RSPO P&C CERTIFICATION AUDIT REPORT

(LAM SOON PALM OIL MILL)

Audit Application Number:	PC25-002651
Assessment Type:	Annual Surveillance Audit 3
Date of Audit:	16 June 2025 – 19 June 2025
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1. Certification Body Background

1.1 Description of Certification Body

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

2. Organisation Details and Certification Scope

2.1.Organisational Overview

Management Unit Information ***Note: Management Unit refers to unit of certification***	
Name of Management Unit/s	Lam Soon Plantations Sdn Bhd
Address of the Management Unit/s	Lam Soon Palm Oil Mill 28 KM Off Jalan Lahad Datu-Sandakan Highway 91109 Lahad Datu Sabah
Country	Malaysia
Websites	lamsoonplantations.com.my
Description of the Management Unit	The Lam Soon Plantations Sdn Bhd. (hereafter referred to as LSPSB) is one of the subsidiary under the Lam Soon (M) Bhd. The company was incorporated in 1978 as Pacific Cocoa Plantations Sdn. Bhd., which was then changed to Lam Soon Plantations Sdn. Bhd. in July 2000. The core business of Lam Soon Plantations Sdn. Bhd. is oil palm plantation. Currently, LSPSB had only oil palm estates and palm oil mill. The oil palm estate and mill is located in Lahad Datu, Sabah, East Malaysia. The Lam Soon Estate consisted of two divisions; the KK estate division and the KL estate division. The palm oil mill commenced operations in 1997 with a processing capacity of 45 metric tonnes of fresh fruit bunches (FFB) per hour. The estate had been fully developed before the year of 2005.
Management Representative Name	Abdul Hamid Kimar
Management Representative Designation	Group Sustainability Manager
Management Representative Email	abdulhamid@lsms.com.my

2.2.RSPO Membership Information

RSPO Membership Information	
RSPO Membership No.	2-0909-18-000-00
Name of RSPO Member	Lam Soon Cannery Private Limited
Member Since	27-10-2007

2.3.Certificate Information

Certificate Information	
Certificate No.	RSPO-PC 00125
prisma Document Reference Number	*MU25-016422*
prisma Trading Account ID	TA25-017087
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	☒ RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 ☒ RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard 2020 ☐ RSPO Management System Requirements for Group Certification of FFB Production 2022 ☒ RSPO Rules on Market Communication and Claims 2022
National Interpretation (NI)	Malaysia National Interpretation
Initial Date of Certification:	25-08-2017
Effective Date of Certificate:	25-08-2022
Expiry Date of Certificate:	24-08-2027
Name of Peer Reviewer	N/A (Only for the case of IC or RC)

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**
Lam Soon Palm Oil Mill	ML25-001390	28 km off Lahad Datu - Sandakan Highway, 91109 Lahad Datu, Sabah, Malaysia	40 Mt/Hr	5.254373 N	118.174882 E
Remarks: To include additional information wherever applicable					

Information of Supply Bases					
Name of Supply Bases	**prisma Supply Base ID**	**Address of Supply Bases**	**Type of Supply Bases**	**GPS Coordinates**	
				Latitude	**Longitude**
Lam Soon Estate	SB25-004912	28 km off Lahad Datu - Sandakan Highway, 91109 Lahad Datu, Sabah, Malaysia	Own/Managed Estate	5.244980 N	118.167033 E

3.1. Area Statement of the Management Unit

Area Statement of Supply Bases									
Name of Supply Base	**Certified Area (Ha)**	**Planted Area (Ha)**			**Unplanted Area (Ha)**				
		Oil palm planted on non peatland	**Oil Palm Planted on Peat**	**Other Crop(s)**	**HCV**	**HCS**	**HCV-HCS**	**Conservation**	**Facilities / Others**
Lam Soon Estate	5,885.00	5593	0	0	122.00	0	0	0	170
TOTAL	5,885.00	5593	0	0	122.00	0	0	0	170
Remarks: To include additional information wherever applicable									

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		
Lam Soon Estate	721	932	3940	0	4872	5593
TOTAL (ha)	721	932	3940	0	4872	5593
Remarks: To include additional information wherever applicable						

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

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

Name of the Supply Base	Land area (ha) by year					Total Area (Ha)
	2025 (current year)	2026 (current year+ 1)	2027 (current year+ 2)	2028 (current year+ 3)	2029 (current year+ 4)	
Lam Soon Estate	0	0	0	0	0	0
TOTAL (ha)	0	0	0	0	0	0

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

3.4. Name FFB Supplier Supplying FFB to the Mill (Certified FFB) – Not Applicable

Name of other FFB Suppliers	Type of FFB Suppliers	GPS Coordinates		FFB received by the mil (MT) *During the current license period*
		Latitude	**Longitude**	
	choose an item	i.e. XX. XXXXX	i.e. XXX. XXXXX	
Rows (including dropdown) can be added as necessary	choose an item	i.e. XX. XXXXX	i.e. XXX. XXXXX	
			TOTAL	

3.5 Name FFB Supplier Supplying FFB to the Mill (Un-Certified FFB) – Not Applicable

Name of other FFB Suppliers	Type of FFB Suppliers	GPS Coordinates		FFB received by the mil (MT) *During the current license period
		Latitude	Longitude	
	choose an item	i.e. XX. XXXXX	i.e. XXX. XXXXX	
Rows (including dropdown) can be added as necessary	choose an item			
			TOTAL	

3.6 Projected Certified Volume for Next License

Information of New License		
Next License Period	Start Date	25/08/2025
	End Date	24/08/2026
Projected Certified FFB Volume (MT)	125,674.94	
Average Production Yield (MT/ Ha)	25.80	
Projected CSPO Certified Volume (MT)	Identity Preserved	29,533.61
	Mass Balance	0
Projected CSPK Certified Volume (MT)	Identity Preserved	5,341.18
	Mass Balance	0
Oil Extraction Rate (OER) (%)	23.50	
Kernel Extraction Rate (KER) (%)	4.25	

3.7 Information of Previous & Current License (Identity Preserved)

Name of Palm Oil Mill	**Lam Soon Palm Oil Mill**			
Information of License	**Previous Year License**		**Current Year License**	
License Period	Start Date	25/08/2023	Start Date	25/08/2024
	End Date	24/08/2024	End Date	24/08/2025
Actual Production Period Reported	From	20/07/2023	From	20/07/2024
	To	19/07/2024	To	15/06/2025
Projected FFB Certified Volume (MT)	130779.00		136556.72	
Actual production of FFB (MT)	116947.89		113946.21	
Projected CSPO Certified Volume (MT)	30733		32091	
Actual CSPO Production Volume (MT)	27173.06		26469.65	
Actual CSPO Volume Sold as RSPO Certified (MT)	26982.71		25847.20	
Actual CSPO Volume Sold as Conventional (MT)	160.75		586.32	
Actual CSPO Volume Sold under Other Scheme (MT)	0		0	
Total Actual CSPO Volume Sold (MT)	27243.46		26433.52	
Actual CSPO credits sold (where applicable)	0		0	

Projected CSPK Certified Volume (MT)	5588	5804
Actual CSPK Production Volume (MT)	4760.86	4460.18
Actual CSPK Volume Sold as RSPO Certified (MT)	4747.90	4430.76
Actual CSPK Volume Sold as Conventional (MT)	0	0
Actual CSPK Volume Sold under Other Scheme (MT)	0	0
Total Actual CSPK Volume Sold (MT)	4747.90	4430.76

3.8 Information of Previous & Current License (Mass Balance)-NA

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)		
Total Actual CSPK Volume Sold (MT)		

4. Audit Programme

4.1. Audit Methodology

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 supply base covered during the audit is Lam Soon Estate (the only supply base). The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

4.2. Audit Team Member

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

4.3. Audit Plan

Date	Time	CAB Auditor Number	Location	Activity
16 June 2025	09.00 am – 05.00 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Lam Soon POM	RMN **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Effluent Treatment/Discharge ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Waste & chemical management ▪ Facilities at workplace Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) DA **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Laws and regulations ▪ GHG assessment ▪ Occupational safety & health practice witness activities at site ▪ Hazard identification and Risk Management ▪ Mill best practices ▪ Metric Template & TBP Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc. MZK **Coverage of assessment: P1, P2, P3, P4, P6, P7:** **Site visit and assessment on Supply Chain Implementation including the:** • Model used • General Chain of Custody • System Requirements • for the supply chain • Documented procedures • Purchasing and goods in • Outsourcing activity • Sales and goods out • Processing

				• Records keeping • Registration • Training • Claims <u>RAR</u> **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Land titles user rights ▪ Mill Boundary, adjacent and neighbouring land use ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with contractors, supplier, etc ▪ Consultation with relevant government agencies ▪ Training and skill development programs Other area identified during the assessment including site visits local communities, estate/mill boundary, buffer zone, HCV area and etc.
17 June 2025	09.00 am – 05.00 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Lam Soon POM	<u>RMN</u> **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Effluent Treatment/Discharge ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Waste & chemical management ▪ Facilities at workplace Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) <u>DA</u> **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Laws and regulations ▪ GHG assessment ▪ Occupational safety & health practice witness activities at site ▪ Hazard identification and Risk Management ▪ Mill best practices ▪ Metric Template & TBP Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc. <u>MZK</u> **Coverage of assessment: P1, P2, P3, P4, P6, P7:**

				▪ Land titles user rights ▪ Boundary, adjacent and neighbouring land use ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with contractors, supplier, etc ▪ Consultation with relevant government agencies ▪ Training and skill development programs ▪ HCV/RTE and action plan ▪ Training and skill development programs ▪ Metric Template & TBP Other area identified during the assessment including site visits local communities, estate/mill boundary, buffer zone, HCV area and etc. <u>RAR</u> **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Interview with gender committee, worker representative, etc ▪ Linesite inspection ▪ Complaints and grievances ▪ Workers Issues & welfare Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.
18 June 2025	09.00 am – 05.00 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Lam Soon Estate	<u>RMN</u> **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Effluent Treatment/Discharge ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Waste & chemical management ▪ Facilities at workplace Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) <u>DA</u> **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Laws and regulations ▪ GHG assessment ▪ Occupational safety & health practice witness activities at site

				▪ Hazard identification and Risk Management ▪ Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ New planting ▪ Metric Template & TBP Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc. <u>MZK</u> **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Land titles user rights ▪ Boundary, adjacent and neighbouring land use ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with contractors, supplier, etc ▪ Consultation with relevant government agencies ▪ Training and skill development programs ▪ HCV/RTE and action plan ▪ Training and skill development programs ▪ Metric Template & TBP Other area identified during the assessment including site visits local communities, estate/mill boundary, buffer zone, HCV area and etc. <u>RAR</u> **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Interview with gender committee, worker representative, etc ▪ Linesite inspection ▪ Complaints and grievances ▪ Workers Issues & welfare Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.

19 June 2025	09.00 am – 05.00 pm	ASI1P4D2WW (RMN) ASI1AU6HF7 (RAR) ASI1GIVNPH (DA) ASI17IDGG4 (MZK)	Lam Soon Estate	RMN **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Effluent Treatment/Discharge ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Waste & chemical management ▪ Facilities at workplace Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) DA **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Laws and regulations ▪ GHG assessment ▪ Occupational safety & health practice witness activities at site ▪ Hazard identification and Risk Management ▪ Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ New planting ▪ Metric Template & TBP Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc. MZK **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Land titles user rights ▪ Boundary, adjacent and neighbouring land use ▪ Stakeholder consultation with affected communities surrounding the CU ▪ Interview with contractors, supplier, etc ▪ Consultation with relevant government agencies ▪ Training and skill development programs ▪ HCV/RTE and action plan ▪ Training and skill development programs ▪ Metric Template & TBP

				Other area identified during the assessment including site visits local communities, estate/mill boundary, buffer zone, HCV area and etc. RAR **Coverage of assessment: P1, P2, P3, P4, P6, P7:** ▪ Social aspects - SIA, management plan & implementation, workers' quarters. ▪ Interview with gender committee, worker representative, etc ▪ Linesite inspection ▪ Complaints and grievances ▪ Workers Issues & welfare Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc. Audit team Discussion on finalization of draft NCRs Closing meeting

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

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

No change to initial audit plan.

4.5. Sampling Details

Description of Management Unit	Number of Estate/Members/Mills	Risk Factor	Result $x = (\sqrt{y})\ x\ (z)$	Total Sampled
Mill	One	N/A	N/A	All mills shall be audited.
Own/Managed Estates	One	Low Risk	One	One
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	202x	20xx
Lam Soon POM	☒	☒	☒	☐	☐
Lam Soon Estate	☒	☒	☒	☐	☐
Rows (including the tickbox) can be added as necessary	☐	☐	☐	☐	☐

4.7. Audit Team Leader and Audit Team Information

Audit Team Leader: Rohazimi Mat Nawi (RMN)	
Requirements	**Description**
At least five (5) years of field experience in the palm oil sector, health and safety, or environmental management. These include experience in HCV and HCS assessment, social auditing, or involvement in human rights activities;	Had more than 5 years in the palm oil sector, health and safety, environmental management and other sustainability audit such as MSPO.
A supervised (by a qualified lead auditor) period of training in practical audits against the RSPO P&C and/or RSPO ISH standard, with a minimum of 15 days audit experience in at least three (3) audits;	Had attended training RSPO P&C and RSPO ISH standard and completed evaluation and qualified as lead auditor RSPO since 2020.
Successfully completed a refresher course for RSPO endorsed P&C lead auditor course every three (3) years after the initial qualification as lead auditor	Successfully completed refresher course for RSPO endorsed P&C lead auditor course every three (3) years after the initial qualification as lead auditor in 2023.
Audit Team Members: **Mohd Zulfakar Kamaruzaman (MZK)** **Dzulfiqar Azmi (DA)** **Rozaimee Ab Rahman (RAR)**	

Requirements	CAB Auditor Number	Description
Possess a bachelor's degree or tertiary education in related disciplines, such as agriculture, environmental science or social sciences, etc;	*ASI1P4D2WW (RMN)*	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia
	ASI1GIVNPH (DA)	Holds a B.SC. (Hons) in Plantation Technology and Management from Mara Technological University (UiTM).
	ASI17IDGG (MZK)	Hold B. Sc. Forestry from University Putra Malaysia
	ASI1AU6HF7 (RAR)	Holds a B. Sc. of Agriculture from UPM.
At least three (3) years of field experience in the palm oil sector, health and safety, or environmental management. These include experience in HCV and HCS assessment, social auditing or involvement in human rights activities	*ASI1P4D2WW (RMN)*	Had more than 5 years in the palm oil sector, health and safety, or environmental management auditing since 2015.
	ASI1GIVNPH (DA)	He had more than 7 years of working experience in the oil palm operation and experience in social auditing since 2017.
	ASI17IDGG (MZK)	He had more than 5 years of working experience in the oil palm operation and experience in HCV and HCS assessment auditing since 2015.
	ASI1AU6HF7 (RAR)	He had 7 years of working experience in the oil palm operation.
Successfully completed an RSPO endorsed P&C lead auditor course	*ASI1P4D2WW (RMN)*	Completed RSPO endorsed P&C lead auditor course in 2020 by Chemark Training.
	ASI1GIVNPH (DA)	Completed RSPO endorsed P&C lead auditor course in 2018 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.	*ASI1P4D2WW (RMN)*	Successfully attended Integrated Management System lead assessor course in 2015.
	ASI1GIVNPH (DA)	Successfully attended Integrated Management System lead assessor course in 2017.
	ASI17IDGG (MZK)	Successfully attended 5-day lead auditor course for ISO 9001, ISO 14001 and ISO 45001 in 2015.
	ASI1AU6HF7 (RAR)	Successfully attended 5-day lead auditor course for ISO 9001, ISO 14001 and ISO 45001 in 2016, 2018.

Demonstrable understanding of the latest version of RSPO Certification Systems	*ASI1P4D2WW (RMN)*	Can demonstrate of the latest version of RSPO Certification Systems
	ASI1GIVNPH (DA)	Capable of demonstrating knowledge and application of the latest version of the RSPO Certification Systems.
	ASI17IDGG (MZK)	Capable of demonstrating knowledge and application of the latest version of the RSPO Certification Systems.
	ASI1AU6HF7 (RAR)	Capable of demonstrating knowledge and application of the latest version of the RSPO Certification Systems.
For auditors verifying compliance with NPP procedures, auditors shall additionally be trained in the assessment of compliance with FPIC, HCV and HCS requirements in the context of RSPO NPP procedure	*ASI1P4D2WW (RMN)*	This has not been audited and is deemed not applicable.
	ASI1GIVNPH (DA)	This has not been audited and is deemed not applicable.
	ASI17IDGG (MZK)	This has not been audited and is deemed not applicable.
	ASI1AU6HF7 (RAR)	This has not been audited and is deemed not applicable.
A supervised (by a qualified auditor/lead auditor) period of training in practical audit against the RSPO P&C, with a minimum of 10 days of audit experience in at least two (2) audits.	ASI1GIVNPH (DA)	Had completed and pass evaluation of RSPO auditor since 2020.
	ASI17IDGG (MZK)	Had completed and pass evaluation of RSPO lead auditor since 2015.
	ASI1AU6HF7 (RAR)	Had completed and pass evaluation of RSPO lead auditor since 2015.
Knowledgeable and experience of the local/regional laws	*ASI1P4D2WW (RMN)*	Knowledgeable and experience of the local/regional laws
	ASI1GIVNPH (DA)	He possesses extensive knowledge and experience in understanding, interpreting, and applying local and regional laws.
	ASI17IDGG (MZK)	He possesses extensive knowledge and experience in understanding, interpreting, and applying local and regional laws.
	ASI1AU6HF7 (RAR)	He possesses extensive knowledge and experience in understanding, interpreting, and applying local and regional laws.
Knowledgeable in Best Agricultural Practices, and Integrated Pest Management, pesticide and fertiliser use;	*ASI1P4D2WW (RMN)*	Had more than 5 years of working experience in the palm oil mill operation
	ASI1GIVNPH (DA)	He has over 5 years of working experience in oil palm operations.
	ASI17IDGG (MZK)	He has over 5 years of working experience in oil palm operations.
	ASI1AU6HF7 (RAR)	He had 7 years of working experience in the oil palm operation.
Experience in health and safety auditing on the farm/plantation and in the palm oil mill,	*ASI1P4D2WW (RMN)*	Had more than 5 years of working experience in the oil palm

for example against the ISO 45001 Occupational Health and Safety Management standard;		operation and auditing health and safety
	ASI1GIVNPH (DA)	He has over 5 years of extensive experience in oil palm operations and auditing health and safety practices.
	ASI17IDGG (MZK)	He has over 5 years of extensive experience in oil palm operations and auditing health and safety practices.
	ASI1AU6HF7 (RAR)	He has over 5 years of extensive experience in oil palm operations and auditing health and safety practices.
Experience in handling workers' welfare or social auditing experience, such as experience with the SA8000 or other international sustainability scheme that has the social auditing requirements. The auditor auditing the social requirements shall have successfully attended the internationally recognised social auditing standard training, such as the SA8000, Social Systems (SMETA) Auditor Training or social training recognised by RSPO;	*ASI1P4D2WW (RMN)*	Not audit
	ASI1GIVNPH (DA)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, demonstrating a strong understanding of ethical practices and compliance with social standards.
	ASI17IDGG (MZK)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, demonstrating a strong understanding of ethical practices and compliance with social standards.
	ASI1AU6HF7 (RAR)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, demonstrating a strong understanding of ethical practices and compliance with social standards.
Experience in handling of land rights, gender and indigenous peoples' issues;	*ASI1P4D2WW (RMN)*	Not audit.
	ASI1GIVNPH (DA)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, handling of land rights, gender and indigenous peoples' issues.
	ASI17IDGG (MZK)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, handling of land rights, gender and indigenous peoples' issues.

	ASI1AU6HF7 (RAR)	He attended SA 8000 training in 2018 and SMETA training in 2021. He has over 5 years of experience in oil palm operations and social auditing, demonstrating a strong understanding of ethical practices and compliance with social standards.
Experience in environmental and ecological auditing or assessments, such as experience with High Conservation Value (HCV)/High Carbon Stock (HCS) assessments, organic agriculture or the ISO 14001 Environmental Management Systems standard;	*ASI1P4D2WW (RMN)*	Experience in auditing ISO 14001 Environmental Management Systems standard since 2016.
	ASI1GIVNPH (DA)	He has experience auditing the ISO 14001 Environmental Management Systems standard since 2019.
	ASI17IDGG (MZK)	He holds a B.Sc. in Forestry from Universiti Putra Malaysia and has extensive experience in auditing High Conservation Value (HCV) and High Carbon Stock (HCS) assessments, as well as organic agriculture practices.
	ASI1AU6HF7 (RAR)	This criterion and indicator have not been audited.
Fluent in one of the main national languages	*ASI1P4D2WW (RMN)*	Fluent in Bahasa Malaysia and English.
	ASI1GIVNPH (DA)	He is fluent in both Bahasa Malaysia and English.
	ASI17IDGG (MZK)	He is fluent in both Bahasa Malaysia and English.
	ASI1AU6HF7 (RAR)	He is fluent in both Bahasa Malaysia and English.
Knowledgeable in supply chain requirements of the palm oil mill. The auditor performing this task shall have successfully completed the RSPO endorsed SCC lead auditor training course. Note: this does not apply for ISH or Group Certification.	*ASI1P4D2WW (RMN)*	Not audited.
	ASI1GIVNPH (DA)	He completed the RSPO Supply Chain Auditor training course in 2024 and has been auditing supply chains since then.
	ASI17IDGG (MZK)	He completed the RSPO Supply Chain Auditor training course in 2016 and has been auditing supply chains since then.
	ASI1AU6HF7 (RAR)	He completed the RSPO Supply Chain Auditor training course in 2019 and has been auditing supply chains since then.

5. Audit Findings & Results

Criterion / Indicator		Audit Findings	Audit Findings (Public Summary)	Results
Principle 1: Behave Ethically and Transparently				
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.				
1.1.1 (C)	Management documents that are specified in the RSPO P&C are made publicly available and shall include (but are not necessarily limited to): • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1);		The Lam Soon Plantations (LSP) Certification Unit (CU) continued to implement its documented procedures for internal and external communications, as established in the Estate/Mill Sustainability Department manual and the RSPO System Procedure (Indicator 1.1.4 – *Internal Communications & External Communication*). Records of communications were maintained in stakeholder-specific files. During the audit, communications with government agencies (e.g., Department of Environment (DOE), Department of Occupational Safety and Health (DOSH), Malaysian Palm Oil Board (MPOB)), as well as with employees, were verified and found to be appropriately documented. The CU maintained a publicly accessible corporate website (http://lamsoonplantations.com.my/), which provides stakeholders with relevant information on sustainability commitments, grievance procedures, environmental and social activities, and channels for information requests. Request Forms were available to stakeholders or interested parties to facilitate access to RSPO-related information. Records of government agency visits and stakeholder engagements were also available. As required by the communication procedure, a designated personnel was appointed to manage and respond to communications within a defined time frame. All communications received were recorded and actions were taken accordingly. Information relevant to RSPO Principles and Criteria, including environmental, social, and legal matters, continued to be made	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	• Public summary of certification assessment report; Human Rights Policy (Criterion 6.13).		available to stakeholders to ensure effective engagement and decision-making. The CU also published its Annual Communication of Progress (ACOP) 2023, which includes upstream and downstream RSPO-related disclosures.	
1.1.2	Information is provided in appropriate languages and made accessible to relevant stakeholders.		The CU maintained continuous engagement with its stakeholders, including contractors, vendors/suppliers, government agencies, schools/Community Learning Centres (CLCs), local communities, neighboring estates, and other interested parties. Lam Soon Plantations has updated its corporate website (http://lamsoonplantations.com.my/) to include publicly accessible management documents relevant to environmental, social, and legal issues. This initiative reflects the CU's ongoing commitment to transparency and compliance with RSPO requirements. The information is provided in English and is accessible to all relevant stakeholders. All communication is managed in accordance with the established Communication Procedure, which outlines the handling of both internal and external stakeholder interactions. To facilitate proper documentation, the CU utilized External Communication Forms and Communication Records, including authority visit logs. During the audit, samples of documented communication and compliance records were reviewed and verified. These included: • Machinery Inspection Logbook (DOSH) • Fire Pump House Logbook (BOMBA) • Department of Environment (DOE) Inspection Logbook • Electrical Inspection Report • Visitor Logbook The records were found to be complete and maintained appropriately, in accordance with RSPO and internal requirements.	☒ 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 maintained proper records of stakeholder requests for information and the corresponding responses. These were found to be well-documented in dedicated files managed by the CU management. Feedback Forms were available and verified during document review. These forms are used to capture stakeholder input during internal meetings with workers and external stakeholder engagements. The CU continued to conduct stakeholder consultations involving both internal and external parties. Internal stakeholders included workers and their representatives, while external stakeholders comprised government agencies, neighbouring estates, local communities, schools/CLCs, suppliers, and contractors. The most recent consultations were held as follows: • Internal and External Stakeholders' Consultation Meeting: 21/05/2025 • Gender Committee Meeting: 28/04/2025 • Workers' Representatives Meeting: 18/03/2025 Evidence of these consultations was reviewed and found to be complete and well-documented. Stakeholder feedback collected during these sessions was incorporated into the Social Impact Assessment (SIA) and Environmental Impact Assessment (EIA) action plans. This systematic approach to collecting, recording, and responding to feedback demonstrates the CU's commitment to continuous improvement, transparency, and compliance with RSPO requirements. The documentation supports accountability and ensures that both regulatory obligations and stakeholder expectations are addressed effectively.	☒ 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		The CU has established a Consultation and Communication Procedure, applicable to both internal and external stakeholders. This documented procedure, last revised in May 2020, outlines structured steps for addressing grievances and communication matters. It defines responsibilities, timelines, and methods to	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	nominated management official.		ensure that all complaints and inquiries are managed fairly, transparently, and effectively. The existence of such procedures demonstrates the CU's commitment to transparency and stakeholder engagement, thereby fostering trust and cooperative relationships with affected parties. To enhance stakeholder awareness, comprehensive briefings on the grievance mechanism and communication procedures were conducted during the most recent stakeholder meeting held on 21/05/2025. These sessions were led by nominated representatives from each operating unit. The briefings were delivered in Bahasa Malaysia and English, ensuring accessibility and understanding among all stakeholder groups. The importance of the grievance mechanism and the right to seek redress were emphasized, in line with RSPO requirements. By making these procedures known and easily accessible, the CU reinforces its accountability and commitment to responsible and ethical palm oil production. The proactive approach taken to communicate grievance channels supports continuous improvement and compliance with RSPO certification standards.	☐ 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.		The CU maintained an up-to-date stakeholder list, which is reviewed and revised as necessary. The list includes the names, contact details, and nominated representatives of each stakeholder. Internal stakeholders include workers' representatives such as *Ketua Kampung*, *Timbalan Ketua Kampung*, *Ketua Suku*, *Timbalan Ketua Suku*, and Gender Representatives. External stakeholders include contractors, vendors, neighbouring estates, embassies, NGOs, government agencies, recruitment agencies, schools, local communities, CPO/PK buyers, hospitals, clinics, service providers, and suppliers.	☒ 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 CU has implemented an Ethical Business Conduct Policy, dated 15/05/2025, applicable to all operations and business transactions. The policy promotes transparency, fairness, and integrity in line with RSPO requirements. The policy is communicated to all levels of the workforce to ensure responsible business practices and to strengthen stakeholder trust. Its implementation supports the CU's commitment to ethical conduct and sustainable operations.	☒ 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.		LSP monitors compliance with its Ethical Business Conduct through internal audits carried out by the Group Finance and Sustainability Departments. Tender awards are overseen by a tender committee to ensure independence and transparency. Additionally, LSP has established a Vendor Ethical Business Conduct policy, dated 24/06/2016, which sets behavioral standards for all suppliers, consultants, recruitment agents, and contractors engaged with the Group. All vendors are required to sign an Ethical Business Conduct Pledge, which includes commitments to uphold human rights and eliminate all forms of exploitation, including modern slavery and human trafficking.	☒ 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 CU (LSPOM and its supply base) demonstrated compliance with all relevant laws and regulations, supported by valid licenses and permits covering key operational areas: • POM MPOB License (No. 500228404000) valid until 31/03/2026, authorizing the handling and storage of FFB, PK, CPO, and SPO. • Company Registration No. 40857-X. • Weighbridge Calibration for two units, with calibration dates 23/10/2024 and 08/04/2025. • Diesel Storage Permit (#PBKB/2024/P/S-000712), valid until 15/12/2027, volume 40,000L. • Energy Commission License (No. ECOS/E/LEP1/3552C805), valid until 22/07/2025. • DOE License (No. 003427), valid until 30/06/2025. • Fire Certificate under the Fire Services Act 1988: currently in progress, with tender completed and contract awarded. • Foreign Worker Employment License (JTK Sabah) valid until 18/03/2026. • Overtime and Salary Deduction Permits valid until 24/11/2026. • Notification from DOE Sabah for new biogas engine installation dated 15/03/2024. **Factory and Machinery Act 1967 Compliance:** • Competent and certified personnel appointed including mill manager, engineers, engine drivers, and boiler men. • Certified professionals for environmental and safety roles, including CePSWaM, CePPOME, and CePSO certifications. • Valid Certificates of Fitness for boilers, air receiver tanks, sterilizers, cranes, and steam receivers, expiring between 2025 and 2026. **Environmental Compliance:** • The mill operates under the Crude Palm Oil Regulations 1977, License	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			No. 003427, with a capacity of 45 mt/hr. • Treated effluent discharge is monitored monthly and consistently meets regulatory standards (<20 mg/L BOD). • Quarterly environmental reports are submitted to the DOE punctually. **Estate Compliance (KL and KK Estates):** • MPOB nursery and estate licenses valid until mid-2026. • Trading license valid until end of 2025. • Certificates of Fitness, weighbridge calibration, diesel storage permits, and energy licenses are valid and up to date.	
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 documented Legal & Other Requirements Register (LORR), which includes all relevant regulatory obligations. The register was made available and reviewed during the assessment. Mosdi Latif is the designated officer responsible for monitoring legal updates and communicating changes to all sites. To stay updated, the CU actively consults various sources, including industrial associations (MPOA, EMPA, SECA), seminars, law publications, and government websites. The most recent review of the LORR was conducted on 01/05/2025, incorporating significant legislative updates such as the Control of Smoking Products for Public Health Act 2024 and the Labour Ordinance of Sabah (Amendment) Act 2025. This systematic approach ensures ongoing compliance with evolving legal requirements, supporting a safe and lawful working environment.	☒ 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.		Boundary stones and markers along legal estate boundaries are visibly maintained by the CU. During the audit, the auditor verified boundary stones at Lam Soon Estate with neighboring plantations including Halusa Estate, Sandau & Boonrich Estate (Sawit Kinabalu), Kam Chong Estate, Hangsam Estate, JC Chang (Melewar and Asia Estate),	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

			Johor Estate, Kemajuan Rota, and Bompy (outgrower). Interviews with managers and persons-in-charge of neighboring estates confirmed there are no boundary disputes or encroachments by the CU.	☐ 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.		All contractors providing operational services are included in the CU's Stakeholder List, which was reviewed during the audit at both the POM and Estate levels. Each unit maintains its own updated list containing contractor names, contact persons, addresses, communication details, and the type of contracted work. The latest updates to the stakeholder lists were dated 27/02/2025 for both the POM and Lam Soon Plantations Estate.	☒ 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.		Contracts with suppliers and contractors include clauses requiring compliance with all relevant laws, regulations, and ethical standards. Examples include contracts dated 21/11/2023 with Chong Shu Min Trading and Thien's Transport Service for CPO and PK transport, and contracts dated 01/01/2024 with Agus Transporter and Winasari Enterprise for estate services. All vendors are expected to comply with labour laws, human rights, anti-bribery, and anti-corruption regulations. Document verification for contractors Agus Transporter and Winasari Enterprise found no immediate issues. However, during monitoring at Lam Soon Estate, significant gaps were observed in contractor compliance, including incomplete employment records (e.g., payslips, SOCSO, EPF) and insufficient worker training. As a result, a Minor Non-Conformance Report (NCR MZK 01/2025) was issued.	☐ Conform ☐ Major Nonconformity ☒ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		All contracts sampled at LSP CU include a clear clause prohibiting the use of child labour, forced labour, bonded labour, and human trafficking. This is specified in the Addendum of the Agreements. Contracts reviewed during the audit include those with Agus Transporter, Winasari Enterprise, Thien's Transport Service, Fajar Pagi (Siti Patimah Sabdiah binti Assok), and Chong Shu Min Trading, dated between November 2023 and January 2024. Where young workers are employed, additional contract clauses ensure their protection.	☒ 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		LSP POM maintains records on the geo-location and land ownership status or valid land use rights for all directly sourced FFB. Currently, no external smallholders or growers supply FFB to LSP POM, as the mill operates under an Identity Preserved system. Therefore, all FFB traceability records pertain solely to Lam Soon Plantations' own estates and are securely maintained in the mill files.	☒ 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.		LSP POM does not practice indirect sourcing of FFB. All Fresh Fruit Bunches are received directly from suppliers. The nearest smallholder plantations are located at least 10 kilometers away from the CU boundary.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

				☐ Not Applicable (justification required)

Principle 3: Optimise productivity, efficiency, positive impacts and resilience				
Criterion 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.				
3.1.1 (C)	A business or management plan (minimum three years) shall be documented and includes, where applicable, a jointly ☒oped business case for Scheme Smallholders.		The CU has a 3-Year Business Plan (2026–2029) projecting FFB and CPO/PK production, area, yield, costs, and capital expenditure. This plan reflects the commitment of the mill and estates to improve resource management, enhance productivity, and reduce costs sustainably. An annual budget, aligned with the business plan, is prepared and approved by top management, detailing expenditures to support sustainable management practices.	☒ 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.		A minimum five-year annual replanting programme is in place. However, KK and KL Estates have no replanting scheduled from 2025 to 2029.	☒ 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 CU held its latest Management Review Meeting on 13/06/2025, chaired by the Plantation Director, covering key topics such as RSPO/MSPO system changes, performance, resources, grievances, and continual improvement. Minutes were reviewed, with no major issues raised. An internal audit was conducted from 20–24/01/2025, identifying one non-conformance which was addressed with a root cause analysis and corrective actions. The issue was closed on 25/02/2025, with follow-up ensuring effectiveness and preventing recurrence. The review focused on preparations for the upcoming external RSPO audit scheduled for June 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)		The CU has implemented a continuous improvement action plan aligned with RSPO Principles & Criteria, focusing on: Optimizing FFB yield via good agricultural practices and field monitoring. Reducing pesticide use through Integrated Pest Management and biological controls. Mitigating environmental impacts by maintaining buffer zones, controlling erosion, and protecting habitats. Minimizing waste through segregation, composting, and responsible disposal.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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)		Reducing pollution and greenhouse gas emissions via methane capture and energy efficiency. Supporting local communities, workers, and smallholders through engagement, grievance management, and social contributions. Managing High Conservation Value and High Carbon Stock areas, peatlands, and conservation zones through protection, monitoring, and rehabilitation.	
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 RSPO metrics template was submitted and verified by auditors, with all data accurately reported.	☒ 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 mill follows several documented procedures guiding daily operations, including: • Palm Oil Mill Operations Procedure (Feb 2023), covering key mill stations. • Environmental Procedure (Dec 2024) for Biogas Plant operation and maintenance. • Safety Procedure (updated Jul 2024) for Biogas Plant safety.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			A list of reviewed SOPs was sighted, including grievance, supply chain, sexual harassment, and payroll procedures, dated from 2018 to 2029. Lam Soon estates use additional manuals such as: • Oil Palm Agricultural Policy (Jan 2017) • Safety Operating Procedures (since May 2016) Estate SOPs cover harvesting, nursery management, planting, fertilizing, pest control, road maintenance, and workshop operations. Employment processes for recruitment, hiring, promotion, retirement, and termination (dated May 2020) are documented and accessible to workers and their representatives. Foreign workers confirmed that passport and permit-related fees are paid by themselves, while the company covers other expenses such as insurance, medical checkups, and levies. Contracts with recruitment agents, including Agensi Pekerjaan TKA Sdn. Bhd., were sighted.	☐ Not Applicable (justification required)
3.3.2	A mechanism to check consistent implementation of procedures is in place.		Monitoring of SOP Implementation at CU 1. RSPO Internal Audit ○ Conducted by Group Sustainability Manager (20–24 Jan 2025). ○ Assessed compliance with RSPO requirements and operational SOPs. 2. Monthly Electrical Inspections ○ Performed by Ir. Yapp Yuk Tshin from Cyes Power Engineering Sdn. Bhd. ○ Latest inspection on 5 June 2025 confirmed all electrical installations in proper working order. 3. Third-Party Environmental Audit ○ Conducted by R&K Consultancy on 17 March 2025 (Report issued 31 March 2025). ○ Led by Jesson Oliver Lian Lee; identified three Opportunities for Improvement (OFIs) which were addressed by management. 4. Plantation Director Visit & Review	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			○ Site visit and review meeting on 16 October 2024. ○ Focused on performance improvement and production efficiency; minutes sighted. 5. Agronomist Reports from Applied Agricultural Resources Sdn. Bhd. (AAR) ○ Reports dated 13/01/2025 (KL Estate) and 10/01/2025 (KK Estate). ○ Reviewed palm appearance, interrow cover, soil & leaf analysis, yields, manuring, pest & disease control, replanting, planting density, and nursery management. 6. Worker Interviews ○ Estate workers demonstrated clear understanding of SOPs, including harvesting standards and pesticide usage.	
3.3.3	Records of monitoring and any actions taken are maintained and available.		The implementation of SOPs is monitored daily by field staff and Assistant Managers, with overall supervision provided by the Managers. Monitoring is conducted through regular supervision and the maintenance of various records. The estates maintain records such as work programs and field cost books, bin cards and harvesting intervals, monthly estate reports and accounts, monthly operational data including rainfall, pest and disease monthly returns, and agrochemical consumption records. Additionally, harvesting details are documented through daily inspection reports and yield improvement programs, summaries of machinery running hours, harvesting records detailing the number of bunches harvested, quantities of loose fruit collected by each harvester, and monthly FFB production reports. For activities carried out by contractors, competency evidence is verified for specialized work or jobs. Estate supervisors and engineers are present onsite to monitor contractor work closely. The estates also ensure that contractors do not bring family members to work in the fields. Furthermore, estates verify that contractors provide appropriate personal protective equipment (PPE), suitable working equipment, and machinery. Records of any necessary follow-up actions are retained accordingly.	☒ 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.		The organization (LSPOM) has established and updated the Environmental Impact Assessment (EIA) and Pollution Prevention Plans for the year 2025. The processes identified in the assessment include FFB receiving, sterilizer, threshing, pressing, oil room, nut plant, steam generation plant, electricity generation plant, effluent treatment plant, scheduled waste store, workshop, and laboratory. The latest update to the EIA was completed on 22 January 2025 by the Assistant Engineer. A new station, the Bioenergy Generation Plant, has also been included in the register. Similarly, the organization (LSE) has established and updated the Environmental Impact Assessment Management Actions Plan (EIA) Revision 2, which is valid until December 2025. The identified processes include replanting, nursery, security guard operations, transportation, road maintenance, fertilizer storage, harvesting, spraying, rat baiting, genset, workshop, and others. There have been no changes to estate operations, and all activities have been addressed within the EIA.	☒ 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 organization has an established document titled Social Impact Assessment (SIA) Management Action Plans and Continuous Improvement Plans for Lam Soon Plantations (January 2022 – December 2027). According to the Social Impact Assessment Report for LSP CU and land title records, no new plantings have been established on land belonging to local people. It has been verified that the land has been legitimately owned by LSP CU since 1986, and the audit team confirmed there are no land issues related to previous owners. Evidence shows that the SIA was developed through the participation of affected stakeholders. The SIA document provides an overview including demographic data, methodology, identification of relevant stakeholders, a flowchart of the grievance procedure, a list of publicly available information, details of	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			complaint and grievance procedures, continuous improvement plans, and sexual harassment reporting procedures. Participation of external stakeholders is mainly through consultations, with the latest held in May 2023 and typically conducted annually to gather feedback. Internal stakeholders participate through various channels such as Joint Consultative Committee (JCC) meetings, Gender Committee meetings, or inputs from complaints raised by workers. A monitoring plan is in place, which includes actions to avoid or mitigate negative impacts, promote positive impacts, and monitor identified impacts with input from relevant stakeholders. The organization has developed mitigation measures to address negative impacts identified through the Environmental Impact Assessment (EIA). These measures include maintenance of oil traps, close monitoring of machinery during operation, provision and maintenance of oil trays, conducting training programs, and implementing good operational practices. The mill targets a Biochemical Oxygen Demand (BOD) level of less than 20 ppm for final discharge and aims to keep the discharge of dust and solid particles below 0.150 g/Nm^3. For LSE, mitigation measures implemented include improving biological pest control, conducting waste management training, continuous monitoring of oil traps and heavy vehicles, and monitoring soil sampling results by the agronomist to ensure fertilizer application is compatible with soil nutrient requirements.	
3.4.3 (C)	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		The social management action plans are reviewed and updated annually, incorporating inputs from various platforms such as external stakeholder consultations, Occupational Safety and Health (OSH) Committee meetings, and Gender Committee meetings. Key social issues identified for management and monitoring include the implementation of human rights, grievance mechanisms, harvesting rates, and replanting activities. The SIA review process involves stakeholder consultations that	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			specifically address social concerns. These reviews are conducted with the involvement of operating unit management and external stakeholders, including government agencies, neighboring estates, schools/Community Learning Centers (CLC), local communities, recruitment agencies, suppliers, and contractors. The most recent stakeholder consultation was held on 21 May 2025, with the meeting minutes reviewed. The session included participation from both internal and external stakeholders, as mentioned above. Evidence of these consultations is available, and all stakeholder feedback has been duly recorded in the SIA and EIA action plans for appropriate follow-up and implementation. For the mill, monitoring programs as per legal requirements have been verified according to indicator 2.1.1. The organization has also established additional monitoring initiatives. A monthly oil trap inspection checklist record was sighted, with the latest update on 6 June 2024, and daily Continuous Emission Monitoring System (CEMS) records were noted, with the latest calibration on 15 June 2025. The Stack Emission Monitoring Reports for Boiler Chimney No. 1 and Boiler Chimney No. 2, dated 17 December 2024 and 20 December 2024 respectively, conducted by Hypergreen Instruments Sdn Bhd, were found to be within the limits of the Environmental Quality (Clean Air) Regulations 2014.	☐ 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 dated 11/05/2020 are documented and accessible to workers and their representatives. These cover selection, hiring, foreign worker recruitment, promotion, retirement, and termination. Recruitment is based on age, medical fitness, skills, and capabilities without discrimination based on religion, gender, or nationality. The CU has implemented a Sustainability Statement signed by the Plantation Director on 01/09/2022, committing to respect human rights,	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			provide safe workplaces, protect worker welfare, and engage and empower communities.	☐ Not Applicable (justification required)
3.5.2	Employment procedures are implemented and records are maintained.		Review of workers' personal files and interviews confirmed that employment records are properly maintained and procedures are followed. For local workers, application forms, interview assessments, medical check-ups, employment contracts, and ID copies were sighted. The latest recruitment at the POM was on 03/12/2024 for a processing worker. Job vacancies are advertised locally near villages. Foreign workers are managed by Estate Management and recruited mainly through walk-in applications often spread via family networks. The company appointed Agensi Pekerjaan TKA Sdn. Bhd. on 02/01/2023 to handle work permits, fees, medical exams, visas, and immigration processes. The Standard Working Procedure – Passport outlines the recruitment process and timelines, ensuring zero recruitment fees as reinforced by the Sustainability Statement dated 01/09/2022. Interviews with new workers in 2025 confirmed awareness of the walk-in process and that recruitment costs are covered by the estate or POM management.	☒ 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.		At Lam Soon Palm Oil Mill (LSPOM), a comprehensive HIRARC has been established and reviewed for all key operational areas, including grading, processing stations, laboratory, effluent treatment plant, and biogas plant. The latest review was conducted on 09 July 2024 for activities at the biogas plant. A Noise Risk Assessment was carried out by Sherman Services & Supply on 13 March 2025, and a Chemical Health Risk Assessment was conducted by Perunding Higien Harmoni on 30 November 2022, covering six work units. Safety Work Procedures have been developed for all critical areas including the lab,	☐ Conform ☒ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			boiler, engine room, electrical, store, and security. Although HIRARC for the Water Treatment Plant was last updated on 01 July 2024, a Major Non-Conformance (NCR RMN 01) was raised due to inadequate control of pipeline maintenance and cleaning activities, as observed during site inspection and worker interviews. At Lam Soon Estate (LSE), risk assessments are documented in the HIRARC register (LSPSB/LDU/HIRARC 01–83) and were last reviewed on 28 June 2024, valid until 2027. All estate activities, including harvesting, chemical handling, workshop, and worker accommodations, are covered. A Chemical Health Risk Assessment was conducted on 01 March 2023 by Anthony Astral Chan, and a Noise Risk Assessment was carried out on 03 August 2021 by Sherman Services & Supply, which remains valid. Medical surveillance for 90 personnel was completed by Klinik Ung Lahad Datu, with all workers certified fit to work. Safety procedures for all operations have been established and implementation of OSH controls was found to be generally effective.	☐ 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 mill has implemented confined space work permits, evidenced by a permit dated 22/10/2024 monitored by an authorized person. The Gas Alert Max XT III calibration certificate is valid until 21/10/2025. The latest medical report for confined space workers, dated 21/4/2025, confirmed employees are fit for work. Workplace inspections are conducted quarterly, with the latest on 4-5/6/2025 by the safety committee. An Audiometric Screening Programme by Klinik Mabello (Paris) Sdn Bhd on 10/6/2024 identified 20 employees with abnormal hearing. Follow-up tests on 26/08/2024 showed 7 employees needing medical inspection, and 3 confirmed cases of Occupational Hearing Loss. The organization submitted the JKKP 7 form via email on 07/11/2024. The latest audiometric test was conducted on 26/5/2025, with results pending. Estate had An Audiometric Screening Programme on 31/3/2025 by Klinik Ung Lahad Datu tested 76 employees; 4 were found with	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			abnormal hearing and retesting is scheduled for late June 2025. The 2025 Medical Surveillance Programme by the same clinic on 21/3/2025 screened 90 workers, all found fit for work.	
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.		A formal training program for 2025 covering RSPO Principles and Criteria is in place across all audited sites, with regular training needs assessments conducted. Each operating unit has established a training plan with target dates. The program includes ESH legal requirements, safe handling of electrical equipment, USECHH 2000, accident investigation, milling and estate activities, emergency response (chemical spills, poisoning, fire, lightning), competent first aider and first aid awareness training for all workers, scheduled waste management, safe work procedures for all stations, defensive driving, LSP policy, social training, and HCV/Biodiversity training.	☒ 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.		All operating units have established and implemented training programs covering RSPO requirements. Evidence of completed trainings includes: **LSPOM:** • NRA & PPE Protection (28/07/2024) • Electrical Safety Training (12/09/2024) • Confined Space SWP (10/10/2024) • Fire Drill and Emergency (10/11/2024) • MDS Operation (07/11/2024) • Scheduled Waste Training (01/12/2024) • Chemical Training and Handling (03/12/2024) • Safety Briefing for Biogas Plant (19/03/2025) • SWP for Press Station (05/04/2025) • SWP for Threshing and Hoisting Crane (05/04/2025) • Sustainability Policy Briefing (15/05/2025) Competent personnel include: • FFB Grader: Roslan Bin Kapis • CePSO & CePPOME: Mr. Yew Cheong Wee • CepSWaM: Mr. Irwin Stewart Bin Walter **LSE:** • Payroll & Leave Briefing (09/01/2025) • Forced Labour & Zero Recruitment Fee (20/01/2025) • Complaint Policy Briefing (05/02/2025) • Acephate Usage Demonstration (26/02/2025) • Open Burning Briefing (13/02/2025) • Fertilizer Toolbox Briefing (05/03/2025)	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			• ESWiss Briefing (28/04/2025) • Emergency Kit Briefing (29/04/2025) • PPE Usage Briefing (03/05/2025) • Pesticide & Store SOP (19/05/2025) • Sabah Labour Ordinance Briefing (24/05/2025) • Buffer Zone & RTE (29/05/2025) • Harvesting Briefing (05/06/2025) • Workshop Briefing (06/06/2025) • Sustainability Policy Statement (09/06/2025) • Emergency Action Plan (22/06/2025) • Noise Awareness (13/06/2025) These trainings demonstrate ongoing commitment to operational safety, environmental management, and sustainability compliance.	
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 related to the Supply Chain Certification Standard (SCCS) was conducted on 19 May 2025 for 17 personnel, including the Person In Charge (PIC), Clerk, Assistant Engineer, Staff, Weighbridge Operator, FFB Grader, and Laboratory Staff. On the same day, a separate session was held for all workers covering the Supply Chain SOP and the complaints and grievance mechanism. For contractors, the transporter owner received training on 9 May 2025 during the agreement signing, with transporter drivers trained on 10 May 2025. Attendance lists and photos were available as evidence.	☒ 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		Lam Soon POM receives only certified FFB from Lam Soon Estate, qualifying it for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the processing controls in	☒ Conform ☐ Major Nonconformity

	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.		place, and the sales volumes of RSPO certified products. Relevant production data can be found in Table 3 of this report.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base.		Not Applicable	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in		Available, as in Table 4 of this report.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	each subsequent annual surveillance report.			
3.8.4	The mill shall also meet all registration and reporting. Requirements for the appropriate supply chain through the RSPO IT platform		The mill has met the registration and reporting requirements for the supply chain through RSPO Palm Trace. Registration details are as follows: Name – LAM SOON PLANTATIONS SDN. BHD, Country – Malaysia, Prisma Member ID – MU25-016422, Palm Trace Account ID – RSPO_AC1000003772, Prisma License ID – LIC25-00005496, Trading Account ID – TA25-017087, RSPO Membership Number – 2-0909-18-000-00, Member Category – Oil Mill, Core Product – Palm Oil, Start Date – 25 September 2024, End Date – 24 August 2025. During the audit, a copy of the Shipping Announcement was provided as evidence of compliance with reporting requirements. The certified volumes licensed were 32,091 mt for CSPO and 5,804 mt for CSPK.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.5	Documented Procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all elements of the supply chain model requirements b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records) c) Identification of the role of the person having the overall responsibility for and authority over the implementation of these requirements and compliance with		LSPOM correctly applies the Identity Preserved (IP) supply chain model, sourcing solely from its own supply base, Lam Soon Estate, and has chosen to maintain this model. The mill is audited against the general chain of custody requirements and Module D of the RSPO Supply Chain Standard. The supply chain procedures are documented in the 'RSPO/MSPO Supply Chain' procedure (Revision 4, dated 5 October 2022) and the SOP on Supply Chain (dated 4 July 2024). These documents cover scope, responsibilities, reception, processing and storage, dispatch, records retention, training, claims, overproduction, internal audit, management review, and nonconformity handling. Procedures are kept in the RSPO Supply Chain file, with updates reflecting necessary changes. LSPOM's SOP on RSPO Supply Chain addresses all relevant activities to meet RSPO certification requirements. Records such as purchasing and sales (FFB delivery notes, weighbridge tickets, FFB grading, daily FFB received, delivery notes), production logs (CPO & PK production, daily reports), training, non-conformance controls, and complaints are maintained and updated accordingly. The Assistant Manager, Pang Mai Cherng, appointed as the RSPO	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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.		Person In Charge (PIC) on 19 April 2025, oversees the traceability system and supply chain implementation. Interview with the PIC confirmed a clear understanding of RSPO standards and internal supply chain processes. LSPOM continues to implement procedures for receiving and processing RSPO certified FFB only, with no receipt of non-certified FFB as confirmed in the SOP (Paragraph 4.0 - Reception).	
3.8.6	Internal Audit (i) The mill shall have a written procedure to conduct an annual internal audit to determine whether the mill; a) Conforms to the requirements in the RSPO SC requirements for mills and the RSPO Rules on Market Communication and Claims b) Effectively implements and maintains the standard requirements within its organization. (ii) Any con-conformities found as part of the internal audit shall be issued and required corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mills shall maintain the internal audit records and reports.		The organization has developed a Sustainability Internal Audit Procedure. An internal audit was conducted from 20 to 24 January 2025 by lead auditor Abdul Hamid bin Kimar, focusing on the RSPO Supply Chain Certification Standard (SCCS) latest requirements. No non-conformities were raised for SCCS. Relevant documents such as the audit attendance sheet, audit plan, and audit notes were reviewed. Management reviews are scheduled annually. The most recent combined management review meeting for RSPO, RSPO SCCS, and MSPO was held on 13 June 2025. Since then, no further management review meetings have been conducted. Key points include zero non-conformities from the internal audit for SCCS, positive customer feedback from surveys regarding contract volume, timely delivery, and dispatch documentation, and no significant operational changes except for the transfer of the Assistant Manager. The main recommendation is to continue improving the established system.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.7	Purchasing and Goods In		Lam Soon POM receives certified Fresh Fruit Bunches (FFB)	☒ Conform

	(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.		exclusively from its own certified estate, Lam Soon Plantation Sdn Bhd (MPOB License No. 501830002000), which is listed on the Approved Sustainable Supplier List (ASSL). The estate consists of two divisions: KL and KK. The actual production of Certified Sustainable Palm Oil (CSPO) and Certified Sustainable Palm Kernel (CSPK) from July 2024 to June 2025 was within projections, with no overproduction issues. Details of FFB received from the estate divisions include: • KK Division: ticket no. FFB25006153W (17/5/2025), 6.46 mt, 424 bunches, planted 2015 • KK Division: ticket no. FFB25002613W (28/2/2025), 6.90 mt, 300 bunches, planted 2012 • KL Division: ticket no. FFB25000164W (6/1/2025), 5.16 mt, 262 bunches, planted 2013 • KL Division: ticket no. FFB25005417W (30/4/2025), 9.00 mt, 506 bunches, planted 2012 • KL Division: ticket no. FFB25004056W (30/3/2025), 2.26 mt, 257 bunches, planted 2019 LSPOM continues to implement procedures for receiving and processing both RSPO certified and non-certified FFB, with clear management controls over certified FFB sources as outlined in the Production and Storage SOP, including critical control points for plant and storage tanks.	☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil		Documented procedures for sales and goods out were reviewed and found adequate, aligning with the shipping announcements. Compliance with Supply Chain model requirements and certificate number notation was confirmed through weighbridge dispatch tickets. Supporting documents such as dispatch tickets, CPO dispatch notes, oil quality tickets, transporter authorizations, Borang MPOB L3, and CPO dispatch authorizations were verified by the auditor. Key transactions from the shipping announcements include:	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	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		• Dispatch ticket CPO25000246W dated 03/05/2025 for 38.20 mt of CPO (IP), delivered by Chong Shu Min (vehicle SMP7008/T/S1963), under contract PO/1020/APR2025, RSPO certification no. RSPO-PC 00125, RSPO no. 2-0909-18-000-00. • Dispatch ticket CPO25000169W dated 25/03/2025 for 35.14 mt of CPO (IP), delivered by Thien Transporter (vehicle SS3772H/SS781J), contract PO/1014/MAR2025, RSPO certification no. RSPO-PC 00125. • Dispatch ticket CPO24000746W dated 28/12/2024 for 38.22 mt of CPO (IP), delivered by Thien Transporter (vehicle SD3088N/T/S143), contract PO/1067/DEC2024. • Dispatch ticket PK24000212W dated 02/12/2024 for 18.8 mt of PK (IP), delivered by Chong Shu Min (vehicle SS8295F), contract PK/2019/NOV2024. • Dispatch ticket PK25000020W dated 18/01/2025 for 20.78 mt of PK (IP), delivered by Chong Shu Min (vehicle SAA6352L), contract PK/2002/JAN2025. • Dispatch ticket PK25000084W dated 05/05/2025 for 18.72 mt of PK (IP), delivered by Chong Shu Min (vehicle SA1137M), accompanied by a security checklist, contract PK/2009/APR2025. All dispatches were properly documented with RSPO certification numbers, confirming compliance with supply chain requirements.	☐ 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		LSPOM outsources the transportation of certified CPO and PK to Chong Shu Min Transport and Thien's Transport. Agreements dated 21/12/2024 (valid until 31/12/2027) were sighted, covering outsourced activities and RSPO supply chain requirements, which were communicated to both companies. Key points: • Representatives from both transporters attended the stakeholder meeting.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	party complies with relevant requirements of this RSPO SC Certification. (ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.		• Training was provided on 10 May 2025 for the contractor owner and transporter drivers during agreement signing and briefing. • The RSPO Supply Chain procedure includes outsourcing in Sales & Despatch to buyers. • Additional inspections, including a “Security Checklist,” are conducted to prevent contamination. • Agreement clause 5.12 requires transporters to provide accredited Certification Bodies access to operations and information upon prior notice. Contracts and training records were verified, confirming effective management and compliance of outsourced transportation within the RSPO framework.	☐ Not Applicable (justification required)
3.8.1	The mill shall record the names and contact details of all contractors used for the		The list of contact persons for both transporters, Chong Shu Min Transport and Thien’s Transport, was available and up-to-date in the	☒ Conform

0	physical handling of RSPO certified oil palm products.		stakeholder list, with the latest update on 23/03/2025.	☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.1 1	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.		No new contractors have been used, nor are any planned for future processing or production of RSPO certified materials.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.1 2	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.		a) CPO and PK delivery notes, weighbridge tickets, production data, internal audit, and management review records were all up-to-date. b) Records are maintained for over 10 years, following the Supply Chain SOP dated 5th October 2022. c) Lam Soon POM uses a continuous accounting system to track RSPO certified FFB and deliveries of certified CPO and PK, summarized from daily templates. d) Not applicable, as this mill operates under the Identity Preserved (IP) model.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	(iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. (iv) For Mass Balance Module, the mill: a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified 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		Lam Soon POM processes all received certified crop, and their output is calculated based on the actual Oil Extraction Rate (OER) and Kernel Extraction Rate (KER).	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	their own extraction rates based upon past experience, documented and applied it consistently.			☐ Not Applicable (justification required)
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.		All figures are monitored daily and monthly by the mill using a prepared template to ensure accuracy and track ongoing performance.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.		Sales activities are typically managed by Lam Soon Marketing Department (HQ) on behalf of Lam Soon POM. Lam Soon POM dispatches RSPO certified CPO/PK to buyers based on specific contracts. Before pumping certified CPO, receiving pits, pipelines, and tanks are thoroughly cleaned, swept, and flushed to prevent contamination. Dedicated tanks are used to store the certified CPO.	☒ 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		The Group Plantation Marketing team registers transactions using the RSPO Member ID. Samples of shipping announcements were verified during the audit.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	Bill of Lading or the dispatch documentation date. (ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform			☐ Opportunity for Improvement ☐ Not Applicable (justification required)
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.		Relevant product claim information—including the Supply Chain model and certificate number—is correctly indicated on all outgoing paperwork. LSPOM does not use the RSPO corporate or trademark logos.	☒ 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.		Lam Soon's Human Rights Policy, revised on 2 January 2020, includes a clause prohibiting retaliation against Human Rights Defenders. Endorsed by the Plantation Director, it is publicly available on the company website and displayed at key sites. The policy is communicated during internal and external stakeholder consultations, including the latest held on 13 June 2024.	☒ 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.		Interviews with stakeholders, including local communities, neighbouring estates, contractors, and suppliers, confirmed that LSP CU does not engage in violence or harassment in its 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.		LSP CU has a documented and accessible grievance system for all employees and stakeholders, outlined in several procedures including the 'Consultation and Grievances Communication Procedure' (May 2020) and related documents. Complaints are submitted via forms or logbooks, with most resolved within 2 to 7 days. Delays, when present, were due to unavailable repair materials. The system includes protection for whistleblowers and safeguards for Human Rights Defenders, as stated in the revised Human Rights Policy dated 2 January 2020.	☒ 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.		LSP CU has implemented a clear and accessible grievance procedure, supported by a flowchart titled 'Grievances Process' dated 30.11.2021. Complaints can be submitted via forms or logbooks, with most resolved within 2 to 7 days. Issues recorded mainly involved housing defects and were addressed accordingly. The system is open to all, including whistle-blowers, with anonymity assured as per the Lam Soon Human Rights Policy. The procedure was communicated to stakeholders on 13 June 2024 and confirmed to be understood, including by illiterate individuals. No disputes were reported during the audit.	☒ 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.		LSP CU demonstrates that complainants are kept informed of grievance progress. At LSP POM, a house defect complaint dated 3.04.2025 was resolved within 3 days, with updates signed off by the complainant and supported with photos. Similarly, at LSP Estate, a culvert issue raised during a JCC meeting could not be resolved immediately, but an action plan with a timeline was in place, and progress was communicated through the JCC meeting.	☒ 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.		LSP CU's conflict resolution mechanism allows aggrieved parties to be represented by individuals of their choice, as stated in the "Consultation and Grievances Communication Procedure Internal/External" (May 2020). Communication channels include morning assemblies, notice boards, posters, and complaint books for both internal and external stakeholders. The procedure also outlines access to independent legal and technical advice. As of this audit, no grievances have been raised by external parties.	☒ 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.		LSP Estate and LSP Palm Oil Mill (POM) actively support local communities by employing 42 and 27 individuals respectively from nearby areas including Sandakan and Lahad Datu. To improve worker welfare, LSP CU is replacing old wooden quarters with brick houses—20 units have been completed, and 12 more are under construction, targeted for completion by December 2025. For education, LSP provides two buses for student transport, including those attending the Community Learning Centre (CLC) at Ladang Sandau. A secondary CLC, built in August 2018, remains in use. In collaboration with the Earthworm Foundation, LSP also runs a program to assess education and safety risks for immigrant children, with the latest meeting scheduled for 23 June 2025. Additionally, LSP supplies water, electricity, and teacher housing at the CLC.	☒ 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.		A review of the documents confirmed that the land was originally owned by Pacific Cocoa Plantations Sdn Bhd, which purchased it from the Sabah government on 24 April 1986. The company was renamed Lam Soon Plantations Sdn Bhd on 8 July 2000. The land is held under a Country Lease, designated for oil palm or other agricultural crops of economic value. Lam Soon Plantations has maintained compliance with the terms of the lease. The Palm Oil Mill is located within the estate's titled land. Copies of the land titles were available and sighted at both the mill and estate offices.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include. a) Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.		As verified in Section 4.4.1, the land has been legitimately owned by Lam Soon Plantations CU since 1986, with no disputes related to previous ownership. Interviews with various stakeholders—including neighboring estates (e.g., Malewar 2, Boonrich, Kim Fung, Sandau Estate), local contractors, vendors, and transporters—confirmed that there are no ongoing land issues or disputes involving the local community or external stakeholders.	☒ 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		As reported in 4.4.1, it has been verified that LSP CU has legitimately owned the land since 1986. All related land acquisition documents are maintained at Lam Soon HQ in Glenmarie, Shah Alam, with copies verified at the estate. No land issues were reported by villagers, local	☒ Conform ☐ Major Nonconformity

	participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).		communities, neighboring estates, or external stakeholders.	☐ 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..		Based on the documents reviewed, the land was originally owned by Pacific Cocoa Plantations Sdn Bhd, which purchased it from the Sabah state government on 24 April 1986. The company was renamed Lam Soon Plantations Sdn Bhd on 8 July 2000. The land is held under a Country Lease, designated for oil palm or other economically valuable agricultural crops. Lam Soon Plantations has maintained compliance with the lease terms. The Palm Oil Mill (POM) is located within the estate's land title area, and copies of the relevant land titles were sighted at both the mill and estate offices.	☒ 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.		Based on the documents reviewed, the land was originally acquired by Pacific Cocoa Plantations Sdn Bhd from the Sabah Government on 24 April 1986. The company was renamed Lam Soon Plantations Sdn Bhd on 8 July 2000. The land is held under a Country Lease for oil palm or agricultural crops and is compliant with all title terms. The Palm Oil Mill is located within the estate's titled area, with land title copies verified onsite. Stakeholder interviews with nearby estates, contractors, vendors, and local community members confirmed there are no land disputes or issues involving Lam Soon Plantations Sdn Bhd.	☒ 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.		Based on the documents reviewed, the land was originally acquired by Pacific Cocoa Plantations Sdn Bhd from the Sabah Government on 24 April 1986. The company was renamed Lam Soon Plantations Sdn Bhd on 8 July 2000. The land, under Country Lease, is designated for oil palm or other agricultural crops of economic value. Lam Soon Plantations has complied with the terms of the land titles, which	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

			include the location of the Palm Oil Mill. Copies of the titles were available and verified at both the mill and estate offices. Stakeholder interviews with nearby estates, contractors, vendors, transporters, and local community members confirmed that there are no land disputes involving Lam Soon. Since there are no customary or indigenous land claims, the implementation of FPIC-related agreements is not applicable.	☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions				
4.5.1 (C)	Documents showing identification and assessment of demonstrable legal, customary and user rights are available		Based on the Social Impact Assessment (SIA) and land title records, no new plantings were established on local communities' land. The land has been legitimately owned by LSP CU since 1986, with no disputes involving previous owners. Interviews with various stakeholders—including nearby estates, contractors, transporters, vendors, and local community members—confirmed that there are no land disputes or related concerns involving LSP CU.	☒ 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		Based on the documents reviewed, the land titles were previously owned by Pacific Cocoa Plantations Sdn Bhd, which purchased the land from the Sabah government on 24 April 1986. The company later changed its name to Lam Soon Plantations Sdn Bhd on 8 July 2000. The land is held under Country Lease titles, designated for oil palm or other economically valuable agricultural crops. It was verified that Lam Soon Plantations has complied with the terms of the land title, and the POM is located within the estate's titled land. Copies of land titles were sighted at the Mill and Estate offices. During interviews with various stakeholders—including nearby estates, transporters, contractors, vendors, and community	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	documented, long-term and two-way process of consultation and negotiation.		members—no land disputes were reported. As there were no issues raised by communities and no agreements negotiated through FPIC, this indicator is considered not applicable.	
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		Based on the documents provided, the land was originally owned by Pacific Cocoa Plantations Sdn Bhd, which acquired it from the Sabah government on 24 April 1986. The company changed its name to Lam Soon Plantations Sdn Bhd on 8 July 2000. The land, held under a Country Lease, is designated for oil palm or other economically viable agricultural crops. Lam Soon Plantations has maintained compliance with the terms of the land title. The POM is located within the estate land, and copies of the land titles were sighted at both the mill and estate offices. During stakeholder interviews—including neighboring estates, contractors, transporters, and vendors—no issues related to land disputes or claims were reported. There is no implementation of agreements negotiated through FPIC, as no such claims exist. Therefore, this indicator is not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	land at the expiry of the unit of certification's title, concession or lease on the land.			
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.		Based on the Social Impact Assessment (SIA) report and land title documents, there were no new plantings on local communities' land. It was verified that the land has been legitimately owned by LSP CU since 1986, with no issues reported from previous owners. The land was originally acquired by Pacific Cocoa Plantations Sdn Bhd from the Sabah Government on 24 April 1986 and later renamed Lam Soon Plantations Sdn Bhd on 8 July 2000. The land, under a Country Lease, is designated for oil palm or other economic crops, and LSP CU has complied with all lease terms. The Palm Oil Mill (POM) is located within the estate's land title area, and copies of the titles were sighted at the mill and estate offices. Stakeholder interviews—including local communities, neighboring estates, transporters, and vendors—confirmed there are no land disputes or grievances related to LSP CU operations. As there are no claims or agreements requiring Free, Prior and Informed Consent (FPIC), this indicator is not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.		Based on documents reviewed, the land was initially owned by Pacific Cocoa Plantations Sdn Bhd, which acquired it from the Sabah Government on 24 April 1986. The company was renamed Lam Soon Plantations Sdn Bhd on 8 July 2000. The land is held under a Country Lease, designated for oil palm or other agricultural crops of economic value. It was verified that Lam Soon Plantations has maintained and complied with all terms of the land title. The Palm Oil Mill (POM) is situated within the estate's titled land, and copies of the land titles were sighted at both the mill and estate offices. Interviews with stakeholders—including neighboring estates, contractors, transporters, and vendors—confirmed that there are no land disputes involving villagers, local communities, or other external parties. As there are no land claims or agreements requiring Free, Prior	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			and Informed Consent (FPIC), this indicator is not applicable.	
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator..		Based on the documents provided, the land titles were originally owned by Pacific Cocoa Plantations Sdn Bhd, which purchased the land from the Sabah government on 24 April 1986. The company changed its name to Lam Soon Plantations Sdn Bhd on 8 July 2000. The land is held under a Country Lease, specifying its use for oil palm or other agricultural crops for economic purposes. It is confirmed that Lam Soon Plantations has maintained and complied with the terms of the land title. The Palm Oil Mill (POM) is located within the estate's titled land, with copies of the land titles sighted at both the mill and estate offices. The audit team interviewed various stakeholders, including representatives from neighboring estates, transporters, contractors, vendors, and service providers. Based on these interviews, there were no land disputes or issues with villagers, local communities, neighboring estates, or external stakeholders at LSP CU. As there were no agreements requiring Free, Prior, and Informed Consent (FPIC), this indicator is deemed 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 without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.		Based on the document provided, the land titles were previously owned by Pacific Cocoa Plantations Sdn Bhd, which purchased the land from the Sabah government on 24 April 1986. The company changed its name to Lam Soon Plantations Sdn Bhd on 8 July 2000. The land is held under a Country Lease, specifying its use for oil palm or other agricultural crops for economic purposes. Lam Soon Plantations has maintained and complied with the terms of the land title. The Palm Oil Mill (POM) is located within the estate land title, with copies of the land titles sighted at the mill and estate offices. No new land acquisitions for plantations or mills have occurred after 15 November 2018, so this indicator is not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

4.5.8 (C)	New lands are not acquired in areas inhabited by communities in voluntary isolation.		Not applicable	☐ 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.		LSP CU has standard procedures for identifying legal, customary, or user rights, and for determining entitlement to compensation, outlined in the “Land Dispute Compensation and Calculation Procedure” and the “Procedure for Calculating & Distributing Fair Compensation.” These procedures detail the process for handling compensation related to land disputes, ownership, and access issues. However, as of the audit date, no evidence of disputes concerning customary rights, boundary issues, or similar matters was found at either the estate or mill.	☒ 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		In accordance with the established “Land Dispute Compensation and Calculation Procedure” and “Procedure for Calculating & Distributing Fair Compensation,” no related issues or cases were identified during the audit team’s consultations with staff and workers at the mill and visited estates.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	evaluation.			☐ 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 are no scheme smallholdings at Lam Soon Plantations Sdn Bhd CU. All Fresh Fruit Bunches are supplied from Lam Soon-owned estates certified under RSPO.	☒ 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 were no processes or outcomes related to negotiated agreements, compensation, or payments to any affected parties.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements				

4.7.1 (C)	A mutually agreed procedure for identifying people entitled to compensation is in place.		The procedure for identifying legal, customary, or user rights, as well as the compensation process, is outlined in the “Land Dispute Compensation and Calculation Procedure” and the “Procedure for Calculating & Distribution of Fair Compensation.” The responsibility for calculating and distributing fair compensation lies with the Land Management Department at the Lam Soon Head Office. The procedure requires the involvement of the respective estate management, Land Office, NGOs, and affected parties during negotiations.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.7.2 (C)	A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.		There were no compensation issues (monetary or otherwise) with villagers, local communities, neighboring estates, or external stakeholders. The audit team interviewed relevant stakeholders, including leaders from various estates, transporters, vendors, and service providers such as Ambotuo bin Hele, Amiruddin bin Kasse, Siti Patimah Sabdiah binti Assok, Palm-Mech Engineering Sdn Bhd, Pieans Enterprise, Pakarmax Electrical Sdn Bhd, Saba-Tech Sdn Bhd, and others. During the audit, no land disputes or related issues were reported by any parties at LSP CU.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.		As reported in section 4.4.1, it has been verified that the land has been legitimately owned by LSP CU since 1986. All related land acquisition documents are kept at Lam Soon HQ in Glenmarie, Shah Alam, with copies verified at the estate by the auditor. There were no issues related to land expansion with villagers, local communities, or neighboring estates. The audit team also interviewed relevant stakeholders from various estates and vendors. No land disputes or issues were reported by any parties during the audit at LSP CU.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.				
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.		As reported in section 4.4.1 of this checklist, it has been verified that the land has been legitimately owned by LSP CU since 1986. All related documentation regarding the land acquisition is kept at the company's headquarters, with copies verified at the estate by the auditor. There were no issues concerning land with villagers, the local community, or neighboring estates.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.8.2 (C)	Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.		Land conflict is not present in the area of the unit of certification. The audit team interviewed relevant stakeholders, including local leaders, transporters, contractors, vendors, and other involved parties. During the audit, no issues regarding land disputes were reported with villagers, local communities, neighboring estates, or external stakeholders at LSP CU.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant		There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to current operations. The audit team interviewed relevant stakeholders, including local leaders, transporters, contractors, vendors, and other involved parties. During the audit, no land disputes or issues were reported with villagers, local communities, neighboring estates, or external stakeholders at LSP CU.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

	requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).			☐ Not Applicable (justification required)
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).		There was no conflict or dispute over the land. This was further confirmed through interviews with relevant stakeholders. During the audit, the team interviewed various local leaders, transporters, contractors, vendors, and other involved parties. No issues regarding land disputes were reported by villagers, local communities, neighboring estates, or external stakeholders at LSP CU.	☒ 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.		Fresh Fruit Bunches (FFB) are supplied solely from Lam Soon Plantations-owned estates (LS Estate), which are RSPO certified. There are no third-party FFBs sent to the mill, and therefore, no contracts with smallholders exist. Records of current and previous period prices paid for FFB are not available, as this mill operates as an IP mill. The LSP CU is surrounded by neighboring estates, with the nearest smallholders located more than 10 km away from the LSP CU. No smallholders are situated directly adjacent to the CU.	☒ 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.		Fresh Fruit Bunches (FFB) are supplied exclusively from Lam Soon Plantations-owned estates (Lam Soon Estate), which are RSPO certified. No third-party FFBs are delivered to the mill; therefore, there are no contracts with smallholders, and no regular briefings are conducted with them.	☒ 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.		Fresh Fruit Bunches were supplied from Lam Soon Plantations-owned estates (Lam Soon Estate), which are RSPO certified. No third-party FFBs were sent to the mill; therefore, this indicator is not applicable.	☒ 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		Fresh Fruit Bunches were supplied from Lam Soon Plantations-owned estates (Lam Soon Estate), which are certified to RSPO. No third-party FFBs were sent to the mill; thus, this indicator was not applicable.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	applicable.			
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.		Interviews conducted with contractors and suppliers at the estate, including FFB transporters, grass-cutting, and garbage transporters, confirmed their understanding of their rights and obligations under the contract. Contractors confirmed the fairness of the contract terms, and payments are usually received within 7 to 10 days of invoice issuance. At the POM, interviews with transporters and service providers also confirmed that there were no issues regarding land with villagers, local communities, neighboring estates, or external stakeholders, and no land disputes were reported at the LSP CU.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
5.1.6 (C)	Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.		The contractors interviewed confirmed that payments are made in a timely manner, typically within 7 to 10 days of invoice submission. The audit team has verified the latest payment records for all contractors for the months of February, March, April, May, and June 2024.	☒ 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 weighing equipment at LSP POM is calibrated annually by the accredited company Metrology Corporation Malaysia Sdn Bhd, with the calibration valid until 7 April 2026 and 22 October 2025.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

				☐ Not Applicable (justification required)
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.		Interviews conducted with contractors and suppliers at the estate and POM—including FFB transporters, grass cutting, and garbage transporters, contractor representatives, and POM crude palm oil and palm kernel transporters—confirmed their understanding of their rights and obligations under the contract. Contractors affirmed that the contract terms are fair, and payments are usually received within 7 to 10 days of invoice issuance.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
5.1.9 (C)	The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.		The contractors interviewed confirmed that payments are made in a timely manner, typically within 7 to 10 days of invoice issuance. The audit team has verified the latest payment records for all contractors for the months of February, March, April, May, and June 2024.	☒ 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.		LSP CU invited nearby smallholders to attend a stakeholder meeting on 31 May 2025 to promote RSPO certification and improve their livelihoods. Minutes of the meeting were reviewed, which included discussions on RSPO certification and training related to enhancing smallholder livelihoods, building their capacity to improve productivity, good agricultural practices, and proper chemical usage and handling.	☒ 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.		LSP CU invited nearby smallholders to attend a stakeholder meeting on 31/5/25 to promote RSPO certification. Minutes of the meeting showed that training was provided on RSPO certification, smallholder livelihoods, capacity building to enhance productivity, good agricultural practices, and safe chemical usage and handling.	☒ 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..		LSP CU invited nearby smallholders to attend the stakeholder meeting on 31/5/25 to promote RSPO certification. Minutes of the meeting showed that training was provided on RSPO certification, good agricultural practices, and safe chemical usage and handling. So far, all growers and smallholders have preferred certification under the MSPO scheme, as it is a government requirement. Additionally, there are no smallholders directly surrounding Lam Soon Plantations; only growers are present in the vicinity.	☒ 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.		LSP CU invited nearby smallholders to a stakeholder meeting on 31/5/25 to promote RSPO certification. Minutes of the meeting confirmed that training on RSPO certification, good agricultural practices, and chemical usage and handling was provided. To date, all growers and smallholders have preferred certification under the MSPO scheme, as it is a government requirement. There are no	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

			smallholders directly surrounding Lam Soon Plantations, only growers.	☐ 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.		LSP CU invited nearby smallholders to a stakeholder meeting on 31/5/25 to promote RSPO certification. The minutes showed that training on RSPO certification, good agricultural practices, and chemical usage and handling was provided. However, all growers and smallholders have preferred MSPO certification, as it is a government requirement. Additionally, there are no smallholders directly surrounding Lam Soon Plantations, only growers.	☒ 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 CU implemented a Sustainability Statement signed by the Plantation Director on 01/09/2022. The policy emphasizes respect for human rights, promoting diversity and inclusion by providing equal opportunities without discrimination based on race, nationality, religion, or gender, and prohibits contract substitution. The statement also commits to facilitating advancement opportunities for employees, especially women, by removing barriers and respecting reproductive and maternal rights. This policy is communicated during morning muster briefings, displayed publicly on noticeboards in housing and office areas, and explained during induction courses for new workers. Interviews with a diverse group of workers—foreign, local, male, and female—across all units confirmed there is no discrimination. Workers reported equal employment opportunities and access to	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			benefits and amenities regardless of gender or nationality.	
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		Document review of the employee list showed a workforce composed of local and foreign workers, both male and female. Interviews with a sample of workers from different nationalities and genders confirmed that no discrimination occurs within the company. Based on interviews and document reviews, there is no evidence of recruitment fees being paid by migrant workers, as most workers came independently. Overtime work is also voluntary and provided without prejudice based on caste, gender, race, or nationality.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available		The company has developed Employment Procedures dated 11/05/2020, outlining the recruitment process for both local and foreign workers. These procedures include clear flowcharts covering stages from recruitment to retirement and termination. Review of sampled worker files during this audit showed that medical fitness is a required element for job selection. This is not considered discriminatory, as it is essential to ensure workers are fit for their assigned tasks. Workers' registration cards indicate "Fit for work" and do not specify any illnesses. Additionally, the company has established a Sustainability Statement dated 01/09/2022, which commits to treating all workers equally without discrimination based on nationality, caste, religion, or other factors. Medical fitness assessments are conducted prior to employment to ensure suitability for the job. Promotion Example: At the POM in January 2025, a worker was promoted from General Worker (Fireman) to Plant Supervisor (Grade III) based on performance evaluation. This promotion complied with the terms and conditions of the worker's contract.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women		Based on interviews with Gender Committee representatives and sampled female workers, pregnancy tests are not conducted in a discriminatory manner. Health screenings are only performed when legally required, specifically for women handling chemicals. Female sprayers interviewed stated that if they are found to be pregnant, they will be reassigned to lighter duties.	☒ 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.		The Sustainability Statement includes a commitment to facilitating the advancement of women at all levels within the organization and ensuring their protection. A Gender Committee has been established at the CU, with membership comprising female employees from both the mill and estate, as well as employees' wives. The organizational chart of the Gender Committee was reviewed, confirming representation from various roles within the mill and estate. The Chairman, Mrs. Habbasia, Sustainability Clerk, assigned the duties of Gender Committee coordinator to Mrs. Kartika Bram and Mrs. Ipasari from the estate, who serve as secretaries for implementation at the operational level. Meetings are held every 4 to 6 months, typically twice a year. The latest meetings took place on 29 May 2025, 23 November 2024, and 28 April 2024. Discussion points in the meeting minutes include complaints and grievances, raising awareness, identifying and addressing issues of concern, and exploring opportunities and improvements for women. No issues related to sexual harassment or violence were reported. Additionally, a WhatsApp group has been established as an alternative communication channel to monitor any concerns.	☒ 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		The Sustainability Statement, signed by the Plantation Director on 01/09/2022, is guided by commitments outlined in paragraph 2.11 of the social policy. It states that all workers will be treated equally to permanent employees in terms of wages, benefits, and accommodations. The policy also identifies under-represented groups, encouraging them to apply for training and employment opportunities within the company. Where possible, special training is provided to prepare these groups to compete on equal terms for jobs and promotions. Comparisons of sampled employment contracts and pay slips across various job scopes provide evidence that workers receive equal pay for equal work.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW)				
6.2.1 (C)	Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.		The CU maintains pay documentation in the form of monthly pay slips, with pay conditions outlined in each worker's employment contract. Samples of monthly pay slips and employment contracts were reviewed during the audit. All employment contracts, issued to both local and foreign workers, are prepared in Bahasa Malaysia. Labour laws, union agreements, and other relevant collective agreements detailing payment terms and conditions are made available in languages understood by the workers and explained during induction before contract signing. Employment contracts include details such as public holidays, paid annual leave, sick leave, employer-covered final repatriation costs, and mutual termination of contract terms. Each pay slip specifies the employee's name, pay month, income components (basic pay, overtime, reimbursements, allowances), deductions, net salary, working days, non-working days, and unpaid leave. Worker interviews confirmed their understanding of contract terms	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			and pay slip details, and they know to seek management clarification if needed. It was verified that payments comply with the Minimum Wages Order 2024 and Sabah Labour Ordinance (Amendment) Act 2025. Labour management is supported by the Quarto-Lintramax System database, which is used to extract and reconcile pay slips, checkroll data, employee profiles, and monthly account reconciliations.	
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 signed between CU management and employees include detailed terms covering contract duration, place of work, job specifications, working hours and overtime, designated public holidays, annual leave, medical expenses, sick leave, maternity leave, employee and employer obligations, payment of foreign workers' levy by the employer, passport and PLKS fees paid by workers, allowances, insurance schemes, EPF for local workers, salary deductions, mutual termination, contract extensions, and more. There is clear evidence that contracts are prepared in languages understood by the workers and explained to them before signing. Worker remuneration is either daily or piece-rate, in line with the Sabah Labour Ordinance and the company's Decent Living Wages (DLW) policy for the tasks performed. Payslips are issued monthly, by or before the 7th, containing the following details: employee name, ID, IC/passport number, pay month, work description, normal hours, overtime pay, piece-rate work, public holiday pay, deductions (SOCSO, EIS, KSWP), average daily rate, total income, total deductions, and net pay. It was confirmed that no workers have family members assisting them in their work. Interviews with a representative sample of local and foreign workers—including sprayers, manurers, harvesters, general workers, and mill workers—showed they generally understand their employment agreements and payslips. Samples of employment	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			contracts and payslips from January, March, April, and May 2025 were reviewed during the audit.	
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 employment contracts reviewed provide clear evidence of compliance with applicable labor laws, including the Sabah Labour Ordinance and the Minimum Wages Order 2024. The contracts detail regular working hours, overtime payment rates in accordance with legal requirements (1.5x on normal days, 2.0x on rest days and public holidays), permissible salary deductions, and entitlements such as annual leave, sick leave, and maternity leave. The system for recording regular working hours and overtime is implemented through daily attendance and work record forms, which are signed by the workers, verified by the Assistant Manager, and approved by the Estate Manager. These records, reviewed during the audit for the period of January to May 2025, were properly maintained and consistent with the workers' payslips. No discrepancies were observed between documented working hours and worker feedback, indicating transparency and accuracy in wage calculation and timekeeping.	☒ 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.		Workers' housing is provided free of charge. Weekly inspections of the workers' quarters are conducted by designated staff using a standardized Housing Inspection Report. Any issues identified during these inspections are recorded in the checklist, with corresponding corrective actions taken promptly by management. Sampled inspection records from March, April, and May 2025 were reviewed during the audit. The cleanliness and upkeep of the housing compounds and workers'	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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		houses were found to be satisfactory. The houses were in reasonable and habitable condition, each typically containing 2 to 3 bedrooms. Water supplied to the workers' quarters is sourced from a treated water catchment. To ensure continued water availability and prevent negative impacts on other users, the management monitors water quality through sampling conducted quarterly. Water quality monitoring, performed by Permulab Sdn. Bhd., shows that water quality at all monitoring points generally meets Class IIB of the National Water Quality Standard for Malaysia (NWQSM). Estate management has proactively undertaken repairs and upgrades to worker housing in compliance with national laws, focusing particularly on the safety and durability of wooden houses. Approved CAPEX budgets for 2025 and 2026 include replacement of old wooden quarters with permanent concrete units, with 20 units completed in 2025 and 4 units planned for 2026. The estate features a Community Learning Centre (CLC), staffed by six qualified teachers, serving approximately 245 students, primarily children of migrant workers. The CLC collaborates with the Indonesian Consulate to provide structured basic education in a safe environment. Additionally, a crèche named 'Creche Ayah' is available to care for workers' children during working hours. Medical treatment is provided free of charge to all workers and their dependents through the estate clinic. A private clinic, Klinik Ung Lahad Datu, serves as the Visiting Medical Officer (VMO) and conducts regular visits. Documented VMO visits on 27/05/2025 and 13/06/2025 included medical check-ups and routine health services for workers.	

6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.		The estate provides access to affordable and adequate food through a sundry shop operated under a valid tenancy agreement with all necessary licenses in place. Essential groceries, including rice, flour, sugar, cooking oil, and frozen meats, are available at clearly displayed and regularly monitored prices. Worker feedback confirms prices are fair considering the estate's location. The POM canteen, managed under a current contract, complies with food safety regulations. The main cook is certified, and staff are vaccinated against typhoid with records maintained. The canteen is clean and hygienic, equipped with proper facilities and PPE, with regular management inspections ensuring ongoing compliance.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.2.6	A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist		The CU ensures a decent living wage for both local and foreign workers based on a prevailing wage assessment. This covers salary, paid leave, medical and retirement benefits, bonuses, meals, housing, healthcare, recreational facilities, education, creche, and welfare. Due to the absence of an official DLW, the management conducted a Prevailing Wage Assessment for December 2024. Review of pay slips confirmed compliance with the Minimum Wage Order 2022 and the company's DLW standards, with average wages of RM 2,498.52 for local workers and RM 2,509.25 for foreign workers.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.2.7	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day		The CU employs full-time check-roll workers, including foreign workers on fixed-term contracts, extendable based on immigration permits. Interviews and document reviews confirm that all core	☒ Conform ☐ Major Nonconformity

	labour is limited to jobs that are temporary or seasonal		activities, such as harvesting, are performed exclusively by full-time, legally employed workers.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel				
6.3.1 (C)	A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented		The Sustainability Statement dated 01/09/2022 (para 2.9) includes a clear recognition of freedom of association and the right to collective bargaining, communicated to all workers during morning muster. This is implemented through the Employee Committee Representative (ECR), which includes both POM and estate management, providing a platform for workers to voice concerns. Meetings are held quarterly, and interviewed workers confirmed their awareness of their 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 made available upon request		Although no official trade unions operate within the CU, workers have appointed representatives to the Employee Committee Representative (ECR), which includes both worker and management members from the estate and POM. This structure facilitates open communication, allowing workers to voice concerns and participate in decision-making. Meeting minutes were documented and verified, with recent meetings held on 18/03/2025, 12/12/2024, 02/10/2024, 21/06/2024, and 15/03/2024. Representatives come from diverse job scopes, ensuring broad worker representation.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers		Interviews with workers' representatives confirmed that the association was formed without management interference, and all representatives were freely elected by the workers.	☒ 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's Sustainability Statement (01/09/2022) includes a policy prohibiting child labour and ensuring child safety. It complies with national age regulations and is communicated to internal and external stakeholders.	☒ 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		Employment records, including Employee Master Lists and personal details, confirmed all workers are above the minimum age of 18. The computerized Quarto-Lintramax system verifies and screens employee ages during data entry.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

6.4.3 (C)	Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.		Based on document review, interviews, and observations, there is no evidence of employment below 18 years. Verification of worker particulars and birth dates in the master lists, along with staff and worker interviews and field observations, confirm all employees are above the minimum age.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
6.4.4	The unit of certification demonstrates communication about its 'no child labour policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live		The company's Sustainability Statement is publicly displayed on noticeboards and communicated to workers during morning musters. Stakeholders, including local communities and neighboring plantations, confirmed their awareness and understanding of the policy. Additionally, the CU requires all contractors, suppliers, and vendors to sign a Labour Policy Pledge, affirming their commitment to comply with the Vendor Code of Business Conduct and the company's Sustainability Statement.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 6.5: Policies and procedures in place to protect workers' rights.				
6.5.1 (C)	A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce		The company's Sustainability Statement dated 01/09/2022 establishes a zero-tolerance policy for sexual harassment and abuse, with a commitment to resolving conflicts without violence. The policy was communicated to workers during morning briefings on the following dates: LSPOM: 15/05/2025, 22/12/2024 KL/KK Estate: 11/12/2024, 09/06/2025 Interviews with female local workers confirmed their awareness and understanding of the policy. A Gender Committee has been established to organize related	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			activities and ensure the policy and procedures for handling social issues, including sexual harassment, are clearly communicated at all workforce levels, fostering a safe and respectful work environment.	
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's Sustainability Statement dated 01/09/2022 includes protection of workers' reproductive rights, recognizing their right to reproductive health and decision-making. The policy was communicated during morning briefings on: • LSPOM: 15/05/2025, 22/12/2024 • KL/KK Estate: 11/12/2024, 09/06/2025 Interviews with female workers confirmed their understanding and awareness of these rights, which are also reinforced through Gender Committee meetings. Female workers are entitled to 98 days of paid maternity leave, and pregnant employees are assigned lighter duties to avoid chemical exposure. The policy ensures employees can make informed family planning decisions free from discrimination, coercion, or violence.	☒ 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 estate conducted assessments for new mothers with infants under 24 months, in consultation with the Gender Committee. Verification of the assessment report and interviews indicated no specific needs, as babies are cared for in nurseries and most were not breastfed. A sample case of a new mother (General Worker) dated 21/05/2025 at KK Estate showed her need for sufficient time to take her newborn for regular clinic check-ups, which was accommodated. Adequate space and paid breaks are provided to enable mothers with infants under 24 months to breastfeed or express and store milk privately.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

6.5.4	Grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.		The company established a sexual harassment reporting flowchart dated 30/11/2021, ensuring anonymity and protection for complainants when requested. The procedure includes clear timelines for each stage, and a complaint panel is in place to handle cases. The grievance mechanism is communicated during morning musters, Gender Committee meetings, and stakeholder consultations. Interviews with sampled female workers and the Gender Committee chairman confirmed their awareness of the procedure, with no cases of sexual harassment or violence reported.	☒ 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 review, worker interviews across job scopes, and observations, there is no evidence of forced labor at the estate: • **Document retention:** All foreign workers keep their own passports, except during work permit renewals when passports are temporarily submitted to immigration. • **Recruitment fees:** No recruitment fees are charged as workers are hired on a walk-in basis; foreign workers confirmed no fees were paid. • **Contract substitution:** Workers are aware of their job roles before joining, with no contract substitution reported. • **Overtime:** No involuntary overtime was reported. • **Freedom to resign:** Workers can resign by submitting a notice as per contract terms, with no restrictions. • **Termination penalties:** No penalties are imposed for early contract termination. • **Debt bondage:** No evidence of debt bondage. • **Wage withholding:** No wages are withheld, confirmed by contracts, pay slips, and interviews.	☒ 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 special labour policy for foreign workers dated 16/05/2024, signed by the Plantation Director. The policy ensures fair treatment in recruitment, work conditions, and provision of decent living standards, with no contract substitution. A three-month post-arrival orientation program is conducted for all foreign workers. The estate follows a specific procedure and flowchart for foreign worker employment, ensuring compliance with the Minimum Wage Order Malaysia. Orientation covers language, safety, regulations, and culture. Decent housing is provided to all foreign workers.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 6.7: Appropriate health and safety measures are in place.				
6.7.1 (C)	The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded		Estate and Mill Managers are appointed as responsible persons for safety and health, serving as Chairmen of the OSH Committee. They delegate OSH coordination to Assistants or medical assistants for implementation. Official appointment letters have been issued to all executives. The OSH Committee, established for 2024-2026, includes the Estate/Mill Manager as Chairman and the Mill Engineer/Assistant Manager as Secretary. Regular meetings are held quarterly, with agendas covering previous minutes, arising matters, accident reports, workplace inspections, and safety programs. Records of these meetings confirm consistent worker engagement and satisfactory maintenance of safety practices.	☒ 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 Emergency Response Plan (ERP), last revised on 25/04/2025 (Revision 02), covers procedures for spillage, fire, accidents, poisoning, flooding, animal attacks, COVID-19 safety, earthquakes, and environmental emergencies such as effluent bund failure and chemical spills. Mill workers interviewed demonstrated awareness of emergency procedures. First aid boxes, inspected on 16/06/2025 (LSPOM) and 20/06/2025 (LSE), are fully stocked with unexpired contents and regularly maintained by the Health Assistant. Emergency Response Team (ERT) members' contacts, along with emergency services numbers, are displayed on notice boards. Certified first aid training certificates dated 20/12/2025 were sighted for six designated personnel. Recent fire drills were conducted on 20/04/2025 at LSPOM and 10/06/2025 at LSE. Accident records show no reported incidents since the last audit at both sites.	☒ 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.		Training and briefings are regularly provided to workers to ensure safe working practices and adherence to precautions. Methods include on-the-job training, meetings, and briefings tailored to job roles. Staff such as storekeepers, mill workers, harvesters, pruners, sprayers, and fertilizer handlers have been trained on chemical hazards and safe usage. During site visits to chemical stores and work areas, sanitation facilities for PPE and clothing washing were available. Observations confirmed workers at harvesting, manuring, spraying, loading ramp, boiler, and bioenergy plant areas were using appropriate PPE as identified in the estates' HIRARC assessments. PPE issuance records are well-maintained and regularly updated. Sanitation facilities for pesticide applicators were available near the chemical store. After spraying activities, workers changed out of their PPE, washed, and changed into personal clothing at the designated area. During site inspections at the estate and mill workshops, most moving and rotating machinery were equipped with proper machine guarding and adequately covered, ensuring compliance with safety requirements.	☒ 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		Lam Soon CU provides medical care to both estate and POM workers through an on-site estate clinic. Cases requiring advanced medical attention are referred to Lahad Datu Hospital. All workers, both local and foreign, are covered under SOCSO, as verified through the *Jadual Caruman Bulanan* for May 2025.	☒ 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		For Lam Soon Estate, all accidents were recorded and submitted to DOSH using the JKKP 8 form. The latest submission on 03/01/2025 reported zero accident cases for the year 2024. For Lam Soon POM, the latest JKKP 8 submission dated 06/01/2025 also recorded zero accident cases for 2024, with four reported cases of ill health.	☒ 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 CU has implemented an Integrated Pest Management (IPM) Plan dated 10/01/2025, with regular monitoring to ensure sustainable pest control. The plan aims to: • Minimise pest threats to palms, worker safety, and surrounding communities • Prevent yield loss from pest damage • Encourage biodiversity and ecological balance through biological control • Promote early pest detection and timely intervention Biological controls include planting beneficial species like *Turnera subulata*, *Cassia cobanensis*, and *Antigonon leptopus* to attract natural predators. The IPM Plan is incorporated into agronomist reports for continuous oversight. Records of pesticide usage and reduction trends are maintained, and periodic training is provided to strengthen staff competency in IPM practices.	☒ 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.		A plan to prevent and monitor the spread of species listed in the Global Invasive Species Database and CABI.org is not applicable at the visited estate. None of the species referenced in these databases are present or used in the CU's Integrated Pest Management (IPM) practices.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with ap prior approval of government authorities. [For NI to define process]		It was confirmed that no open burning or use of fire is practiced for pest control at the estates.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.				
7.2.1 (C)	Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.		The justification for pesticide use is well documented, with selection based on specificity to target pests, weeds, or diseases, as outlined in the Oil Palm Agricultural Policy manual. This includes weed control, pest management, and nursery practices. Each estate maintains a chemical register detailing the purpose, target pest, hazard signage, and both trade and generic names of chemicals. The latest update was in January 2025. Chemicals used include: • **Class II**: Amine 2,4-D • **Class III**: Glyphosate isopropylamine, Sodium chlorate, Glufosinate ammonium, Triclopyr butoxy, Metsulfuron methyl, Cypermethrin, Triclopyr butoxy ethyl ester, Bayfolan	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			• **Class IV**: Canyon 20G	
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.		Both estates maintain comprehensive records on pesticide use, including active ingredients, LD50 values, application areas, total quantities used, number of applications, and dosage per hectare. Pesticides are applied only when justified, with usage tracked through bin cards, program sheets, chemical registers, field cost books, and progress reports. Documented spraying and rat baiting programs are in place, and all records were available and verified during the assessment.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.3 (C)	Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.		The estates have implemented a long-term chemical reduction plan, with monthly monitoring of pesticide usage to support gradual reduction. Paraquat has been eliminated and replaced with safer alternatives like Glyphosate and Glufosinate Ammonium. To further reduce reliance on chemicals, the estates have adopted an IPM Plan. During the site visit, the presence of beneficial plants along estate roads and in immature areas, as well as barn owl boxes for biological rat control, were observed.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.		There was no evidence of prophylactic pesticide use, except in immature and young fields where diluted cypermethrin is applied as per SOPs to manage pests such as Rhinoceros Beetle.	☒ 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		The CU uses only pesticides officially registered under the Pesticides Act 1974 (Act 149) and compliant with USECHH Regulations 2000. The January 2025 chemical register showed all	☒ Conform ☐ Major Nonconformity

	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 application to the specific outbreak.		pesticides used are Class II, III, or IV. No Class 1A or 1B pesticides, nor those listed under the Stockholm or Rotterdam Conventions, were used.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.2.6 (C)	Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		The CU maintains records confirming that pesticides are handled and applied only by trained personnel, following Safety Data Sheets (SDS) and relevant guidelines. Staff and workers—including storekeepers, sprayers, manurers, and rat bait applicators—have received training on chemical hazards and safe usage. Pesticide application is guided by the Manual Oil Palm Agricultural Policy, Safe Work Procedures (SWP), Chemical Health Risk Assessment (CHRA), and SDS from manufacturers. These documents include a chemical register listing purposes, hazard signage, and trade and generic names, all of which are communicated to workers during SDS training sessions. SDS are readily available at all relevant sites, such as chemical stores, lubricant stores, and laboratories. Training and refresher	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			courses ensure ongoing understanding of chemical safety. Recent training sessions were conducted on 18/02/2025 at KL Estate and 13/01/2025 at KK Estate.	
7.2.7 (C)	Storage of all pesticides is in accordance with recognised best practices.		The CU stores all pesticides in compliance with legal requirements, including the Occupational Safety and Health Act 1994 and the Pesticides Act 1974, following manufacturer SDS guidelines. Chemical and fertilizer stores are secure, ventilated, and managed only by authorized personnel. Chemicals are properly segregated, and fertilizers are well stacked. Stores are equipped with showers, wash areas, PPE storage, and clear safety signage. A designated premixing area with eye wash facilities is available. Wastewater from washing containers and PPE is collected in storage tanks for reuse, preventing soil contamination. Triple rinsing of empty pesticide containers is consistently practiced in a three-level concrete pond. Containers are punctured and disposed of responsibly to avoid environmental and health risks. Chemical information, including hazards and trade names, is provided in English and Bahasa Malaysia and understood by workers. Safety information is communicated via morning musters and pictorial posters. Training records confirm regular chemical handling sessions, especially for sprayers, to ensure proper knowledge of usage and hazards.	☒ 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.		Except for some empty agrochemical containers reused for premixing pesticides before field application, all other empty containers were triple rinsed, pierced, and stored as scheduled waste (SW 409). These containers are then disposed of by a DOE-licensed contractor.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

				☐ Not Applicable (justification required)
7.2.9 (C)	Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.		Aerial pesticide spraying is not practiced in either estate. This was confirmed through interviews with executives, field staff, and workers, and no such activity was observed during the site inspection.	☒ 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.		Lam Soon CU conducts annual medical surveillance for pesticide handlers. In 2025, 90 workers were examined at Klinik Ung Lahad Datu by OHD Dr. Fesya Heeza Binti Mansor. All were fit to handle chemicals, though 11 workers were found with underlying conditions. Follow-up actions included dietary advice, prescribed medication, and monthly monitoring by the estate medical 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.		Monthly medical screening for female workers handling chemicals was conducted, with the latest results showing no pregnancies. During site visits, interviewed female chemical handlers confirmed they were neither pregnant nor breastfeeding. Additionally, both estates have no workers under 18 years old.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner				
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		The CU has a documented "Waste Management Plan for 2025" to minimize pollution. Waste types and actions include: • Scheduled Waste: Disposed by DOE-approved contractors • EFB: Collected for mulching • Scrap Iron: Sold to scrap buyers • Used Tires: Recycled by suppliers • Domestic Waste: Managed by external service providers	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		The organization maintains procedures for managing scheduled waste with regular verification: **LSPOM:** • Scheduled waste inventory updated monthly; latest update on 19/05/2025 covering waste codes SW102, SW305, SW306, SW322, SW409, SW410, and SW429. • Latest disposal consignment note dated 23/05/2025, collected by Legenda Bumimas Sdn Bhd for the same waste codes. **LSE:** • Scheduled waste inventory updated monthly; latest update on 10/05/2024 for waste codes SW102, SW305, SW404, and SW410. • Latest disposal records dated 23/05/2025 collected by Legenda Bumimas Sdn Bhd for SW102, SW410, and SW305. SW404 was collected by Sedafiat Sdn Bhd on 29/04/2025.	☒ 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.		Domestic waste generated from workers' quarters is disposed of by a contractor, Fajar Pagi, at the designated landfill site called Tapak Pembuangan Sampah Bangkaruan, Jalan Silam Lahad Datu, which is located approximately 70 kilometers from the estate. Approval for this disposal site is confirmed by the letter with reference number MDLD.200-2/3 klt 5 dated 28 May 2018. Waste collection is conducted three times a week, on Monday, Wednesday, and Friday. The "Rekod Sampah 2025" for May records a total of 19.90 metric tonnes of domestic waste disposed during that month.	☒ 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 continues to implement good agricultural practices as outlined in its Standard Operating Procedures (SOPs) to manage soil fertility, optimize yield, and minimize environmental impacts. The maintenance of soil fertility is guided by the Manual Oil Palm Agricultural Policy – Manuring. Fertilizer application, which is crucial for maintaining soil fertility, is carried out based on recommendations provided by Applied Agricultural Resources Sdn. Bhd. These recommendations are made annually based on foliar sampling. The fertilizer application program is closely monitored through program sheets, bin cards, field cost books, and Fertilizer Quality Assessments conducted by Applied Agricultural Resources Sdn. Bhd.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.		Periodic foliar and soil sampling have been carried out by Applied Agricultural Resources Sdn. Bhd. (AAR), and the results have been used as part of the basis for fertilizer input recommendations. These periodic tissue and soil samplings are essential to monitor changes in nutrient status over time. Annual foliar sampling is conducted to assess key nutrients, specifically nitrogen (N), phosphorus (P), potassium (K), magnesium (Mg), calcium (Ca), and	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement

			boron (B). Both foliar and soil sampling and analysis are conducted concurrently. As of now, the sampling activities have been completed as follows: at KL and KK Estate, foliar sampling and analysis were conducted in July 2024, while soil sampling and analysis were conducted in August 2024.	☐ 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.		The estates continue to implement nutrient recycling by pruning palm fronds for natural decomposition and applying empty fruit bunches (EFB) at 45 tons per hectare annually in single layers between palms. Records and field maps of EFB applications were verified. In 2024, KK Estate applied 4,564.98 MT over 114.12 ha, and KL Estate applied 17,834.58 MT over 445.86 ha. As of May 2025, KK Estate applied 4,326.42 MT on 108.16 ha, and KL Estate applied 12,784.52 MT on 319.61 ha. At KK Estate, liquid palm oil mill effluent (POME) was applied via furrow irrigation over 321 ha at 15 MT/ha in palm interrows. A total of 7,464.50 m^3 was applied in 2024, with an additional 2,891.11 m^3 applied by May 2025.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.4.4	Records of fertiliser inputs are maintained.		All estates maintain comprehensive fertilizer records, which were made available for audit verification. In 2025, fertilizers such as AS/AC, MOP, and ERP/BRP were applied to mature palms, while OP Com 50B, NPK 44, ERP, AS, and Fertibor were used for newly mature and immature palms. The average application rate ranged from 10.50 to 12.00 kg per palm. Fertilizer use is monitored and aligned with recommendations from Applied Agricultural Resources Sdn. Bhd. (AAR), with records maintained in Fertilizer Application Record Books and Bin Cards. In 2024, KK Estate applied 4,241.47 MT and KL Estate 2,775.75 MT of fertilizer in mature areas. Up to May 2025, applications were approximately 1,649.70 MT in KK Estate and 984.68 MT in KL	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

			Estate.	
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.		Lam Soon Plantations CU has no fragile or marginal soils. A soil survey conducted by Param Agricultural Soil Surveys (M) Sdn. Bhd. in February 2017 characterized the soils for management in oil palm cultivation and identified no problem soils. The soil composition in KK Estate includes Dagat (4.1%), Stom (1.1%), Gol (6.9%), Kumansi (41.8%), Talisai (0.6%), Kekura (0.3%), Tok Yong (3.0%), Lundang (14.1%), Medang (5.9%), Lating (17.5%), Tepus (2.0%), and Non-Agricultural Land (2.7%). In KL Estate, soils comprise Jempol (1.4%), Stom (8.8%), Gol (7.5%), Kumansi (54.9%), Kuah (2.7%), Kekura (3.9%), Tok Yong (1.1%), Lundang (3.3%), Buran (11.5%), Lating (0.7%), and Non-Agricultural Land (4.2%). No problematic soils such as podzols or acid sulfate soils were found. Maps at a 1:250,000 scale and legal documents were maintained and verified.	☒ 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.		Auditors verified via GlobalForestWatch, Google Maps, estate maps, and site visits that no extensive replanting on steep terrain or new area development occurred at both estates.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

7.5.3	There is no new planting of oil palm on steep terrain.		Auditors verified via GlobalForestWatch, Google Maps, estate maps, and site visits that no extensive replanting on steep terrain or new area development occurred at both estates.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.				
7.6.1 (C)	To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils including steep terrain, are taken into account in plans and operations.		There were no marginal or fragile soils, as confirmed by site visits and the soil survey report from Param Agricultural Soil Surveys (M) Sdn. Bhd. dated February 2017. Only 2% of the total area consisted of steep terrain.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.		Extensive planting on marginal or fragile soils is not practiced within the estate, as no fragile soils have been identified on the premises. During replanting planning, careful consideration is given to land terrain, drainage, and road systems. The process follows the Manual Agricultural Policy on best practices for new planting and replanting of oil palm, dated March 2017, ensuring compliance with industry standards and guidelines.	☒ 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		Soil maps and topography information were utilized in planning replanting activities, with detailed soil series and topography documented in section 7.5.1. The estate considered factors such as land terrain, drainage, and road systems during the planning process. To ensure best practices, reference was made to the Manual Agricultural Policy on new planting and replanting of oil palm dated March 2017, which provides guidelines for optimal planting practices and supports successful replanting efforts.	☒ 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 verified through www.globalforestwatch.com, Google Maps, estate maps, and site visits that no new planting or development has occurred within the CU. Additionally, this is not applicable as no peat soils exist in either KL or KK Estates. This is supported by soil maps prepared by Param Agricultural Soil Surveys (M) Sdn. Bhd. in February 2017, with no peat areas observed during the site inspections.	☒ 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 requirement is not applicable as no peat soils are present in either KK or KL Estate. This is supported by soil maps prepared by Param Agricultural Soil Surveys (M) Sdn. Bhd., dated February 2017, and confirmed through site visits where no peat areas were observed.	☒ 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		This requirement is not applicable as no peat soils are present in either KK or KL Estate. This is supported by soil maps prepared by Param Agricultural Soil Surveys (M) Sdn. Bhd., dated February	☐ Conform ☐ Major Nonconformity

	(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).		2017, and confirmed through site visits where no peat areas were observed.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☒ Not Applicable (justification required)
7.7.3 (C)	Subsidence of peat is monitored, documented and minimised.		This requirement is not applicable as no peat soils are present in either KK or KL Estate. This is supported by soil maps prepared by Param Agricultural Soil Surveys (M) Sdn. Bhd., dated February 2017, and confirmed through site visits where no peat areas were observed.	☒ 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 requirement is not applicable as no peat soils are present in either KK or KL Estate. This is supported by soil maps prepared by Param Agricultural Soil Surveys (M) Sdn. Bhd., dated February 2017, and confirmed through site visits where no peat areas were observed.	☒ 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		This requirement is not applicable as no peat soils are present in either KK or KL Estate. This is supported by soil maps prepared by Param Agricultural Soil Surveys (M) Sdn. Bhd., dated February 2017, and confirmed through site visits where no peat areas were observed.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

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

	Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]			
7.7.6 (C)	All existing plantings on peat are managed according to the *'RSPO Manual on Best Management Practices (BMTs) for existing oil palm cultivation on peat', version 2 (2018)* and associated audit guidance.		This requirement is not applicable as no peat soils are present in either KK or KL Estate. This is supported by soil maps prepared by Param Agricultural Soil Surveys (M) Sdn. Bhd., dated February 2017, and confirmed through site visits where no peat areas were observed.	☒ 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 requirement is not applicable as no peat soils are present in either KK or KL Estate. This is supported by soil maps prepared by Param Agricultural Soil Surveys (M) Sdn. Bhd., dated February 2017, and confirmed through site visits where no peat areas were observed.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.				

7.8.1 (C)	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: 7.8.1a. The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. 7.8.1 b. Workers have adequate access to clean water		The CU Water Management Plans for 2025 were reviewed. Key initiatives include rainwater collection, site water usage monitoring, contingency plans for dry spells or water shortages, and actions to address water pollution. Workers are advised to conserve water through briefings during muster. Rainfall records from rain gauge readings for the past 10 years are maintained to support water management efforts. For LSPOM, river water quality monitoring upstream was conducted by Dynakey Laboratories Sdn Bhd, with the latest analysis dated 30 April 2025. LS Estate also conducts river water analysis through the accredited KDC Laboratory. The latest tests were carried out from 26 to 29 November 2024 at five points—including upstream and downstream locations, a pond, and the nursery—across two rivers (Sg. Kam Chong and Sg. Sandau) within the CU. At LSP CU, drinking water is supplied through a water treatment plant located at LSPOM. Treated water for domestic use is sent quarterly to the accredited Permulalab Sdn Bhd for quality testing, as per the Company's Water Management Plan. Recent test results from 20 March 2025 show the treated chlorinated water meets safety standards, with E. coli and total coliform levels below 1.0, ammoniacal nitrogen at 0.119 mg/L, mercury and aluminium undetectable (<0.0008 mg/L and <0.007 mg/L respectively), and turbidity at 0.430. Total domestic water usage for 2024 was recorded at 192,619,300 liters.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

7.8.2 (C)	Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).		Protection of watercourses and wetlands at Lam Soon Estate has been verified, with riparian buffer zones clearly identified and demarcated. No chemicals or fertilizers are applied within these zones. In some areas, vetiver grass has been planted along riverbanks to aid stabilization. The estate follows detailed guidelines outlined in the Lam Soon SOP to ensure the maintenance and restoration of these buffer zones, safeguarding watercourses and wetlands effectively.	☒ 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.		LSPOM has submitted quarterly discharge quality reports to the DOE for mill effluent. The analysis, conducted by Dynakey Laboratories Sdn Bhd, confirmed compliance with the required standards.	☒ 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.		Mill water use per tonne of FFB is monitored and recorded	☒ 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.		A fossil fuel efficiency improvement plan is incorporated into the Environmental Aspect and Impact activities report for 2025, including the Environmental Aspect Identification Summary, Environmental Impact Evaluation Summary, and Fossil Fuel Reduction Plan.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

			At LSPOM, the Fossil Fuel Reduction Plan for 2025 focuses on reducing diesel usage by ensuring regular maintenance of boilers and machinery to maintain optimal performance. Diesel consumption is monitored closely, and workers receive training on reducing fuel and diesel usage, particularly for power generation. At LSE, the Fossil Fuel Reduction Plan for the financial year 2025 has been established and is actively monitored. The plan aims to reduce diesel consumption by ensuring regular maintenance of vehicles to keep them operating at optimal levels. Diesel usage is tracked, and workers receive training on fuel optimization to further reduce consumption.	☐ 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 CU utilized the RSPO Palm GHG version 4.0 Calculator to measure greenhouse gas emissions. The verified input data and resulting report were submitted to RSPO on 17/06/2025. Please refer to Appendix 2.0 for the detailed GHG report.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.10.2 (C)	Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).		Auditors verified through www.globalforestwatch.com, Google Maps, estate maps, and site visits to the sampled estate areas. Based on these observations, it was confirmed that there were no new plantings or developments at Lam Soon CU. Therefore, the RSPO GHG Assessment Procedure for New Development is 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 Environmental Impact and Aspect Assessment and Pollution Prevention Plan were used to identify greenhouse gas (GHG) emissions, including those from land conversion, crop sequestration, fertilizer use, N_2O emissions from fertilizer, fuel consumption, and peat oxidation. Plans to reduce or minimize these emissions are in place. Significant pollutants from both the mill and estate have also been identified in the Pollution Prevention Plan for FY 2025.	☒ 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.		In accordance with the Oil Palm Agricultural Policy and Sustainability Statement, land preparation for new planting or replanting does not involve burning, complying with environmental best practices and national legal requirements. Site visits to the replanting areas at KL and KK Estates during the assessment confirmed that no open burning took place.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.		Each operating unit within the CU has established its own Fire Fighting Team as part of the Emergency Response Team to handle fire emergencies and implement fire prevention and control measures. Annual fire drills are conducted regularly, with the latest held on 20/04/2025 at the Palm Oil Mill and on 10/06/2025 at KL and KK Estates.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		Each operating unit within the CU engages with adjacent stakeholders on fire prevention and control measures during external stakeholder meetings, with the latest held on 21/05/2025.	☒ 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.		Auditors verified through www.globalforestwatch.com, Google Maps, estate maps, and site visits to all estates. Based on the findings, it was confirmed that no land clearing has occurred since 2005.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.12.2 (C)	HCVs, HCS forests and other conservation areas are identified as		A report titled “High Conservation Value (HCV)/Biodiversity Assessment of the estates Lam Soon Plantations” was provided during the audit. Conducted by S.K Yap Forestry and Landscape	☒ Conform ☐ Major Nonconformity

	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.		Advisor Services, the initial study was completed in May 2017 and amended in January 2018. It covered all HCV/biodiversity areas within and adjacent to the Lam Soon Plantations CU. The assessment concluded that no High Conservation Value sites exist within the estate boundaries due to the CU being entirely surrounded by other oil palm plantations. However, management has maintained a 122-hectare buffer zone as a conservation area. A further HCV assessment, dated 10 April 2019 and prepared by the Sustainability Department of Lam Soon Plantations Sdn Bhd, was reviewed by S.K Yap. This update covered KK and KL Estates (totaling 5,682.6 ha) to identify sites with high conservation attributes in line with RSPO and MSPO certification requirements. The assessment found that, despite clearing natural vegetation during plantation establishment, the estates retain good biodiversity in flora and fauna. Notably, the estates contain water catchment areas and small rivers, with riparian buffer zones designated as HCV 4.2 for erosion control. These riparian buffer zones are the primary HCV features present in both KK and KL Estates.	☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)
7.12.2 b)	Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		Not Applicable as there is no new land clearing.	☐ 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		Not Applicable as this is MYNI	☐ Conform ☐ Major Nonconformity ☐ Minor Nonconformity

	rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies. PROCEDURAL NOTE for 7.12.3: There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.			☐ Opportunity for Improvement ☒ Not Applicable (justification required)
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		The HCV Assessment (Clause 5 – HCV Identification findings) found that Lam Soon Plantations Sdn Bhd has good biodiversity representation in both flora and fauna within the CU, and maintains these areas as HCV Management Areas. Common fauna observed include beavers, kingfishers, and foxes. A 2025 HCV Management Area Monitoring Plan was prepared by Jimi Kalabon and verified by Mosdi bin Latif on 03/05/2025. Although no Rare, Threatened, or Endangered (RTE) species were identified within the CU, management has designated several conservation areas: • Point 1 – Pond • Point 2 – Orchard	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

	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).		• Point 3 – KL2019C (Buffer Zone) – 122 ha • Point 4 – KK2018A (Unplanted area) – 2.76 ha • Point 5 – Office compound The CU runs regular training to educate employees on RTE protection and buffer zone conservation, with the latest session conducted on 29/05/2025. Regular patrols of HCV areas, estate boundaries, and access points are carried out, with monitoring records available for KL Division. Site visits confirmed no pesticide spraying in buffer zones, with intact yellow 'X' markings and signage such as "No Hunting," "No Fishing," and "Buffer Zone" clearly displayed. Overall, while no RTE species or HCVs are directly impacted by plantation or mill operations, appropriate conservation measures and monitoring plans are in place and actively implemented.	
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 no rights of local communities identified in the HCV assessment conducted in 2017.	☒ 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.		All Rare, Threatened, or Endangered (RTE) species are strictly protected at Lam Soon Plantations CU, regardless of their identification in the High Conservation Value (HCV) assessment. To maintain ongoing awareness, training on HCV, buffer zone management, and RTE species protection was conducted on 29 May 2025, educating the workforce on the importance of conservation and the consequences of non-compliance. The company enforces strict disciplinary measures, aligned with internal policies and national legislation, against anyone involved in the capture, harm, collection, trade, possession, or killing of RTE species. This policy and its legal implications were clearly communicated during the training, with visual reminders posted at the roll-call area and main gate. In compliance with legal obligations, management commits to promptly notifying relevant authorities if any RTE-related violations occur. A formal statement dated 8 May 2017 also reinforces that disciplinary actions will be taken under the Enakmen Pemeliharaan Hidupan Liar 1997 (Wildlife Conservation Enactment 1997).	☒ 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.		A Management Plan titled “HCV Monitoring Plan” for 2025 is in place at Lam Soon Estate. Scheduled monthly monitoring of buffer zones and estate boundaries has been consistently conducted, with records from January to May 2025 for both KK and KL Divisions available for review. No Rare, Threatened, or Endangered (RTE) species were detected during this period. Monitoring results have been integrated into the ongoing HCV Monitoring Plan to support continuous improvement. Additionally, Lam Soon Plantations CU continues to implement biodiversity conservation initiatives, including staff and public awareness programs, dissemination of biodiversity information via the Lam Soon website, and installation of informative signage at key estate locations.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

7.12.8 (C)	Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.		There are no rights of local communities identified in the HCV assessment conducted in 2017.	☒ Conform ☐ Major Nonconformity ☐ Minor Nonconformity ☐ Opportunity for Improvement ☐ Not Applicable (justification required)

6. Summary of Audit Findings

6.1 Positive and noteworthy findings

No.	Positive finding
1	Shown good commitment and cooperation during the audit.
2	All documentation are retrieve in timely manner
3	Sample interviewers with employees and workers are well aware on the RSPO implementation

6.2 Non-conformities and opportunities for improvement

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

7. Nonconformity(ies) Issue in this Audit

Indicator Number	2.2.2
Nonconformity Number	MZK 01 2025
Nonconformity Category	☐ Major Nonconformity ☒ Minor Nonconformity
Recurring Nonconformity	☐ Yes ☒ No
Date of Nonconformity Issued	19/6/2025
Nonconformity Issued To *(when more than one site/member)*: NA	
Deadline:	☐ 3 months from date of closing meeting ☒12 months from date of closing meeting
Mode of Nonconformity Closure	☒ Onsite ☐ Off-site
Standard Reference	RSPO P&C MYNI
Nonconformity Statement: Finding: Evidence of legal due diligence for the storage and sale of LPG gas at the sundry shop was not available.	
Evidence: During site verification at the Sundry Shop operated by Imran Trading, it was observed that LPG cylinders were stored on the premises. However, the owner failed to provide a valid storage permit or license issued by the relevant authority. No documentation or approvals were available to demonstrate compliance with regulatory requirements for the safe storage and handling of LPG. During the document verification for backhoe contractor Agus Transporter, FFB transporter Winasari Enterprise, Grass Cutting Contractor Fajar Pagi the auditor found that no issues were identified. However, upon reviewing the monitoring process at Lam Soon Estate, the Auditor observed significant shortcomings in the contractor's compliance. Key employment documents such as Monitoring Job records and Job quality, pay slips, SOCSO records, compliance records and EPF records were not submitted consistently to estate for monitoring.	
Root Cause Analysis	The system for checking and tracking legal compliance and employment documentation from contractors was not strong enough. Contract requirements did not clearly state the need for legal due diligence and regular submission of required documents. Inadequate enforcement of document submission protocols and insufficient follow-up mechanisms led to gaps in maintaining complete and updated legal compliance records for engaged contractors.

Correction(s)	✓ Collected all missing legal documents related to the storage and sale of LPG gas at Imran Trading. ✓ Requested and started verifying the outstanding employment records from the contractor. ✓ To issue a warning letter to Imran Trading ownership. ✓ Requested and started verifying the outstanding employment records from the contractor. ✓ To issue a warning letter to Agus Transporter, Winasari & Fajar Pagi.
Corrective Action Implemented *(including any evidence submitted)*	✓ To create a Monitoring Checklist: A inspection checklist has been created to track the submission and verification of all required documents from contractors as per attached. ✓ To conduct training: The Assistant Manager In-Charge will receive training on how to monitor contractor compliance with legal and RSPO requirements. ✓ Follow-up Mechanism: A quarterly meeting will be held to review contractor performance and update procedures if needed.
Date of Response	10/7/2025
Audit Team Conclusion *(including any evidence reviewed)*	Root cause and corrective action plan were found acceptable.
Status of Nonconformity	☐ Closed ☒ Open
Date of Closure:	NA. Will verify in next audit.

Indicator Number	3.6.1
Nonconformity Number	RMN 01
Nonconformity Category	☒ Major Nonconformity ☐ Minor Nonconformity
Recurring Nonconformity	☐ Yes ☒ No
Date of Nonconformity Issued	19/6/2025
Nonconformity Issued To *(when more than one site/member)*:	
Deadline:	☒ 3 months from date of closing meeting ☐12 months from date of closing meeting
Mode of Nonconformity Closure	☐ Onsite ☒ Off-site
Standard Reference	RSPO P&C MYNI
Nonconformity Statement: Finding: Mitigation plans was not adequate.	
Evidence: Lam Soon Palm Oil Mill had established HIRARC for Water Treatment Plant (WTP) with latest updated on 01/07/2024. However, during site visit at that area and interviewed with worker found that maintenance pipeline and cleaning floating vegetation activities were found not adequately control.	
Root Cause Analysis	Existing HIRARC was found to be inadequate to mitigate safety risk for working at Water Treatment Plant. This include working on pipeline maintenance and clearing floating vegetation.
Correction(s)	Risk Assessment carried out immediately for working at the water body in the Water Treatment Plant. Revised risk assessment to ensure mitigation plan are documented. All safety intallations, safety signages as well as life buoy to be provided immediately on site.
Corrective Action Implemented *(including any evidence submitted)*	Safety working procedure to be allignged with GIRARC recommendation. The procedure will be used as part LSPOM regular training to WTP workers. The training shall cover safety control measure when worming on pipeline or cleaning vegetation in the pond
Date of Response	8/9/2025
Audit Team Conclusion *(including any evidence reviewed)*	Hirarc for WTP updated on 19/6/2025 and found covering cleaning and maintenance of pipeline. Training record date 1/7/2025 on new HIRARC evidence.
Status of Nonconformity	☒ Closed ☐ Open

Date of Closure:	17/9/2025

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

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. Status of Nonconformities Previously Identified and Opportunity for Improvement -NA

Indicator No	Nonconformity No	Evidence Observed / Nonconformity Raised	Auditee Response	Verification of Correction/ Corrective Action	Conclusion /Status
			Correction / Corrective Action		

Indicator No	Opportunity for Improvement Number	Opportunity for Improvement Statement:	Verification / Follow-up actions:

10. Stakeholder Consultation Process

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

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

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

10.1 For Audit Report

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

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)*	*16-19/6/2025*	Site interviewed	Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between. All workers confirmed that they receive a minimum of RM1700 per month.	*No issues identified during session.*

				They receive their salaries before 7th of every month. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. 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. 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. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer. For newly arrived foreign workers who did not understand Bahasa or English, translations are provided during briefings.	
2	*Contract workers (local / foreign*	*16-19/6/2025*	Site interviewed	*Verification through employment contract and payslip of contractor's workers from Menuju Kejayaan, Fajar Pagi, Chong Shu Min and Thien Transport. No issues found.*	*No issues identified during session.*
3	*Contractor*	*16-19/6/2025*	Site interviewed	*No issues raised by contractors. Terms in the contract are understood by the contractors and followed by the CU. Interviewed contractors were:* *a.Fajar Pagi (Siti Patimah Sabdiah binti Assok)*	*No issues identified during session.*

				b.Thien's Transport Service, *c.Menuju Kejayaan and* *d. Chong Shu Min* *e.Palm Mech Engineering Sdn Bhd* *f.Pakarmax Electrical Sdn Bhd* *g.Saba Tech Sdn Bhd*	
4	*Neighbouring Estate*	*16-19/6/2025*	Site interviewed	*There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders. The audit team has also interviewed relevant stakeholders such as the Ldg Malewar2, Ldg Boonrich, Ldg Kim Fung (JC Chang Ldg Asia 2, Ham Sam Estate, Johor Estate, Kemajuan Ruta, Bompy Estate, Sawit Kinabalu (Sandau Estate) & Kam Chong Estate.*	*No issues identified during session.*

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

Total Workers in the Unit of Certification			**811**	
Sampled Worker Consulted/ Interviewed in This Audit			**43**	
No	**Type of Workers Consulted/ Interviewed**	**Interview Method**	**Feedback/Comments/Issue Raised/ Received from Workers**	**CB's Responses**
1	Male Malaysian	Group Interview	Interviews with workers during the audit confirmed that they are generally satisfied with the company's management	NA

			practices, working conditions, and welfare facilities. No negative issues or grievances were raised or observed throughout the consultation process."	
2	Female Malaysian	Group Interview	Interviews with workers during the audit confirmed that they are generally satisfied with the company's management practices, working conditions, and welfare facilities. No negative issues or grievances were raised or observed throughout the consultation process."	NA
3	Male Indonesian	Group Interview	Interviews with workers during the audit confirmed that they are generally satisfied with the company's management practices, working conditions, and welfare facilities. No negative issues or grievances were raised or observed throughout the consultation process."	NA
4	Female Indonesian	Group Interview	Interviews with workers during the audit confirmed that they are generally satisfied with the company's management practices, working conditions, and welfare facilities. No negative issues or grievances were raised or observed throughout the consultation process."	NA

10.4 Consultation with Previous Land User-NA

Total Identified Previous Land User in the Unit of Certification				
Sampled Previous Land User in This Audit				
Name of Previous Land User	**Contact Details (address/telephone/email)**	**Total Area (Ha)**	**Date of Consultation**	**Result of Discussion with Previous Land User**
Add rows as necessary			DD Mmm YYYY	

11. Time Bound Plan

Name of the Management Unit	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status	Plan Year for Certification	Actual Certification Year	New Proposed Year for Certification
Lam Soon Plantations Sdn Bhd	Malaysia	Lam Soon POM	NA	Certified	NA	2017	NA
	Malaysia	Lam Soon Estate	5593	Certified	NA	2017	NA

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.	**Not Applicable**
Was the time bound plan submitted during the initial audit?	Yes
Does the time bound plan contain a current list of all estates and mills?	Yes
Does the time bound plan include the certification of all estates and mills within five years after obtaining RSPO membership?	Based on Annual Communication On Progress (ACOP 2024) dated 29/4/2025 indicated that all estates and mills under Lam Soon Plantations Sdn Bhd were already certified.

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?	No
If there are any deviations from these maximum periods, did the Unit of Certification request approval from the RSPO Secretariat?	NA
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.*	Based on Annual Communication On Progress (ACOP 2024) dated 29/4/2025 indicated that all estates and mills under Lam Soon Plantations Sdn Bhd were already certified.
Is there any revision made to the time bound plan? If YES, has the revised time bound plan been reviewed by the CB? *Note: Changes to the time bound plan are allowed only if the organisation can provide evidence to the CB that these changes are justified.*The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or Chamber of Commerce (or equivalent).	NA

Are there any isolated lapses in the implementation of a time bound plan? If YES, a minor non-compliance shall be raised.	NA
Is there any evidence of fundamental failure to proceed with the implementation of the plan? If YES, a major non-compliance shall be raised.	NA

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*	Not applicable due to there is no uncertified management units under Lam Soon Plantations Sdn Bhd
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.*	Not applicable due to there is no uncertified management units under Lam Soon Plantations Sdn Bhd
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?	Not applicable due to there is no uncertified management units under Lam Soon Plantations Sdn Bhd

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.	
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.*	Not applicable due to there is no uncertified management units under Lam Soon Plantations Sdn Bhd
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.*	Not applicable due to there is no uncertified management units under Lam Soon Plantations Sdn Bhd

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?	Not applicable due to there is no uncertified management units under Lam Soon Plantations Sdn Bhd
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)*	Not applicable due to there is no uncertified management units under Lam Soon Plantations Sdn Bhd
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)?	Not applicable due to there is no uncertified management units under Lam Soon Plantations Sdn Bhd

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:		
Name	Abdul Hamid Bin Kimar	
Position	Group Sustainability Manager	
Date	01.10.2025	 Signature

Signing by the Audit Team Leader		
I, the undersigned, being the Audit Team Leader, confirm that this report accurately reflects the findings and proceedings of the closing meeting. Furthermore, I affirm that the summary of the findings presented in this report is a true and accurate representation of the actual findings of the Audit Team.		
Acknowledged by:		
Name	Rohazimi Bin Mat Nawi	
Position	Lead Auditor	
Date	19/9/2025	 Signature

Signing by the Certification Decision Maker		
I, the undersigned, being the Certification Decision Maker, confirm that the information and conclusions contained in this report have been prepared in good faith and that the certification decision has been made based upon this information.		
Acknowledged by:		
Name	Kamini Sooriamoorthy	
Position	Section Head	
Date	30/09/25	 Signature

Appendix 1: Location Map Unit of Certification and Supply bases

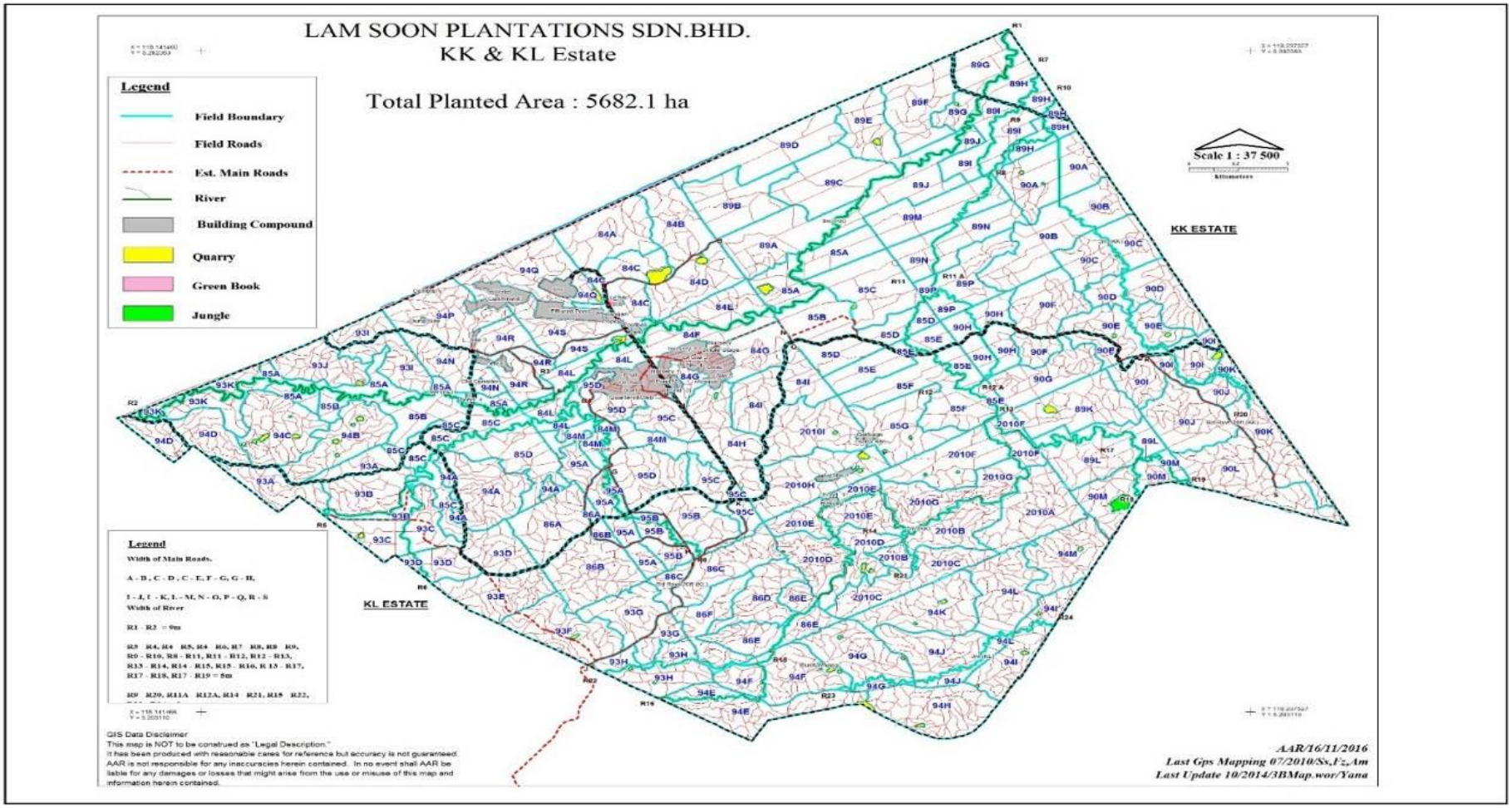


Figure: Map of Lam Soon Estate

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

Assessment Type	Date of Audit	Changes
Choose	DD Mmm YYYY	e.g. additional of supply bases, changes of supply chain model, removal of certified area *etc.* The row can be added as necessary

Appendix 3: Greenhouse Gas (GHG) Reporting Summary

The GHG emissions produced by the Unit of Certification (POM and its supply bases) in the period of 01-2024 until 12-2024 have been calculated using the RSPO PalmGHG Calculator (version 4). The assessment team had verified the data input in the PalmGHG Calculator against operations records. The Certification Unit has selected the following options from the PalmGHG Calculator when preparing inputs for the GHG emissions calculations:

☒ Apply Full Version

☒ Exclude LUC Emissions

The summary of the Net GHG emitted in 12-2024 for POM and supply base are as following:

1. **Summary of Emissions**

Description	**tCO_2eq/t product**
CPO	0.31
PK	0.31
PKO	0.00
PKE	0.00

Extraction	**%**
OER	20.77
KER	4.58

2. Summary of Plantation/Field Emissions and Sink

Land Use	Ha
OP Planted Area	14,727.32
OP Planted on Peat	0.00
Conservation (Forested)	534.71
Conservation (Non-Forested)	0.00
Total	**15,262.03**

Production	t/year
FFB Processed	154,321.53
CPO Produced	32,047.12

	Own Crop		Group		3rd Party		Total
	tCO_2e	tCO_2e/ tFFB	tCO_2e	tCO_2e/ tFFB	tCO_2e	tCO_2e/ tFFB	
Land Conversion	102,288.39	0.67	43,167.88	22.51	0	0	145,456.27
CO_2 Emission from Fertilizer	2,901.76	0.28	853.80	0.45	0	0	3,755.57
N_2O Emission	2,285.01	0.22	559.49	0.29	0	0	2,844.50
Fuel Consumption	2,893.57	0.28	0	0	0	0	2,893.58
Peat Oxidation	0	0	0	0	0	0	0
Crop Sequestration	-96,955.81	-0.64	-40,917.44	-21.34	0	0	-137,873.25
Sequestration in Conservation Area	-2,292.50	-0.02	-2,610.79	-1.36	0	0	-4,903.29
Total	**11,120.43**	**0.07**	**1,052.94**	**0.55**	**0**	**0**	**12,173.37**

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

3. Summary of Mill Emission and Credits

	tCO_2	tCO_2e/t FFB
Emission		
POME	0	0
Fuel Consumption	134.31	0
Grid Electricity Utilization	0	0
Credit		
Export of Excess Electricity to Housing & Grid	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	**134.31**	**0**

4. Palm Oil Mill Effluent (POME) Treatment

Description	%
Divert to compost	0.00
Divert to anaerobic digestion	100

5. POME Diverted to Anaerobic Digestion

Description	%
Diverted to anaerobic pond	63.85
Diverted to methane capture (Flaring)	0
Diverted to methane capture (electricity generation)	36.15