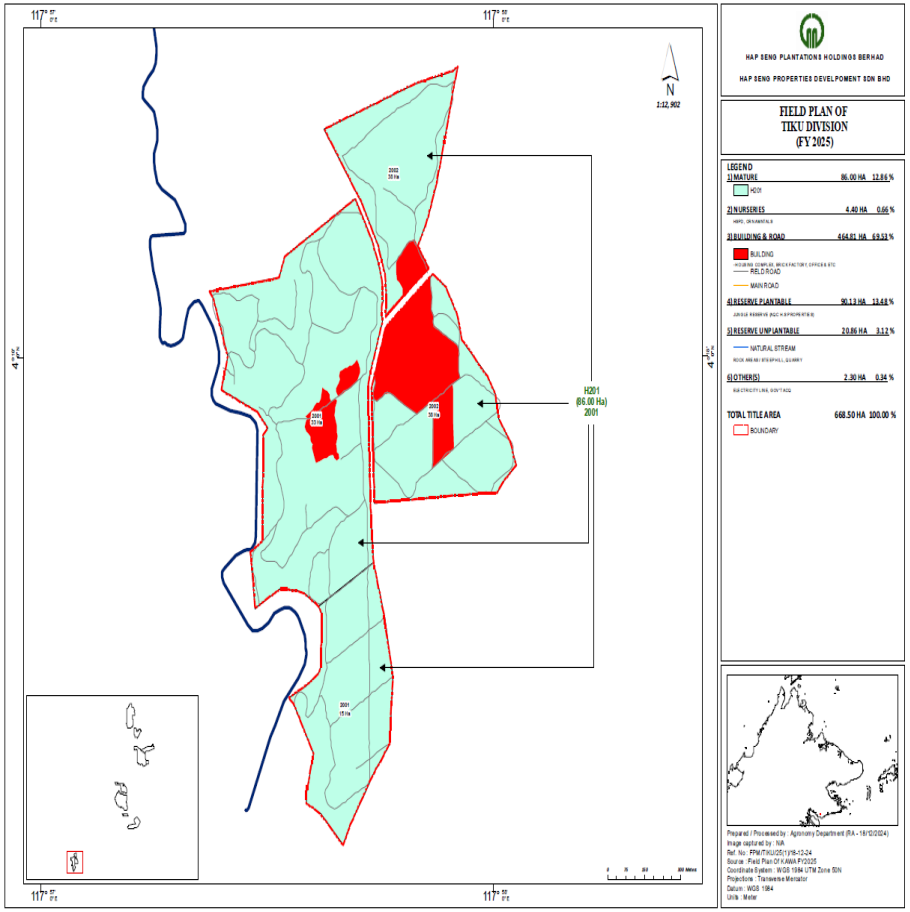
i.e. figure: Map of Kawa Estate (Apas Claremont Division)



i.e. figure: Map of Kawa Estate (Muul Hill Division)



i.e. figure: Map of Kawa Estate (Tasek Division)



i.e. figure: Map of Kawa Estate (Tiku Division)

Appendix 2: Greenhouse Gas (GHG) Reporting Summary

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

☒ Apply Full Version

☐ Exclude LUC Emissions

The summary of the Net GHG emitted in December 2024 for Bukit Mas POM and supply base are as following:

1. **Summary of Emissions**

Description	**tCO_2eq/t product**
CPO	0.35
PK	0.35
PKO	0.00
PKE	0.00

Extraction	**tCO_2e/t product**
OER	20.13
KER	4.82

2. Summary of Plantation/Field Emissions and Sink

Land Use	Ha
OP Planted Area	24859.07
OP Planted on Peat	0.00
Conservation (Forested)	256.64
Conservation (Non-Forested)	526.59
Total	**25642.30**

Production	t/year
FFB Processed	236270.34
CPO Produced	47566.12

	Own Crop		Group		3rd Party		Total
	tCO_2e	tCO_2e/ tFFB	tCO_2e	tCO_2e/ tFFB	tCO_2e	tCO_2e/ tFFB	
Land Conversion	51049.20	0.35	40346.15	0.50	0.00	0.00	91,396.20
CO_2 Emission from Fertilizer	2839.98	0.02	2470.35	0.03	0.00	0.00	5,310.38
N_2O Emission	3430.26	0.02	3109.77	0.04	0.00	0.00	6,540.09
Fuel Consumption	4933.87	0.03	3445.04	0.04	0.00	0.00	8,378.98
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Crop Sequestration	-42862.74	-0.29	-37578.12	-0.47	0.00	0.00	-80,441.62
Sequestration in Conservation Area	-657.24	-0.00	-751.17	-0.01	0.00	0.00	-1,408.42
Total	**18,733.34**	**0.13**	**11,042.02**	**0.14**	**0.00**	**0.00**	**29,775.63**

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

3. Summary of Mill Emission and Credits

	tCO_2	tCO_2e/t FFB
Emission		
POME	2730.92	0.01
Fuel Consumption	1099.34	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sales of PKS	-14286.80	-0.06
Sales of EFB	0.00	0.00
Total	**-10456.55**	**-0.04**

1. **Palm Oil Mill Effluent (POME) Treatment**

Description	%
Diverted to	0.00
Divert to anaerobic digestion	100.00

2. **POME Diverted to Anaerobic Digestion**

Description	%
Diverted to anaerobic pond	0.00
Diverted to methane capture (Flaring)	19.10
Diverted to methane capture (electricity generation)	80.9