



SIRIM QAS INTERNATIONAL SDN. BHD.  
Building 4, SIRIM Complex, No. 1, Persiaran Dato' Menteri,  
Section 2, 40700 Shah Alam, Selangor, Malaysia.

File Ref. : EB03320001

RSPO PUBLIC SUMMARY REPORT

CLIENT : BOUSTEAD ESTATES AGENCY SDN BHD - TRONG BUSINESS UNIT

PARENT COMPANY : BOUSTEAD PLANTATIONS BERHAD

RSPO MEMBERSHIP No.: 1-0012-04-000-00

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE):

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
BOUSTEAD TRONG BUSINESS UNIT	Trong Palm Oil Mill	100.708154	4.673560	Km 24, Trong/Bruas 34800 Trong, Taiping.
	Taiping Rubber Plantations Estate	100.692292	4.709455	Km 24, Trong/Bruas 34800 Trong, Taiping.
	Malaya Estate	100.725561	5.124982	Jalan Selama/Kubu Gajah 34100, Selama, Perak.
	Malakoff Estate	100.708153	4.673561	Jalan Pokok Machang/ Tasak Gelugor, 13300, Seberang Perai Utara, Pulau Pinang
	Bukit Mertajam Rubber Estate	100.628622	5.422728	Kulim-Mahang main road, Mukim Padang China 09000 Kulim, Kedah
	Kuala Muda Estate	100.582824	5.618517	Sungai Petani/Kuala Ketil main road, 08009, Sungai Petani, Kedah
	Stothard Estate	100.707683	5.551471	Kuala Ketil/Baling main road, Mukim Tawar 09300, Kuala Ketil, Kedah.
	Batu Pakata Estate	100.628213	5.588646	Sungai Petani/Kuala Ketil main road, 09300 Kuala Ketil, Kedah

MAP : See Attachment 1

AUDIT DATE : 13-17 March 2017

DURATION : 15 auditor days

STANDARD : RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014

SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model

The following attachments form part of this report:

Non-conformity Report(s)

List of additional site(s)

Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : MOHD ZULFAKAR KAMARUZAMAN

Name : ANUAR SEMAN

Signature :

Signature :

Date : 21 July 2017

Date : 21<sup>st</sup> JULY 2017

**RSPO PUBLIC SUMMARY REPORT**

**SUMMARY OF AUDITS**

Stage 2 Audit				
On-site audit date :	13-17 March 2017		No. of auditor days :	15 auditor days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Rozaimée Ab Rahman, Mohd Razman Salim, Rahayu Zulkifli (Trainee)			
No. of major NCR :	8	2.1.1, 4.4.2, 4.6.6, 4.6.11, 4.7.2, 6.5.2, 6.1.3, 6.9.1		Closing date : 15 June 2017
No. of minor NCR :	6	2.1.2, 2.1.3, 2.2.2, 4.1.2, 6.2.3, 6.5.3		
Indicate the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers	Suppliers
	X		X	X
	Contract workers	NGOs	Govt. agency	Independent growers
		X	X	
	Indigenous people	Contractor	Others (Please specify)	
	X	Contractors Workers	X	
Supply base sampled :	Kuala Muda Estate, Stothard Estate, Batu Pekaka Estate			

**SUMMARY OF INFORMATION**

TYPE OF AUDIT	STAGE 2
<b>Projection Period</b>	March 2017 to February 2018
<b>Certified Area (Ha)</b>	9351.20
<b>Production Area(Ha)</b>	8927.10
<b>Immature</b>	1211.60
<b>HCV Area (Ha)</b>	116.30 (including buffer zone, pond and stream)
<b>Certified FFB Processed (MT)</b>	147,000.00
<b>Production of Certified CPO (MT)</b>	30,100.00
<b>Production of Certified PK (MT)</b>	7,000.00
<b>REMARKS</b>	-

<b>Table of contents</b>	<b>Page</b>
1.0 AUDIT PROCESS	4
1.1 Certification body	4
1.2 Qualification of audit team	4
1.3 Audit methodology	4
1.4 Stakeholder Consultation	4
1.5 Audit plan	4
1.6 Date of next audit	4
2.0 SCOPE OF CERTIFICATION AUDIT	5
2.1 Description of the certification unit	5
2.2 Description of the Supply Base (including planting profile)	5
2.3 Organization Information / Contact Person(s)	8
3.0 AUDIT FINDINGS	8
3.1 Changes to certified products in accordance to the production of the previous year	8
3.2 Time bound plans including changes and reasons for the changes see below	8
3.3. Overall comment in terms of acceptance or non-acceptance on the changes in the time-bound plan (including details of non-adherence or the conditions justifying a time-bound plan have changed)	8
3.4 All associated smallholders (including scheme smallholders) where their fruit supply is included , by the mill, are audited within 3 years from when their fruit was first included in the mill certification.	8
3.5 Any new acquisition which has replaced primary forests or HCV areas	8
3.6 Other changes (e.g. organizational structure, new contact person, addresses, etc.)	8
3.7 Status of previous non-conformities * (refer to Attachment 6)	8
3.8 Complaint received from stakeholder (if any)	8
4.0 DETAILS OF NON-CONFORMITY REPORT	8
4.1 For P&C (Details checklist refer to Attachment 3)	8
4.2 For SC (Details checklist refer to Attachment 5)	8
5.0 AUDIT CONCLUSION	9
6.0 RECOMMENDATION	9
 List of Attachment	
Attachment 1 : Map of Trong BU	10
Attachment 2 : RSPO Stage 2 Audit Plan	21
Attachment 3 RSPO P&C Audit Checklist And Findings	27
Attachment 4 : Details of Non-conformities and Corrective Actions Taken	52
Attachment 5 RSPO Supply Chain at Trong Palm Oil Mill – Identity Preserved model – Module D	57
Attachment 6 : Boustead Plantation time bound plan	60

**1.0 AUDIT PROCESS**

**1.1 Certification Body**

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. 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 accredited by ASI on 27 September 2014.

**1.2 Qualification of audit team**

<b>Member of the Audit Team</b>	<b>Role/area of RSPO requirements</b>	<b>Qualifications</b>
Mohd Zulfakar Kamaruzaman	Lead Auditor / Environment, Safety & Health and Supply Chain	Holds a B. Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation.
Mohd Razman Salim	Auditor / Social and Conservation scopes	Holds a B.Sc. Forestry (Hons) degree from University Putra Malaysia with more than 6 years of working experience in the forest management, HCVF and ecology.
Rozaimiee Ab Rahman	Auditor / Good Agricultural Practices(GAP)	Holds a B. Sc. in Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation
Rahayu Zulkifli	Trainee Auditor/ Social	Holds an Degree in LLB (Hon), she was a practising lawyer before joining WWF-Malaysia and RSPO as a Dispute Settlement Facility Manager. She left RSPO in May 2015 and during this audit she was acting as an RSPO trainee auditor.

**1.3 Audit methodology**

The audit covered the Trong palm oil mill and three of its supply base. The sampling of the number of the supply base was using the formula of  $0.8\sqrt{y}$ . The three supply base covered during the audit are Kuala Muda Estate, Stothard Estate and Batu Pekaka Estate. The audit included on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the management of Trong BU, employees, contractors, local NGO's and other relevant stakeholders were also conducted during the audit.

**1.4 Stakeholder Consultation**

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the the SIRIM QAS International's websites on 6 February 2017 and sending letter to all the stakeholders. There was no comment received for this BU.

**1.5 Audit plan : Refer to Attachment 2**

**1.6 Date of next audit : The first surveillance audit will be conducted within 12 months but not sooner than 9 months from the certification decision date.**

**2.0 SCOPE OF CERTIFICATION AUDIT**

**2.1 Description of the certification unit**

The Boustead Trong Business Unit (hereafter referred to as Trong BU) is one of the business unit registered under the Boustead Estates Agency Sdn. Bhd., a subsidiary company of Boustead Plantation Bhd (BPB). The BU is located at the north of Peninsular Malaysia and consisted of the Trong Palm Oil Mill (TPOM) and 7 other estates namely the Taiping Rubber Plantations (TRP) Estate, Bukit Mertajam Rubber (BMR) Estate, Malakoff Estate, Malaya Estate, Kuala Muda Estate, Stothard Estate and Batu Pekaka Estate.

The Trong Palm Oil Mill commenced its operations in year 2000 with a processing capacity of 60 metric tonnes of Fresh Fruit Bunches (FFB) per hour. All the estates within the CU have been fully developed before the year of 2005. Hence, Principle 7 of the RSPO P&C is therefore not applicable.

**2.2 Description of the Supply Base (including the planting profile)**

The FFB sourced from company owned estates that are certified. Details of the FFB contribution from each source to the Trong Palm Oil Mill are shown in the following tables:

Table 1: Projected FFB production for period from March 2017 to February 2018

Estates	FFB Production	
	Metric Tonnes	Percentage (%)
Taiping Rubber Plantations Estate	17,300	12
Malaya Estate	14,450	10
Malakoff Estate	20,700	14
Bukit Mertajam Rubber Estate	34,565	24
Kuala Muda Estate	28,950	20
Stothard Estate	16,382	11
Batu Pekaka Estate	14,653	10
<b>Total</b>	<b>147,000</b>	<b>100</b>

Table 2: Projected CPO and PK tonnage for the next reporting period (March 2017 to February 2018)

	Total (MT)
FFB Received	147,000
FFB Processed	147,000
Certified FFB	147,000
CPO Production	30,100
PK Production	7,000
CPO delivered as Identity Preserved	30,100
PK delivered as Identity Preserved	7,000

Table 3 : Planted and certified area of the Trong BU

Estate	Planted (ha)	Certified (ha)
Taiping Rubber Plantations Estate	1,263.60	1,382.80
Malaya Estate	806.90	806.90
Malakoff Estate	1,286.50	1,379.00
Bukit Mertajam Rubber Estate	2,310.40	2,482.60
Kuala Muda Estate	1,419.00	1,419.00
Stothard Estate	942.90	983.10
Batu Pekaka Estate	897.80	897.80
<b>Total</b>	<b>8927.10</b>	<b>9351.20</b>

## RSPO PUBLIC SUMMARY REPORT

**Table 4: Planting profile for Taiping Rubber Plantations Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2017	2 <sup>nd</sup>	Immature	97.9	7.75
2016	"	Immature	124.7	9.87
2015	"	Immature	60.4	4.78
2014	"	Mature	54.2	4.29
2011	"	Mature	50.7	4.01
2010	"	Mature	41.8	3.31
2004	"	Mature	82.4	6.52
2003	"	Mature	45.0	3.56
2001	"	Mature	157.6	12.47
2000	"	Mature	35.9	2.84
1999	1 <sup>st</sup>	Mature	60.0	4.75
1998	"	Mature	23.9	1.89
1997	"	Mature	36.6	2.90
1996	"	Mature	100.0	7.91
1995	"	Mature	110.5	8.74
1994	"	Mature	76.0	6.01
1993	"	Mature	106.0	8.39
Total			1263.60	100.00

**Table 5 : Planting profile for Malaya Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2017	2 <sup>nd</sup>	Immature	45.6	5.65
2016	"	Immature	59.6	7.39
2013	"	Mature	68.7	8.51
2012	"	Mature	52.2	6.47
2011	"	Mature	63.8	7.91
2010	"	Mature	81.8	10.14
2008	"	Mature	117.5	14.56
2007	"	Mature	100.1	12.41
2006	"	Mature	57.6	7.14
1993	1 <sup>st</sup>	Mature	98.9	12.26
1992	"	Mature	61.1	7.57
Total			806.90	100.00

**Table 6 : Planting profile for Malakoff Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2017	2 <sup>nd</sup>	Immature	51.1	3.97
2016	"	Immature	48.9	3.80
2015	"	Immature	0	0
2014	"	Mature	94.3	7.33
2013	"	Mature	57.0	4.43
2011	"	Mature	58.8	4.57
2010	"	Mature	57.0	4.43
2009	"	Mature	82.1	6.38
2008	"	Mature	45.4	3.53
2007	"	Mature	73.9	5.74
2006	"	Mature	59.3	4.61
2005	"	Mature	70.1	5.45
2003	"	Mature	22.3	1.73
2002	"	Mature	27.9	2.17
2001	"	Mature	96.7	7.52
2000	"	Mature	77.6	6.03
1999	1 <sup>st</sup>	Mature	55.5	4.31
1995	"	Mature	159.7	12.41
1993	"	Mature	30.1	2.34
1992	"	Mature	50.0	3.89
1990	"	Mature	68.8	5.35
Total			1286.50	100.00

## RSPO PUBLIC SUMMARY REPORT

**Table 7: Planting profile for Bukit Mertajam Rubber Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2017	2 <sup>nd</sup>	Immature	218.8	9.47
2016	"	Immature	206.9	8.96
2015	"	Immature	106.7	4.62
2014	"	Mature	121.4	5.25
2012	"	Mature	40.9	1.77
2007	"	Mature	29.7	1.29
2001	"	Mature	252.1	10.91
2000	"	Mature	134.6	5.83
1999	1 <sup>st</sup>	Mature	96	4.16
1996	"	Mature	191.7	8.30
1995	"	Mature	241	10.43
1994	"	Mature	213.8	9.25
1993	"	Mature	175.8	7.61
1992	"	Mature	281	12.16
<b>Total</b>			<b>2310.40</b>	<b>100</b>

**Table 8: Planting profile for Stothard Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2017	2 <sup>nd</sup>	Immature	31.5	3.34
2014	"	Mature	55.7	5.91
2013	"	Mature	41.4	4.39
2012	"	Mature	71.9	7.63
2011	"	Mature	49.8	5.28
2010	"	Mature	32.9	3.49
2009	"	Mature	48.5	5.14
2008	"	Mature	54.9	5.82
2003	"	Mature	2.8	0.30
2001	"	Mature	43.5	4.61
2000	"	Mature	49.4	5.24
1999	1 <sup>st</sup>	Mature	143.9	15.26
1998	"	Mature	134.9	14.31
1997	"	Mature	78.1	8.28
1996	"	Mature	56.9	6.03
1995	"	Mature	46.8	4.96
<b>Total</b>			<b>942.90</b>	<b>100.00</b>

**Table 9: Planting profile for Batu Pekaka Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2017	2 <sup>nd</sup>	Immature	60.5	6.74
2016	"	Immature	37.2	4.14
2015	"	Immature	61.8	6.88
2014	"	Mature	58.5	6.52
2013	"	Mature	64.9	7.23
2012	"	Mature	33.1	3.69
2011	"	Mature	34.2	3.81
2010	"	Mature	30.7	3.42
2009	"	Mature	39.8	4.43
2008	"	Mature	63.3	7.05
2002	"	Mature	151.2	16.84
2001	"	Mature	44.1	4.91
2000	"	Mature	77.8	8.67
1999	"	Mature	41.1	4.58
1997	"	Mature	21.4	2.38
1995	"	Mature	78.2	8.71
<b>Total</b>			<b>897.80</b>	<b>100.00</b>

## RSPO PUBLIC SUMMARY REPORT

Table 10: Planting profile for Kuala Muda Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2017	2 <sup>nd</sup>	Immature	41.1	2.90
2003	"	Mature	239.0	16.84
2001	"	Mature	340.4	23.99
2000	"	Mature	195.5	13.78
1999	1 <sup>st</sup>	Mature	176.6	12.45
1998	"	Mature	149.1	10.51
1997	"	Mature	100.1	7.05
1996	"	Mature	177.2	12.49
Total			1419.00	100.00

### 2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Mr. Anuar Semail
Position	:	Chairman RSPO, Boustead
Address	:	11th Floor, Menara Boustead, 69 Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia
Phone no.	:	+603-2145-2121
Fax no.	:	+603-2141-0693
Email	:	<a href="mailto:anuar.bea@boustead.com.my">anuar.bea@boustead.com.my</a>

### 3.0 AUDIT FINDINGS

#### 3.1 Time-bound Plan for Other Management Units

Boustead Plantations Berhad (BPB) is a member of RSPO since 10 October 2004 with the membership number 1-0012-04-000-00. The organization has 41 estates and 10 mills divided under 10 Business Units and with a total land of 65,680.00 ha. All of the Business units are in Malaysia. BPB has established a time bound plan (Attachment 6) for the phased implementation of the RSPO standard for their oil mills and estates.

The audit team considers that the BPB Group is on the right track with its time-bound plan which is considered reasonable and challenging, given the widespread geographic locations of its estates and the resources required.

#### 4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) (details refer to Attachment 4 )	List : 6	MZK 02 2017, RR 02 2017, MRS/02/2017, MRS/03/2017, MRS/04/2017, RZ 03/2017
Total no. of major NCR(s) (details refer to Attachment 4 )	List : 8	(MZK 01 2017, MRS/01/2017, RZ 01/2017), MZK 03 2017, RR 01 2017, RR 03 2017, MRS/06/2017, MRS/05/2017, RZ 02/2017, RZ 04/2017

##### 4.2 For SC (Details checklist refer to Attachment 5) :

Total no. of major NCR(s)	List : 0
---------------------------	----------



RSPO PUBLIC SUMMARY REPORT

**5.0 AUDIT CONCLUSION**

The audit team concludes that the organisation has established its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to achieve agreed criterion & requirements.

**6.0 RECOMMENDATION**

No NCR recorded. Recommended for certification

Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.

*Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs.*

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.

Recommended for certification.

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

Audit Team Leader :

MOHD ZULFAKAR  
KAMARUZAMAN



15/6/2017

(Name)

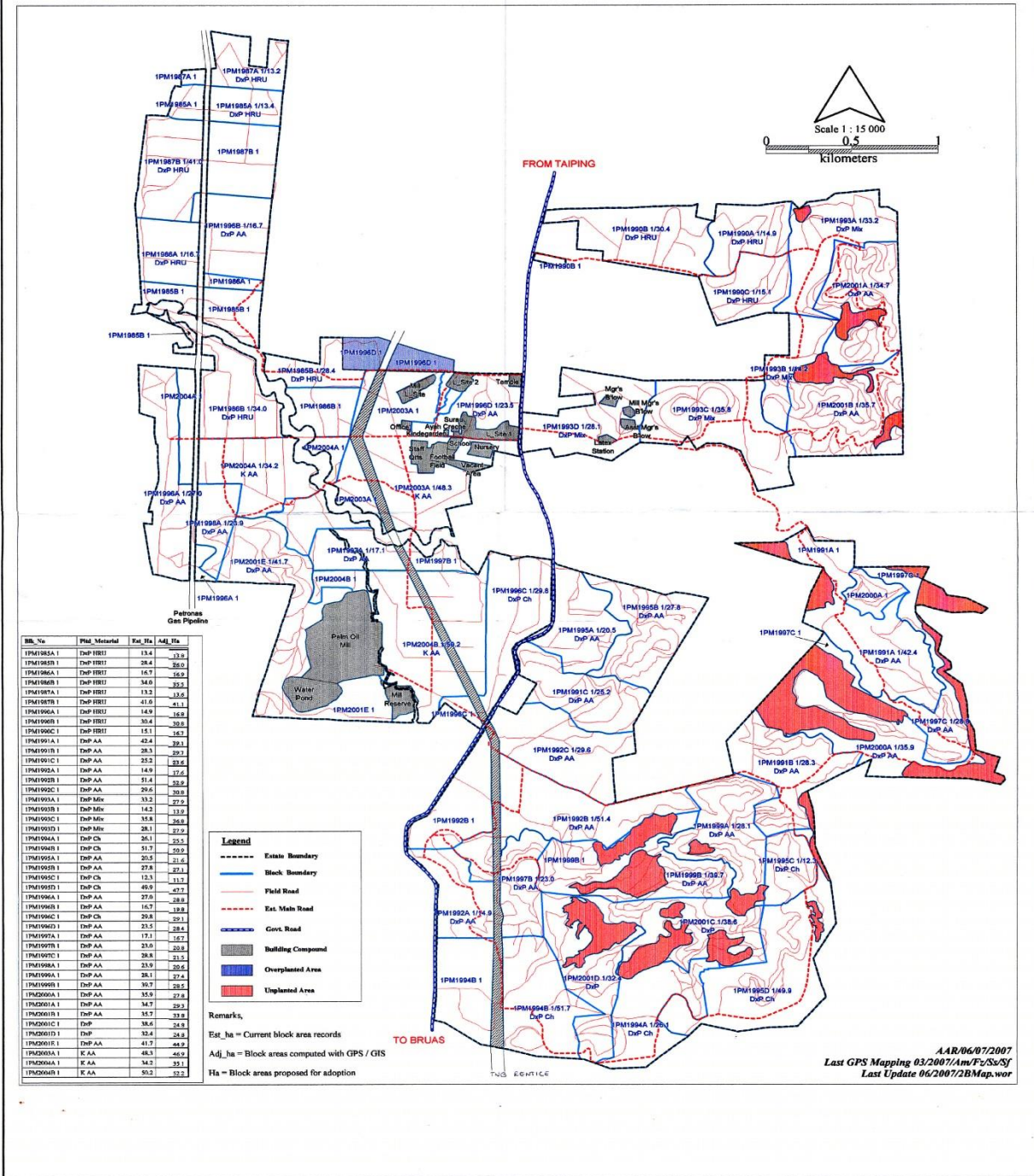
(Signature)

(Date)

Map of TRP Estate - Trong CU

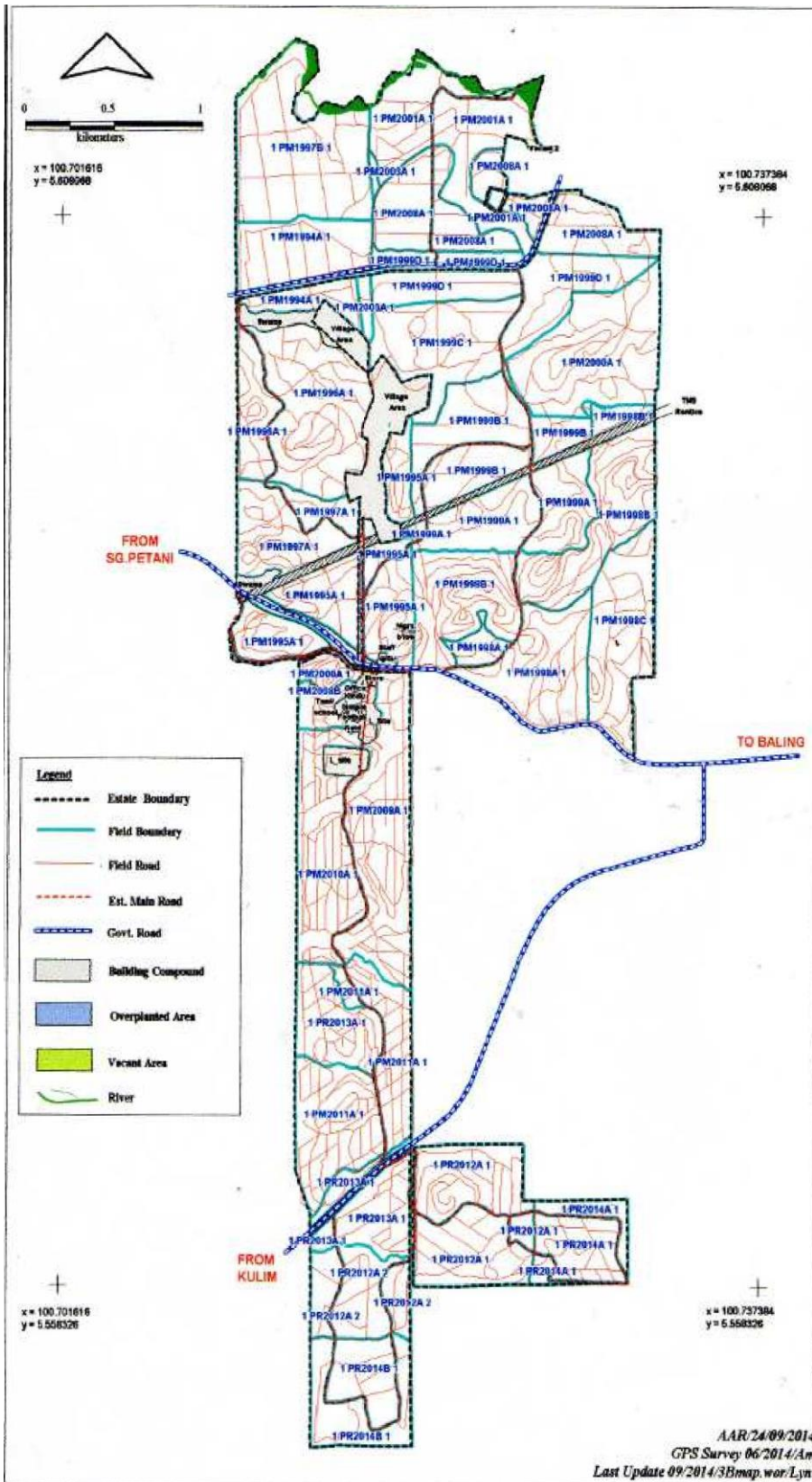
TAIPING RUBBER PLANTATIONS  
Home Division

Total Planted Area : 1257.1 ha



# RSPO PUBLIC SUMMARY REPORT

## Map of Stothard Estate - Trong CU



Blk No	Plng Material	Est_ha	Adj_ha	Ha
1 PM1994A 1	K AA	31.50	32.74	32.7
1 PM1995A 1	DdP Fdb	46.80	50.88	50.9
1 PM1996A 1	DdP AA	56.90	56.61	56.6
1 PM1997A 1	DdP Mix	26.90	26.27	26.3
1 PM1997B 1	DdP Mix	51.20	50.90	50.9
1 PM1998A 1	DdP AA	35.20	36.06	36.1
1 PM1998B 1	DdP AA	65.60	65.22	65.2
1 PM1998C 1	DdP AA	34.10	32.80	32.8
1 PM1999A 1	DdP AA	31.80	34.28	34.3
1 PM1999B 1	DdP AA	36.50	40.05	40.0
1 PM1999C 1	DdP AA	34.50	31.59	31.6
1 PM1999D 1	DdP AA	41.10	41.06	41.1
1 PM2000A 1	DdP AA	49.40	49.58	49.6
1 PM2001A 1	DdP AA	43.50	41.33	41.3
1 PM2003A 1		2.80	3.17	3.2
1 PM2008A 1	Ramets	49.20	48.55	48.6
1 PM2008B 1	Ramets	5.70	5.93	5.9
1 PM2009A 1		48.50	46.20	46.2
1 PM2010A 1		32.90	34.22	34.2
1 PM2011A 1		49.80	48.38	48.4
1 PR2012A 1		46.40	46.79	46.8
1 PR2012A 2		25.50	24.78	24.8
1 PR2013A 1		41.40	41.10	41.1
1 PR2014A 1	DdP AA	23.50	22.49	22.5
1 PR2014B 1	DdP AA	32.20	31.15	31.1
Others		0.00	66.02	66.0

Remarks:

Est\_ha = Current Block area records.

Adj\_ha = Block area computed with GPS/GIS.

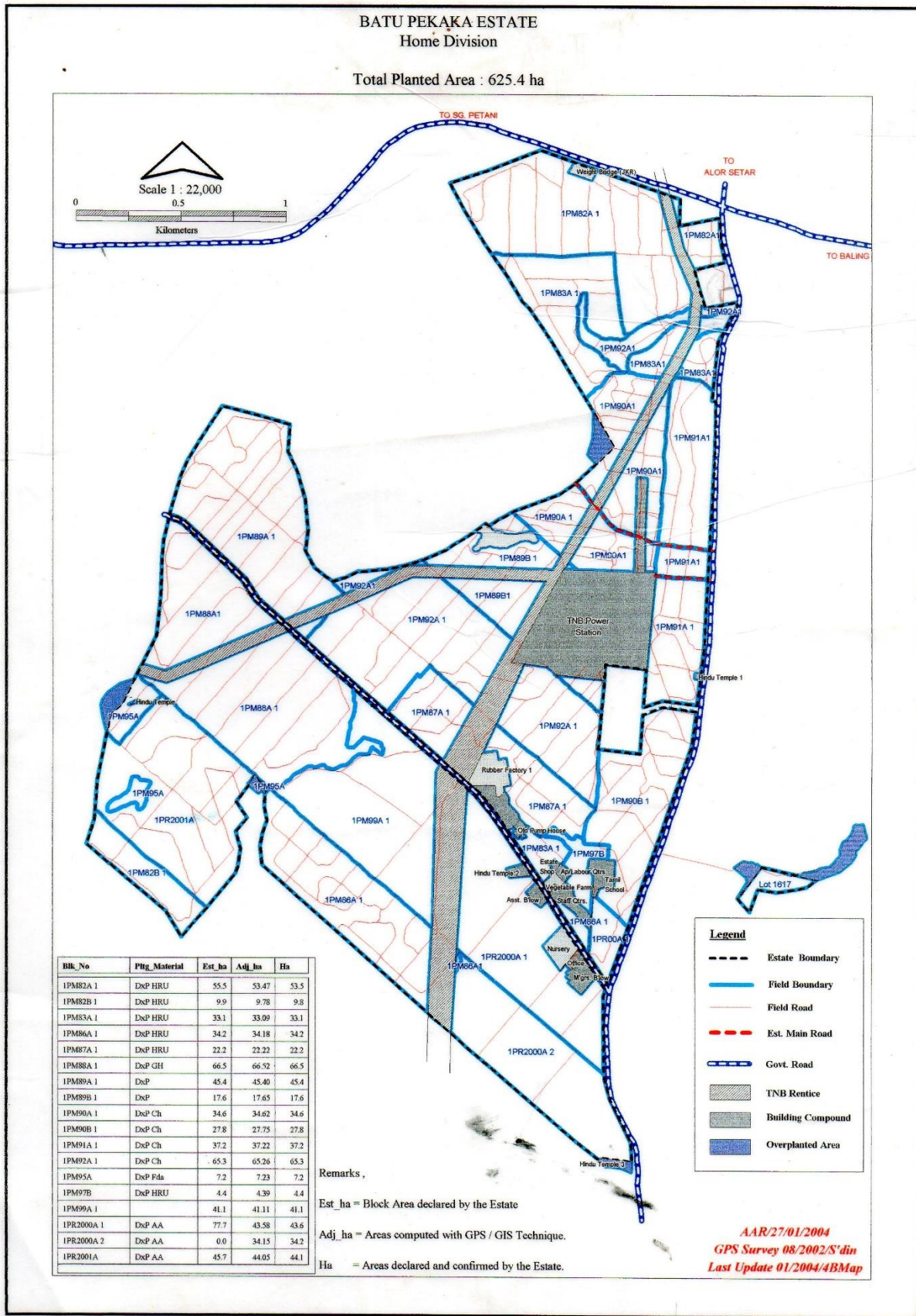
Ha = Block areas proposed for adoption.

\* Coordinate readings in (WGS\_84)

AAR/24/09/2014  
GPS Survey 06/2014/Am  
Last Update 09/2014/3Bmap.wor.Lyn

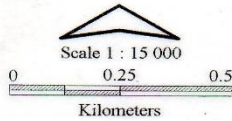
# RSPO PUBLIC SUMMARY REPORT

## Map of Batu Pekaka Estate (Home Div) - Trong CU



Map of Batu Pekaka Estate (Lubok Anak Batu Div) - Trong CU

**BATU PEKAKA ESTATE**  
**Lubok Anak Batu Division**  
**Total Planted Area : 276.9 ha**



**Legend**

- Estate Boundary
- Field Boundary
- Field Road
- Est. Main Road
- Govt. Road
- Building Compound
- New GPS Survey Aug '02

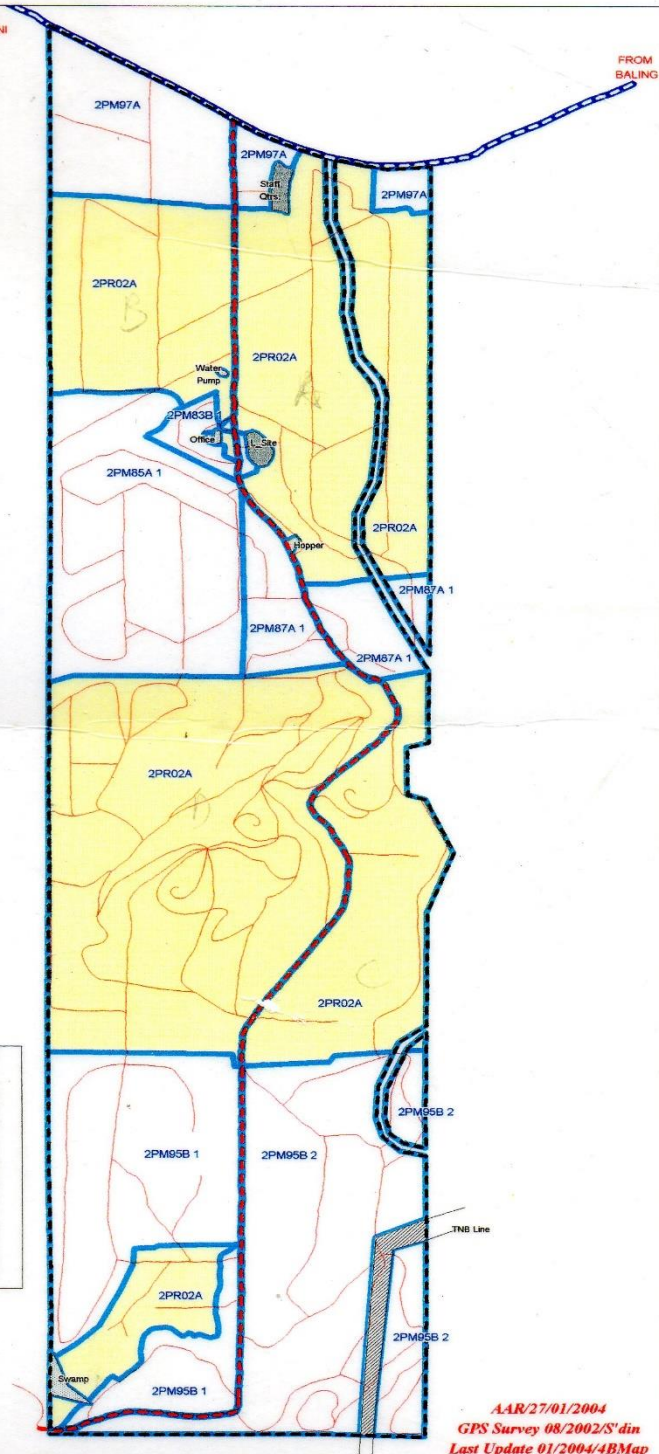
Blk_No	Pltg_Material	Est_ha	Adj_ha	Ha
2PM83B 1	DxP HRU	2.3	2.33	2.3
2PM85A 1	DxP HRU	28.4	28.41	28.4
2PM87A 1	DxP HRU	10.9	10.91	10.9
2PM95B 1	DxP Fda	32.0	31.99	32.0
2PM95B 2	DxP Fda	38.8	38.73	38.8
2PM97A	DxP HRU	17.0	16.98	17.0
2PR02A	DxP Mix	147.5	149.91	149.9

Remarks,

Est\_ha = Areas declared by the Estate

Adj\_ha = Areas computed with GPS / GIS Technique

Ha = Areas declared and confirmed by the Estate.

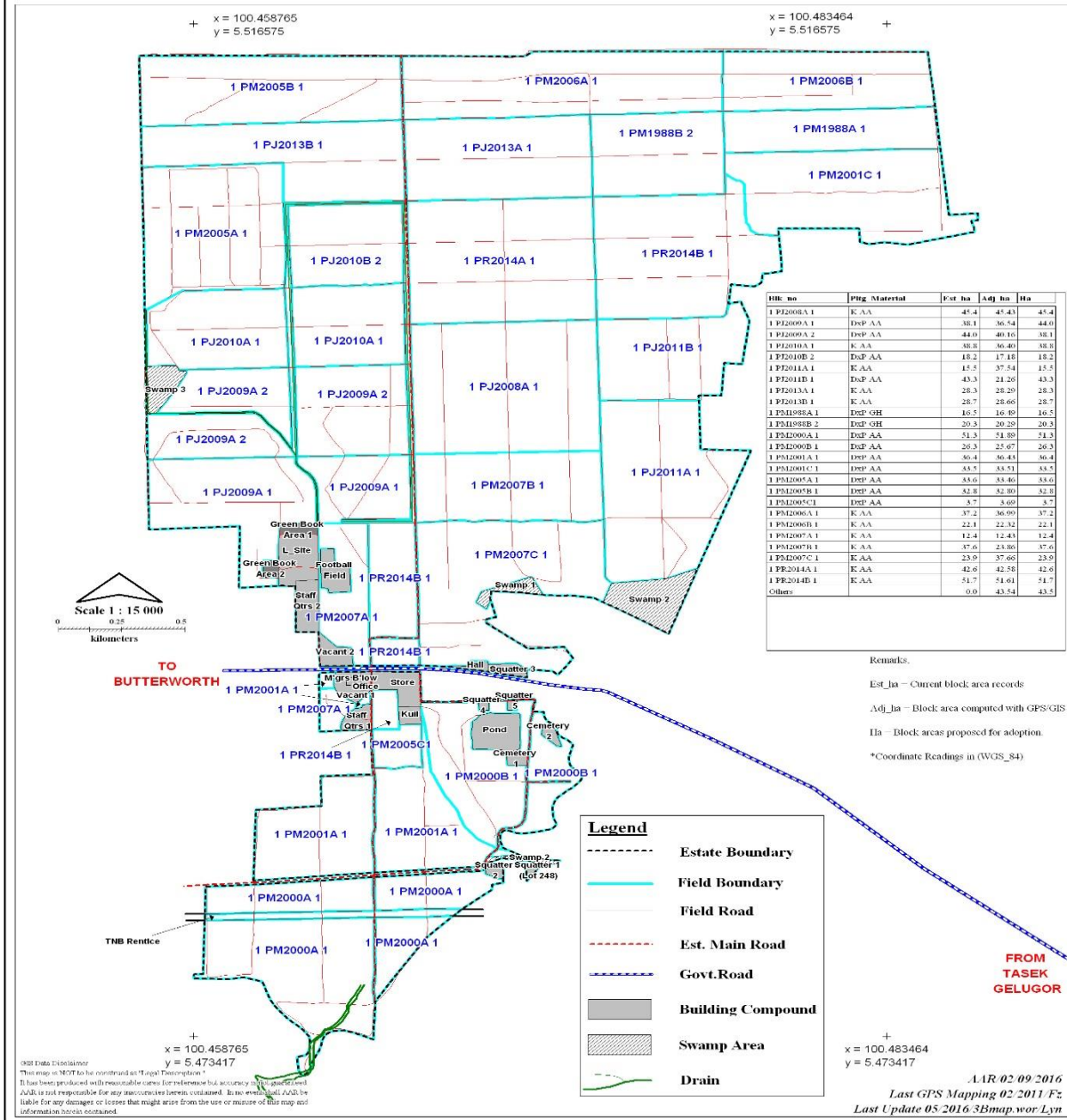


RSPO PUBLIC SUMMARY REPORT

Map of Malakoff Estate (Home Div) - Trong CU

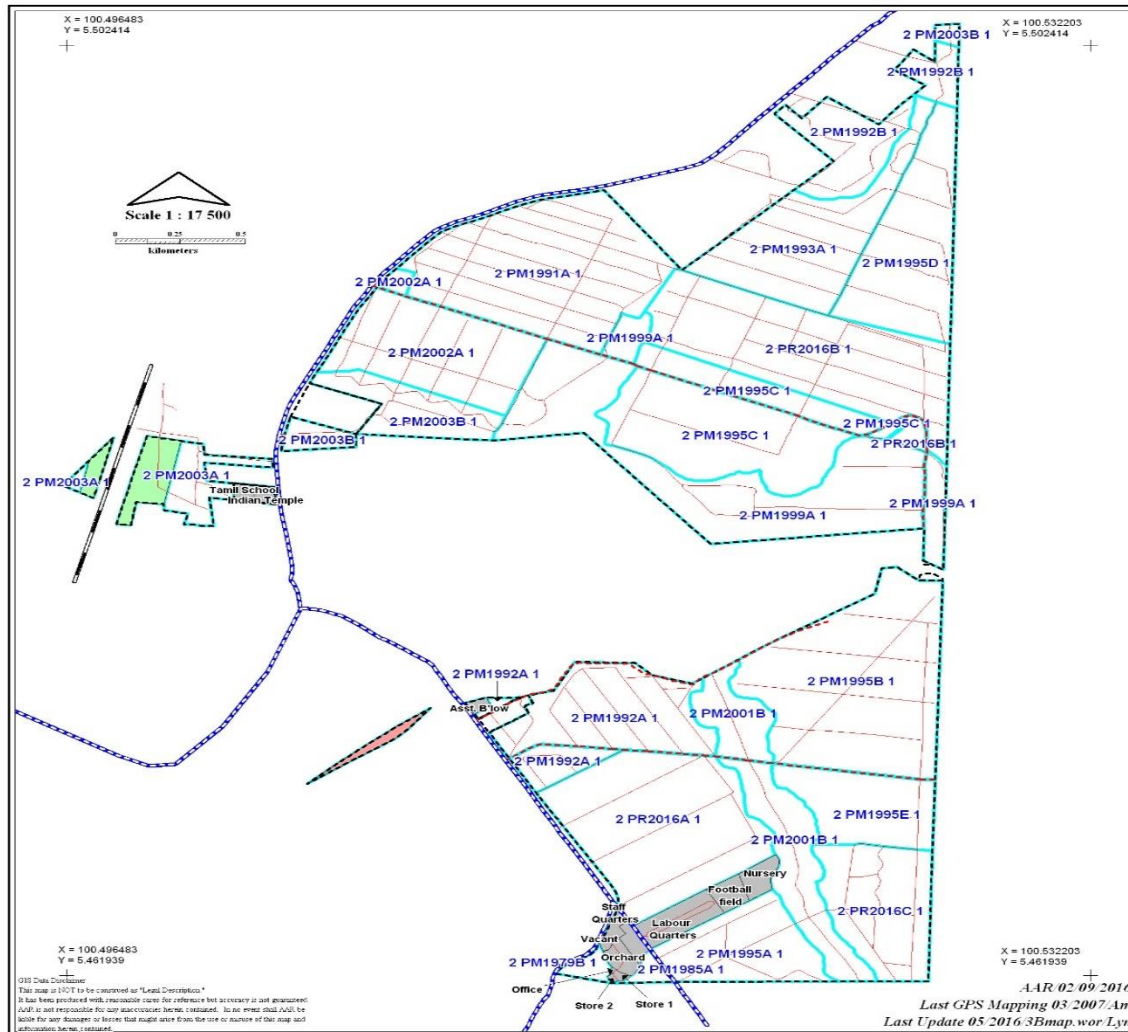
MALAKOFF  
Home Division

Total Planted Area : 782.2 ha



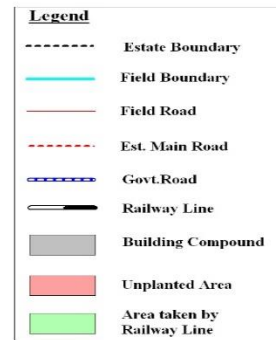
RSPO PUBLIC SUMMARY REPORT

Map of Malakoff Estate (Mayfield Div) - Trong CU



MALAKOFF ESTATE  
Mayfield Division

Total Planted Area : 544.5 ha



Blk. No	Plg. Material	Est. ha	Adj. ha	Ha
2 PM1979B 1	DSP GH	0.0	1.54	1.5
2 PM1985A 1	DSP GH	0.0	1.53	1.5
2 PM1991A 1	DSP AA	51.1	51.12	51.1
2 PM1992A 1	DSP AA	31.6	31.61	31.6
2 PM1992B 1	DSP AA	18.4	18.30	18.4
2 PM1993A 1	DSP AA	30.1	30.14	30.1
2 PM1995A 1	DSP AA	18.9	18.90	18.9
2 PM1995B 1	DSP AA	52.4	52.70	52.4
2 PM1995C 1	DSP AA	41.1	41.37	41.1
2 PM1995D 1	DSP AA	30.4	30.39	30.4
2 PM1995E 1	DSP AA	16.9	17.53	16.9
2 PM1999A 1	DSP AA	55.5	57.43	55.5
2 PM2001B 1	DSP AA	26.8	26.82	26.8
2 PM2002A 1	DSP AA	27.9	30.18	27.9
2 PM2003A 1	K AA	7.6	7.60	7.6
2 PM2003B 1	K AA	11.7	16.78	11.7
2 PR2016A 1	DSP AAR	46.4	46.35	46.4
2 PR2016B 1	DSP AAR	48.9	48.87	48.9
2 PR2016C 1	DSP AAR	22.4	23.42	22.4
Others		0.0	22.95	23.0

Remarks.

Est. ha = Current block area records

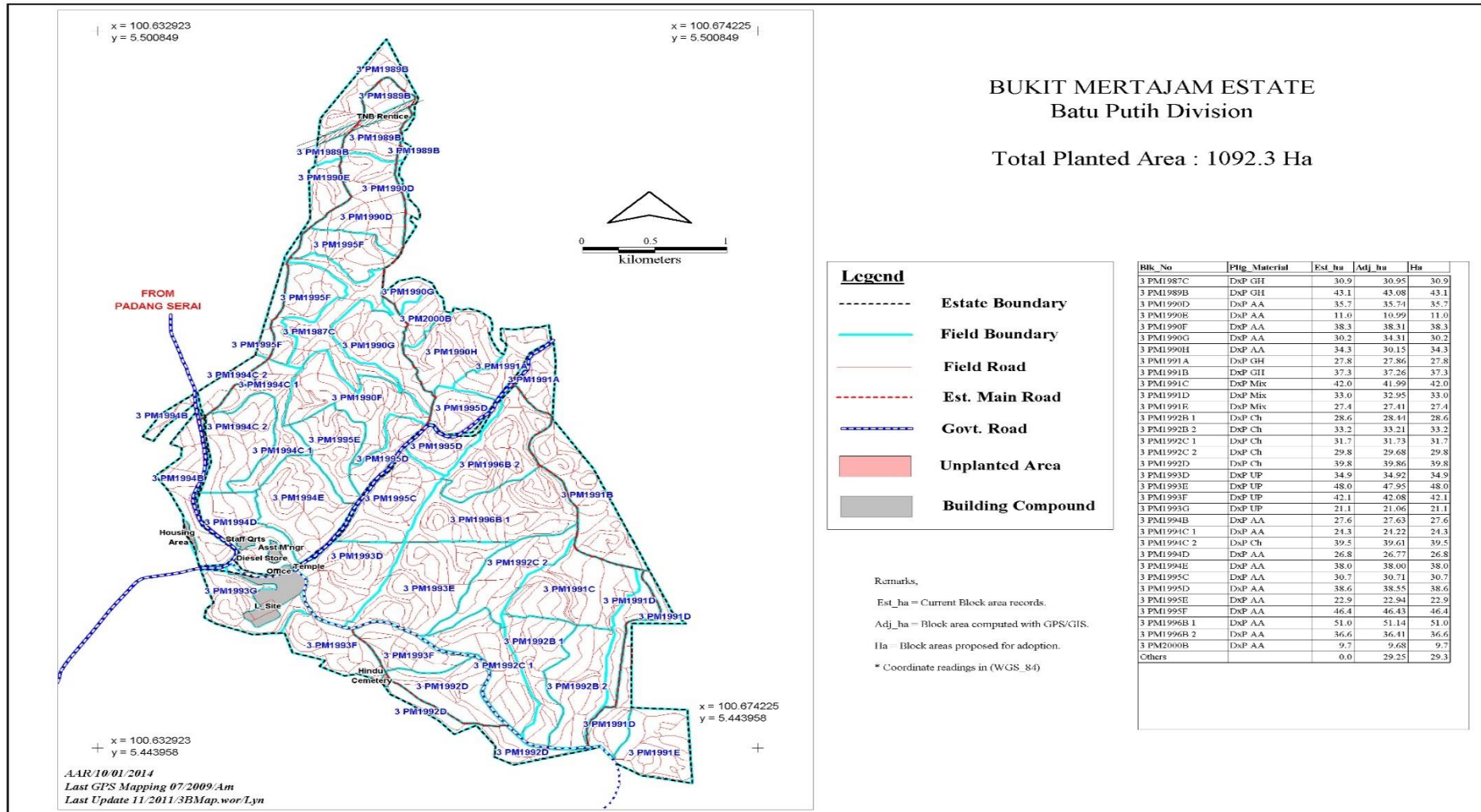
Adj. ha = Block area computed with GPS/GIS

Ha = Block areas proposed for adoption.

\*Coordinate Readings in (WGS 84)

RSPO PUBLIC SUMMARY REPORT

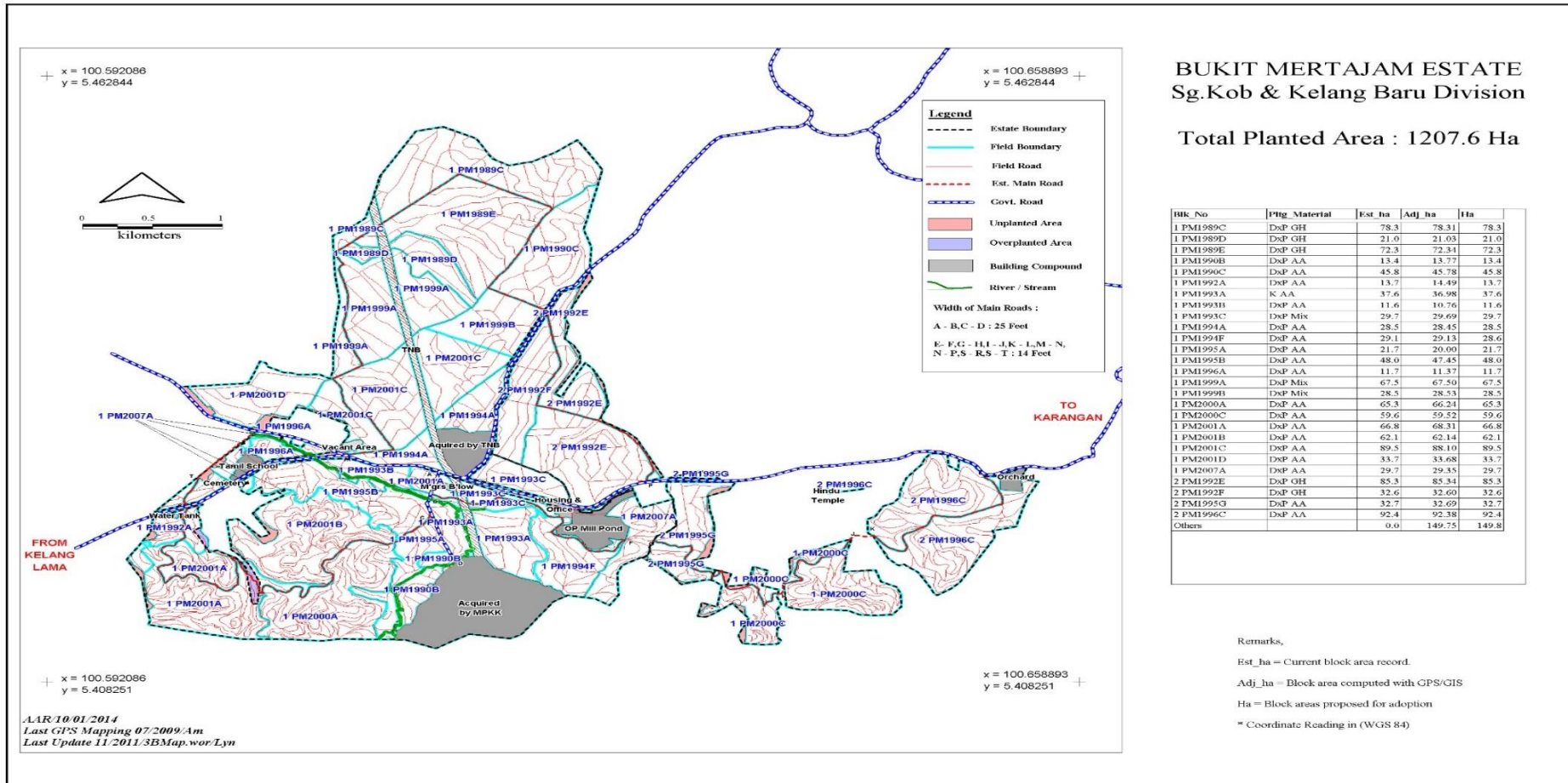
Map of Bukit Mertajam Rubber Estate (Batu Putih Div) - Trong CU





# RSPO PUBLIC SUMMARY REPORT

## Map of Bukit Mertajam Rubber Estate (Sg. Kob & Kelang Baru Div) - Trong CU



### BUKIT MERTAJAM ESTATE Sg. Kob & Kelang Baru Division

Total Planted Area : 1207.6 Ha

BUK No	Plntg Material	Est. ha	Adj. ha	Ha
1 PM1989C	DxP GH	78.3	78.31	78.3
1 PM1989D	DxP GH	21.0	21.03	21.0
1 PM1989E	DxP GH	72.3	72.34	72.3
1 PM1990B	DxP AA	13.4	13.77	13.4
1 PM1990C	DxP AA	45.8	45.78	45.8
1 PM1992A	DxP AA	13.7	14.49	13.7
1 PM1993A	K AA	37.6	36.98	37.6
1 PM1993B	DxP AA	11.6	10.76	11.6
1 PM1993C	DxP Mix	29.7	29.69	29.7
1 PM1994A	DxP AA	28.5	28.45	28.5
1 PM1994F	DxP AA	29.1	29.13	28.6
1 PM1995A	DxP AA	21.7	20.00	21.7
1 PM1995B	DxP AA	48.0	47.45	48.0
1 PM1996A	DxP AA	11.7	11.37	11.7
1 PM1999A	DxP Mix	67.5	67.50	67.5
1 PM1999B	DxP Mix	28.5	28.53	28.5
1 PM2000A	DxP AA	65.3	66.24	65.3
1 PM2000C	DxP AA	59.6	59.52	59.6
1 PM2001A	DxP AA	66.8	68.31	66.8
1 PM2001B	DxP AA	62.1	62.14	62.1
1 PM2001C	DxP AA	89.5	88.10	89.5
1 PM2001D	DxP AA	33.7	33.68	33.7
1 PM2007A	DxP AA	29.7	29.35	29.7
2 PM1992E	DxP GH	85.3	85.34	85.3
2 PM1992F	DxP GH	32.6	32.60	32.6
2 PM1995G	DxP AA	32.7	32.69	32.7
2 PM1996C	DxP AA	92.4	92.38	92.4
Others	DxP AA	0.0	149.75	149.8

Remarks,

Est\_ha = Current block area record.

Adj\_ha = Block area computed with GPS/GIS

Ha = Block areas proposed for adoption

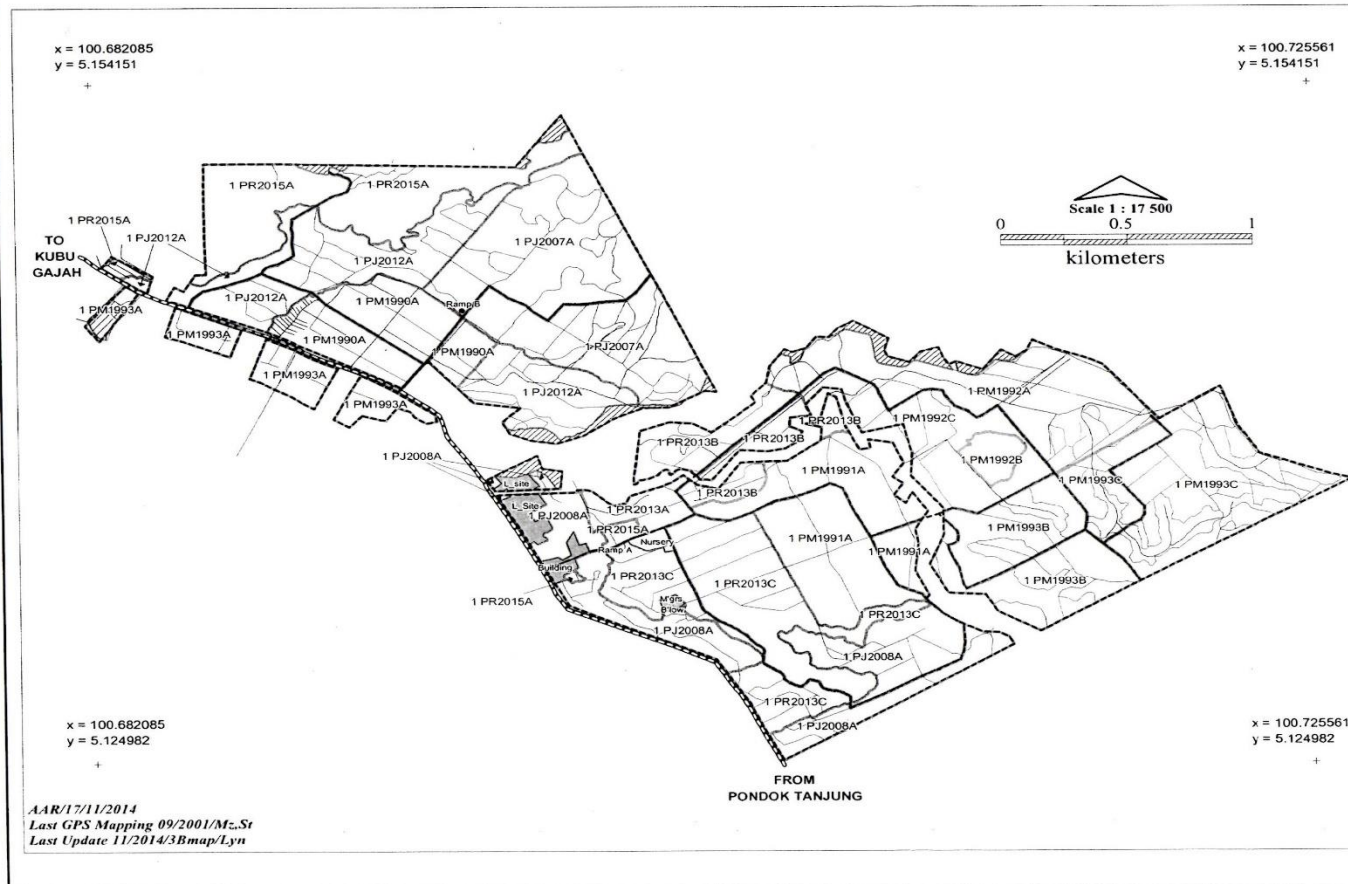
\* Coordinate Reading in (WGS 84)

# RSPO PUBLIC SUMMARY REPORT

## Map of Malaya Estate (Home Div) - Trong CU

### MALAYA ESTATE Home Division

Total Planted Area : 499.2 ha



Legend	
	Field Boundary
	Estate Boundary
	Field Road
	Est. Main Road
	Govt. Road
	Drains
	Building Compound
	Swamp

Blk. No	Plng. Material	Est. ha	Adj. ha	Ha
1 PJ2007A	DxP AA	69.10	68.83	
1 PJ2008A	DxP AA	44.00	43.85	
1 PJ2012A	DxP AA	52.20	50.21	
1 PM1990A	DxP AA	28.00	28.02	
1 PM1991A	DxP AA	45.60	45.32	
1 PM1992A	DxP AA	34.00	39.28	
1 PM1992B	DxP AA	4.30	4.34	
1 PM1992C	DxP AA	22.80	22.60	
1 PM1993A	DxP AA	15.30	16.42	
1 PM1993B	DxP AA	34.50	34.68	
1 PM1993C	DxP AA	49.10	49.52	
1 PR2013A		8.50	6.17	
1 PR2013B		15.60	20.45	
1 PR2013C	DxP KAA	44.60	47.69	
1 PR2015A	DxP AA	31.60	41.20	

Remarks.

Est. ha = Current Block area records.

Adj. ha = Block area computed with GPS/GI

Ha = Block areas proposed for adoption.

\* Coordinate readings in (WGS\_84)

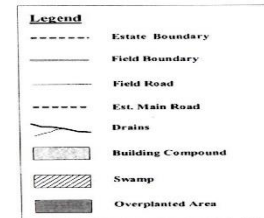
AAR/17/11/2014  
Last GPS Mapping 09/2001/M...St  
Last Update 11/2014/3Bmap/Lyn

RSPO PUBLIC SUMMARY REPORT

Map of Malaya Estate (Lumboh Kluang Div) - Trong CU

MALAYA ESTATE  
Lumboh Kluang Division

Total Planted Area : 316.7 ha



Blk_No	Pltg_Material	Est_ha	Adj_ha	Ha
2 PJ2007B	DxP AA	40.00	42.97	40.0
2 PJ2008B	DxP AA	29.40	29.16	29.4
2 PJ2008C	DxP AA	44.10	47.69	44.1
2 PJ2010A	DxP AA	45.50	45.55	45.5
2 PJ2010B	DxP AA	36.30	38.56	36.3
2 PJ2011A	DxP AA	63.80	63.84	63.8
2 PM2006B	DxP AA	57.60	55.49	57.6

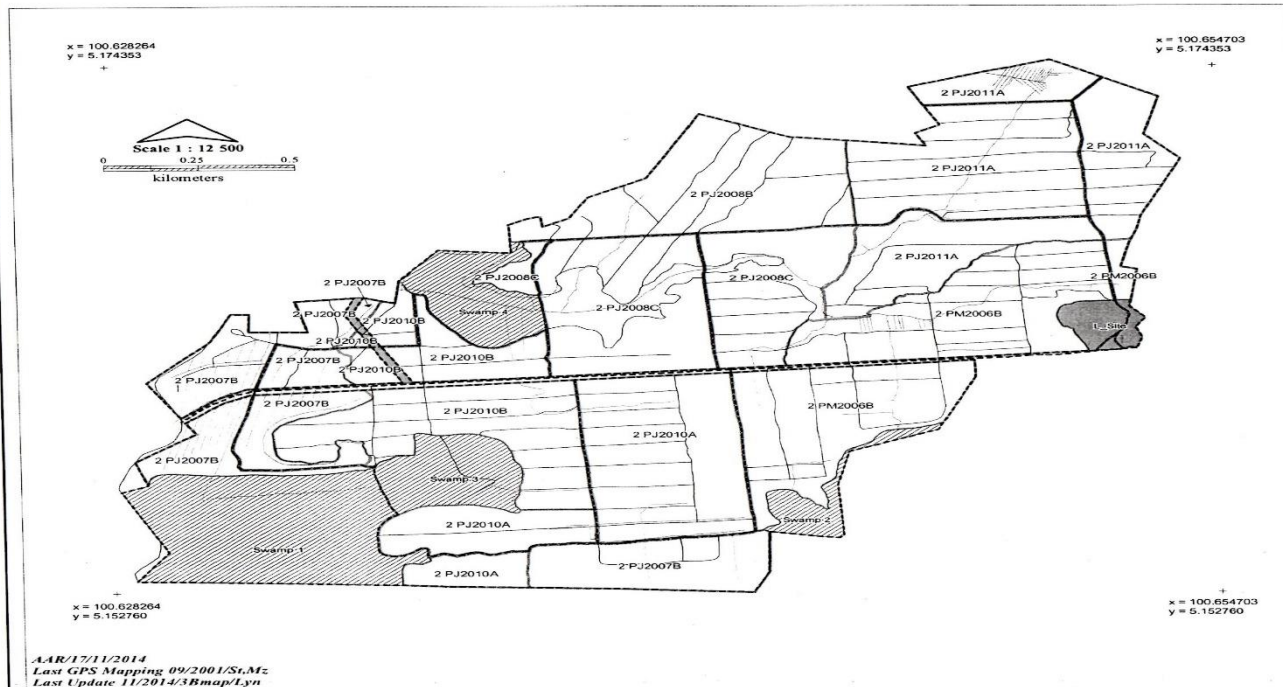
Remarks:

Est\_ha = Current Block area records.

Adj\_ha = Block area computed with GPS/GIS.

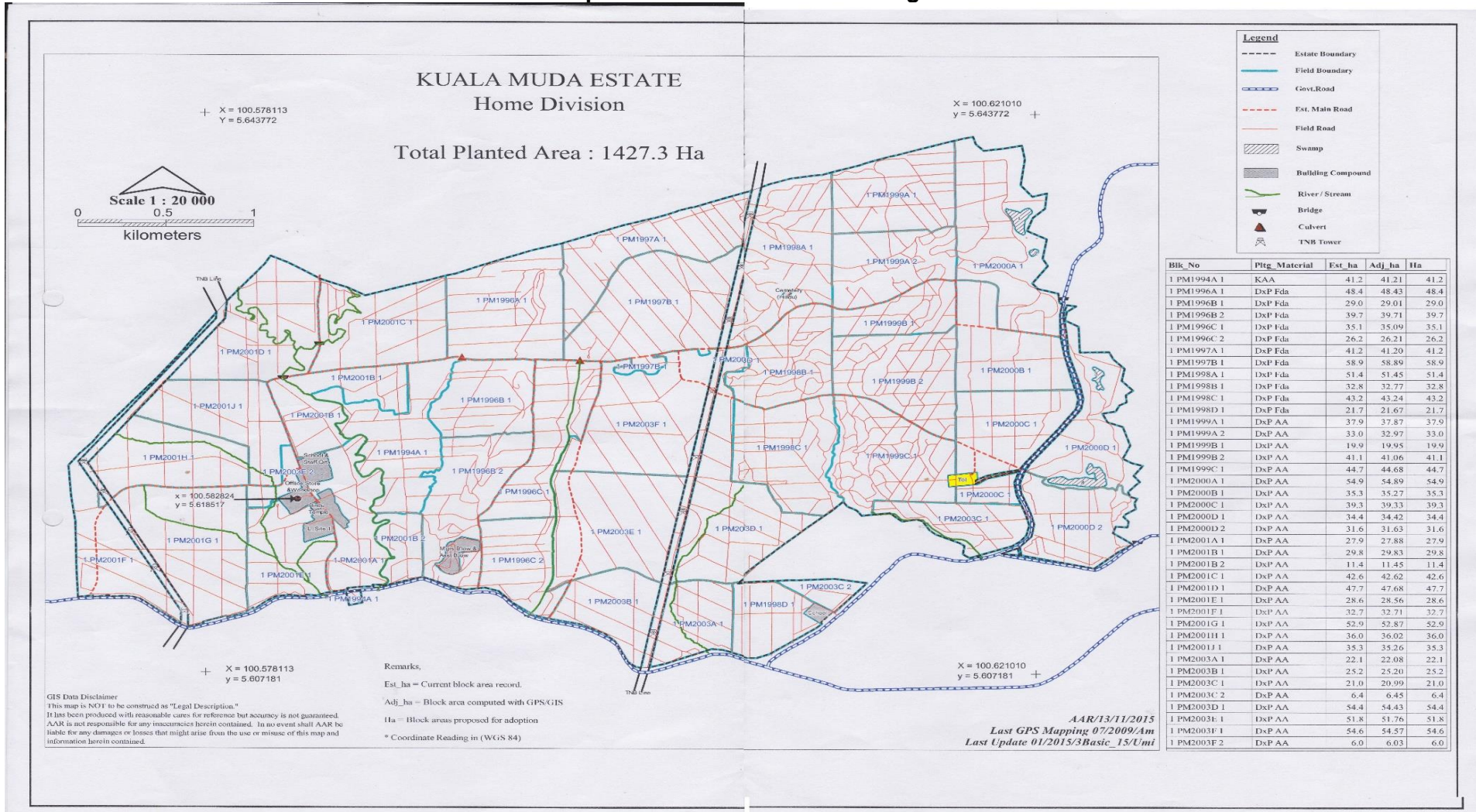
Ha = Block areas proposed for adoption.

\* Coordinate readings in (WGS\_84)



# RSPO PUBLIC SUMMARY REPORT

## Map of Kuala Muda Estate - Trong CU



## RSPO PUBLIC SUMMARY REPORT

Attachment 2

### RSPO STAGE 2 AUDIT PLAN

**1. Objectives**

The objectives of the audit are as follows:

- (i) To evaluate Certification Unit conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI) and RSPO Supply Chain Requirements
- (ii) To verify the effective implementation of issue of concerns arising from the stage 1 assessment.
- (iii) To make appropriate recommendations based on the assessment findings.

**2. Date of audit** : 13-17 Mar 2017

**3. Site of audit** : Boustead Trong BU

- Trong Palm Oil Mill
- Kuala Muda Estate
- Stothard Estate
- Batu Pekaka Estate

**4. Audit Criteria:**

- RSPO P&C MYNI: 2014
- RSPO Supply Chain Certification Standard, 2014
- Company's audit criteria including Company's Manual/Procedures

**5. Audit Team**

a) Audit Team Leader : Mohd Zulfakar Kamaruzaman  
b) Auditors : Mohd Razman Salim & Rozaimée Ab Rahman  
c) Trainee Auditor : Rahayu Zulkifli

**6. Audit Method**

Site audits including observation of practices, interviews with interested parties (employees, nearby population, etc.), documentation evaluation and evaluation of records.

**7. Audit Findings**

Audit findings shall be classified as major and/or minor.

**8. Confidentiality Requirements**

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain. In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

**9. Working Language** : English and Bahasa Malaysia

**10. Reporting**

a) Language : English  
b) Format : Verbal and written  
c) Expected date of issue : Tentative date of issue of report not more than 30 days after the closure of the major NCR.  
d) Distribution list : Client file

## RSPO PUBLIC SUMMARY REPORT

11. **Facilities Required**
- a) Room for discussion
  - b) Relevant document and record
  - c) Personnel protective equipment if required
  - d) Photocopy and printing facilities
  - e) A guide for each auditor
12. **Audit Programme Details:** As shown below:

Day 1: 13 March 2017 (Monday)				
Time	Activities / areas to be visited			
9.00 – 9.30	<p><b><u>Opening meeting at Stothard Estate</u></b>                      Lead Auditor to introduce audit team member, brief on audit objectives, scope, methodology, criteria and programmes  <b>Organization Representative to brief on the following :</b></p> <ol style="list-style-type: none"> <li>1) Briefing on <b>Trong BU</b> organization's background, operations, RSPO implementation &amp; legal non compliances such as land / labour dispute - if any (Please provide maps that have details of surrounding stakeholders, terrain, soil profile and conservation/HCV area).</li> <li>2) Time bound plan for Boustead Plantations Sdn. Bhd.</li> <li>3) Significant changes on organization activities, machinery, supply bases capacity etc.</li> </ol>			Top management & Committee Member
	<b>Zulfakar</b>	<b>Razman/Rahayu</b>	<b>Rozaimiee</b>	
9:30 – 13:00	<p style="text-align: center;"><b><u>Stothard Estate</u></b></p> Coverage of assessment: P1, P2, P4, P5, P6, P8 <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- HCV Assesment</li> <li>- Complaints and grievances</li> <li>- Consultation with relevant government agencies</li> <li>- Inspection of protected sites with HCV attributes</li> <li>- Forested area, plantation boundary, adjacent and neighbouring land use</li> <li>- Riparian zone</li> <li>- Environmental management (witness activities at site)</li> <li>- EIA, Environmental Plan.</li> <li>- Waste &amp; chemical management</li> <li>- Interview with workers , committee and contractors</li> <li>- Facilities at workplace</li> <li>- Continuous improvement</li> </ul>	<p style="text-align: center;"><b><u>Kuala Muda Estate</u></b></p> Coverage of assessment: P1, P2, P4, P5, P6, P8 <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Land titles user rights</li> <li>- Social Impact Assessment (SIA), management plan &amp; implementation</li> <li>- Consultation with relevant government agencies</li> <li>- Interview workers, gender committee, local communities and stakeholders</li> <li>- Laws and regulations</li> <li>- Safety Plan, HIRARC</li> <li>- Occupational safety &amp; health practice – witness activities at site</li> <li>- Interview with workers , safety committee and contractors</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	<p style="text-align: center;"><b><u>Batu Pekaka Estate</u></b></p> Coverage of assessment: P1, P2, P3, P4, P5, P7, P8 <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Commitment to long-term economic and financial viability</li> <li>- Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>- EFB mulching, POME application</li> <li>- Plantation on hilly/swampy area</li> <li>- IPM implementation, training and safe use of agro-chemicals.</li> <li>- New planting</li> <li>- Facilities at workplace</li> <li>- Occupational safety &amp; health practice -witness activities at site</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	Guide(s) for each assessor
13.00 – 14.00	Break			

**RSPO PUBLIC SUMMARY REPORT**

14.00 – 17.00	Continue assessment	Guide(s) for each assessor
---------------	---------------------	----------------------------

<b>Day 2: 14 March 2017 (Tuesday)</b>				
<b>Activities /areas to be visited</b>	<b>Zulfakar</b>	<b>Razman/Rahayu</b>	<b>Rozaimiee</b>	
9.00 – 13.00	<p align="center"><b><u>Kuala Muda Estate</u></b></p> <p>Coverage of assessment: P1, P2, P4, P5, P6, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- HCV Assesment</li> <li>- Complaints and grievances</li> <li>- Consultation with relevant government agencies</li> <li>- Inspection of protected sites with HCV attributes</li> <li>- Forested area, plantation boundary, adjacent and neighbouring land use</li> <li>- Riparian zone</li> <li>- Environmental management (witness activities at site)</li> <li>- EIA, Environmental Plan.</li> <li>- Waste &amp; chemical management</li> <li>- Interview with workers , committee and contractors</li> <li>- Facilities at workplace</li> <li>- Continuous improvement</li> </ul>	<p align="center"><b><u>Stothard Estate</u></b></p> <p>Coverage of assessment: P1, P2, P4, P5, P6, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Land titles user rights</li> <li>- Social Impact Assessment (SIA), management plan &amp; implementation</li> <li>- Consultation with relevant government agencies</li> <li>- Interview workers, gender committee, local communities and stakeholders</li> <li>- Safety Plan, HIRARC</li> <li>- Occupational safety &amp; health practice – witness activities at site</li> <li>- Interview with workers , safety committee and contractors</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	<p align="center"><b><u>Batu Pekaka Estate</u></b></p> <p>Coverage of assessment: P1, P2, P3, P4, P5, P7, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Commitment to long-term economic and financial viability</li> <li>- Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>- EFB mulching, POME application</li> <li>- Plantation on hilly/swampy area</li> <li>- IPM implementation, training and safe use of agro-chemicals.</li> <li>- New planting</li> <li>- Safety Plan, HIRARC</li> <li>- Facilities at workplace</li> <li>- Interview with workers , safety committee and contractors</li> <li>- Occupational safety &amp; health practice -witness activities at site</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	Guide(s) for each assessor
13.00 – 14.00	Break			
14.00 – 17.00	Continue assessment	Continue assessment	<p align="center"><b><u>Stothard Estate</u></b></p> <p>Coverage of assessment: P1, P2, P3, P4, P5, P7, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Commitment to long-term economic and financial viability</li> <li>- Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>- EFB mulching, POME application</li> <li>- Plantation on hilly/swampy area</li> <li>- IPM implementation, training and safe use of agro-chemicals.</li> <li>- New planting</li> <li>- Safety Plan, HIRARC</li> <li>- Facilities at workplace</li> </ul>	

## RSPO PUBLIC SUMMARY REPORT

			<ul style="list-style-type: none"> <li>- Interview with workers , safety committee and contractors</li> <li>- Occupational safety &amp; health practice -witness activities at site</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	
--	--	--	---	--

Day 3: 15 March 2017 (Wednesday)				
Activities /areas to be visited	Zulfakar	Razman/Rahayu	Rozaimee	
9.00 – 13.00	<p style="text-align: center;"><b><u>Batu Pekaka Estate</u></b></p> <p>Coverage of assessment: P1, P2, P4, P5, P6, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- HCV Assesment</li> <li>- Complaints and grievances</li> <li>- Consultation with relevant government agencies</li> <li>- Inspection of protected sites with HCV attributes</li> <li>- Forested area, plantation boundary, adjacent and neighbouring land use</li> <li>- Riparian zone</li> <li>- Environmental management (witness activities at site)</li> <li>- EIA, Environmental Plan.</li> <li>- Waste &amp; chemical management</li> <li>- Interview with workers , committee and contractors</li> <li>- Facilities at workplace</li> <li>- Continuous improvement</li> </ul>	<p style="text-align: center;"><b><u>Batu Pekaka Estate</u></b></p> <p>Coverage of assessment: P1, P2, P4, P5, P6, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Land titles user rights</li> <li>- Social Impact Assessment (SIA), management plan &amp; implementation</li> <li>- Consultation with relevant government agencies</li> <li>- Interview workers, gender committee, local communities and stakeholders</li> <li>- Safety Plan, HIRARC</li> <li>- Occupational safety &amp; health practice – witness activities at site</li> <li>- Interview with workers , safety committee and contractors</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	<p style="text-align: center;"><b><u>Stothard Estate</u></b></p> <p>Coverage of assessment: P1, P2, P3, P4, P5, P7, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Commitment to long-term economic and financial viability</li> <li>- Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>- EFB mulching, POME application</li> <li>- Plantation on hilly/swampy area</li> <li>- IPM implementation, training and safe use of agro-chemicals.</li> <li>- New planting</li> <li>- Safety Plan, HIRARC</li> <li>- Facilities at workplace</li> <li>- Interview with workers , safety committee and contractors</li> <li>- Occupational safety &amp; health practice - witness activities at site</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	Guide(s) for each assessor
13.00 – 14.00	Break			
14.00 – 17.00	Continue assessment	Continue assessment	Continue assessment	Guide(s) for each assessor



## RSPO PUBLIC SUMMARY REPORT

Day 4: 16 March 2017 (Thursday)				
Activities /areas to be visited	Zulfakar	Razman/Rahayu	Rozaimiee	
9.00 – 13.00	<p style="text-align: center;"><b><u>Trong POM</u></b></p> <p>Coverage of assessment: P1, P2, P4, P5, P7, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Complaints and grievances</li> <li>- Consultation with relevant government agencies</li> <li>- Environmental management (witness activities at site)</li> <li>- EIA, Environmental Plan.</li> <li>- Waste &amp; chemical management</li> <li>- Interview with workers , committee and contractors</li> <li>- Facilities at workplace</li> <li>- Continuous improvement</li> </ul>	<p style="text-align: center;"><b><u>Trong POM</u></b></p> <p>Coverage of assessment: P1, P2, P4, P5, P6, P7, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Land titles user rights</li> <li>- Social Impact Assessment (SIA), management plan &amp; implementation</li> <li>- Consultation with relevant government agencies</li> <li>- Interview workers, gender committee, local communities and stakeholders</li> <li>- Safety Plan, HIRARC</li> <li>- Occupational safety &amp; health practice – witness activities at site</li> <li>- Interview with workers , safety committee and contractors</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	<p style="text-align: center;"><b><u>Kuala Muda Estate</u></b></p> <p>Coverage of assessment: P1, P2, P3, P4, P5, P7, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Commitment to long-term economic and financial viability</li> <li>- Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>- EFB mulching, POME application</li> <li>- Plantation on hilly/swampy area</li> <li>- IPM implementation, training and safe use of agro-chemicals.</li> <li>- New planting</li> <li>- Safety Plan, HIRARC</li> <li>- Facilities at workplace</li> <li>- Interview with workers , safety committee and contractors</li> <li>- Occupational safety &amp; health practice -witness activities at site</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	Guide(s) for each assessor
13.00 – 14.00	Break			
14.00 – 17.00	Continue assessment			Guide(s) for each assessor

Day 5: 17 March 2017 (Friday)				
Activities /areas to be visited	Zulfakar	Razman/Rahayu	Rozaimiee	

**RSPO PUBLIC SUMMARY REPORT**

8.30 – 13.00	<p align="center"><b><u>Trong POM</u></b></p> <p>Site visit and assessment on Supply Chain Implementation including the Model used</p> <ul style="list-style-type: none"> <li>- General Chain of Custody System Requirements for the supply chain</li> <li>- Documented procedures</li> <li>- Purchasing and goods in</li> <li>- Outsourcing activity</li> <li>- Sales and goods out</li> <li>- Processing</li> <li>- Records keeping</li> <li>- Registration</li> <li>- Training</li> <li>- Claims</li> </ul>	<p align="center"><b><u>Trong POM</u></b></p> <p>Coverage of assessment: P1, P2, P3, P4, P5, P7, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Commitment to long-term economic and financial viability</li> <li>- Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>- EFB mulching, POME application</li> <li>- Plantation on hilly/swampy area</li> <li>- IPM implementation, training and safe use of agro-chemicals.</li> <li>- New planting</li> <li>- Safety Plan, HIRARC</li> <li>- Facilities at workplace</li> <li>- Interview with workers , safety committee and contractors</li> <li>- Occupational safety &amp; health practice -witness activities at site</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	<p align="center"><b><u>Kuala Muda Estate</u></b></p> <p>Coverage of assessment: P1, P2, P3, P4, P5, P7, P8</p> <ul style="list-style-type: none"> <li>- Laws and regulations</li> <li>- Commitment to long-term economic and financial viability</li> <li>- Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>- EFB mulching, POME application</li> <li>- Plantation on hilly/swampy area</li> <li>- IPM implementation, training and safe use of agro-chemicals.</li> <li>- New planting</li> <li>- Safety Plan, HIRARC</li> <li>- Facilities at workplace</li> <li>- Interview with workers , safety committee and contractors</li> <li>- Occupational safety &amp; health practice -witness activities at site</li> <li>- Training and skill development programmes</li> <li>- Continuous improvement</li> </ul>	Guide(s) for each assessor
13.00–14.00	Break			
14.00 – 16.00	<ul style="list-style-type: none"> <li>• Continue assessment on unfinished area</li> <li>• Verification on outstanding issues,</li> <li>• Audit Team discussion, preparation on audit findings and issuance of NCR (if any)</li> </ul>			
16.00 – 17.00	Closing meeting	Top management & Committee member		

**RSPO PUBLIC SUMMARY REPORT**

**Attachment 3**

**RSPO P&C AUDIT CHECKLIST AND FINDINGS**

**Principle 1: COMMITMENT TO TRANSPARENCY**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
C 1.1 Growers and millers provide 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 There shall be evidence that growers and millers provide adequate information upon request for information on issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. Major Compliance	YES	Trong Business Unit (BU) has established procedure for responding to any communication. The records of communication were identified and maintained in different files depending on the stakeholder. Among the records reviewed were correspondences with the authorities and employees. The BU continued to use website for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances are available through Boustead Plantations' website at <a href="http://www.bousteadplantations.com.my/home.html">http://www.bousteadplantations.com.my/home.html</a>
	1.1.2 Records of requests for information and responses shall be maintained. Major Compliance	YES	Stothard, Kuala Muda and Batu Pekaka estates have identified personnel responsible for complaints. Records of communication were identified and maintained in different files, depending on the stakeholders. Among the records reviewed were correspondences with the authorities, local communities and employees. The latest communications sighted in the records were the requesting repairs of the employee's houses and from nearby villagers who requested repair of roads, schools, mosque and temple. The procedure for responding to any communication has been outlined in "The flow chart" and displayed at the notice boards in the Estate office and Muster grounds.
C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	1.2.1 Land titles/user rights	YES	Land titles of Trong POM, Stothard Estate, Batu Pekaka Estate and Kuala Muda Estate were kept at their respective offices.
	Occupational health and safety plans	YES	Occupational Health & Safety Plan titled 'Program Tahunan 2017' has been established at Trong BU. Indicators set in the plan are being monitored. The progress of the monitoring were verified by the auditor. Cross refer to C 4.7.
	Plans and impact assessments relating to environmental and social impacts	YES	Plans and impact assessments relating to environmental and social impacts maintained available (refer to Criteria 5.1 and 6.1).
	HCV documentation summary	YES	Documents related to HCV are available at the estates. The documents reported their activities, HCV area, riparian zone, map and the appointed person in-charge. (Cross refer to Criteria 5.2)
	Pollution prevention and reduction plans	YES	Pollution prevention and reduction plans maintained available (refer to Criterion 5.6).
	Details of complaints and grievances	YES	The estates and mill have established an External Communications Procedures, a flowchart for complaints to management and a written consultation and communications procedure. These documents were all documented and sighted. There was also another set of forms that contain complaints and suggestions from external stakeholders and submitted to the estate during a stakeholder meeting.
	Negotiation procedures	YES	Negotiation related with land dispute or grievances was made available at the visited sites.
Continual improvement plans	YES	Continuous improvement plans for 2017 are available for the BU.	

**RSPO PUBLIC SUMMARY REPORT**

		Public summary of certification assessment report	YES	NA. This is main assessment.
		Human Rights Policy	YES	A policy to respect human rights has been established by Trong CU in Jan 2016. Auditor has verified through interview with workers that the policy has been communicated to all levels of the workforce and operations.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	Code of ethical conduct and integrity was established and distributed to all staffs and workers. As verified through interview with local and foreign workers, levels of the workforce have been briefed with code of ethic during morning muster. This company's code of ethic as evident that any unethical business on conduct such as corruption, bribery and fraudulent are prohibited.

**Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**

Clause	Indicators		Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	NO	Generally, Trong BU continued to comply with most of the applicable local, national and ratified international laws and regulations. However, these non-compliances were detected: 1) Scheduled wastes were not disposed properly at Kuala Muda Estate (SW 305, SW 410 and SW 409 generated from Feb 2016) and Trong POM (SW 305, SW 110, SW 410 generated from Oct 2015). Thus, Major NCR MZK 01 2017 was raised. 2) Auditor has found that Trong POM has not complied with certain legal requirements as listed below: a Major NCR MRS 01 2017 was raised 1. Based on 'Borang Permit Bekerja Bagi Memasuki Ruang Terkurung' on 23 June 2016 at Boiler 2 Steam Drum and on 18 June 2016 at Vacuum Dearator, there was no record of Health fitness certificate for authorized entrance. 2. Workplace inspection was carried out only two times e.g. 6 December 2016 and 24 September 2016 3. Record of refresher training for chemical handling was not evident 4. Secondary container of N-Hexane and alcohol at laboratory was not labelled as required by CLASS Reg. 3) It was observed that employees' salaries are being deducted without the necessary written consent from the Labour Office, as required under Section 24(4) Employment Act 1955. A Major NCR RZ 01 2017 was raised.
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	NO	At Trong BU has a documented system for identifying, updating and tracking changes in legal requirements and monitoring the status of the legal compliance. Each estate has developed its own Legal Register. There was evidence of compliance to legal requirements has been evaluated on an annual basis. However, there are a few of applicable legal which were not addressed in the legal register such as: 1. Children and Young Persons (Employment) Act 1966,

**RSPO PUBLIC SUMMARY REPORT**

				<ol style="list-style-type: none"> <li>2. National Land Code, 1965</li> <li>3. Workmen Compensation Act, 1952</li> <li>4. Pension Law of Malaysia</li> <li>5. Water Act 1920 (Act 418)</li> <li>6. FMA (Persons-In-Charge) (Amendment) Regulations, 2014</li> <li>7. Industry Code of Practice for Safe Working in a Confined Space 2010</li> <li>8. Poisons Ordinance, 1952</li> <li>9. Poisons (Sodium Hydroxide) Regulations, 1962</li> <li>10. Factories and Machinery (Electric Passenger and Goods Lift) Regulations, 1970</li> </ol> <p>Therefore, a Minor NCR MRS 02 2017 was raised.</p>
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	NO	<p>The legal register has been used as guidance in carrying out the periodic evaluation of compliance exercise. Through this exercise, the certification unit obtained information about the status of their compliance to the applicable regulations. Appropriate actions shall be taken should there be any non-compliance found. Based on the verification of this exercise, the auditors confirmed that most of the non-compliance found have been acted upon. There was evidence of compliance to legal requirements which had been evaluated on an annual basis.</p> <p>However, it was sighted during field visit at Trong POM that the boiler ash flowing to the drain during rain. No evidence of monitoring at final discharge point. Therefore Minor NCR MZK 02 2017 was raised.</p>
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	<p>Sustainability Department Executive who is based in Kuala Lumpur is responsible to track any changes to the Acts and Regulations. This was done through communicating with the publisher of the documents. This mechanism was outlined in its procedure. The updating of the legal register was carried out on a periodical basis. Any change in the legal register is communicated to the respective BUs.</p>
<p>C 2.2 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</p>	2.2.1	Documents showing legal ownership or lease, history of land tenure NCR land and the actual legal use of the land shall be available. Major Compliance	YES	<p>Trong Business Unit maintains and complies with the terms of the land title. The land titles specified the purpose of the planting for either oil palm or agricultural crops for economic value. Noted that the land title for Batu Pekaka Estate is still in progress to change the ownership from CIMB Trustee Berhad to Boustead.</p>
	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	NO	<p>On-site verification at estate boundary between Kuala Muda Estate with Kg. Jerong and Kg. Sg. Division confirmed that the boundary marking were available. At Stothard Estate, observed that the boundary stones were visibly maintained between the estate with neighboring village and private oil palm estates. However, the audit team found that there was no physical markers located along the legal boundaries between visited estate with neighbouring private estate and local communities as verified during site visit below:</p> <ol style="list-style-type: none"> <li>1. Stothard Estate - Ladang Kim Seng, abandoned area which belongs to local community, and also Kg. Kuala Merah</li> <li>2. Batu Pekaka Estate - Sime Darby Kuala Ketil Estate and Genting Plantation</li> <li>3. Kuala Muda Estate – OSK Properties</li> </ol> <p>Therefore, a Minor NCR MRS/03/2017 was raised.</p>

**RSPO PUBLIC SUMMARY REPORT**

	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	It has been confirmed that there was no issue raised on land dispute at Trong BU.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	YES	There was no issue raised on land dispute as explained in Indicator 2.2.3.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties. Minor Compliance	YES	There was no issue raised on land dispute as explained in Indicator 2.2.3.
	2.2.6	To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance	YES	Site visits to Kuala Muda Estate, Stothard Estate, Pekaka Estate and Trong POM confirmed that there is no evidence that the oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.
C 2.3 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.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be developed through participatory mapping involving affected parties. Major Compliance	YES	There was no evidence of land dispute as verified through interview with neighbouring local communities.
	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected	NA	Since there was no conflict or dispute over land ownership in the Trong BU, this indicator was not applicable to them.

**RSPO PUBLIC SUMMARY REPORT**

		groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance		
	2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance	NA	Since there was no conflict or dispute over land ownership in the Trong BU, this indicator was not applicable to them.
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, incl. legal counsel. Major Compliance	YES	Since there was no conflict or dispute over land ownership in the Trong BU, this indicator was not applicable to them.

**Principle 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY**

Clause	Indicators	Comply Yes/No	Findings
--------	------------	---------------	----------

## RSPO PUBLIC SUMMARY REPORT

C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1	A business or management plan (min. 3yrs) shall be documented that includes, where appropriate, a business case for scheme s/holders. Major Compliance	YES	All estates have documented annual budgets for 2018 to 2022. The budget provisions cover activities for upkeeping, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton & per ha.
	3.1.2	An annual replanting programme projected for a min. of 5yrs, shall be available. Minor Compliance	YES	The replanting programme for the next five years had been prepared in the Long Range Replanting Programme (LRRP) 2015 until 2022. This programme is reviewed once a year and is incorporated into their annual financial budget. The said programmes were sighted.

### **Principle 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS**

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored	4.1.1	Standard Operating Procedures for estates and mills shall be doc. Major Compliance	YES	In Trong BU, SOPs for plantation and mill were documented and reviewed during the audit.
	4.1.2	A mech. to check consistent implementation of procedures shall be in place. Minor Compliance	NO	A list of SOPs in the Oil Palm Circular and safety work procedure was established. All estates monitored the good agricultural practices as per SOPs through on-site visits, inspections and discussions with relevant personnel and by conducting audits such as Internal Audits, RSPO Audits and visits by PA and Agronomists. Noted that during the on-site visits, inspections and discussions with relevant personnel, random interview with the workers at the estates showed that they understand the requirement stated in the SOPs. For example, it was observed that harvesting standards and chemicals usage had been properly understood by the estate harvesters and sprayers respectively. However at Batu Pekaka Estate pollution prevention plan was not clearly identified. Water from emergency shower was directed into a field drain. Thus, a #Minor RR 02 2017 was raised.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	Records of Internal Audits, RSPO Audits and visits by PA and Agronomists were available and reviewed.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	N/A	Auditor has verified through weighbridge ticket and interview with weighbridge clerk, and confirm that no third party FFB supplier send their fruit to Trong POM and the mill will be implementing the Identity Preserved (IP) supply chain model. Therefore this indicator was not applicable.
C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	All estates continued to practice the maintenance of long-term soil fertility by annual application of fertilisers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and EFB in replants and application in mature areas. Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the Agronomist, all the Agronomist were from the Applied Agriculture Resources Sdn. Bhd. Annual Fertiliser recommendations were made based on annual foliar sampling and soil sampling.



**RSPO PUBLIC SUMMARY REPORT**

	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertiliser application program was monitored using records like program sheets, bin cards, field cost book, Fertiliser Application monitoring forms, work flow sheets in Replants, etc. Records of programs and applications of fertilisers were made available to auditors.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	From the Agronomist's report it was established that all estates carried out yearly foliar sampling for the nutrients N, P, K, Mg, CA & B and the results formed the basis for the fertiliser recommendations to maintain and to improve soil fertility. Soil maps were made available to the auditors. Analysis for soil T-N, Av-P, Ex-K. Ex-Ca and Ex-Mg was carried out as per RSPO requirement in all estates on same date.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	All estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and by EFB compost application. There is no specific prog. for EFB mulching and compost application at the estates and application was only based on wherever possible area to be applied. The total tonnage taken from the mill is based on the amount of FFB sent.
C 4.3 Practices minimise and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	Based on the soil maps provided, there was no fragile/marginal soils in all the sampled estates.
	4.3.2	A management strategy shall be in place for plantings on slopes between 9 & 25° unless specified otherwise by the company's SOP. Minor Compliance	YES	Trong BU continued to plant palms within slopes between 9 and 25 degrees as per Boustead Plantations Berhad policy dated in Jan 2015.
	4.3.3	A road maintenance prog. shall be in place. Minor Compliance	YES	During the field visit, it was noted roads were well maintained in all estates. Accessibility were made possible by regular maintenance guided by its road maintenance programmes. The programme had been supported by adequate provisions in the budgets. Surface run off water from roads were directed into fields and drains with well cambered roads, road side drains and silt pits. For road maintenance all estates had a backhoe, a compactor and a motor grader each which were rented. Tractors with back buckets and excavators were hired on contract basis as and when required. Heaps of laterite was sighted at strategy points in all estates.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	YES	There were no peat soils in both estates visited.
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	YES	There were no peat soils in both estates visited.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	There were no peat soils in both estates visited.

**RSPO PUBLIC SUMMARY REPORT**

C 4.4 Practices maintain the quality and availability of surface and ground water.	4.4.1	An implemented water management plan shall be in place. Minor Compliance	YES	The water management plans were established and implemented. The water management plans were more towards soil water conservation, pollution prevention and domestic use. The management plan covered dry spell/shortage and in case of water pollution. Workers were advised to conserve water. Water from process was reused for cleaning. Water from triple rinsing of pesticide containers was reused for spraying. Water bodies were established in ravines and slit pits in flat areas and on slopes.
	4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated. Major Compliance	NO	Trong BU protects the water courses and wetlands including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estates. Best management practices adopted by Trong BU to prevent soil degradation, environmental pollution and conserve water. During the site review at Batu Pekaka Estates, it was confirmed that the buffer zone boundary had been identified with signboard erected along the river. Spraying activities were prohibited at the riparian buffer zone along Sungai Muda. It was clear that Boustead has the policy to maintain the buffer by restricting agrochemicals application and will be left undeveloped during replanting. There was no observation of bunds, weirs or dams across any water ways and rivers in any of the visited estates of Trong BU. The HCV assessment had identified that there was a water body in the Stothard estate. However, the auditor has found that no signage to prevent from spraying or fishing and there was evidence of spraying activities in the buffer zone area. Therefore, Major NCR MZK 02 2017 was raised.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance	YES	Site visit at effluent treatment plant and interview with operator in-charge revealed that the operation was in accordance with the standard operation procedure and legal requirements. No effluent overflow was sighted and flow meter reading was recorded daily. Mill submitted the effluent monitoring analysis to DOE and noted that the results of all the parameters were within the regulatory limit.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	The processing water obtained from Sungai Rusa. Mill water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.	4.5.1	Implementation of IPM plans shall be monitored. Major Compliance	YES	In Trong BU, the roles of cultural, physical and biological control measures are now emphasised in the pest management programs to minimise the frequency and quantity of synthetic pesticides used. IPM practices are preferred and are implemented for sustainable management of oil palm pests. Natural insect predator plays a vital role to keep leaf eating pest population under control. To encourage natural predator, Trong BU has planted variety of beneficial plants to provide food, shelter and breeding sites for these beneficial predators. The estates have programme to constantly monitor the palm canopy for signs of pest damage and early detection of potential outbreaks. Chemical control is implemented only if pest population are above economic threshold level. IPM approach for rat control was implemented using barn owl as a biological control agent.
	4.5.2	Training of those involved in IPM impl. shall be demonstrated. Minor Compliance	YES	The procedure is stipulated in the Oil Palm Circular. The IPM program among others includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. IPM trainings were conducted by the respective Estate's Assistant Manager.
C 4.6 Pesticides are used in ways that do not	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are	YES	The use of all types of agrochemicals at the estates was guided by its SOP. The SOP had included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic names.

**RSPO PUBLIC SUMMARY REPORT**

endanger health or the environment		specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance		
	4.6.2	Records of pesticides use (incl. AI used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. Major Compliance	YES	All estates visited had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and Ai/Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. All estates had documented programs for spraying pesticides and for rat baiting.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance	YES	As part of the IPM plans, management of both estates had established nectariferous beneficial plants nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides. As mentioned in 4.5.1, during the visit it was observed a number of Beneficial Plants and LCC had been planted and both estates had plants ready for planting in the Nurseries. In Estate prophylactic spraying using diluted cypermethrim was carried out in the replants and immature area, where palms were felled, chipped, widowed and left to decompose and not burn for replanting. The spraying was carried out against rhinoceros' beetles as per SOP.
	4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Minor Compliance	YES	Both estates only used Pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. All estates had only used class ii, iii & class iv pesticides.
	4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be	YES	Records showed that pesticides were handled, used and applied by trained persons and as per the MSDS of the pesticide. The employees involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers have been trained in chemical handling and they had understood the hazards of the chemicals and how the chemicals should be used in a safe manner.

**RSPO PUBLIC SUMMARY REPORT**

	applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance		The trade and generic names of the chemicals were made known to them through the MSDS/CSDS training. It was also noted that MSDS/CSDS are available at all sites during the audit. All employees involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issuance and replacement records were verified by the auditors. It was also observed that most of the workers in the fields were using an appropriate PPE.
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations. Major Compliance	NO	The chemical stores in all estates were observed to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. Record of the purchase, storage and use had been properly maintained. All of the stores were equipped with exhaust fan and are locked. Only authorized personnel were allowed to handle the chemicals. All the chemicals were stored and segregated accordingly. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal. However, at Kuala Muda Estate : <ul style="list-style-type: none"> <li>• Petrol was not kept inside a safety can as determined by the CHRA assessor.</li> <li>• Storage of fertilizer was not in accordance with the fertilizer management guidelines; and</li> <li>• In the chemical store, chemicals were store without secondary containment.</li> </ul> Thus, a #Major NCR RR 03 2017 has been raised.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	During the audit, noted that Trong BU had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Paraquat had not been used in the estate. The Safety Procedures for pesticides application were well described in Safe Work Procedure (SWP) dated 12 March 2011.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial spraying was not practice at all Trong BU estates and there was no evidence to show that it had been carried out in Batu Pekaka, Stothard, and Kuala Muda Estate.
4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demonstrated or made available. Minor Compliance	YES	The employees such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. Records of trainings available.

**RSPO PUBLIC SUMMARY REPORT**

	4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated. Minor Compliance	YES	Field inspection and observation confirmed that chemicals were being handled in accordance with the product safety precautions. MSDS were made available at point of use, for example at the workshop, store, and chemical mixing area. Domestic wastes and recycle wastes were segregated by the workers. Only organic wastes were disposed at the landfill. Recycle materials such as cans, glass bottle, plastic bottle and paper are sent to recycle area. Records of disposals were sighted.
	4.6.11	Specific annual med. surveillance for pesticide operators, and doc. action to treat related health conditions, shall be demonstrated. Major Compliance	NO	Annual medical surveillance for pesticide operators, and action to treat related health conditions, had been demonstrated by all estates. All sprayers, store keepers and workers handling pesticides in all estates were sent for medical surveillance. Reports of were reviewed by the auditors. In Batu Pekaka Estate, the medical surveillance was conducted by an OHD for workers applying chemicals on 15/11/2016. However, some that carried out spraying in nursery and foremen were not send for medical surveillance. Thus, #Major NCR RR 01 2017 was raised.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women Major Compliance	YES	The estates had policy "handling high toxic pesticide" stated that no work with pesticides shall be undertaken by pregnant or breast-feeding women. At all the visited estates, identification of pregnancy was done by the HA through interview with their women workers on the last menstrual period dates. This interview was done during the monthly medical check-up. Pregnancy test was carried on doubtful cases. There was no evidence that work with pesticides was undertaken by pregnant or breast-feeding women.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. Major Compliance	YES	Occupational health and safety policy dated in June 2012 is available in English and Bahasa Malaysia. The policy has been communicated to all levels of the organization through briefings and also displayed prominently at the notice board of the mill, estate office and Muster Ground. Random interviewed with employees showed that they generally understood the basic requirements of the policy. Occupational health and safety (OHS) management plan for each operating unit had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans were acceptable.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	NO	Trong BU had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. At the estates, the HIRARC covered activities like chemical mixing and spraying, chemical storage, harvesting and FFB collection and vehicle maintenance. The review of the HIRARC was conducted on in Jan 2017. CHRA report for Trong POM was conducted in Jan 2016 was reviewed. However, noted that the risk assessment of the following activities were not carried out : 1. Conveyor / rotating machine 2. Heat stress at grading, boiler, sterilizer and EFB area 3. Construction / upgrading sterilizer (non-routine work) Hence, a Major NCR MRS/06/2016 was raised.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate	YES	Chemical hazards were communicated through awareness and training to all workers involved in handling of dangerous chemicals. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Those trained workers and staffs included sprayers, manure spreaders, and store clerk.

**RSPO PUBLIC SUMMARY REPORT**

	protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance		OSH awareness and various OSH training courses had been identified for each category of workers. Training program for FY2017 had been established. Field inspection and observation of spraying tasks confirmed chemicals were applied in accordance with the product safety precautions. MSDS were made available at point of use, e.g. at estate chemical mixing area and at the chemical store.
4.7.4	The responsible persons shall be identified. There shall be records of regular meetings bet. the responsible person sand workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance	YES	The responsible person for OSH at the Mill and Estate was the respective Manager. Safety and Health Committee Organization Chart 2017 was available. Quarterly Safety & Health Committee meetings were held, chaired by the respective managers. Minutes reviewed.
4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance	YES	Emergency Response Plan has been established and included in the Environmental Impact Assessment, Management Action Plan and Continuous Action Plan dated. Emergency situation that had been identified included the chemical spillage, fire and other accident. Procedure to respond to emergency situation had been disseminated. This included emergency contact number, site plan showing evacuation route to assembly point and location of firefighting equipment and action to be taken during emergency by staffs and contractors. Instructions to respond to accident and emergencies situation were tested and it was found to be clearly understood by all workers interviewed both at the mill and estates. Trained first aiders were available at all work area both in the estates and mill. Cross checked with training records found that most of the estate mandores and department heads were trained on first aid. The last centralized refresher training on first aid was conducted in Dec 2016 at Kuala Muda Estate. Interviews with First Aiders found that they were aware of their duties and responsibility. First aid boxes were provided and maintained at several locations in the estates' office, stores and workshops. Each work area for example spraying, manuring and harvesting has been supplied with the first aid kit. Trained first aider will take charge on monitoring of the usage and will be replenished on monthly basis by HA. Accident statistics were maintained in the Trong BU. Accidents were recorded and the cause investigation carried out with corresponding mitigation action were taken. The use of JKPP 6, 7, 8 & 9 Forms are used in timely & satisfactory manner.
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	All estates have provided group insurance for all foreign workers as required under the Workmen Compensation Act 1992. Sighting of records and cross check with workers showed that they were covered with valid insurance policy. Local workers are covered by SOCSO. There are only local workers work at Trong POM. All of them have been covered with SOCSO.

**RSPO PUBLIC SUMMARY REPORT**

	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	The BU has monitored its occupational injuries/accident using the the Lost Time Accident (LTA) metrics. All injuries/accidents were recorded in this metrics. For 2016, 1 accident with 9 days of lost of workdays was recorded at Stothard Estate, no accident recorded at Kuala Muda Estate and Batu Pekaka Estate, while at Trong POM, 1 accident with 14 days lost of workdays was recorded.
C 4.8  All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	A formal training programme covering all aspects of the RSPO Principles and Criteria were established in the 'Training Program year 2017'. A regular assessments of training needs was also conducted for all its workers and staffs.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	The employees training records were maintained at each operating units. It was made available for auditors review.

**Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY**

Clause	Indicators	Comply Yes/No	Findings	
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	YES	Boustead Trong BU has established its environmental aspects/impacts register associated with their activities. The environmental aspect and impact covers the upstream activities such as FFB reception until the downstream processes. At the mill, the identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the significant environmental receptors are the air emission from the boiler stack, the generation of the POME and land contamination which related to the management of scheduled wastes and domestic waste. For the estate operation, all activities from harvesting, manuring, weeding, nursery, pest and disease, upkeep programme until delivery to mill has been identified.
	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible persons. Minor Compliance	YES	Significant environmental impact was derived from the environmental impact evaluation. Those activities evaluated as significant were then monitored using the mitigation measure established for each activity where the significant impacts occurred. The management has periodically reviewed the implementation and effectiveness of the established program.
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation	YES	No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed.

**RSPO PUBLIC SUMMARY REPORT**

		measures. The plan shall be reviewed as a min. 2yrs to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance		
<p>C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>	5.2.1	Information collated in a HCV assessment that incl. both the planted area itself & relevant wider land scape-level considerations. Major Compliance	YES	The HCV Assessment of the estates under Trong Business Unit of Boustead Plantations BHD is available. The study was conducted by third party was completed in Dec 2016. The study had covered HCV within and adjacent to the 7 estates under Trong BU. The HCV assessment had identified the HCV 1.1, 1.4, 3, 4.2, 5 and 6 within the 7 estates.
	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain enhance them shall be implemented through an action plan. Major Compliance	YES	Identification and assessment of HCV habitats or protected areas was carried out prior to the main assessment through. The HCV Assessment of the estates under Trong Business Unit of Boustead Plantations BHD is available. The HCV assessor has outlined several recommendations for biodiversity and landscape management by the estate. It has been reviewed during the audit.
	5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance	YES	A training programme and records for year 2017 was available and reviewed.
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> <li>The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>Outcomes of monitoring shall be fed back into the action plan. Minor Compliance</li> </ul>	YES	Trong BU has developed action plan base on recommendation made by the HCV assessor. At Stothard Estate the plan titled as HCV Area Management Plan 2017 dated 3 January 2017 was established. For Kuala Muda the HCV action Plan for year 2017 was updated on 1 January 2017, and since no HCV has been declared in Batu Pekaka, thus the estate decided not to have an action plan. Trong BU is committed to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signages to prohibit hunting were erected at riparian zone and border. Patrolling for Illegal hunting was also being implemented to control the illegal activities.



**RSPO PUBLIC SUMMARY REPORT**

	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance	YES	In Stothard Estate, a cemetery site at Kampung Tiban has been gazette as the HCV site. The villagers asked the estate management to fence the cemetery area. Estate management also provided an access key to the Head of Kampung Tiban to enter the cemetery whenever they want to pay their respect to their next of kin there. In Kuala Muda estate, a cemetery inside the estate is available, and estate management has allow their next of kin to come to pay homage to the graves.
C 5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	Trong BU has identified all of its wastes and sources of pollution in the Waste Management Action Plan. Among the wastes identified for recycling include plastic, paper and metal. These wastes were sent to recycling center near to the workshop. Scheduled wastes include used lubricant, used oil filter, contaminated rags and gloves, chemical containers and clinical waste. Other domestic wastes such as organic wastes were collected and buried at the estate's landfill.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	For the empty chemical containers, the BU is practicing the triple rinsing as recommended by the Agriculture Department. All the rinsed containers were punctured and stored prior to disposal. Records of triple rinsing has been showed to the auditor.
	5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance	YES	Trong BU are committed to reduce pollution to environment. A "Waste Management Plan" was established at the respective site. Among the wastes that were identified palm fronds, fertiliser bags and chemical containers, scheduled wastes, domestic wastes from household, scrap iron, and mill wastes such as boiler ash, POME, EFB, fibre & shell, decanter cake, etc.
C 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.	5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. Minor Compliance	YES	Trong BU has a plan to improve the efficiency of fossil fuel usage titled as 'Improvement on usage of fossil fuel'. In the plan, the BU planned to replace the old vehicles and to reduce fuel consumption through daily routine inspection, replace engine oil and filter every month. In Trong POM, they stop the diesel generator during non-processing hour, and to ensure the higher load machineries running only during mill operation also monitored the consumption of diesel per mt FFB.
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance	YES	Boustead Plantations Berhad practice the zero burning. A policy on the zero burning was established since Jan 2011. There was no evidence that land preparation by burning. It was also observed that signage " <i>Dilarang Membakar</i> " was available at various locations within the estates.
	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	There was no evidence that fire had been used to prepare land for replanting in all the estates within the BU. There was also no evidence of open burning at all the visited replanting areas within the three estates. No fire was used for waste disposal.
C 5.6 Preamble Growers and millers commit to reporting on	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions,	YES	The Stothard Estate, Kuala Muda and Batu Pekaka Estate have identified the environmental aspects and its associated environmental impacts for all its activities related to field operation as well as other facilities such as the workshop, chemical and waste stores. The aspect-impact

**RSPO PUBLIC SUMMARY REPORT**

<p>operational GHG emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and meth. It is also recognised that it is not always feasible or practical to reduce or minimise these emissions. Growers and millers commit to an implementation period until the end of Dec 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO. Plans to reduce pollution and emissions, incl. GHG, are developed, implemented and monitored.</p>		particulate/soot emissions and effluent (see Criterion 4.4).		assessment was reviewed annually. Last review was carried out in Dec 2016. The identification of the environmental aspects was carried out using the BEA/5.1/EAI – Environmental aspect & impact identification form. A procedure titled as “Environmental Aspect Impact/ Environmental Impact Evaluation” was established to guide on how to carry out the environmental aspect impact assessment. The assessment has covered activities related to estate operation such as chemical spraying, manuring, harvesting/pruning, EFB mulching, transportation and decanter cake application, chemical storage, etc. For the mill, the assessment covered activities from receiving FFB until dispatch of CPO. The estates had included the assessment for activities which emit GHG, e.g. FFB transportation, manuring and road maintenance.
	5.6.2	Significant pollutants and GHG emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	The estates have established GHG emissions & carbon stock management program which included the reduction program. Significant amount has been budgeted to ensure the implementation of the program.
	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. Minor Compliance	YES	Trong BU had been used RSPO PalmGHG Calculator as a tool. Sighted report send to RSPO in March 2017.

**RSPO PUBLIC SUMMARY REPORT**

**Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS**

Clause	Indicators		Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	The SIA was carried out by external consultants in 2016, available during the audit. The SIA report included reports of each estates within the BU and the mill. The individual report contains respective estate map, manpower statement as at September 2016, date of focus group discussions were held, number of participants who attended each session, number of internal and external stakeholders consulted, stakeholders' perspectives, issues that were raised, and proposed mitigation/enhancement measures. The reports have covered on stakeholder mapping, employment conditions, living conditions, health & safety in the workplace, public health & safety, respect for human rights, communication with management, and community relations.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Review of the SIA report indicated that the assessment has been done with participation of the affected parties.
	6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, incl. responsibilities for implementation. Major Compliance	NO	Trong POM: There is evidence that the action plan has been developed in consultation with the affected parties. The action plan was documented with timeline of each actions and the person-in charge. At Kuala Muda Estate: No action plan was sighted. At Stothard Estate, an action plan was established. However, there was no timetable and no person(s) responsible for implementation was identified. And as for Batu Pekaka Estate, during the meeting in Nov 2016, several issues pertaining to payment of benefits , housing requirements, road repair and manpower shortage were raised. A table was sighted showing a summary of the issues raised, solutions, and a schedule for completion. However, the person(s) responsible for implementation was not identified. Due to the above lapses, a Major NCR RZ 02 2017 was raised.
	6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance	YES	Since this was the first time that Trong Business Unit has carried out an SIA as explained in Indicator 6.1.1, none of the action plan is due for revision.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	There was no smallholder schemes in Trong BU
C 6.2 There are open and transparent methods	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	The estates and mill have maintained its consultation and communication procedures titled 'External Communications Procedures' and a flowchart for complaints to management (internal) for any stakeholders to communicate with the company on any issues concerning their interest.

**RSPO PUBLIC SUMMARY REPORT**

for communication and consultation between growers and/or millers, local communities and other affected or interested parties	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	Kuala Muda Estate: There are Complaint Panels in estates and POM. Appointment of members evident.
	6.2.3	A list of stakeholders, records of all comm, incl. confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	NO	List of stakeholders and records of communication, including confirmation of receipt and efforts made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders were maintained at all the audited sites. The list of stakeholders at mill and estates has been updated in Jan 2017. Noted that at Kuala Muda Estate, stakeholders meeting minute in Nov 2016 was reviewed by the audit team and found that there was no evidence of foreign workers or their representatives attended the stakeholders' meeting. Therefore, a Minor NCR RZ 03 2017 was raised.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistle-blowers, where requested. Major Compliance	YES	All estates and mill are using the same complaints form which anyone can fill up and submit to the office. The audit team sighted some of the filled forms by their own employees. Most cases recorded in the form were resolved within 2 to 7 days. In some cases, some delays were noted. All the complaints forms sighted contain sections for complainants to fill up their names, and in some forms, their job and address. The BU affirms that its dispute system is open to any affected parties. Relevant policy i.e. Whistleblowing and procedures were observed established. Anonymity of complainants and whistleblowers will be maintained and will not be disclosed to third parties where requested as explained in the job description for management social responsible person.
	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	There was no dispute in Trong BU. It was confirmed during the consultation with heads of neighboring villages.
C 6.4 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.	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	YES	The BU maintained its documented procedures for identifying legal and customary right and for identifying people entitled to compensation. The procedure is to have details about implementation of fair compensation for any issues/disputes related to land, ownership and access to land, and ensures negotiations concerning compensation are dealt with through a documented system that enables indigenous peoples, local community, and other stakeholders to be treated fairly.
	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities;	YES	Fair Compensation procedure details out the procedures for calculating and distributing compensation in a fair manner. This procedure specifies that it would take into account ethnic group, gender differences, etc. A flowchart to the same effect was also sighted. Nevertheless, no case of compensation related to loss of legal or customary rights of indigenous peoples, local communities or external stakeholders was observed.

**RSPO PUBLIC SUMMARY REPORT**

		and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance		
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	YES	There was no dispute in Trong BU. It was confirmed during the consultation with heads of the neighboring villages.
C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	All estates and mill have documentation of pay in the form of monthly pay slips. Each employees received a copy of their pay slip every month. The pay slip contains the date, salary payable including any allowances, overtime pay, paid medical leave, minus any deductions such as advances taken, statutory deductions (SOCSO, EPF), temple/mosque funds, etc. Interviews with workers reveal that they understood the contents of the pay slip and would seek clarifications from the relevant clerk if they are unsure or have questions.
	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	NO	Workers and staff have their contracts of employment based on NUPW or AMESU documents, respectively. Details of payments, working hours, deductions, overtime, leave entitlement, reasons for dismissal, etc are available in the respective documents. The contracts are in Bahasa Malaysia and understood by the estate and mill employees. Auditor has verified employment contract of workers at Kuala Muda Estate, Stothard Estate and Batu Pekaka Estate. However, auditor has found that employment contract of two foreign workers at Trong POM, had not stated Minimum Wage Order 2016. Therefore, a Major NCR MRS/05/2016 was raised.
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	NO	All estates and mill provided housing facilities to the staffs and workers. Based on visits conducted, the houses provided were in good conditions and comfortable. Interviews with the workers reveal that they were satisfied with the accommodation provided at the linesite. Each family was given one house. Single workers share between 2 to 4 persons per house. All houses are supplied with 24 hours of electricity (from the national grid) and water (from government facilities). Sundry shops and recreational facilities like ping pong table, football field, volleyball and takraw/badminton court are also available. Employees are accorded with medical facilities at the estate clinic located next to the office. The Green Book initiative seen at Stothard Estate and Trong Palm Oil Mill also provide space near the houses for the employees to plant vegetables and fruits trees. Household wastes were cleared weekly. Creches were also available for younger children. The crèche at Stothard Estate gets milk supply from the estate. However, at Kuala Muda Estate and Batu Pekaka Estate, it was found that both estates had not complied with the Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) on the housing weekly inspection. Therefore, a Minor NCR MRS/04/2017 was raised.

**RSPO PUBLIC SUMMARY REPORT**

	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance	YES	Sundry shops are available within the estates premises except at Batu Pekaka Estate and Trong POM. Stothard Estate and Kuala Muda Estate have monitored a sundry shop on the adequacy, sufficient and affordable food by annually. The sundry shop at Stothard Estate sells basic daily needs including tobacco, beverages, rice, flour, cooking oil, etc. These shops also allow the workers to buy goods on credit. In Kuala Muda Estate, some workers complained that vegetables sold at the sundry shop is not fresh, and they had to source for alternatives elsewhere. This matter was brought up to the estate's attention and the reason for this is because vegetables are perishable items which cannot be kept long. However, the estate allows the workers to instead do their grocery shopping at a shop outside the estate which is located less than 2km away.
C 6.6 The employer 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.	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	A valid freedom of association policy (Polisi Kebebasan Berpersatuan) dated 11 January 2011 is available in bilingual (Malay and English). The policy is found to be posted on the company's notice and information wall.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	Minutes of meeting between NUPW/AMESU representatives with estate and mill management were documented and as verified.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be doc. evidence that min. age requirements are met. Major Compliance	YES	The list of workers sighted contains workers' detail, including their dates of birth were sighted. Observations were also made during field visits and during interviews with workers confirm that no one below 18 is employed in the estates and the mill.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	Equal opportunities policy was sighted at every estate and mill identifying the relevant/affected groups as 'every worker, customer, business partners and members of the public involved in estate and mill activities. Among other things, the policy specifies that management would ensure that all parties directly or indirectly involved with the estate/mill would be accorded fair treatment, and that the estates/mill would not be involved in, nor support any oppression based on race, caste, nationality, religion, disability, age, sexual orientation, union membership or political leanings. Interviews conducted with the staff and workers at all estates and mill confirm that there is no discrimination of any form at the estates and palm oil mill.
	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and	YES	A human rights policy and Equal opportunities policy sighted at all estates and mill also state their commitment against unfair and discriminatory practices.

**RSPO PUBLIC SUMMARY REPORT**

		migrant workers have not been discriminated against. Major Compliance		The company does not practice discrimination based on race, caste, national, origin, disability, gender, sexual orientation, union membership, political affiliation, or age. A functioning grievance mechanism is in place. The <i>Persatuan Pekerja</i> and Gender Committee also looks into allegation of discrimination if reported. Interviews with local communities, migrant workers and female employees confirm that there is no evidence of any form of discriminatory practices by the estates and oil palm mill.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	Based on interviews with workers/staffs at all estates and mill, they were appointed to their respective positions based on job availability, their experience and qualification. An interview evaluation form dated Nov 2016 was sighted which shows an objective assessment of a candidate during a job interview.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	NO	A policy on sexual harassment signed by the Plantation Director in Jan 2011 is available. The policy was also written in Malay language and displayed on the notice boards. No evidence or acts that contradict this policy were observed. Interview with the employees (both men and women), and the Gender Committee members reveal that the level of understanding of what constitutes sexual harassment varies. Interviews with workers at all visited estates and mill reveal that there is either inadequate understanding, or no understanding on sexual harassment and what constitutes sexual harassment. Female employees appear to have a slightly better understanding of what constitutes sexual harassment, compared to their male counterparts. Therefore, a Major NCR RZ 04 2017 was raised. Nevertheless, all employees interviewed at the estates and mill confirm that they have not encountered any form of sexual harassment.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The company has established a policy. All the estates and the mill adopts a written Reproductive Rights Policy. Generally, based on interviews, the female employees were aware of their maternity rights, and that they were to cease any spraying and fertilizing works once they get pregnant.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance	YES	A grievance mechanism has been sighted at all estates and the mill. It involves a flowchart which explains the process of grievance handling for both external and internal parties. At Batu Pekaka, Stothard Estate, Kuala Muda Estate and Trong Palm Oil Mill, the flowchart is exhibited prominently near the entrance to the main estate/mill office. The grievance mechanism has been briefed to all workforce in March 2017.
C 6.10 Growers and millers deal fairly and transparently with smallholders and	6.10.1	Current and past prices paid for FFB shall be publicly available. Minor Compliance	YES	This CU is to be certified under the Identity Preserved supply chain model. Hence, the POM is not accepting any outsiders FFB from smallholders or another private plantation. Therefore, the mill is not required to display current and past prices for FFB.
	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing	YES	Auditor has verified through interview and verification of contract agreements and payment invoices for selected contractors. The agreement will be renewed on annual basis. All contractors have been explained on the agreement.

**RSPO PUBLIC SUMMARY REPORT**

other local businesses.		mechanisms for FFB shall be documented. Major Compliance		
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	Interviews were conducted with selected contractors. Based on interview conducted, there was evidence that all parties understood the contractual agreements they entered into, including their rights and obligations. The contractors and suppliers also informed that dealings with Trong BU have been fair, legal and transparent. Payments are received within one or two months of issuance of invoice.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	It was evident that the payment was made in a timely manner.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	YES	It has been demonstrated that the estates and the Trong BU provides contributions to the local communities.
	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	YES	There is no scheme smallholder in Trong BU.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES	All the estates and the mill adopt the Human Rights Policy which, among others, respects human rights and will not be complicit in human rights infringement. Interviews with workers and staff also confirm that they entered into the employment voluntarily and freely. Equally, they are allowed to terminate their employment as per their terms of employment, without any penalty. Foreign workers also confirm that the job they are doing corresponds with what they were told on their home country. There is no evidence of contract substitution. All employees work 8 hours a day and are paid overtime should this number of hours is exceeded. Workers who work on rest days are also compensated in accordance with the Employment Act, 1955.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	During interview with foreign workers, they confirmed that the current job were as what they were told at their home country. There was no evidence of contract substitution.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	Special labour policy for employment of foreign workers has been addressed dated in Apr 2016. Accordingly, foreign workers shall be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival programme will be conducted once arrived for three months.
C 6.13	6.13.1	A policy to respect human rights shall be documented and	YES	A policy to respect human rights has been established by Trong BU in Jan 2016. Auditor has verified through interview with workers that the policy has been communicated to all levels of the



## RSPO PUBLIC SUMMARY REPORT

Growers and millers respect human rights		communicated to all levels of the workforce and operations. Major Compliance		workforce and operations. All the estates and the mill adopt the Human Rights Policy which, among others, respects human rights and will not be complicit in human rights infringement.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance	YES	This indicator is not applicable as the estates and mill are located in Peninsular Malaysia.

### Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Trong BU has no plan for any new planting and no new development of area was observed during the visit. Auditors has verified through [www.globalforestwatch.com](http://www.globalforestwatch.com) , GOOGLE Maps Data, Estate Maps and also through visits to the sites that there was no new planting and no new development of area was observed, Therefore this Indicator was not applicable Thus Principle 7 is not applicable.

### Principle 8: COMMITMENT TO CONTINUOUS IMPROVEMENT IN KEY AREAS OF ACTIVITY

Clause	Indicators	Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to: Major Compliance	
	a)	Reduction in use of pesticides(Criterion 4.6);	YES The estates within the BU continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of insecticides, the estates have established nurseries for beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> . This was to ensure continuity in the planting of the beneficial plants. The estates were committed to reduce the use of chemicals. The estates have implemented and will continue to only spray Circles (Strip) and noxious weeds. Spraying was only carried when required. Soft weeds and <i>Nephrolepis bisserata</i>

**RSPO PUBLIC SUMMARY REPORT**

				were maintained and encouraged in the inter rows. EFB was applied in single layers and was not dumped in large amounts to prevent breeding of Rhinoceros Beetles. To ensure efficient loose fruit collection, circle raking was carried to avoid VOPs from merged and for the purpose to reduce of chemical usage.
b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	<p>The CU maintained established and implemented environmental improvement plans and measures. Among the relevant plans and measures were:</p> <ul style="list-style-type: none"> <li>• Environmental Improvement Plan - Environmental Impact Evaluation (EIE).</li> <li>• Waste Management Action Plan 2017/18.</li> <li>• Environmental Management Programme (EMP).</li> <li>• Pollution Prevention Plan.</li> <li>• Identification and Management of Wastewater.</li> <li>• <i>"Prosedur Untuk Pelupusan Sampah Domestik / Bahan Buangan Setempat"</i>.</li> <li>• <i>"Prosedur 3 Kali Pembilasan Bekas Simpanan"</i>.</li> </ul> <p>Among content of plans were:</p> <ul style="list-style-type: none"> <li>• reduction of diesel usage / GHG emission.</li> <li>• reduction of POME generation.</li> <li>• maintain water quality.</li> <li>• reduce soil erosion.</li> <li>• reduce usage of chemical.</li> <li>• reduce land contamination</li> <li>• improve soil fertility</li> <li>• reduce waste</li> </ul> <p>Further, the Trong BU already has planned for installation 1 unit of solid de-watering machine to reduce solid content.</p>	
c)	Waste reduction (Criterion 5.3);	YES	<p>The CU continued established and implemented waste reduction plans. Among the plans were:</p> <ul style="list-style-type: none"> <li>• Environmental Improvement Plan - Environmental Impact Evaluation (EIE).</li> <li>• Waste Management Action Plan 2017/18.</li> <li>• Environmental Management Programme (EMP).</li> <li>• Pollution Prevention Plan.</li> <li>• Identification and Management of Wastewater.</li> </ul> <p>Among type of wastes are agricultural organic wastes, rubbish, used oils, used batteries, empty pesticide containers, clinical waste, scrap iron, wastewater, etc.</p> <p>Non-reusable empty chemical containers observed disposed as per relevant requirements of scheduled wastes or using Jabatan Pertanian contractors after triple rinsed. Reusable agrochemical containers observed used for collecting of triple-rinsing wastewater.</p> <p>Scheduled wastes observed labelled with relevant information and hazard sign, and disposed to valid licensed party.</p>	
d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	<p>The BU had established and implemented GHG emission reduction plan. Among the plan implemented were replacement of 2 unit of tractors of less fuel consumption, periodical maintenance of tractor and power generator installation 1 unit solid dewatering machine to reduce solid content, application of organic material (biomass) as fertilizer.</p>	

**RSPO PUBLIC SUMMARY REPORT**

	e)	Social impacts (Criterion 6.1);	YES	<p>Trong POM, Batu Pekaka Estate, Stothard Estate and Kuala Muda Estate have allocated budget FY2017 for social commitment as continuous improvement such as:</p> <ol style="list-style-type: none"> <li>1. Donation to public funds</li> <li>2. Transportation for school children</li> <li>3. Creche Ayah</li> <li>4. Medical transportation</li> <li>5. Contribution to estate Tamil school</li> <li>6. Water supply subsidy</li> </ol>
	f)	Encourage optimising the yield of the supply base	YES	<p>In order to optimise yields Kuala Muda, Stothard and Batu Pekaka Estates were committed to implement best agricultural practices inclusive of timely and proper fertiliser application, Improve on accessibility to maximise crop evacuation, maintaining harvesting interval below 10 days, To collect all loose fruit to minimise losses, Water bodies and water conservation pits were constructed to conserve moisture.</p>

**RSPO PUBLIC SUMMARY REPORT**

**Attachment 4**

**Details of Non-conformities and Corrective Actions Taken for RSPO P&C MYNI 2014**

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action Taken by the CU and Verification by Auditors
Indicator 2.1.1	Major	<p>#NCR No : MZK 01 2017 Finding : Noncompliance against the Environment Quality (Schedule Waste) Regulation 2005. Regulation 9. Storage of Schedule waste more than 180 days at Trong POM and Kuala Muda Estate Objective evidence :</p> <ul style="list-style-type: none"> <li>- At Kuala Muda Estate SW 305, SW 410 and SW 409 date generated from February 2016 was not disposed accordingly.</li> <li>- At Trong POM SW 305, SW 110, SW 410 date generated from October 2015 was not disposed accordingly.</li> </ul> <p>#NCR No : MRS/01/2017 Finding : Noncompliance against:</p> <ol style="list-style-type: none"> <li>1. Industry Code of Practice for Working in a Confined Space Area, 2010</li> <li>2. Section 12. Inspection of place of work, OSH (Safety and Health Committee) Regulations 1996</li> <li>3. 22. Information, instruction and training – OSH (USECHH) Regulations 2000</li> <li>4. OSH (Classification, Labelling and Safety Data Sheet of Hazardous Chemical) Regulations 2013</li> </ol> <p>Objective evidence :</p> <ol style="list-style-type: none"> <li>1. Based on 'Borang Permit Bekerja Bagi Memasuki Ruang Terkurung' on 23 June 2016 at Boiler 2 Steam Drum and on 18 June 2016 at Vacuum Dearthor, there was no record of Health fitness certificate for authorized entrance.</li> <li>2. Workplace inspection was carried out only two times e.g. 6 December 2016 and 24 September 2016</li> <li>3. Record of refresher training for chemical handling was not evident</li> <li>4. Secondary container of N-Hexane and alcohol at laboratory was not labelled as required by CLASS Reg.</li> </ol>	<p>#NCR No : MZK 01 2017 Corrective Action: 1) Currently in progress to dispose the scheduled waste items, but still pending approval from DOE. 2) Mill already disposed schedule waste SW110 and SW410. SW305 in progress to dispose. Auditor Verification: Copy of quotation from Ken Ep Waste Management Sdn Bhd and Kualiti Alam Sdn Bhd and consignment note for SW 110 and 410 have been provided to the audit team. Status: Closed</p> <p>#NCR No : MRS/01/2017 Corrective Action: 1) Mill already performed the Health Fitness Certificate for authorized entrance on 29<sup>th</sup> March 2017. 2) The workplace inspection will be included in Mill Programme Year 2017. 3) Mill has amended the attendance record, and make sure record of attendance will be sign when finish the training. 4) Secondary container of N-Hexane and Alcohol has been labelled as required by CLASS Reg. Auditor Verification: 1) Auditor has received picture of health fitness certificate for authorized entrance on 29<sup>th</sup> March 2017 by Dr Pervinder Kaur. 2) Auditor has received picture of Mill Programme Year 2017 that include workplace inspection and the mill already done a workplace inspection on 26 March 2017 before safety meeting. 3) Auditor has received picture attendance has been sign for Chemical handling. 4) Auditor has received picture Secondary container of N-Hexane and Alcohol has been labelled as required by CLASS Reg. Status: Closed</p> <p>#NCR No : RZ 01/2017 Corrective Action: 1) Currently Mill already updated list employees for deduction and Mill already send the Letter to the Labour office for seeking approval.</p>

**RSPO PUBLIC SUMMARY REPORT**

		<p>#NCR No : RZ 01/2017</p> <p>Finding : Staff salary deducted for temple and mosque funds but there was no evidence of request in writing by the employees, and the prior permission in writing of the Labour Office. This is a requirement under Section 24(4) of the Employment Act 1955</p> <p>Objective evidence : Trong Palm Oil Mill – RM10 of the workers’ salary was deducted for temple fund. There was no written permission from the Labour Office for this deduction. Written request on 14 August 2014 from the employees for this deduction was available, but the list was not updated. Stothard Estate – RM10 of the workers’ salaries were deducted for mosque fund. There was no written consent from the Labour Office for this deduction. Written consent from the Muslim employees dated 17 May 2013 were available, but the list was not updated.</p>	<p>2) Estate have received consent letter pertaining deduction for mosque fund from Muslim workers. Approval from Labour Office was obtained on 1 July 2013. List has been updated as per attached appendix.</p> <p>Auditor Verification: 1) Copy of the Letter to Labour Office dated 28 April 17 (signed by the Mill manager) seeking approval for deduction of salary and the updated list of workers involved in the deduction of the salary was provided to the audit team. 2) Copy of the Letter to Labour Office dated Labour Office (from Stothard Estate) dated 1 July 13 and updated list of workers involved in the deduction of the salary was provided to the audit team.</p> <p>Status: Closed</p>
Indicator 2.1.2	Minor	<p>#NCR No : MRS/02/2017</p> <p>Finding : The applicable legal requirement was not updated in the legal register</p> <p>Objective evidence : Trong BU has not included the following regulations in their established legal register:</p> <ol style="list-style-type: none"> <li>1. Children and Young Persons</li> <li>2. National Land Code, 1965</li> <li>3. Workmen Compensation Act, 1952</li> <li>4. Pension Law of Malaysia</li> <li>5. Water Act 1920 (Act 418)</li> <li>6. FMA (Persons-In-Charge) (Amendment) Regulations, 2014</li> <li>7. Industry Code of Practice for Safe Working in a Confined Space 2010</li> <li>8. Poisons Ordinance, 1952</li> <li>9. Poisons (Sodium Hydroxide) Regulations, 1962</li> <li>10. Factories and Machinery (Electric Passenger and Goods Lift) Regulations, 1970</li> </ol>	<p>Corrective Action Plan: - Discussion done with Boustead Legal Department pertaining outdated legal registry and the legal requirement. - Requested to the Lawnet to upgrade their notification system to be more user friendly - All applicable legal requirement updated as per below: -</p> <ol style="list-style-type: none"> <li>1) Children and Young Persons (updated)</li> <li>2) National Land Code, 1965 (updated -Land Acquisition Act 1960)</li> <li>3) Workmen Compensation Act, 1952(updated)</li> <li>4) Pension Law of Malaysia</li> <li>5) Water Act 1920 (Act 418) (Updated)</li> <li>6) FMA (Persons-In-Charge) (Amendment) Regulations, 2014(updated)</li> <li>7) Industry Code of Practice for Safe Working in a Confined Space 2010(updated)</li> <li>8) Poisons Ordinance, 1952(superseded)</li> <li>9) Poisons (Sodium Hydroxide) Regulations, 1962(updated)</li> <li>10) Factories and Machinery (Electric Passenger and Goods Lift) Regulations, 1970 (updated)</li> </ol> <p>Auditor Verification: Corrective action plan accepted Status: Open The effectiveness of the corrective action will be verified during next audit.</p>
Indicator 2.1.3	Minor	<p>#NCR No : MZK 02 2017</p> <p>Finding: Mechanism for ensuring compliance was not effective at Trong POM</p> <p>Objective evidence: Evidence of boiler ash flowing to the drain during rain.</p>	<p>Corrective Action Plan: 1) Mill plan to construct the roof before year end. 2) Mill plan to give training to workers immediately.</p> <p>Auditor Verification: Corrective action plan accepted.</p>

**RSPO PUBLIC SUMMARY REPORT**

			Status: The effectiveness of the corrective action plan will be verified during next audit
Indicator 2.2.2	Minor	<p>#NCR No : MRS/03/2017</p> <p>Finding: Physical markers was not always maintained along the legal boundaries at all estate boundaries</p> <p>Objective evidence: During audit, the audit team found that physical markers along the legal boundaries were not available at the following areas:</p> <ol style="list-style-type: none"> <li>1. Stothard Estate - Ladang Kim Seng, abandoned area which belongs to local community, and also Kg. Kuala Merah</li> <li>2. Batu Pekaka Estate - Sime Darby Kuala Ketil Estate and Genting Plantation</li> <li>3. Kuala Muda Estate – OSK Properties</li> </ol>	<p>Corrective Action Plan:</p> <ol style="list-style-type: none"> <li>1) Stothard Estate have erected boundary marker and signage along the boundary immediately.</li> <li>2) Batu Pekaka Estate have erected boundary signage along the boundary immediately.</li> <li>3) Kuala Muda Estate have erected boundary signage along the boundary immediately.</li> </ol> <p>Auditor Verification: Corrective action plan accepted.</p> <p>Status: The effectiveness of the corrective action plan will be verified during next audit</p>
Indicator 4.1.2	Minor	<p>#NCR No : RR 02 2017</p> <p>Finding : The practice of reusing all water from emergency showers was not reused.</p> <p>Objective evidence : At Batu Pekaka Estate, water from emergency shower was directed into a field drain.</p>	<p>Corrective Action Plan: Batu Pekaka Estate has constructed the Separate chemical trap immediately and now ready for use.</p> <p>Auditor Verification: Corrective action plan accepted</p> <p>Status: The effectiveness of the corrective action plan will be verified during next audit.</p>
Indicator 4.4.2	Major	<p>#NCR No : MZK 03 2017</p> <p>Finding : Management did not prevent their buffer zones from any chemical activities</p> <p>Objective evidence : Stothard Estate</p> <ol style="list-style-type: none"> <li>1. During site review at the water pond/lake in Stothard Estate Block 95A and 97A, it was found that no signage to prevent from spraying or fishing available at site. Further, there was signed of spraying in the buffer zone area.</li> </ol>	<p>Corrective Action:</p> <ol style="list-style-type: none"> <li>1) Estate have erected notification signage along the buffer zone to prevent any activities to be carried out in the buffer zone.</li> <li>2) Awareness briefing and campaign was conducted to all estate workers. Stakeholders will be informed later during stakeholder meeting. Additional boundary markers will be placed.</li> <li>3) Estate will do training immediately to the contractor workers regarding to HCV / buffer zones area.</li> </ol> <p>Auditor Verification: Picture showing signage has been erected along the buffer zone to prevent any spraying and fishing activities. Record of training which was conducted on 14/3/2017 to the workers was also provided.</p> <p>Status: Closed</p>
Indicator 4.6.6	Major	<p>#NCR No : RR 03 2017</p> <p>Finding : The requirement regarding storage of all pesticides shall be according to recognized best practices not implemented</p> <p>Objective evidence : At Kuala Muda Estate</p> <ul style="list-style-type: none"> <li>• Petrol has not keep inside a safety can as determined by the assessor (CHRA).</li> </ul>	<p>Corrective Action:</p> <ol style="list-style-type: none"> <li>1) Safety can for petrol storage will be purchase immediately.</li> <li>2) The Estate has purchase pallet immediately.</li> <li>3) Spill tray was provided in Chemical Store immediately.</li> </ol> <p>Auditor Verification: 1) A copy of purchase invoice form was provided. 2) A copy of the purchase invoice for pallet was provided.</p>

**RSPO PUBLIC SUMMARY REPORT**

		<ul style="list-style-type: none"> <li>Storage of fertilizer was not in accordance with the fertilizer management guidelines</li> <li>In chemical store-all chemical drums not keep inside a bunding area or tray to prevent pollution occurs.</li> </ul>	<p>3. A photo showing chemicals had been put in the spill tray was provided to the audit team. Status: Closed</p>
Indicator 4.6.11	Major	<p>#NCR No : RR 01 2017 Finding : The recommendation for medical surveillance made in the CHRA (2016) for sprayers and foreman was not complied Objective evidence : At Batu Pekaka Estate - Workers carrying out spraying in nursery and foreman were not sent for medical surveillance.</p>	<p>Corrective Action: 1) Nursery workers and foreman will be send to OHD on 15<sup>th</sup> March 2017 for annual medical surveillance as per CHRA recommendations. Auditor Verification: 1) A copy of medical surveillance for foreman and sprayer at the nursery dated 16/3/2017 was provided to the audit team. Results of the medical surveillance indicated all workers were fit to continue their job. Status: Closed.</p>
Indicator 4.7.2	Major	<p>#NCR No : MRS/06/2017 Finding : Risk assessment not covered all activities in the working place Objective evidence : Risk assessment was not carry out for the following mill's activities: 1. Conveyor / rotating machine 2. Heat stress at grading, boiler, sterilizer and EFB area 3. Construction / upgrading sterilizer (non-routine work)</p>	<p>Corrective Action: 1. HIRARC for Conveyor/Rotating machine was carry out and done the assessment. 2. Mill already amended and included Heat Stress for HIRARC at Grading, Boiler, Steriliser and EFB area. 3. The HIRARC for construction had been done. Auditor Verification: A copy of HIRARC which included all the activities highlighted in the NC have been identified. Status: Closed.</p>
Indicator 6.1.3	Major	<p>#NCR No : RZ 02/2017 Finding : Plans for avoidance or mitigation of negative impacts and promotion of the positive ones was not available Objective evidence : Kuala Muda Estate - There is no evidence of any action plan developed, no timetable, and no responsibilities for implementation was identified. Stothard Estate – Although an action plan was developed and documented, there is also no timetable and no responsibilities for implementation was identified.</p>	<p>Corrective Action: 1) Estate have developed action plan &amp; time table based on complaints and finding received immediately. 2) Estate will train all the staff regarding to requirement of Social in RSPO. Expected to complete by July 2017. Auditor Verification: A copy of the Social Plan named 'Maklumbalas hasil dari penilaian impak sosial (SIA report 19.7.2016) dalaman (Pekerja/Staff and Contractor) for both Kuala Muda Estate and Stothard Estate was provided. The plan had included all the timetable and person responsible for the action. Status: Closed.</p>
Indicator 6.2.3	Minor	<p>#NCR No : RZ 03/2017 Finding : There is no evidence that foreign workers or their representatives attended the stakeholders' meeting Objective evidence : The stakeholders' meeting was not attended by any foreign workers or their representative at Kuala Muda Estate. The meeting was attended by the mandore and labour supplier contractor.</p>	<p>Corrective Action Plan: 1) The estate will invite/ Appoint foreign worker's representatives for the next stakeholders' meeting. Auditor Verification: Corrective action plan accepted Status: The effectiveness of the corrective action plan will be verified during next audit.</p>

**RSPO PUBLIC SUMMARY REPORT**

Indicator 6.5.2	Major	#NCR No : MRS/05/2017 Finding : Employment contract for foreign workers had not stated the Minimum Wage Order 2016 Objective evidence : Auditor has found that employment contract of two foreign workers not stated Minimum Wage Order 2016.	Corrective Action: The estate had discussed with all contractors pertaining the issue and revise their employment agreement in accordance with Minimum Wages Order 2016. Auditor Verification: A copy of new workers agreement referred to the Minimum Wages Order 2016 has stated in para 5(3). Status: Closed.
Indicator 6.5.3	Minor	#NCR No : MRS/04/2017 Finding : Weekly inspection was not carried out by weekly as required by Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) Objective evidence : 1. Kuala Muda has conducted housing inspection twice in a month by VMO and Hospital Assistant (HA) on 6 & 27 February 2017, 9 & 26 January 2017 and 5 & 29 December 2016. 2. Batu Pekaka Estate only conducted housing inspection on 2 March 2017 and 6 & 12 January 2017	Corrective Action Plan: 1) Discussion and briefing have been conducted with HA and executive at Kuala Muda. Staffs to conduct housing inspection weekly. 2) Discussion and briefing have been conducted with HA and executive at Batu Pekaka. Staffs to conduct housing inspection weekly. Auditor Verification: Corrective action plan accepted Status: The effectiveness of the corrective action plan will be verified during next audit.
Indicator 6.9.1	Major	#NCR No : RZ 04/2017 Finding : There is no evidence that the policy to prevent sexual has been implemented and communicated to all levels of workforce Objective evidence : Interviews with workers at all visited estates and mill reveal that there is either inadequate understanding, or no understanding on sexual harassment and what constitutes sexual harassment (Polisi Gangguan Seksual). There is also no evidence that it has been communicated to all levels of workforce.	Corrective Action: 1) Estate will conduct briefing immediately regarding to sexual harassment and the briefing will be given frequently. 2) Mill management invited officer from Jabatan Tenaga Kerja Taiping to brief the sexual harassment on 3 <sup>rd</sup> Apr 2017 for all workers. Mill will conduct understanding test to all workers tentatively after 3 months to evaluate their understanding. Auditor Verification: A copy of training report and attendance list for male workers carried out on 3 April 2017 by Jabatan Tenaga Kerja at Trong POM and at muster call at Stothard Estate were provided to the audit team. Status: Closed



**RSPO PUBLIC SUMMARY REPORT**

Attachment 5

**RSPO Supply Chain at the Trong Palm Oil Mill – Identity Preserved Model – Module D**

Item No	Requirement NOV 2014	Findings																											
D.1 D.1.1	<p><b>Definition</b></p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&amp;C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p> <p>To verify :</p> <p>a) the volume of certified FFB entering the mill b) the volume sales of RSPO certified</p> <p>The claim only the volume of oil palm products produced from processing of the certified FFB as IP</p>	<p>Trong POM received its crop from its own estates, hence the Identity Preserved of the supply chain model is applicable. The FFB volume entering the mill and sales as RSPO products will not be verified at this audit until the BU is certified to RSPO P&amp;C</p>																											
D 2 D.2.1	<p><b>Explanation</b></p> <p>Estimate total tonnage of CPO and PK potentially produce in a year</p>	<p><b>Projection (March 2017 – Feb 2018)</b></p> <table border="0"> <tr> <td></td> <td></td> <td align="right"><b>MT</b></td> </tr> <tr> <td>(1) FFB Received</td> <td></td> <td align="right"><b>147,000.00</b></td> </tr> <tr> <td>    RSPO</td> <td align="right">147,000.00</td> <td></td> </tr> <tr> <td>    Non-RSPO</td> <td align="right">0</td> <td></td> </tr> <tr> <td>(2) FFB Processed</td> <td></td> <td align="right"><b>147,000.00</b></td> </tr> <tr> <td>    RSPO</td> <td align="right">147,000.00</td> <td></td> </tr> <tr> <td>    Non-RSPO</td> <td align="right">0</td> <td></td> </tr> <tr> <td>(3) CPO Production</td> <td align="right"><b>30,100.00</b></td> <td></td> </tr> <tr> <td>(4) PK Production</td> <td align="right"><b>7,000.00</b></td> <td></td> </tr> </table>			<b>MT</b>	(1) FFB Received		<b>147,000.00</b>	RSPO	147,000.00		Non-RSPO	0		(2) FFB Processed		<b>147,000.00</b>	RSPO	147,000.00		Non-RSPO	0		(3) CPO Production	<b>30,100.00</b>		(4) PK Production	<b>7,000.00</b>	
		<b>MT</b>																											
(1) FFB Received		<b>147,000.00</b>																											
RSPO	147,000.00																												
Non-RSPO	0																												
(2) FFB Processed		<b>147,000.00</b>																											
RSPO	147,000.00																												
Non-RSPO	0																												
(3) CPO Production	<b>30,100.00</b>																												
(4) PK Production	<b>7,000.00</b>																												
D. 2 D 2.2	<p><b>Explanation</b></p> <p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization.</p>	<p>The Palmtrace license has yet to be registered as this is the main assessment of the BU. However the registration will be carried out by the Boustead Central office in Kuala Lumpur once the BU had been certified to the RSPO P&amp;C.</p>																											
D 3 D 3.1	<p><b>Documented procedures</b></p>	<p>a) The mill has established the RSPO: Supply Chain procedure, dated July 2016. The procedure described the following activities :</p>																											

## RSPO PUBLIC SUMMARY REPORT

	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>	<ul style="list-style-type: none"> <li>• 4.0 Responsibilities</li> <li>• 5.0 Control of Documents</li> <li>• 6.0 Delivery of FFB the Estates (FFB)</li> <li>• 7.0 Receiving FFB at the Mill</li> <li>• 8.0 Process monitoring</li> <li>• 9.0 CPO and PK Despatch</li> <li>• 10.0 Product Claims</li> <li>• 11.0 Outsourced Contractor</li> <li>• 12.0 Training</li> <li>• 13.0 Management Review &amp; Audit</li> <li>• 14.0 Reclassification of Mill's Supply</li> <li>• 15.0 Production Volume</li> </ul> <p>b) The RSPO Chairman has the overall responsibility and authority over the implementation of the supply chain requirements. It was noted RSPO Chairman has assigned Trong POM Assistant Manager to ensure the implementation of supply chain procedure met the RSPO requirements. Interviewed with relevant person in-charge at critical control point was revealed they are understood on the RSPO standard requirements which requires no mixing of RSPO certified and non RSPO certified material in receiving, processing, storage and delivery.</p>
<b>D 3.2</b>	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	As stated in the procedure, receiving of FFB is stated in section 7.0 (Receiving FFB at the Mill).
<b>D.4</b> D.4.1	<p><b>Purchasing and goods in</b></p> <p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p>	All certified FFB will come from its own supply base/estates namely TRP Estate, Malakoff Estate, Malaya Estate, Batu Pekaka Estate, Kuala Muda Estate, Stothard Estate and BMR Estate. All delivery documents of certified FFB will be accompanied with Delivery Note/Order. Delivery Note/Order state with information such as ticket no, field no and mode of transport. The Mill weighbridge operator will verify the source and issue the weighbridge ticket. The clerk shall keep the DO copy and maintain in the file. The Person in charge verified the documents to ensure the certified status of the FFB. Volumes of certified FFBs received by the mill had been properly recorded and monitored.
<b>D 4.2</b>	The site shall inform the CB immediately if there is a projected overproduction.	There is the BU main assessment. Hence, this requirement is not applicable.
<b>D.5</b> D.5.1	<p><b>Record keeping</b></p> <p>The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p>	Trong POM will maintain the three-monthly accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record entitle " <i>Identity Preserved Records for Oil Mills</i> ". It records on the Monthly basis.
<b>D 6</b> <b>D.6.1</b>	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.	The mill only receives certified crops from its own estates. The RSPO SC procedure, section 8.0 mentioned that the <i>mill shall ensure that there is no mixing of RSPO certified and non-certified material in the processing and storage of sustainable products (through cleaning, flushing or other appropriate methods). This is to ensure 100% segregated sustainable product to be reached'</i>

**RSPO PUBLIC SUMMARY REPORT**

<b>D.6.2</b>	The objective is for 100 % segregated material to be reached.	Trong POM does not accept any non-certified FFB. It was confirmed through weighbridge summary report. Therefore CPO and PK can be considered 100% segregated.
--------------	---	---

**RSPO PUBLIC SUMMARY REPORT**

Attachment 6

**Boustead Plantations Berhad Time Line on RSPO Certification.**

<b>Business Unit</b>	<b>2011</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>
Sg. Jernih Business Unit											
Nak Business Unit											
TRP Business Unit											
Segaria Business Unit											
Telok Sengat Business Unit											
Segamaha Business Unit											
Lapan Kabu Business Unit											
Sugut Estates Business Unit											
Loagan Business Unit											
Kanowit Business Unit											