



# RSPO PRINCIPLES AND CRITERIA PUBLIC SUMMARY REPORT

Kwantas Corporation Berhad (Haranky Palm Oil Mill and its supply base) KM40, Simpang Haranky Estate, 91100 Jalan Kinabatangan, Lahad Datu, Sabah, Malaysia

RSPO Membership No.: 1-0150-14-000-00

Certificate No. BVC-RSPO-20171201-1

Issue Date **01 DECEMBER 2017**Expiry Date **30 DECEMBER 2022** 

#### **Assessment Type**

#### **Date of Assessment**

Main Assessment 24-27 Jul 2017

Annual Surveillance Assessment 01

Annual Surveillance Assessment 02

Annual Surveillance Assessment 03

Annual Surveillance Assessment 04

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# **PUBLIC SUMMARY INFORMATION**

BV Contract Number	BVKI	_/LCW/2017/Q161 (Rev 2)	Contract Date	27 May 2017		
Company Name	Kwantas Corporation Berhad (Haranky Palm Oil Mill)					
Parent Company Name	Kwar	Kwantas Corporation Berhad				
Company Address	KM40	KM40, Simpang Haranky Estate, 91100 Jalan Kinabatangan, Lahad Datu, Sabah, Malaysia				
Country	Mala	ysia				
				K-63-3	rd Floor,	
				Signatu	ure Office KK Times Square,	
Contact Person	Mr. M. Badrul Nizam (Plantation Administration Manager)		Contact Details	Off Coastal Highway,		
Contact Person				88100 Kota Kinabalu, Sabah		
		J- /		Tel: +6088 486 555		
				Fax: +6088 486 777		
Company e-mail	mohd.badrul@kwantas.com.my		Website	www.kwantas.com.my		
Certification Scope			de Palm Oil (CPO) and Palm Kernel (PK) at Haranky Palm Oil dule E (CPO Mill: Mass Balance) system.			
Supply Chain Module	Modu	ule E: CPO Mills- Mass Baland	ce;			
POM Capacity	Capacity 60MT/Hour		Total Estates	Total Estates 02 estates		
Annual FFB Produced (MT)		26,304.00MT (Jul 2017 to	Jun 2018)			
Annual CSPO Produced (MT) 5,523.84MT		5,523.84MT	Annual CSPO Sold (MT) n.a		n.a	
Annual CSPK Produced (	MT)	1,446.72MT	Annual CSPK Sold	(MT)	n.a	

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# LIST OF ABBREVIATION

Short Form	Meanings			
CHRA	Chemical Health Risk Assessment			
СРО	Crude Palm Oil			
CU	Certification Unit			
DID	Department of Drainage and Irrigation, Malaysia			
DOE	Department of Environment, Malaysia			
EFB	Empty Fruit Bunch			
EIA	Environment Impact Assessment			
EMS	Environmental Management System			
EQA	Environmental Quality Act			
ERT	Endangered, Rare and Threatened species			
FFA	Free Fatty Acids			
FFB	Fresh Fruit Bunches			
Ha	Hectare			
HCV	High Conservation Value			
HDPE	High Density Polyethylene			
IPM	Integrated Pest Management			
ISO	International Organization for Standardization			
IUCN	International Union for Conservation of Nature and Natural Resources			
K	Potassium			
kW	Kilowatt			
m	Meter			
Mg	Magnesium			
mm	Millimeter			
MT	Metric ton			
N	Nitrogen			
NGO	Non Governmental Organization			
OER	Oil Extraction Rate			
OSH	Occupational Safety & Health			
Р	Phosphate			
P & C	Principles and Criteria			
PK	Palm Kernel			
PKE	Palm Kernel Expeller			
POM	Palm Oil Mill			
POME	Palm Oil Mill Effluent			
PPE	Personal Protective Equipment			
SOP	Standard Operating Procedures			
Sdn Bhd	Sendirian Berhad (Private Limited)			
SEIA	Social and Environment Impact Assessment			
Sg	Sungai			
SOP	Standard Operating Procedures			
SPC	Senior Plantation Controller			
USECHH	Use and Standards of Exposure of Chemicals Hazardous to Health			
WHO	World Health Organization			

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#### 1. SCOPE OF THE CERTIFICATION ASSESSMENT

#### 1.1 Introduction

The assessment for Kwantas Corporation Bhd (Haranky Palm Oil Mill and its supply bases) has been conducted against Roundtable on Sustainable Palm Oil (RSPO) Principles and Criteria for the Production of Sustainable Palm Oil 2013 (Malaysian National Interpretation of RSPO Principles and Criteria for Sustainable Palm Oil Production – MYNI 2014) and RSPO Supply Chain Certification Standard dated 21 November 2014 by Bureau Veritas Certification Hong Kong Limited on 24-27 Jul 2017.

Scope of the certification assessment certification includes the production of Haranky Palm Oil Mill and its supply base according to the RSPO standard requirement stated above.

Kwantas Corporation Berhad is a member of RSPO since 2 Apr 2014 with membership number 1-0150-14-000-00. The Certification Unit (CU) is located in KM40, Jalan Kinabatangan, Lahad Datu, Sabah, Malaysia which consist of 02 directly Managed Estates. Total combined land areas of the CU are 1,345.02Ha of which; 1,255.35Ha had been planted with oil palm.

Kwantas Corporation Berhad was incorporated in 1995 as an investment holding company and listed on the Main Board of Bursa Malaysia (formerly known as Kuala Lumpur Stock Exchange) in 1996. The Kwantas Group is an integrated palm oil producer which operates oil palm plantations, mills, crushing plants, refineries, bulking and trading as well as wholesale of diesel and lubricants products. The company is committed to be part of the sustainable producer for palm oil products, thus they decided to undergo RSPO P&C Certification.

#### 1.2 Location and Description of the Certification Unit

Overview of the Palm Oil Mill and its supply base location is simplified in the Table 1 and Table 2 below. Details and location maps of the supply base for the CU can be referred in Appendix 6, respectively.

Table 1: Location and Capacity of the Palm Oil Mill

Name of the Palm Oil	Plant	GPS Coordinate		Location Address	
Mill	Capacity (MT/Hour)		Latitude	Location Address	
Haranky Palm Oil Mill (Kwantas Oil Sdn Bhd)	60	5° 12' 47.10" N	118° 03' 52.02" E	KM40, Simpang Haranky Estate, 91100 Jalan Kinabatangan, Lahad Datu, Sabah, Malaysia	

Table 2: Location of the Supply Base

No. Name of the Supply Base		GPS Co	ordinate	Location Address	
		Longitude	Latitude	Location Address	
1	Haranky 01 Estate			KM40, Simpang Haranky Estate, 91100 Jalan	
2	Haranky 02 Estate	5 <sup>°</sup> 12' 55.96'' N	118 <sup>°</sup> 03' 43.09''E	Kinabatangan, Lahad Datu, Sabah, Malaysia	

#### 1.3 Description of Supply Base and Palm Oil Mill Processing Capacity

The FFB is sourced from plantations which are directly managed by the CU as listed above. The budgeted crop yields from each estate are listed in Table 3 below. Details of transactions for the Certification Unit are tabulated in Appendix 7.

**Table 1: Crop Projection and Yield** 

Projected Production from last	Actual Production for this Audit	Projected Production for next 12	
12 Months (MT)	Year (MT)	Months (MT)	

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			Jul 2016 to Jun 2017 (Actual)			Jul 2016 to Jun 2017 (Actual) Jul 2017 to Jun 2018 (Project				Projection)
FFB	СРО	PK	FFB	СРО	PK	FFB	СРО	PK		
NA	NA	NA	33,571.71	6,858.04	1,697.35	26,304	5,523.84	1,446.72		

Remark: projected FFB production from the last 12 months is not applicable because it is main assessment

## 1.4 Date of Planting and Cycles

#### 1.4.1 Date of planting

The details of the CU certified area and its planting profiles are described in **Table 4** and **Table 5**.

**Table 2: Land Profiles of Supply Base** 

Name of the Total		Planted A	Planted Area (Ha)		Un-Planted Area (Ha)		
Supply Base	Titled Area (Ha)	Other Oil Palm agricultural products		нсу	Conservation	Facilities / Others*	
Haranky 01	1,122.86	1034.44	0	0.3	1.9	86.22	
Haranky 02	228.21	220.91	0	7.3	0	0	
Total	1,351.07	1,255.35	0	7.6	1.9	86.22	

<sup>\*</sup>Facilities/others include storage, housing, roads, etc.

Tables below show the details of the year of establishment of the CU's supplying estates and their planting profiles.

**Table 3: Age Profiles for the Supply Base** 

Table 3. Age I follies for the Supply base								
Year of Planting	Areas (Ha)	Maturity Status	Planting Cycles					
HARANKY 1 ESTATE								
1992	195.34	Mature	1 <sup>st</sup> Cycle					
1993	101.29	Mature	1 <sup>st</sup> Cycle					
2012	193.04	Mature	2 <sup>nd</sup> Cycle					
2013	451.56	Mature	2 <sup>nd</sup> Cycle					
2014	73.00	Immature	2 <sup>nd</sup> Cycle					
2015	20.21	Immature	2 <sup>nd</sup> Cycle					
HARANKY 2 ESTATE								
1993	138.04	Mature	1 <sup>st</sup> Cycle					
1998	70.21	Mature	1 <sup>st</sup> Cycle					
1997	8.50	Mature	1 <sup>st</sup> Cycle					
2000	4.16	Mature	1 <sup>st</sup> Cycle					
Total	1,255.35							

### 1.4.2 Replanting program

Name of the	FY2017/2018	FY2018/2019	FY2019/2020	FY2020/2021	FY2021/2022
Supply Base	(Ha)	(Ha)	(Ha)	(Ha)	(Ha)

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Haranky 01	-	90.56	109.84	96.23	
Haranky 02	-	-	-	-	138.04
Total	-	90.56	109.84	96.23	138.04

#### 1.5 Other Certification Held by the Certificate Holder

The company did not hold any sustainable certification.

#### 1.6 Organizational Information/Contact Person

The contact person for the Certification Unit is as below:

Contact Person : Mohd Badrul Nizam Ahamad

Position : Plantation Administration Manager

Company Name : Kwantas Corporation Berhad

Company Address

K-63-3rd Floor, Signature Office, KK Times Squares, Off

Coastal Highway, 88100 Kota Kinabalu, Sabah, Malaysia

Telephone No. : +6088 486 555 Fax No. : +6088 486 777

e-mail Address : mohd.badrul@kwantas.com.my

#### 1.7 Time-bound Plan/Progress against Time Bound Plan

See Appendix 1.

#### 1.8 Partial certification

#### 1.8.1 General

Organizations that have a majority shareholding\* in and/or management control of more than one autonomous company growing oil palm will be permitted to certify individual management units and/or subsidiary companies only if all the following are complied with the requirements mentioned below.

\*Majority shareholding: the largest shareholding. Where the largest shareholdings are equal (e.g. 50/50) this applies to the organisation that has management control

Requirement	Findings/Compliance
The parent organization or one of its majorities owned and/or managed subsidiaries is member of RSPO.	Kwantas Corporation Group is a registered member with RSPO as ordinary member 1-0150-14-000-00 since 2 Apr 2014.
	Kwantas Corporation Berhad owned 3 production units covering 13 estates, 1 refinery, and 3 palm oil mill. This has been verified against latest ACOP documents submitted to RSPO.
	The listed production units covers:
	a. Haranky Palm Oil Mill
	b. Pintasan Palm Oil Mill
	c. Mewah Palm Oil Mill
For groups with complex management structures the following are required:	All units under Kwantas Corporation Berhad are managed by same legal entity.
a. A statement of the ultimate controlling	

shareholders and directors in the managing agency company/companies.	
b. Ditto in respect of each of the operating groups.	
<ul> <li>Application for membership by the top asset owning company/companies.</li> </ul>	
Application for membership by the managing agency company/companies	

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If one of above mentioned requirements is non-compliant, this leads to a major non-conformity.

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The following requirements about a time bound plan (2.2) and requirements for uncertified management units and/ or holdings (2.3) are applicable, if the registered RSPO member is the holding company or one of its subsidiaries.

#### 1.8.2 Requirements for Time Bound Plan

Requirement	Findings/Compliance
A challenging time-bound plan for certifying all its relevant entities (Relevant entities – including both	Kwantas Corporation Berhad has established a challenging time bound plan.
the business units and parent company(s)' commitment to RSPO, membership status and involvement with palm oil for each subsidiary) is	All production units under the group are expected to be completed by 2021 which distributed into 4 phase.
available. The time-bound plan should contain a list of subsidiaries, estates and mills.	1. Phase 1: 2016/2017
of subsidiaries, estates and milis.	2. Phase 2: 2018
	3. Phase 3: 2020
	4. Phase 4: 2021 (Phase 4 is included for final 2 units which are currently under land acquisition process. Both units are going to be certified within 3 years upon completion of acquisition process.)
	The established time bound plan covered 11 estates and 2 POM
The time bound plan is appropriate (in particular, the time scale is sufficiently challenging, taking into account circumstances around each entity), taking into account comments received from stakeholders following the public consultation process.	It was evaluated that the time bound plan has been established appropriately within 5 years period. The five years timebound has been established which incorporate 2 units which are currently under land acquisition process. Both new units are going to be certified within 3 years after completion of land acquisition.
	There is no land issues arise in the all units under Kwantas Group.
What is the progress of this plan since the last audit? (if the last audit was done by another CB, the time-bound plan shall be accepted at the moment of first acceptance and only check continued appropriateness shall be checked).	Not applicable. This is Main Assessment of the company.
Are there any revisions to the time-bound plan or to the circumstances of the company?	Not applicable. This is Main Assessment of the company.
If the previous question was answered with yes, the plan shall be reviewed for whether it is still appropriate, such that changes to the time-bound plan are permitted only where the organisation can demonstrate that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent).	Not applicable. This is Main Assessment of the company.

Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance is raised. Where there is evidence of systematic failure to proceed with implementation of the plan, a major non-compliance is raised.

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#### 1.8.3 Requirements for Uncertified Management Units/or holdings

Requirement	Findings/Compliance
No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in	All production units (including Haranky); under Kwantas Corporation Berhad have been established before January 2010.
accordance with RSPO criterion 7.3. Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure.	There are 2 production units in Sarawak which is currently at Early Acquisition phase.
· ·	The company is aware of RSPO P&C requirements relating to RSPO New Planting Procedure. This has been discussed during Group Management Review. The company has started some development prior to make decision to undergo RSPO certification.
	Thus, the company has consulted RSPO secretariat for the establishment of NPP after decided to undergo RSPO certification.
	They are currently working closely with RSPO on the completion of NPP process.
Land conflicts, if any, are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5. and 7.6.	There is land issue in one of the estate (Pintasan 5) under Kwantas Corporation Berhad in 2008. However, the issue has been resolved involving court decision.
	For the new unit under new acquisition in Sarawak, the company has started the SIA process to identify any land conflicts issue as required by RSPO New Planting Procedure. As explained above, the company is currently consulting closely with RSPO secretariat on the NPP.
Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	Not applicable. No labour disputes are available under Kwantas Corporation Berhad.
Legal non-compliance, if any, are they being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1.	No evidence of legal non-compliance has been identified under Kwantas Corporation Berhad.

For requirements above, the definition of major and minor non-compliance is stated in the RSPO P&C. For example, if non-compliance against a major indicator in a non-certified holding/management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed:

Failure to address any outstanding non-compliance may lead to certificate suspension(s), in accordance with the provisions of these Certification Systems.

#### 2. ASSESSMENT PROCESS

#### 2.1 Assessment Methodology and Program

The assessment was conducted on 24 Jul 2017 to 27 Jul 2017 covering onsite audit involving **02** estates of the certification unit respectively. The audit covers documentation review, internal procedures, management system, field inspection as well as identification of any significant issues for both environment or social issues. Details of the actual assessment programme are given in Appendix 2 (Audit Plan). A sample of stakeholders was consulted during the assessment to get their feedback on the management doing.

The assessment was conducted based on sampling approach in which regulated under RSPO Certification System for Principles and Criteria (June 2007). Therefore, total numbers of supply based assessed in the audit are 02 estates. For the purpose of sampling audit, risk assessment of the group member and group

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manager was carried out prior to the certification assessment through the documentation review. The risk assessment was based on factors i.e. geographically as well as socioeconomically.

#### 2.2 Date of Next Surveillance Visits

The next surveillance assessment shall be carried out by Bureau Veritas within nine to twelve months from the date of expiry for the trading license (Palm Trace License).

#### 2.3 Lead Assessor and Assessment Team Qualification

Bureau Veritas holds copies of educational qualifications, certificates and audit logs for each of the audit team members. This assessment has been conducted by **03** approved assessors which hold sufficient qualification and experiences to conduct RSPO Assessment. Summary of auditors' background and qualifications are listed in Table 8 below.

**Table 4: Auditors Profile and Qualification** 

Assessment Team Leader: Muhammad Shazaley Abdullah (MSA)		
Description		
MSA earned the degree in B. Sc. (Hons) Forestry Science from Universiti Malaysia Sabah since 2008.		
MSA has been working as Cadet Assistant of Oil Palm Plantation company since 2009.		
He then continues his career as Research Executive in Bio-Fertilizer (Mychorriza sp.) related to oil palm development.		
Since 2012, MSA has joined SGS Malaysia Sdn Bhd as RSPO Auditor and has qualified as RSPO Lead Auditor in 2013.		
MSA has undergone RSPO Endorsed Lead Auditor Course conducted by Wild Asia in 2013 (2013-SSP02-0044).		
MSA has successfully completed ISO 9001:2008 Lead Auditor Course conducted by Neville Clarke in 2013 (A17399).		
MSA has conducted more than 50Mandays of RSPO P&C ISCC or MSPO assessment as Auditor and Lead Auditor more than 3 different organizations.		
He has been evaluated by RSPO Accreditation Body (ASI) and Department of Standard Malaysia (DSM) for his auditing performance.		
For internal BVC qualification process, he has been witness by Dr. Chaiyaporn Seekao as Lead Auditor in Jun 2017.		

#### Team Member(s): Valence Shem (VS) and Mohd Faisal Jaafar (MFJ)

Requirement	Team Members Name	Description
Field working experience in the palm oil sector, or demonstrable equivalent.		MSA has been working as Cadet Assistant of Oil Palm Plantation company since 2009.
	M. Shazaley Abdullah	He then continues his career as Research Executive in Bio-Fertilizer (Mychorriza sp.) related to oil palm development.
		Since 2012, MSA has joined SGS Malaysia Sdn Bhd as RSPO Auditor and has qualified as RSPO Lead

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		Auditor in 2013.
	Valence Shem (VS)	VS have been working as Assistant Manager in Oil Palm Plantation company for 9 years.
		He then joined SIRIM QAS Sdn Bhd as RSPO Lead Auditor.
		MFJ is a forester by education and working background. He graduated from Universiti Putra Malaysia in Forestry Science.
	Mohd Faisal Jaafar (MFJ)	He has been qualified as RSPO P&C Lead Auditor under SGS Malaysia Sdn Bhd since 2012.
		He has been assessing various oil palm plantations company under various certification standards (ISCC, MSPO, RSPO, etc.).
Good Agricultural Practices (GAP), and Integrated Pest Management (IPM), pesticide and fertilizer use.	M. Shazaley Abdullah	MSA is direct experience in GAP, IPM and fertilizer usage when working as Cadet Assistant in oil palm plantation company and by training.
	W. Shazaley Abdullari	Auditing oil palm certification standard has exposed his qualification and understanding in GAP, IPM, chemicals usage and manuring.
	Valence Shem (VS)	VS have been working as Assistant Manager of oil palm plantation company. He has been involved directly and indirectly in training and understanding of GAP, IPM, fertilizer and chemical application.
	Mohd Faisal Jaafar (MFJ)	MFJ is a qualified auditor for RSPO P&C. Experience in auditing oil palm plantation and operating certification standard (Malaysian Timber Certification System - MTCS) has exposed him to the GAP.
		He has undergone various training related to GAP and IPM in forestry and oil palm plantation.
Health and safety auditing on the farm and in processing	M. Shazaley Abdullah	MSA has been working in oil palm plantation in 2009.
facilities, for example OHSAS 18001 or Occupational, Health & Safety Assurance System.		He has undergone series of training which includes health and safety in oil palm plantation and operations.
	Valence Shem (VS)	VS have been working in oil palm plantation industries for more than 9 years. He has direct experience in handling health and safety issues in oil palm operations.
	Mohd Faisal Jaafar (MFJ)	MFJ is experienced in operating and auditing forestry and oil palm plantation. He has been qualified as RSPO P&C Auditor since 2012.
Worker welfare issues and social auditing experience,	M. Shazaley Abdullah	MSA has been working in oil palm plantation in 2009.
for example with SA8000 or related social or ethical	Grazaroj Abdunari	He has undergone series of training which includes workers welfare issues

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accountability codes.		and social in oil palm plantation and operations.
	Valence Shem (VS)	VS have been working in oil palm plantation industries for more than 9 years. He has direct experience in handling social issues in oil palm operations.
		Furthermore, VS is also qualified as Lead Auditor for SMETA standard.
		MFJ is experienced in operating and auditing forestry and oil palm plantation.
	Mohd Faisal Jaafar (MFJ)	He has been qualified as RSPO P&C Auditor since 2012. He has been working closely with social expert and been witnessed by ASI to evaluate his capacity in auditing social requirements on oil palm industries.
Environmental and ecological auditing, for example	M. Shazaley Abdullah	MSA has been working in oil palm plantation in 2009.
experience with organic agriculture, ISO 14001 or Environmental Management Systems (EMS).		He has undergone series of training which includes environmental protection and management in oil palm plantation and operations.
		VS is a qualified Lead Auditor for ISO 14001.
	Valence Shem (VS)	His working experience in oil palm plantation (more than 9 years) has exposed him to the environmental and ecological auditing.
	Mohd Faisal Jaafar (MFJ)	MFJ has attended ISO 14001 Lead Auditor course. He is qualified RSPO P&C auditor since 2012.
Fluent in Local Language and English	M. Shazaley Abdullah	
Eligiisti	Valence Shem (VS)	All of the team members are fluent in English and Malay (local language).
	Mohd Faisal Jaafar (MFJ)	, , , , , , , , , , , , , , , , , , , ,

#### 2.4 Certification Body Background

Created in 1828, Bureau Veritas is a global leader in Testing, Inspection and Certification (TIC), delivering high quality services to help clients meet the growing challenges of quality, safety, environmental protection and social responsibility.

As a trusted partner, Bureau Veritas offers innovative solutions that go beyond simple compliance with regulations and standards, reducing risk, improving performance and promoting sustainable development. Bureau Veritas core values include integrity and ethics, impartial counsel and validation, customer focus and safety at work.

Bureau Veritas is recognized and accredited by major national and international organizations. RSPO accreditation status of Bureau Veritas has been obtained by Bureau Veritas Certification Hong Kong Limited (BVC HK) since 2<sup>nd</sup> Jun 2014. The RSPO accreditation number for BVC HK is RSPO-ACC-012 for the scopes of P&C (Single Site & Group) and SCCS worldwide. It was transferred from Bureau Veritas Singapore Pte. Ltd.

#### 2.5 Stakeholder Consultation Process

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Bureau Veritas initiated the Public Stakeholder Notification (internal and external) by announcing an invitation for feedback in the RSPO websites on **20 Jun 2017**. In addition, Bureau Veritas had also sent the invitation through e-mails and letters to all the relevant stakeholders, including government agencies and Non-Governmental Organizations (NGOs) before the actual assessment is performed.

Meetings and interview with the relevant stakeholders has been arranged during the on-site assessment without interference from members of the group. Meetings were held with stakeholders to seek their views on the performance of the Certification Unit (CU) with respect to the RSPO requirements and aspects where they considered that improvements could be made; these included environmental interest groups, local government agencies and relevant authorities, social groups, and workers' unions etc. At the start of each meeting, the assessor explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. The method of consultation with the workers, contractors and staff were through random sampling from each group in each of the FFB supplying unit and oil mill (e.g. mill operators, harvesters, general workers and sprayers) visited. The consultations which were conducted at the CU's workplace had included solicitation of comments on issues relevant to principles 4, 5 and 6 of the RPSO P&C Standard. List of the stakeholders contacted and responded during the audit are available in Appendix 3.

#### 3. ASSESSMENT FINDINGS

#### 3.1 Summary of Findings

The assessment has been conducted as planned using the methodology described in Section 2.1 and Appendix 2: Audit Program. A total of 02 Major non-conformity and 05 Minor non-conformity against Roundtable on Sustainable Palm Oil (RSPO) Principles and Criteria for the Production of Sustainable Palm Oil (2013) [Malaysian National Interpretation of RSPO Principles and Criteria for Sustainable Palm Oil Production 2014 (MYNI 2014)] and 00 Major non-conformity against RSPO Supply Chain Certification Standard (21 Nov 2014); requirements were raised as shown in Appendix 4.

The CU has taken necessary corrective actions in order to close the Major non-conformities raised. Minor non-conformities will be verified in the next surveillance assessment. Nonetheless, the CU has submitted their corrective action plan for the minor non-conformity and has been accepted by the assessment team. The verification comments for the non-conformities raised in the previous assessment can be seen in Appendix 5.

#### 3.2 Principles and Criteria for Production of Sustainable Palm Oil (2013) - Generic

#### **Principle 1: Commitment to Transparency**

Princ	Principle 1: Commitment to Transparency		
Grov	Criterion 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 on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	Minor	
	Findings	Comply?	
Kwai	ntas has categorized stakeholder based on stakeholders groups covering the following:	Yes	
a)	Relevant Government Agencies and Regulatory Authorities;		
b)	Local Communities;		
c)	NGO – covering social indigenous peoples NGOs, social workers association and environmental NGOs;		
d)	Internal Stakeholders – workers representative;		
e)	Contractors;		

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#### **Principle 1: Commitment to Transparency**

f) FFB Suppliers – covering both direct FFB suppliers (from local communities) and FFB Collectors (entity collecting FFB from local communities before transporting FFB to POM).

The above stakeholder list is found to be periodically updated. The estates and mill place no restriction in providing any information to the stakeholders with respect to company's RSPO implementation.

The audit team observed that the latest stakeholder consultation was conducted on 13/6/2017 which was attended by 11 stakeholders representing relevant government agencies, local communities, FFB suppliers and NGOs. Based on the minutes of the meeting, the audit team observed that the stakeholders have been duly informed that they can obtain a management documents and its summary information, upon request through the utilization of the Company's "Borang Permohonan Maklumat" (Request of Information Form), which outlining information on the requestor's details (name, IC no., position, organization, contact no., address), type of info, date, type of documents and reason to request. List of the management documents that are made publicly available upon request are as follows:

- Summary of land titles;
- Summary of Environmental Management Plan;
- HCV related documentation such as Summary of HCV Management Plan;
- Complaints and grievances procedures and mechanisms;
- Land Dispute and Conflict Management Procedures;
- Pollution prevention and reduction plan;
- Management Policies such as:
  - Human Rights Policy;
  - Policy Statement of Code of Conduct;
  - Occupational Safety and Health Policy;
  - Environmental Policy;
  - Zero Burning Policy;
  - Equal Opportunity Employment & Freedom of Association Policies;
  - Child Labour Policy;
  - o Sexual Harassment Policy; and
  - Policy Statement on Women Reproductive Right.
- Continuous Improvement Plan.

As of the date of the audit, the audit team notes that there is no request of information placed from any stakeholders.

1.1.2	Records of requests for information and responses shall be maintained.	Major
Findings		Comply?
found.	ected earlier, as of the date of the audit, there is no request placed from any stakeholders. As reflected in the SOP, all records of request for information and response from any olders shall be kept and maintained.	Yes
Manag where	on 1.2: pement documents are publicly available, except where this is prevented by commercial confidentic disclosure of information would result in negative environmental or social outcomes.	ality or
1.2.1	<ul> <li>Publicly available documents shall include, but are not necessarily limited to:</li> <li>Land titles/user rights (Criterion 2.2);</li> <li>Occupational health and safety plans (Criterion 4.7);</li> <li>Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>HCV documentation (Criteria 5.2 and 7.3);</li> <li>Pollution prevention and reduction plans (Criterion 5.6);</li> <li>Details of complaints and grievances (Criterion 6.3);</li> <li>Negotiation procedures (Criterion 6.4);</li> </ul>	Major

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Principle 1: Commitment to Transparency	
Continual improvement plans (Criterion 8.1);	
Public summary of certification assessment report;      Human Rights Religion (Criterian 6.13)	
Human Rights Policy (Criterion 6.13)  Findings	Comply?
The company maintains all the documents required by this indicator. All of the documents listed are made publicly available upon request as follows:  • Land titles/user rights - 35 land titles in total	Yes
<ul> <li>Occupational health and safety plans; - action plan for 2017, prepared by Elvise MSJ, dated 5/1/2017 is available</li> </ul>	
<ul> <li>Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>environmental management plan 2016/17, prepared by Dalton Nicco Didacus, dated 2/12/2016 is available</li> </ul>	
• HCV documentation (Criteria 5.2 and 7.3); - e.g. HCV report, training records, minutes of meeting, HCV patrol records are available	
• Pollution prevention and reduction plans (Criterion 5.6); - prepared by Dalton Nicco Didacus, dated 2/12/2016 is available	
• Details of complaints and grievances (Criterion 6.3); - available in two forms, i.e. "Fail Aduan" and "Buku Aduan Pekerja"	
• Negotiation procedures (Criterion 6.4); - "Land Conflict Management" [SOP no. A 4.3.2, dated 1/1/2015] is available	
• Continual improvement plans (Criterion 8.1); - "Continuous Improvement Plan", dated 27/12/2016, prepared by Mr. Badrul (Project Manager) is available	
• Public summary of certification assessment report; - this is the initial assessment, therefore no public summary yet.	
<ul> <li>Human Rights Policy (Criterion 6.13) – "Human Rights Policy", signed by Steve Kwan(Group Chief Executive Officer), dated 1/6/2014 is available</li> </ul>	
All of the above information has been notified to the stakeholders on its availability status (upon request) during the Stakeholder Meeting with the latest meeting was conducted on 13/6/2017.	
Criterion 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
Findings	Comply?
A Policy committing to a code of conduct is available entitled "Policy Statement on Code of Conduct for FFB Suppliers" and "Policy Statement on Code of Conduct":-  The above policy outlined the company's commitment to implement fair conduct of business. The policy also specifies the objective of the policy COC for FFB suppliers, a prohibition of all forms of corruption, bribery and fraudulent use of funds and resources; stated in section (1) of the policy, a proper disclosure of information in accordance with applicable regulations and accepted industry practices. The policy is found to be signed by employees upon joining and it is also available in the company's website.  Verification during the audit confirmed that there is no evidence of violation against the signed policy observed by the audit team.	Yes

# Principle 2: Compliance with Applicable Laws and Regulations

Princip	Principle 2: Compliance with Applicable Laws and Regulations		
	<u>Criterion 2.1:</u> There is compliance with all applicable local, national and ratified international laws and regulations.		
2.1.1	2.1.1 Evidence of compliance with relevant legal requirements shall be available. Major		Major
Findings		Comply?	
per in	Legal documentation is maintained by the company covering the workers, social, environmental as per in the Summary of License Renewal for Haranky Estate & POM Licenses. Example of licenses that have been verified during the audit are as follows:		No
No.	Details	Validity	

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Princi	ole 2: Compliance with Applicable Laws and Regulations	
1.	Scheduled Control Permit ( <i>Permit Barang Kawalan Berjadual</i> ) for scheduled waste storage for Haranky Estate:- License Serial No. CSA: A135122	until 14 Sept 2017
2.	MPOB License for Haranky 1 Estate with License no. 502000202000.	until 31 March 2018
3.	MPOB License for Haranky 2 Estate with License no. 502760102000.	until 31 October 2017
4.	License to Employ Foreign Workers – License no. 28971- K, issued by Department of Labour Sabah	until 16 March 2018
5.	Certificate of compliance for Air Receiver (Haranky Estate), Reg. No. PMT-SB 54665 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)	until 14 September 2017
6.	Certificate of compliance against the safety, fire prevention, fire protection and fire fighting requirements of the Fire Services Act 1988 (Cert No. JBPM: SB/7/127/2016) issued by the Fire Department of Malaysia	until 4 May 2017 – the renewal process has been initiated since May 2017 and the inspection by the Fire Department will be held on 1 <sup>st</sup> week of August 2017.
7.	Lesen Menduduki atau Menggunakan Premis yang Ditetapkan (License for Operating and Settling the Prescribed Premise) for Haranky POM issued by Department of Environment as required under the Section 18(1) of the Environmental Quality Act, 1974:- No. 003528	30 June 2018
8.	Certificate of compliance for Air Receiver, Reg. No. PMT 89605 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)	
9.	Certificate of compliance for Steam Separator, Reg. No. PMT 89606 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)	Validity until 17 Apr 2017 (inspection has been
10.	Certificate of compliance for Vacuum Tank, Reg. No. PMT 89607 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)	conducted by DOSH on 7 June 2017. Based on the inspection conducted, the Department has concluded that all of the equipments are
11.	Certificate of compliance for Pressure Filter (Sand Filter), Reg. No. PMT 89608 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)	fit for operational and hence recommended for the issuance of the Certificate of Fitness with the new validity of 1 year from the date of the issuance certificate.
12.	Certificate of compliance for Bi Drum Water Tube Boiler, Reg. No. SB PMD 2599 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)	However, the new Certificate of Fitness has yet to be issued by the Department.
13.	Certificate of compliance for Softener Vessel, Reg. No. SB PMT 921 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)	

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Princip	ole 2: Compliance with Applicable Laws and Regulations
14.	Certificate of compliance for Spherical Tank, Reg. No. SB PMT 9058 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
15.	Certificate of compliance for Spherical Tank, Reg. No. SB PMT 9059 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
16.	Certificate of compliance for Spherical Tank, Reg. No. SB PMT 9060 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
17.	Certificate of compliance for Spherical Tank, Reg. No. SB PMT 9061 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
18.	Certificate of compliance for Vickers Babcock Water Tube, Reg. No. PMD 10220 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
19.	Certificate of compliance for Vacuum Dryer, Reg. No. PMT 56780 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
20.	Certificate of compliance for Back Pressure Steam Receiver, Reg. No. PMT 56781 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
21.	Certificate of compliance for Vertical Pressure Sand Filter, Reg. No. PMT 56897 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
22.	Certificate of compliance for Horizontal Deaerator, Reg. No. PMT 56909 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
23.	Certificate of compliance for Water Softener, Reg. No. PMT 56910 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)
24.	Certificate of compliance for Entrainment Separator, Reg. No. PMT 57014 issued by the Department of Occupational Safety and Health (DOSH) against the requirement of the Factories and Machinery (Notification, Certificate of Fitness and Inspections) Regulations, 1970 Regulation 10(2)

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Princi	Principle 2: Compliance with Applicable Laws and Regulations				
25.	MPOB licence 524031004000 for receiving, processing and producing CPO Haranky POM with a capacity of 216,000m <sup>3</sup>	1 Oct 2016 to 30 Sept 2017			
26.	License to operates Palm Oil Mill issued by the Department of Environment as prescribed by the Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations, 1977 (P.U.(A) 342/1977 and Environmental Quality (Clean Air) Regulations, 1978 (P.U.(A) 280/1998: license no. 003528 with a maximum capacity allowed 60mt/hr	1 July 2017 to 30 June 2018			

All of the foreign workers employed found to have a valid work permit issued by the Department of Immigration of Lahad Datu with the examples verified are as follows:

Name	Permit Serial No.	Validity
Hendri Beddu	2193903	Until 27 May 2018
Kasman Maro	2251493	Until 31 Oct 2017
Rohana Hakim	2232230	Until 4 Sept 2017
Oktovianus Paling	VFD6A204651C2P117	Until 19 May 2018
Amri Jumain	VFDQD581082C2P117	Until 25 Apr 2018
Asfar Sangkala	VFD49262323C2P117	Until 5 Apr 2018
Juliana Rasyid	VFDB8581993C2P117	Until 19 May 2018
Merianti Paling	VFD49194221C2P117	Until 19 May 2018
Petrius Lina Magang	VFDB8582175C2P117	Until 19 May 2018
Syamsul Suparjo	VFD6A204540C2P117	Until 05 Apr 2018
Merlinda Loro Castello	PGFB171289C2P17	Until 29 June 2018
Fitriyana Sabtu	2232421	Until 09 Sept 2017
Irmayanti Maming	PGFD857529C0B13	Until 27 Apr 2018

For any situation where the workers permit is due for expiry, the audit team observed that the company has taken action to apply for renewal prior to the expiry of the work permit. Example of formal application letter (Ref No.: P&A/02/IMM/1706-3857) dated 7 June 2017 issued by the company to the Immigration Department of Lahad Datu which has been acknowledge receipt by the Department on the same date is made available to the audit team during the audit.

Land title is also found to be maintained for both estates within the Registers of Legal Land Titles dated 1 February 2013 with the list are as follows:

Title No.	Date	Purpose
PL 096290069	11 Jan 1979	Agricultural Crop of Economic Value
CL 115415668	4 Jan 2000	Agricultural Crop of Economic Value
CL 115415659	4 Jan 2000	Agricultural Crop of Economic Value
CL 115415640	31 Mar 2000	Agricultural Crop of Economic Value
CL 115415631	4 Jan 2000	Agricultural Crop of Economic Value
CL 115415677	25 Jan 2000	Agricultural Crop of Economic Value
CL 115403112	26 Oct 1992	Oil Palm
CL 115403131	26 Oct 1992	Oil Palm
CL 115403140	26 Oct 1992	Oil Palm
CL 115403159	26 Oct 1992	Oil Palm
CL 115403168	26 Oct 1992	Oil Palm
CL 115403117	26 Oct 1992	Oil Palm

All staffs or workers working in the boiler station are found to be qualified. The audit team notes that all of them has undergone assessment and has been approved by the Department of Occupational Safety and Health (DOSH) in compliance with the Regulation No. 5(2) Factory and Machineries (Competency Approval-Examination) Regulations, 1970. Examples of approvals verified are as follows:

- Enggal Yassin Approval No. H/ED/67/93 dated 22 Sept 1993 (Boilerman); and
- Jamal Mohamad Nasir Approval No. H/ED/59/08 dated 30 Oct 2008.

Besides the above, there is an Audiometric Testing Programme conducted to all workers stationed at high pitch area such as oil extraction station, kernel plant, press station, boiler plant, and engine room and water treatment. Latest programme conducted in 13 April 2017 resulted in out of 43 workers inspected, 38 of them have been declared as exposed to high pitch area (as mentioned above) with a

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#### **Principle 2: Compliance with Applicable Laws and Regulations**

decibel above 85dB with normal hearing. 5 of the workers have been declared as having hearing impairment. All workers have been recommended to conduct the test to monitor their hearing loss status as per required within the Regulation 22(b) of the Factories and Machinery (Noise Exposure) Regulation, 1989.

In addition, the Audiometric Testing Programme also resulted in the following recommendation from the occupational health doctor:

- Strict implementation and supervision on PPE and SOP to the employees exposed to noise;
- Information and training and retraining pertaining to safe working environment shall be conducted at regular interval;
- Workers with "Hearing Impairment" shall:
  - o Strictly use Hearing protection devices;
  - o Must be closely monitored by the supervisor;
  - Must be sent or attend information, instructions and training on noise and PPE;
  - o Must be aware of his responsibility on occupational safety and health;
  - o Must undergo an annual audiometric test.
- Baseline audiometric test shall be done to all new workers within 6 month from the date of their employment; and
- Annual audiometric test shall be done yearly to all workers exposed to noise level as follows:
- o Above Noise Action Level (>85dB) in Noise Monitoring Report;
- Above the Permissible Exposure Limit (PEL) in Noise Monitoring Report;
- Listed as having Hearing Impairment;
- o Listed as having High Tone Hearing Loss; and
- o Listed as having Standard Threshold Shifts.

The auditor has sampled and interviewed several workers whom have undergone the test during the field visit and the result of the interview confirmed that they have undergone the test in 2017. In addition, the interview also confirmed all recommendations made by the occupational health doctor conducting the test where they are strictly required to wear hearing protection devices.

Despite the above, some of the requirements stipulated in mill DOE's license (#003528) are not complied by the POM as follows:

- (5) effluent final discharge point was not labelled with "TAKAT PELEPASAN" (Emission Rate)
- (9) the mill has installed overflow pipes at the last trenches of the land irrigation system to let the effluent flow out from the trenches to the environment
- (16) no stack sampling was conducted in 2015 while there is only one stack sampling was conducted in 2016
- (29) No evidence that boundary noise test has been done
- (37) No evidence that the location plan of water sampling stations at Koyah River has been agreed by the Dept. of Environment.

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	nen en	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained	Minor
	Findings	Comply?
	tem for maintaining and updating the legal requirements has been established as per in the document entitled Legal Compliance System (Ref. No. A 4.1.1) dated 1 Jan 2015.	Yes
	ved that the procedure specifies the personnel in-charge for managing and maintaining the n i.e. Plantation Admin (Manager) (reflected in Section 5 of the SOP).	
Set of	legal documents and comprehensive list of international, national, sub-national and provincial	

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Principle 2	: Compliance with	Applicable Law	s and Regulations		
			ny's operations is also available and spec ws and Regulations (SOP Ref No.: 2.0) of		
The above POM.	document is found t	o be compiled a	and maintained at both Haranky Estates ar	nd Haranky	
	nechanism for ensuri	ng compliance s	shall be implemented		Minor
			indings		Comply?
process per on 5 to 9 Ju	rformed by the Region	e laws and regonal Office. Basere are no non-	ulations are monitored through the interned on records, the latest internal audit was compliances issued with respect to the impl	conducted	Yes
2.1.4 A sy	ystem for tracking an	y changes in th	e law shall be implemented		Minor
		F	indings		Comply?
changes of SOP (speci- The audit to updates re providing th	the laws have been fied earlier). eam observed that to ceived from the Late latest laws and reg	appointed i.e. I he list of laws hawNet which is	ining the system which also includes track Plantation Admin (Manager) as per in Sections been periodically updated based on the the governing body responsible for upaysia.	ion 5 of the e input and	Yes
	use the land is dem		s not legitimately contested by local people	who can den	nonstrate
that they have legal, customary or user rights.  2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.		legal use	Major		
		F	indings		Comply?
			oth estates within the Registers of Legal	Land Titles	Yes
dated 1 Feb	oruary 2013 with the				
	<b>Title No.</b> PL 096290069	<b>Date</b> 11 Jan 1979	Purpose Agricultural Crop of Economic Value		
	CL 115415668	4 Jan 2000	Agricultural Crop of Economic Value		
	CL 115415659	4 Jan 2000	Agricultural Crop of Economic Value		
	CL 115415640	31 Mar 2000	Agricultural Crop of Economic Value		
	CL 115415631	4 Jan 2000	Agricultural Crop of Economic Value		
	CL 115415677	25 Jan 2000	Agricultural Crop of Economic Value		
	CL 115403112	26 Oct 1992	Oil Palm		
	CL 115403131	26 Oct 1992	Oil Palm		
	CL 115403140	26 Oct 1992	Oil Palm		
	CL 115403159	26 Oct 1992	Oil Palm		
	CL 115403168	26 Oct 1992	Oil Palm		
	CL 115403117	26 Oct 1992	Oil Palm		
audited. Procedure	wise, all Customary	use of land f	re is no customary land identified within to or community purposes shall be identified archaeological site) and shall be maintained	d either on	
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained.		Minor			
Findings		Comply?			
land title. B	Soundary markers at during the field visit	all estates are	occupation and operation comply with the to visible and clearly marked. the boundary markers are well maintained		Yes
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 free, prior and informed consent (FPIC).			Minor		
1 2.75	2, 2, 2, 3, 3, 3, 3, 3, 3, 3, 3, 3, 3, 3, 3, 3,		indings	/-	Comply?
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Princi	ple 2: Compliance with Applicable Laws and Regulations	
There	is no disputes arises with respects to land acquisition.	Yes
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.	Major
	Findings	Comply?
There	is no disputes arises with respects to land acquisition.	Yes
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 (including neighboring communities where applicable).	Minor
	Findings	Comply?
There	is no disputes arises with respects to land acquisition.	Yes
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations.	Major
	Findings	Comply?
mainta	eation during the audit confirmed that there is no evidence that Kwantas instigated violence in aining peace and order in Haranky's operations.  ew with the workers during the audit also confirmed the above.	Yes
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Major
	Findings	Comply?
	ky does not have any land disputes. However, the company has established a system to resolve lisputes which is documented in Land Conflict Management Procedures (ref. No.: A 4.3.2) dated 2015.	Yes
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:  a. Evidence that a plan has been developed through consultation and discussion with all affected 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
	Findings	Comply?
Haran	ky does not have any land disputes.	Yes
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
	Findings	Comply?
Haran	ky does not have any land disputes.	Yes
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.	Major

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Principle 2: Compliance with Applicable Laws and Regulations		
Findings	Comply?	
Haranky does not have any land disputes.	Yes	

# Principle 3: Commitment to Long-Term Economic and Financial Viability

Criterion 3.1:					
here is an implemente	ed management plar	that aims to achie	eve long-term econo	mic and financial viab	oility.
	nanagement plan (mate, a business case		s) shall be documer holders.	nted that includes,	Major
1		Findings			Comply?
susiness or managem The annual budget with					Yes
Details	Management Units	2017/18	2018/19	2019/20	
Crop projection	Haranky 1	21.00	25.88	23.41	
	Haranky 2	31.89	32.61	33.26	
RM/mt	Haranky 1	mature = RM213.44	mature = RM203.44	mature = RM199.75	
	Haranky 2	RM154.83	RM156.77	mature = RM153.01	
RM/Ha	Haranky 1	mature = RM4,483.20	mature = RM4,611.15	mature = RM4,677.03	
		immature = RM5,253.93	immature = RM4,932.13	immature = RM11,112.34	
	Haranky 2	RM4,954.30	RM5,147.05	RM5,114.10	
OER	Haranky POM	21.00	21.00	21.00	
mt CPO ( <i>including 3<sup>rd</sup> parties</i> )	Haranky POM	48,300 mt	48,300 mt	48,300 mt	
mt PK (including 3 <sup>rd</sup> parties)	Haranky POM	12,650 mt	12,650 mt	12,650 mt	
for monitoring purpose Department to monito of the reviewed by the rom the estate's PIC. The stipulated timeframe	r the expenditure r uction report, to-date Sr. Analysis Manag The estate's PIC wi	report against the e expenses (RM/m er of which some	budget. The progr t, RM/Ha). The prog may requires justific	ress report outlined gress report is found cation and response	
example of the verified ccounts from the Plar eedback for April & I meframe.	ntation Analysis Dep	ot. Based on the r	eport, the audit tear	m observed that the	
	flect the manageme		num of five years (busee Criterion 4.3), wi		Minor
1		Findings			Comply
1 1 0			ailable for both estat	0 ( )	Yes

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# Principle 4: Use of Appropriate Best Practices by Growers and Millers

Principle 4: Use of Appropriate Best Practices by Growers and Millers		
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.		
4.1.1 Standard Operating Procedures (SOPs) for estates and mills shall be documented.	Major	
Findings	Comply?	
The company has established a SOP for the estate plantations as evident in Oil Palm Agricultural Policy (May 2008). The documents covered all key processes in plantation such as:  a. Development and Land Clearing b. Nursery c. Planting and Supplying d. Upkeep and Maintenance e. Harvesting and Production	Yes	
At the POM, all procedures at every process have been established as evident in Production Control Process Flow (K-PF-QMS-HPO-001). The documents has covered all operations such as:  a. FFB Receiving b. Spherical Sterilizer c. Digester d. Decanter		
Copy of the procedure is available in both estates (Haranky 1 & 2) and POM. It is established in English and Malay. The SOP has been displayed at all points of use.		
Implementation and maintenance of the GAP is verified during Plantation Admin Department (PAD) every 6 months. However, monthly monitoring is conducted by analysis department. Latest PAD Audit Report is evident in KCB/HKY(01)-20/2017 dated 19 Jun 2017. The audit has been conducted on 5-9 Jun 2016. Routine monthly analysis has been conducted on 24 May 2017.		
The estate is regularly conducted training on all activities in the estate according to the GAP. Latest training session has been conducted on 8 May 2017 by Tn. Hj. Patolai Mencing for all field staffs and assistant manager. Field training conducted for all workers has been made on 28 May 2017.		
For the POM, training on SOP has been conducted as per OSH Plan. For example:  a. SOP Stesen Threshing (17.07.2017) – Elvise Johnny  b. SOP Stesen Sterilizer (30.05.2017) – Elvise Johnny		
4.1.2 A mechanism to check consistent implementation of procedures shall be in place	Minor	
Findings	Comply?	
Master list of all SOP is evident in Oil Palm Agricultural Policy (May 2008). The GAP is currently under reviewed process by Plantation Analysis Department (PAD). In the POM, the master lists of all SOPs are made available in Production Control Process Flow (K-PF-QMS-HPO-001). All documents revisions are clearly recorded in Document Revision History.	Yes	
All activities are closely monitored by the estate management, for example harvesting, manuring and weeding.		
Example of activities being evaluated are manuring and harvesting. It is evaluated by Field Staff, Cadet, and Estate Manager and verified by Quality Assessor. The evaluation has been made using Harvesting Inspection Record and Manuring Inspection Record (daily).		
Example of inspection record in the estate verified during the audit are:  a. 29 Jun 2017 (Harvesting) b. 05 Jul 2017 (Harvesting) c. 09 Jul 2017 (Harvesting) d. 20 Jun 2017 (Manuring) e. 15 & 18 Jun 2017 (Manuring) Routine audit to ensure all activities in the plantation are conducted according to the GAP is conducted by Plantation Admin Department (PAD). Latest audit has been conducted on 5-9 Jun 2017.  The company has appointed external 3rd parties expert (IR KP Chow) for the machineries inspection.		
Internally, Kwantas group has conducted regular Operation Audit conducted by Operational Unit from Regional Office (Lahad Datu) to evaluate the implementation of company SOP and best practices. Latest operational audit conducted on 11-20 Apr 2016 as evident in audit report (KCB/HPOM(01)-		

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	16).	
	T	
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate	Minor
	Findings	Comply
Audit F	ring of GAP implementation is made by Plantation Admin Department (PAD) and presented by Report. Latest audit has been conducted on 5-9 Jun 2017. Result of the audit has been ed in the Audit Findings and being responded by the estate in July 2017.	Yes
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).	Major
	Findings	Comply?
The PC (A 7.1.	DM has established a SOP for third party FFB sourcing in Receiving Third Party Sourced FFB 1).	Yes
supplie	ed third party FFB suppliers are listed in FFB Supplier License List. There are 55 third parties registered in the mill on the date of audit. All FFB received from third parties will be ed in Non-RSPO Record Book.	
568.36 Sheet	tion made on the record confirmed that the SOP has been implemented. For example, there is 0MT FFB received from external suppliers on 25 Jul 2017. The POM has practiced a Test of Mass Balance Table which recorded incoming and outgoing "Sustainable" and Non-nable FFB, CPO and PK.	
	on 4.2: es maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal a ed yield.	and
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.	Minor
	Findings	Comply?
has cle	Findings  1 4.9: Manuring of the GAP has been established to ensure oil palm and soil fertility. The GAP arly explained the Manuring Schedule for Immature Palms. For example:	Comply? Yes
has cle a. RF b. SC	Findings  1 4.9: Manuring of the GAP has been established to ensure oil palm and soil fertility. The GAP	
has cle a. RF b. SC c. MC	Findings  1 4.9: Manuring of the GAP has been established to ensure oil palm and soil fertility. The GAP arly explained the Manuring Schedule for Immature Palms. For example: 12: 0.50kg/palm 12: 0.20kg/palm 13: 0.20kg/palm	
has cle a. RF b. SC c. MC  The SC Implem Soil sa Lab. R	Findings  1 4.9: Manuring of the GAP has been established to ensure oil palm and soil fertility. The GAP arly explained the Manuring Schedule for Immature Palms. For example:  2: 0.50kg/palm  20: 0.20kg/palm  20: 1.00kg/palm  20: 1.00kg/palm  20: 1.00kg/palm  20: 1.00kg/palm  21: 1.00kg/palm  22: 1.00kg/palm	
has cle a. RF b. SC c. MC  The SC Implem Soil sa Lab. R result c Leaf ar report Harank	Findings  1. 4.9: Manuring of the GAP has been established to ensure oil palm and soil fertility. The GAP arly explained the Manuring Schedule for Immature Palms. For example:  2. 0.50kg/palm  2. 0.20kg/palm  2. 1.00kg/palm  2. 1.00kg/palm  2. 2. 2. 3. 4. 5. 5. 5. 5. 5. 5. 5. 5. 5. 5. 5. 5. 5.	
has cle a. RF b. SC c. MC  The SI Implem Soil sa Lab. R result c Leaf al report Harank a. Blo • •	Findings  1 4.9: Manuring of the GAP has been established to ensure oil palm and soil fertility. The GAP arly explained the Manuring Schedule for Immature Palms. For example:  2: 0.50kg/palm  2: 0.50kg/palm  2: 0.50kg/palm  3: 0.20kg/palm  3: 0.20kg/palm  3: 0.20kg/palm  4: 0.20kg/palm  5: 0.40kg/palm  6: 0.50kg/palm  7: 1.00kg/palm  7: 1.00kg/palm  7: 1.00kg/palm  8: 0.50kg/palm  8: 0.50kg/palm)	
has cle a. RF b. SC c. MC  The SC Implem Soil sa Lab. R result c Leaf ar report Harank	Findings  1 4.9: Manuring of the GAP has been established to ensure oil palm and soil fertility. The GAP arly explained the Manuring Schedule for Immature Palms. For example: 2: 0.50kg/palm 20: 0.20kg/palm 20: 0.20kg/palm 20: 0.00kg/palm	
has cle a. RF b. SC c. MC  The SC Implem Soil sa Lab. R result c Leaf al report Harank a. Blc  b. Blc	Findings  1. 4.9: Manuring of the GAP has been established to ensure oil palm and soil fertility. The GAP arly explained the Manuring Schedule for Immature Palms. For example:  2. 0.50kg/palm  2. 0.50kg/palm  2. 0.20kg/palm  2. 0.00kg/palm  3. 0.20kg/palm  3. 0.20kg/palm  3. 0.20kg/palm  3. 0.20kg/palm  3. 0.20kg/palm  4. 0.20kg/palm  4. 0.20kg/palm  5. 1. 0.00kg/palm  5. 1. 0.00kg/palm  6. 1. 0.00kg/palm  6. 1. 0.00kg/palm  6. 20 1. 0.00kg/palm  6. 20 1. 0.00kg/palm  7. 1. 20 1. 0.00kg/palm  7. 20 1. 0.00kg/palm  8. 20 1. 0.00kg/palm)	

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	nple as below:	1			
	Block No.	Fertilizer Type	Recommend (kg/palm)	Actual (kg/palm)	
	7	MOP (Apr 17)	2.0 (Apr 17)	2.0 (May 17)	
	14	SOA (Feb 17)	1.75 (Feb 17)	NPK 3.0 (Apr 17)	
	12	SOA (Jun 17)	1.75 (Jun 17)	NPK 1.5 (Mar 17)	
1.2.2	Records of fer	rtilizer inputs shall t	pe maintained.		Minor
L		·	Findings		Comply?
Application a. Hara	a > Daily Muste anky 1: Block 1 Program: Jun Realization: 2' Total bags app anky 2 Program: Jun Realization: 20 Total bags app ion of fertilizer Sang Foo). The on in Fertilizer anky 1: SOA: 0.32kg/N MOP: 0.30kg/N	r Chit > Stock Card 3 2017 (MOP=280ba 1, 22 and 29 Jun 20 blied: 280 bags 2017 (MOP=172ba 0 Jun 2017 blied: 172 bags has been made e production unit per FFB (Haranky MT FFB MT FFB	d. For example: ags) 017 ags) in accordance to fertilizer	recommendation report (by ed fertilizer usage per ton a to Jun 2017 as below:	Mr.
1.2.3			dic tissue and soil sampling	to monitor changes in nutrie	nt Minor
			Findings		Comply?
			re for tissue sampling (leaf quency of the leaf sampling i	analysis) as evident in Oil Fis once a year.	Palm Yes
hat leat	f sampling has ed on 11 Mar 2	s been conducted	l once a year whereby th 5&L034). Result of the leaf	L012). The audit team confire previous sampling has be analysis has been incorport	peen
1.2.4			l be in place, and may inclu ME), and palm residues afte	de use of Empty Fruit Bunch er replanting	es Minor
			Findings		Comply?
n EFB F applied v Although determin a. EFB	ibre Applicatio with 6577MT file on there is no	on Program (rate: 1 bres. As of Jun 201	OOMT/Ha). For example, bluif, block 4 has been applied application of EFB, Fibre	t recycling program. It is evicock 4 (67.77Ha) is planned to with 427.61MT (below targets or POME, the company	o be et).
	ME: 3MT/Ha				
c. FO			d de sus detiens of sells		
riterio		Leantral areaion an			
Practice:	s minimize and	I control erosion an			Maior
Criterio	s minimize and	l control erosion an			Major <b>Comply</b>

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Princip	le 4: Use of Appropriate Best Practices by Growers and Millers	
Topogr	aphy map for both estates has been prepared based on scale of 1:16,000.	
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).	Minor
	Findings	Comply?
establis	is no steep slope identified in both estates. However, based on GAP, the company has shed an Environmental Management Plan which clearly stated that:	Yes
b. Slo Section	development shall be done on slopes >25° upe 12°-20° should be terraced for better result in the field.  3.4: Classification of Slopes in GAP also explained the management plan for planting on	
•	Site inspection confirmed no areas with slope >25° available in both estates.	
4.3.3	A road maintenance programme shall be in place.	Minor
	Findings  naintenance program FY2016/2017 is made available during the audit. The activities included maintenance programme:	Yes
a. Gra	ading avelling	
	maintenance program conducted are recorded in Road Maintenance Program. The programs ported with financial budget. Latest road maintenance activities conducted in May 2017.	
For fina Mainte	ancial year 2016/2017, the company has allocated budget of RM133,452.00 for Road Bridge nance. At the end of FY2016/2017 (Jun 2017), the company has utilized RM201,163.72.	
4.3.4	Subsidence of peat soils shall be minimized and monitored. A documented water and ground cover management programme shall be in place.	Major
	Findings	Comply?
There i	s no peat soil identified in both estates.	Yes
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing	Minor
	Findings	Comply?
There i	s no peat soil identified in both estates.	Yes
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).	Minor
	Findings	Comply?
	s no problematic soil identified in both estates (Haranky 1 & 2). Both estates consist of Kretam midi soil types.	Yes
Criterio	on 4.4:	
	es maintain the quality and availability of surface and ground water.	
4.4.1	An implemented water management plan shall be in place.	Minor
	Findings	Comply?
(Haran	mpany has established a water management plan as evident in Water Management Plan ky Estate & Haranky Palm Oil Mill). The plan has included:	Yes
a. Ide	Intification of water courses Water catchment (3 Ponds)	
•	Rainwater Harvesting	
and	newability of Water source is evident as both sources are collected from natural waterways d rain.	
Hu	e company has conducted a study on water requirements per person per day according to man Water per Capita (200L/person/day). Based on the study conducted, total water uirement for domestic usage in 2016 is 55,620m3, however, the production unit only managed	

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#### Principle 4: Use of Appropriate Best Practices by Growers and Millers

to supply 26,788.04m3 in the same period.

- d. The production unit has established a water management plan which included:
  - Alternative Water Sources
  - Riparian/Buffer
  - Water Catchment Pond and Waterways
  - Drinking Water
  - Palm Oil Mill Effluent
  - Sewage and Sanitation

There is no evidence of any dams constructed across the production unit. Water quality for water flowing through the estate has been evaluated based on 7 sampling points. Sampling points are map accordingly in the water management plan. Latest water sampling has been conducted on 13 May 2017. Result of water analysis is evident in Certificate of Analysis:

- a. 20170513/09A W1
- b. 20170513/09B W2
- c. 20170513/10A W3
- d. 20170513/10B W4

All parameters inspected from the lab have been verified against National Water Quality Standard (NWQS). It was found that all water samples meet Class IIA: Conversional Treatment Required.

The production unit are monitoring rainfall data as evident in Rainfall Record. Result recorded are:

- a. FY2014/2015: 2242mm/year
- b. FY2015/2016: 1683mm/year
- c. FY2016/2017: 2837mm/year

Site inspection conducted at Block 14 and 15 of Haranky 1 estate confirmed that riparian along stream are well maintained. There is signage to prevent any illegal activities (e.g.: burning, spraying, manuring, fishing) within the area. It is also sighted that riparian area has been clearly marked with Red Paint at last palm stand (5 metres). A map showing location and area reserve for riparian area is available.

Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.

Major

#### Findings

The company has identified watercourses available within the plantation area. There are 3 natural water catchment identified and being utilized for domestic usage.

Comply? Yes

Field verification has been made to all water catchment (Block 1, Block 20 and Block 22) confirmed that the area are protected. No activity (except harvesting FFB) is allowed within 20m from the water catchment.

SOP for riparian maintenance is evident in Surface and Groundwater Management (SOP: 4.3). Site inspection conducted at Block 14 and 15 of Haranky 1 estate confirmed that riparian along stream are well maintained. There is signage to prevent any illegal activities (e.g.: burning, spraying, manuring, fishing) within the area. It is also sighted that riparian area has been clearly marked with Red Paint at last palm stand (5 metres). A map showing location and area reserve for riparian area is available.

Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).

Minor

#### **Findings**

Comply?

The POM has established a SOP for effluent treatment process as evident in Work Instruction for Effluent Treatment (K-WI-QMS-HPO-019). Person in charge for the effluent treatment is Mr. Jusman (Lab In-Charge); Jamaludin Laijo (Operator). Training for person in charge has been provided on 8 Nov 2016.

In practice, the POM has monitored final discharge quality (BOD) as required by *Jadual Pematuhan*, *Jabatan Alam Sekitar* [Department of Environment's (DOE's) Compliance Schedule] (ASSH(B)31/152/000/142). Sampling activities for the discharge quality is conducted by appointed external party, Dkesh Resources. Samples are taken every month and submitted to Department of Environment (DOE) as required in *Jadual Pematuhan* [Department of Environment's (DOE's) Compliance Schedule]. Latest sampling has been conducted on 2 Jun 2017.

Results of the samples (3 points) have been submitted to DOE on 3 Jul 2017. Result for final discharge in Jun 2017 is 29.4mg/L; which above the approved level required by DOE (20mg/L). As part of the improvement plan, the POM has initiated new treatment process using OXYNOL-S to

Yes

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Principle 4: Use of Appropriate Best	Practices by Growers and Millers	
	Report of the implementation of OXYNOL-S Test (by OXYNOL)	
Malaysia Sdn Bhd) has been made av		
	r treatment, discharge and land application of mill effluent as is Minyak Kelapa Sawit Mentah (Preconditions for Licensing of 2].	
4.4.4 Mill water use per ton of fresh	fruit bunches [FFB] - see criterion 5.6 - shall be monitored.	Minor
	Findings	Comply?
	for the processing activities. Water consumption is monitored in lanagement Plan (Haranky Estate & Haranky Palm Oil Mill).	Yes
Record of water usage per MT FFB pr	ocessed are as below:	
a. Jan 2017: 1.19m3/MT FFB		
<ul><li>b. Mar 2017: 1.24m3/MT FFB</li><li>c. Jun 2017: 0.96m3/MT FFB</li></ul>		
Criterion 4.5: Pests, diseases, weeds and invasive in Management techniques.	ntroduced species are effectively managed using appropriate Inte	grated Pest
<u> </u>	Pest Management (IPM) plans shall be monitored.	Major
1	Findings	Comply?
The company has documented an	Integrated Pest Management Procedure (SOP: 4.5). The	Yes
procedure has included:	Ç ,	
<ul><li>a. Identification (Census)</li><li>b. Implementation &amp; Monitoring</li><li>c. Review</li></ul>		
The IPM treatment program has include	led:	
a. Spraying	icu.	
b. Trunk Injection     c. Rat Baiting		
Field inspection sighted that benefic	uction unit promoted planting of beneficial plant and barn owl. ial plant has been planted along main road as per program anky 1 estate has established 50 points (out of 100 points) of	
	for barn owl 1 barn for every 20Ha (15 barns for Haranky 1 and date of the audit, the production unit has installed 1 barn in	
unit has conducted census to monitor	n the estate. Major pest reported is rat damage. The production rate of pest as evident in Rat Baiting Record. The company has to begin rat baiting program. Sample of census conducted as	
a. Block 19		
Census Date: 27 Mar 2017     Attacks 4770/		
<ul><li>Attack: 47%</li><li>Round 1 (100%): 3 May 2017</li></ul>	(100%)	
<ul> <li>Round 2 (70%): 7 May 2017 (</li> </ul>		
Round 3 (40%): 11 May 2017	,	
<ul> <li>Round 4 (20%): 17 May 2017</li> <li>Block 04</li> </ul>	7 (10%)	
<ul> <li>Census Date: 26 Mar 2017</li> </ul>		
Attack: 57%		
<ul> <li>Round 1 (100%): 4 May 2017</li> <li>Round 2 (70%): 8 May 2017 (</li> </ul>	•	
<ul> <li>Round 2 (70%): 8 May 2017 (</li> <li>Round 3 (40%): 12 May 2017</li> </ul>		
<ul> <li>Round 4 (20%): 16 May 2017</li> </ul>		
c. Block 06 • Census Date: 23 Mar 2017		
<ul><li>Census Date: 23 Mar 2017</li><li>Attack: 68%</li></ul>		
<ul> <li>Round 1 (100%): 8 May 2017</li> </ul>		
<ul> <li>Round 2 (70%): 12 May 2017</li> </ul>	(70%)	

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•	Round 3 (40%): 16 May 2017 (39%) Round 4 (20%): 22 May 2017 (17%)	
4.5.2	Training of those involved in IPM implementation shall be demonstrated.	Minor
	Findings	Comply?
Program The train planned	oduction unit has established annual training plan as evident in RSPO Annual Training nme. Latest IPM training has been conducted by Mr. Mohd Badrul Nizam on 23 May 2016. ining has been attended by 22 personnel including general workers. Next IPM training is it to be conducted in Aug 2017.	Yes
	ining record is evident in Minit Mesyuarat IPM which includes the training report, training ls and attendance list.	
Criterio Pesticio	on 4.6: les are used in ways that do not endanger health or the environment.	
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.	Major
	Findings	Comply?
	mpany has established and promoted safe working procedure as evident in <i>Prosedur Kerja t (Penyembur Racun)</i> [Safe Operating Procedures (Pesticide Sprayers)]. The procedure has d:	Yes
b. Cal	tective Equipment (PPE) ibrations thod of Applications emical Handling	
	on safe use and handling of chemicals has been conducted on 15 Jul 2017. The training has onducted by Mr. Elvise M.S. Johny (Safety Officer).	
species	The production unit has established a Justification on Agrochemicals Used (SOP: 4.6) for target species. Example of chemicals listed are:	
b. Am c. Ker	n-Glyphosate ( <i>Imperata cylinderica, Pennisetum sps</i> ) ine ( <i>Asystassia</i> ) nlyy (woodies and broad leaves) tikus/Arakus (rat baits)	
	n to minimize usage of chemicals is by maintaining circle spraying in immature field and strip t 2 rounds per year. Implementation of Rat Baiting is evident during the audit.	
All chemicals stored in the production units are recorded in Register of Chemicals Hazardous to Health. The register has been JKKP in Feb 2016. The list has included:		
	ss 1: Paraquat ss 3: Glyphosate, Arakus, Kenlon	
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.	Major
	Findings	Comply?
The production unit has established a spraying program in both estates as evident in Work Programme 2017/2018. Spraying program for immature area is 8 rounds/year and 3 rounds/year for mature area. As part of chemical reduction plan, campaign for spraying in FY2017/2018 has been reduced to 6 rounds/year (immature) and 3 rounds/year (mature).		Yes
Work C	s of pesticides/weedicide use are available in Material Application for Field Usage and Daily ontrol Sheet. Example of application recorded are:	
a. Blo •	<ul> <li>a. Block: 09 (Immature)</li> <li>Chemical Type: Ken-Glyphosate (41%)</li> <li>Volume: 26.56 Liters</li> </ul>	
b. Blo	Date Applied: 1 Jun 2017 ck: 10 (Immature)	
<ul> <li>Chemical Type: Ken-Glyphosate (41%)</li> <li>Volume: 29.39 Liters</li> <li>Date Applied: 1 Jun 2017</li> </ul>		
The pro	duction unit has recorded to a.i used per hectare in FY2016/2017. Example of the recorded	

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a.i used	le 4: Use of Appropriate Best Practices by Growers and Millers	
	/phosate: 1.0662 a.i/ha raquat: 0.0028 a.i/ha	
	nethylamine: 0.3813 a.i/ha	
4.6.3	Any use of pesticides shall be minimized as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.	Major
	Findings	Comply?
	ompany has documented an Integrated Pest Management Procedure (SOP: 4.5). The ure has included:	Yes
	entification (Census) plementation & Monitoring view	
	Vitreatment program has included:	
	raying unk Injection t Baiting	
As part Field ir (50m/pe	of biological control, the production unit promoted planting of beneficial plant and barn owl. espection sighted that beneficial plant has been planted along main road as per program point). As of date of audit, Haranky 1 estate has established 50 points (out of 100 points) of ial plants. It was sighted during the audit.	
4.6.4	Pesticides that are categorized as World Health Organization 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 national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.	Minor
	Findings	Comply?
All chemicals stored in the production units are recorded in Register of Chemicals Hazardous to Health. The register has been JKKP in Feb 2016. The list has included:		Yes
a. Class 1: Paraquat b. Class 3: Glyphosate, Arakus, Kenlon		
the date 1). The	s of chemicals application is monitored in Monitoring of Chemical Usage Record 2016. As of e of audit, the production unit still holds a stock of 148.35 Litres of Paraquat dichloride (Classere is evidence showing commitment of the company to reduce the usage of Class 1 signed by hd Badrul. This has been verified against no new purchased been made on any Class 1	
	·	
chemic: Verifica	·	
chemic: Verifica	als.  Ition on inventory in chemicals store confirms that the remaining stock for Class 1 chemicals	Major
chemic Verifica (Paraqu	als.  Ition on inventory in chemicals store confirms that the remaining stock for Class 1 chemicals uat) is 148.35 Litres.  Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be 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 Comply?
Verifica (Paraqu 4.6.5	rition on inventory in chemicals store confirms that the remaining stock for Class 1 chemicals suat) is 148.35 Litres.  Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be 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 (see Criterion 4.7).	•
chemica Verifica (Paraqua 4.6.5 SOP for Operation to Officer) Intervieo implemintervieo	rition on inventory in chemicals store confirms that the remaining stock for Class 1 chemicals part is 148.35 Litres.  Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be 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 (see Criterion 4.7).  Findings  or chemicals handling is evident in Prosedur Kerja Selamat (Penyembur Racun) [Safeing Procedures (Pesticide Sprayers)]. Training on safe use and handling of chemicals has onducted on 15 Jul 2017. The training has been conducted by Mr. Elvise M.S. Johny (Safety)	Comply?
Verifica (Paraque 4.6.5  SOP for Operation been conficer) Intervie implementation interview they have a. Propertion of the properties of t	als.  Ition on inventory in chemicals store confirms that the remaining stock for Class 1 chemicals stat) is 148.35 Litres.  Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be 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 (see Criterion 4.7).  Findings  or chemicals handling is evident in Prosedur Kerja Selamat (Penyembur Racun) [Safeing Procedures (Pesticide Sprayers)]. Training on safe use and handling of chemicals has onducted on 15 Jul 2017. The training has been conducted by Mr. Elvise M.S. Johny (Safety in Malay Language.  We conducted with sprayers confirm that they are aware of all safety measures to be ented during applying chemicals. Although no spraying activities sighted during the audit, we conducted by the spraying gang (Lina Magang, Alimudin Basri, Oktavianus) confirms that	Comply?

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Principle 4: Use of Appropriate Best Practices by Growers and Millers		
a. 2,4D-dimethylamine (60%)		
b. Paraquat dichloride (13%) c. Metsulfuron methyl (20%)		
Interview conducted with sprayer gang confirms that they have been provided with appropriate and safe application equipment (Conventional Knapsack Sprayer) such as cotton and rubber gloves, respiratory mask, apron, rubber boot and google.		
PPE provided for all sprayers are recorded in Record of PPE Received & Issued. Verification of PPE issuance for Lina Magang and Sul Sanu (Sprayers) confirms that they have been provided with PPE and replaced without any charges. Field staff is responsible to monitor the usage of PPE on-site. All workers are checked whether sprayers are wearing PPE properly every time they are doing work as per PPE Checklist.		
4.6.6 Storage of all pesticides shall be according to recognized best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).	Major	
Findings	Comply?	
The production unit has established a SOP for pesticide storage as evident in <i>Prosedur Kerja Selamat Penyimpanan dan Pengurusan Bahan di Stor Bahan Kimia</i> (Safe Operating Procedures Storing and Management of Chemicals in Chemical Store). Site verification conducted at chemical store confirms that all chemical has been stored according to best practice.		
Empty chemicals containers are properly stored in a locked area. It has been clearly labelled and triple rinsed. Site inspections confirmed that no empty chemicals containers being used indiscriminately/disposed in the field. Result from interview with Alimuddin Basri (Mandor for Spraying) confirmed that he is responsible to do the triple rinse before keeping in empty chemical containers store.		
4.6.7 Application of pesticides shall be by proven methods that minimize risk and impacts.	Minor	
Findings	Comply?	
Work instruction for pesticides application has been clearly explained in <i>Prosedur Kerja Selamat Menyembur Racun</i> [Safe Operating Procedures Spraying].	Yes	
Although no spraying activities conducted during the audit, it was confirmed that all sprayers has been trained with safe working procedures (spraying). Training records confirmed that new workers in spraying gang, Sul Sanu (3 months joining sprayer gang) has participated in training conducted on 15 Jul 2017. Earlier, he has been provided with training <i>Penerangan Pengendali Racun &amp; Baja</i> (Briefing on Chemical & Fertilizer Handling) conducted by Mr. Elvise on 26 Apr 2017.		
Verification during the audit confirmed that the dosage of chemical applied by sprayer are in accordance with the given label and instruction.		
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	
Findings		
No aerial spray has been conducted in the area.		
4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8).	Minor	
Findings		
There is no associated smallholder involved in the production unit.		
All workers handling pesticides are regularly trained with safe working procedure. Example of latest training conducted for sprayers has been conducted on 17 May 2017. The training has been conducted by Mr. Elvise M.S. Johnny (Safety officer). Training materials has been evaluated and made available during the audit.		
Result from interview conducted with the spraying gang confirmed that they understood the safe working practices introduced by the production unit.		
4.6.10 Proper disposal of waste material, according to procedures that are fully understood by	Minor	
workers and managers shall be demonstrated (see Criterion 5.3		

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Principle 4: Use of Appropriate Best Practices by Growers and Millers	
The production unit has established Waste Management Plan (SOP: 5.3) which identified sources and type of waste, category and responsible person. The plan has included management of:	No
<ul> <li>a. Domestic Waste</li> <li>Recyclable</li> <li>Non-Recyclable</li> <li>b. Schedule Waste</li> </ul>	
Training on waste management has been conducted on 24 Oct 2016. The training has been conducted for all workers at the linesite.	
However, during inspection at the landfill conducted at Block 17, it is evident that not all waste disposed in the landfill has been segregated. It is evident that schedule waste (lubricant container) and recyclable materials (glass, plastic) been disposed in the landfill which is not compliance with the company's procedures. (Minor NC 02)	
4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.	Major
Findings	Comply?
List of operators handling the pesticide is available in Summary report Medical Surveillance for April 2017. All workers handling pesticides are required to undergo annual medical surveillance at least once a year.	Yes
Records of Annual Medical Surveillance are available in Occupational Medical Surveillance Programme Record Book as per Medical Surveillance Program for 2016. The medical surveillance has been conducted by Dr. Mohd Azizan bin Abdul Aziz (OHD: HQ/10/DOC/00/167).	
The program has listed staffs/workers which should undergo annual medical surveillance for example:	
<ul><li>a. Sprayer</li><li>b. Manuring</li><li>c. Storekeeper</li><li>d. Workshop (Welder)</li></ul>	
Example of the records conducted on 13 Apr 2017 available for	
<ul><li>a. Lina Magang Petrus (Fit)</li><li>b. Mariana Mukhsin (Fit)</li><li>c. Rufinus Igo Watun (Fit)</li></ul>	
All medical treatments and record of workers handling with pesticides are kept with Hospital Assistant (Ms. Katrina Yunus).	
4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women.	Major
Findings	Comply?
The company has indicated a commitment to prevent pregnant and breast feeding woman from handling pesticides as evident in Employment of Workers/Staff (SOP: 4.6). List of workers handling pesticides is available in Summary report Medical Surveillance for April 2017.	
The company has a system to monitor pregnancy of workers every 2 months. All workers health record is available in Medical Check Up Form. Test included in routine check-up are Blood Pressure Test and Urine Test (Pregnancy). Site inspection confirms that no pregnant woman is doing work with chemicals.	
Criterion 4.7:	
An occupational health and safety plan is documented, effectively communicated and implemented.  The health and safety plan shall cover the following:	
<ul> <li>A health and safety policy shall be in place.</li> <li>A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</li> </ul>	Major
Findings	Comply?
Policy on health and safety is available in <i>Polisi Keselamatan dan Kesihatan</i> . The policy has been established in English and Malay language. It has been approved by Mr. Steve Kwan on 24 Oct 2014. The policy covered mitigation of risk to all workers at workplace. The policy has been communicated to all workers during induction session and displayed publicly within estate compound.	
The production unit has established an Occupational Safety and Health Action Plan which indicates the plan to improve occupational health and safety. The plan includes:	

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#### Principle 4: Use of Appropriate Best Practices by Growers and Millers a. OSH Inspection b. OSH Training c. OSH Inspection The OSH Plan has been implemented based on records available in: a. OSH Inspection Checklist (5 May 2017) b. Panduan Senarai Periksa Traktor/Trailer (Guidelines for Checklist for Tractor/Trailer) (daily) c. Checklist for Air Compressor (Jun 2017) d. Monthly Inspection Report Haranky Estate (Jun 2017) e. Senarai Semak Pemeriksaan Kawasan Perumahan (Checklist for Linesite Inspection) (23 Jul 2017-weekly) The OSH plan is made available to all parties upon request. As of the date of audit, the company is meeting the OSH plan as established by the safety committee. At the mill, OSH plan is made available in MPOM & Haranky Mill. The OSH Plan has been approved by mill manager, Mr. Perumal Rajoo on 5 Jan 2017. Monitoring for the implementation of OSH plan is available and recorded; for example: a. Safety and Health Committee Training (27 Jan 2017) b. SOP Kernel Plant (10 Feb 2017) c. SOP Laboratory (14 Jul 2017) d. SOP Sterilizer (30 May 2017) All operations where health and safety is an issue shall be risk assessed, and procedures 4.7.2 and actions shall be documented and implemented to address the identified issues. All Major precautions attached to products shall be properly observed and applied to the workers. **Findings** Comply? The POM has conducted risk assessment for activities in the mill. Risk analysis has been compiled in No Borang HIRARC (HROSHFC.230714.04.V0). The HIRARC has been conducted for activities such as: a. Engine Room b. Spherical Sterilizer c. EFB Press Station d. Workshop e. CPO Dispatch All accident occurred in the POM has been recorded in Accident (and Near Miss) Records. As of Jan-Jun 2017, there are 2 accident cases recorded with total MCs of 2 days. Briefing for other staff to refresh safety requirement has been conducted on daily basis during Taklimat Sebelum Memulakan Risk analysis for estate operations are recorded in Borang HIRARC. The plan has included for example: a. Sprayer b. Manurer c. Chemical Store However, it is evident that not all operations/activities have been conducted by HIRARC (e.g.: field upkeep-slashing; crèche; maintenance of water catchment). (Major NC 03) All relevant workers conducting activities in the estate has been briefed and trained on OSH, HIRARC and safety. Example of recorded training are: a. Taklimat Keselamatan & SOP Menyembur Racun (Briefing on OSH and SOP for Sprayers) (26 Apr 2017) b. Taklimat Keselamatan & SOP Pemunggah Buah (Briefing on OSH and SOP for FFB Loading) (4 c. Taklimat Keselamatan & SOP Penuai Buah (Briefing on OSH and SOP for Harvesters) (19 Jan Site inspection conducted during the audit (Block 13: Harvesting and Upkeep) confirmed that all safety measures has been implemented. All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all 4.7.3 Major 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. **Findings** Comply?

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-	le 4: Use of Appropriate Best Practices by Growers and Millers	
All work	kers involved in operations at mill are appropriately trained for safe working practices. Example	Yes
	ng conducted is evident, for example as below:	
a. Taklimat Keselamatan & SOP Kernel Plant (OSH and SOP for Kernel Plant Briefing) (10 Feb 2017)		
b. Lat	tihan Memadam Kebakaran (Fire Drill and Fire Extinguishing Training) (23 May 2017)	
c. <i>Tal</i> 201	klimat Keselamatan & SOP Stesen Spherical (OSH and SOP for Spherical Station) (30 May	
The tra	ining has been conducted by Mr. Elvise M.S. Johnny (Safety Officer). All workers have been	
	d with appropriate PPEs to ensure safe working conditions. Interview conducted with Mr. Chief Mechanic) and Mr. Enggal Yassin (Boilerman) confirms that he received complete PPE	
at zero	cost to ensure safe working conditions. The POM has also recorded PPEs provided to all	
	s available in PPE Issuance Record (Stock Card). The audit team found that PPE has been for all workers.	
	spection conducted in the POM and estates confirms that all workers are using appropriate	
	then commencing work.	
	vant workers conducting activities in the estate has been briefed and trained on OSH, HIRARC lety. Example of recorded training are:	
	klimat Keselamatan & SOP Menyembur Racun (Briefing on OSH and SOP for Sprayers) (26	
b. <i>Tal</i>	r 2017) k <i>limat Keselamatan</i> & <i>SOP Pemunggah Buah</i> (Briefing on OSH and SOP for FFB Loading) (4	
	y 2017) klimat Keselamatan & SOP Penuai Buah (Briefing on OSH and SOP for Harvesters) (19 Jan	
201	17)	
	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about	
4.7.4	health, safety and welfare shall be discussed at these meetings, and any issues raised shall	Major
	be recorded.	
	Findings	Comply?
	mpany has identified a Safety Officer whom responsible to implement OSH. The identified is Mr. Elvise M.S. Johnny. His appointment is supported by Appointment Letter dated 8 Jun	Yes
At the POM, a Safety Committee has been established which representing employees and employers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has been conducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH Meeting). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16		
employe been co	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has onducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH	
employe been co Meeting persons	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has onducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH g). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes:	
employed been con Meeting persons a. OS	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has conducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH by). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes:	
employebeen compersons a. OS b. Accomp. C. Wo	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has conducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH g). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes: SH Program cident Cases in 2016 orkplace Inspection	
employed been considered Meeting persons a. OS b. Acc. c. Wood. Oth	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has conducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH g). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes:  SH Program cident Cases in 2016 orkplace Inspection	
employebeen of Meeting persons a. OS b. Acc c. Wo d. Oth In the Meeting is main has be	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has conducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH g). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes: SH Program cident Cases in 2016 orkplace Inspection	
employebeen of Meeting persons a. OS b. Acc c. Wo d. Oth In the Meeting is main has be	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has conducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH dg). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes:  H Program cident Cases in 2016 orkplace Inspection hers  estate, meeting between safety committees and workers are conducted every 3 months. It is related to safety has been conducted by Safety & Health Committee Minutes of the meeting tained and verified during the audit. Latest meeting has been conducted on 19 Jul 2017 which en attended by 26 people. Result from interview with Mr. Basri (Workers Representative) ed that he has attended the meeting.  Accident and emergency procedures shall exist and instructions shall be clearly understood	
employebeen of Meeting persons a. OS b. Acc c. Wo d. Oth In the Meeting is main has be	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has conducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH dg). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes:  H Program cident Cases in 2016 orkplace Inspection hers  estate, meeting between safety committees and workers are conducted every 3 months. It is related to safety has been conducted by Safety & Health Committee Minutes of the meeting tained and verified during the audit. Latest meeting has been conducted on 19 Jul 2017 which en attended by 26 people. Result from interview with Mr. Basri (Workers Representative) ed that he has attended the meeting.	Minor
employebeen compersons a. OS b. Acc. Wood. Oth In the Meeting is main; has beconfirm	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has conducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH dg). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes:  H Program cident Cases in 2016 orkplace Inspection hers  estate, meeting between safety committees and workers are conducted every 3 months. It is related to safety has been conducted by Safety & Health Committee Minutes of the meeting tained and verified during the audit. Latest meeting has been conducted on 19 Jul 2017 which en attended by 26 people. Result from interview with Mr. Basri (Workers Representative) ed that he has attended the meeting.  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	Minor  Comply?
employ been compersons a. OS b. Acc c. Wo d. Oth In the Meeting is main has beconfirm  4.7.5  Procede (HROS) Prosed	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has conducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH g). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes:  H Program cident Cases in 2016 orkplace Inspection ners  estate, meeting between safety committees and workers are conducted every 3 months. It is related to safety has been conducted by Safety & Health Committee Minutes of the meeting tained and verified during the audit. Latest meeting has been conducted on 19 Jul 2017 which en attended by 26 people. Result from interview with Mr. Basri (Workers Representative) ed that he has attended the meeting.  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.  Findings	
employ been compensions a. OS b. Acc. C. Wood. Oth In the Meeting is main has beconfirm.  4.7.5  Procede (HROS) Prosed estate in These persons.	ers. The committee is evident in OSH Committee 2017. Regular meeting (every 3 months) has onducted by the OSH Committee as evident in <i>Mesyuarat Keselamatan &amp; Kesihatan</i> (OSH g). Latest meeting has been conducted on 14 Jul 2017. The meeting has been attended by 16 s. Agenda of the meeting includes:  He Program cident Cases in 2016 orkplace Inspection ners  estate, meeting between safety committees and workers are conducted every 3 months. It related to safety has been conducted by Safety & Health Committee Minutes of the meeting tained and verified during the audit. Latest meeting has been conducted on 19 Jul 2017 which en attended by 26 people. Result from interview with Mr. Basri (Workers Representative) ed that he has attended the meeting.  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.  Findings  ure for accidents investigation is available in <i>Prosedur Siasatan Kemalangan</i> HPP.230714.03.V0). Furthermore, procedure to cater emergency situation is also available in <i>ur Tindakan Kecemasan</i> (i.e.: Fire, Chemical Handling, Flood). In case of emergency, the	Comply?

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#### Principle 4: Use of Appropriate Best Practices by Growers and Millers Crescent). In the estate, competent person to handle emergency cases is Katrina Yunus (Staffnurse). Training on handling first aid has been conducted to 21 personnel from estates and POM by Mr. Borhan M. Noh (Medical Assistant) on 13 Jul 2017. Result from site inspection in the POM found that first aid box has been provided in certain station in the POM, however, it is evident that the provided first aid is limited and not made available at all workstation (e.g.: Control Room). Verification made against First Aid distribution Map confirms that only 3 first aid kit been provided in the POM. (Minor NC 04) In the estate, 11 first aid boxes have been provided to accommodate emergency situation. The first aid boxes are regularly checked (monthly) by Mr. Mohd Risal (POM) and Ms. Katrina (Estate). Accident cases are recorded in Accident (and Near Miss) Records and being reviewed in every safety committee meeting. All workers shall be provided with medical care, and covered by accident insurance 4.7.6 Minor Comply? **Findings** List of all workers in Haranky POM is available in Manpower Budget FY2016/2017. As of the date of Yes audit, there are 116 workers (16 Malaysian, 35 Filipino, 65 Indonesian) serving Haranky POM. All workers are covered under Foreign Worker Compensation Scheme Schedule and SOCSO for Locals. Samples of policies checked for workers in the POM are as below: a. Halim Sulaiman (Policy: 701700002244 - Valid: 31 Oct 2017) b. Nuraini Tajuddin (Policy: 701700002244 - Valid: 31 Oct 2017) c. Irmayanti Sultan (Policy: 701700004844-00 - Valid: 27 Apr 2018) Samples of insurance policies covering all workers and migrant workers in the estates are as below: a. Basman Sima (Policy: 701700003935 - Valid: 3 Apr 2018) b. Kasma Harjo (Policy: 701600009039 - Valid: 28 Jul 2017) c. Mores Beri (Policy: 701700003938 - Valid: 5 Apr 2018) Abd Rahman Udin(New workers, currently in process for insurance policy. Handled by Head Office, Lahad Datu) There is no accident cases involving insurance claim recorded in Haranky POM and Estate. 4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor **Findings** Comply? Occupational injuries are reported to JKKP using JKKP 8 (I)/(IV). Latest submission has been made Yes on 5 Jan 2017. In 2016, there are 5 accident cases happened in Palm Oil Mill. For both estates, all accidents/injuries has been recorded in Accident (and Near Miss) Records. Example of accident recorded and total MC taken are as below: **Accident Cases** Month Total LTI No. (Day) Jun 2017 1 1 5 5 May 2017 Apr 2017 3 6 Lost Time Accident (LTA) analysis has been recorded in JKKP 8 form and submitted to JKKP on 5 Jan 2017. Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained. 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 4.8.1 Major the programme. **Findings** Comply? Training program for POM has been combined in Occupational Safety and Health Action Plan 2017. Yes Example of training listed are: a. Fire Extinguisher Training b. Workplace Inspection Training c. SOP Sterilizer d. Emergency Response Plan e. MSDS/CSDS Training

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Princip	Principle 4: Use of Appropriate Best Practices by Growers and Millers		
f. RS	PO Awareness Training		
For the estate, annual training program has been summarized in RSPO Annual Training Programme. Contents of the training includes:			
a. RSPO Awareness Training b. Riparian/Buffer Zone c. HCV Management d. Schedule Waste Handling and Triple Rinse e. Good Agriculture Policy f. Integrated Pest Management			
The trai	ning program targeted all workers and sub-contractors. Example of training conducted:		
<ul><li>a. RSPO Awareness: 13 Jun 2017</li><li>b. Briefing on Responsibility and Safety for Contractor: 18 Jul 2017</li><li>c. RSPO SOP Training: 8 Nov 2016</li></ul>			
For the contractors, it is evident that all sub-contractor has signed <i>Tanggungjawab dan Penerangan Keselamatan</i> which includes their commitment to implement RSPO.			
4.8.2	Records of training for each employee shall be maintained.	Minor	
Findings		Comply?	
All training conducted for workers who work at the POM and estates are recorded appropriately in Training Report. List of attendees of all training are recorded in Training Attendance & Evaluation Form (SOP: 4.8). It is clearly maintained by estate and POM office.		Yes	

# Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity

Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity		
Criterion 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	
Findings	Comply?	
Guided by a procedure [Environmental Impact Assessment, SOP 5.0, dated 1/10/2016], the estate has developed their Environmental Aspect & Impact which among others covering the following operations:  Building new roads, processing mills or other infrastructure; - mainly during replanting activity  Putting in drainage or irrigation systems;- mainly during replanting and drain maintenance  Replanting and/or expansion of planting areas;  Management of mill effluents;- covered in the mill's environmental aspect and impact evaluation  Clearing of remaining natural vegetation;- covered under land clearing during replanting and spraying  Management of pests and diseases palms by controlled burning – ganoderma treatment and rat control  Mill operations – discharge of POME, EFB & PKS discharge, boiler operation, generation of wastes (SW & general), land clearing  For the case of EAI evaluation, the assessment has been conducted adequately which outlining elements such as all major activities, environmental aspect, environmental impact, risk assessment (likelihood & consequence). Score of impact is calculated by multiplying likelihood of occurrence, consequence and severity of impacts.  Based on the process structure, inputs from stakeholders are obtained from the stakeholders' consultation meeting. Based on the meeting on 20/4/2016, there was no issue raised pertaining to environment and therefore none recorded in the EAI assessment dated 1/12/2016. Nonetheless, based on the minutes of meeting with stakeholders dated 13/6/2017 some environmental issues raised by the surrounding communities e.g. river pollution and dust generation from estate's roads. The EAI assessment is planned to be revised by Oct 2017.	Yes	
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 management plan. The management plan shall identify the responsible person/persons.	Minor	

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	Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity		
	Findings	Comply?	
	ompany has established a documented environmental management plan entitled nmental Management Plan 16/17" which is established separately for both Estates and Mill.	Yes	
The environmental management plan specifies the following:  • Identification of responsible person(s);			
	ential impacts from current practices;		
Measures to mitigate negative impacts; - under "management control" column			
Based on the field verification, the management unit has satisfactorily implemented according to the plan for examples setting up buffer zone, avoid development at >25° slope, construction of terrace at slope between 12°-20°, cover crop planting at replanting area (CC, CM, PJ, MB), avoiding application of agrochemicals during rainy days, watering road during dry season, construction of speed humps and recycling campaign.			
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 measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.	Minor	
		Comply?	
Environ	Findings mental performance monitoring is recorded in "Pemeriksaan Bulanan Alam Sekitar", with the		
latest up zones, o plan is Manage	podate was conducted in June 2017. Among the action plans monitored are soil erosion, buffer domestic wastes management, scheduled wastes handling, zero burning implementation. The reviewed annually. Regular monitoring to evaluate the performance on Environmental ement Plan 16/17.	Yes	
	ing results stated in the said management plan.		
Criterio			
in the pl	tus of rare, threatened or endangered species and other High Conservation Value habitats, if an lantation or that could be affected by plantation or mill management, shall be identified and oper ed to best ensure that they are maintained and/or enhanced.		
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).	Major	
5.2.1		Major Comply?	
High Co • Pr • Co rec	includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).  Findings  Inservation Value (HCV) assessment has been conducted and cover the following: esence of protected areas that could be significantly affected by the grower or miller; onservation status (e.g. IUCN status), legal protection, population status and habitat equirements of rare, threatened, or endangered (RTE) species that could be significantly fected by the grower or miller.	-	
High Co Pr Co rec aff	includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).  Findings  Description Value (HCV) assessment has been conducted and cover the following: essence of protected areas that could be significantly affected by the grower or miller; onservation status (e.g. IUCN status), legal protection, population status and habitat quirements of rare, threatened, or endangered (RTE) species that could be significantly	Comply?	
High Co • Pr • Co rec aff • Ide sig	includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).  Findings  Inservation Value (HCV) assessment has been conducted and cover the following: esence of protected areas that could be significantly affected by the grower or miller; onservation status (e.g. IUCN status), legal protection, population status and habitat quirements of rare, threatened, or endangered (RTE) species that could be significantly fected by the grower or miller.  Entification of HCV habitats, such as rare and threatened ecosystems, that could be	Comply?	
High Co Pr Co rec aff Ide sig The HC made a Section consulta and Dis Paris 1, (DOE), (Kinaba	includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).  Findings  Onservation Value (HCV) assessment has been conducted and cover the following: esence of protected areas that could be significantly affected by the grower or miller; onservation status (e.g. IUCN status), legal protection, population status and habitat quirements of rare, threatened, or endangered (RTE) species that could be significantly fected by the grower or miller.  Pentification of HCV habitats, such as rare and threatened ecosystems, that could be gnificantly affected by the grower or miller;  V assessment was conducted by Wild Asia. Report dated July 2014 [project ref. no.: P170] is	Comply?	
High Co Pr Co rec aff Ide sig The HC made a Section consulta and Dis Paris 1, (DOE), (Kinaba maintain The HC relevant	Findings  Onservation Value (HCV) assessment has been conducted and cover the following: esence of protected areas that could be significantly affected by the grower or miller; onservation status (e.g. IUCN status), legal protection, population status and habitat quirements of rare, threatened, or endangered (RTE) species that could be significantly exceed by the grower or miller.  Sentification of HCV habitats, such as rare and threatened ecosystems, that could be aprificantly affected by the grower or miller;  V assessment was conducted by Wild Asia. Report dated July 2014 [project ref. no.: P170] is variable to the audit team for verification.  3 of the summary report states that the HCV assessment has been conducted with the ation with the relevant stakeholders. Among stakeholders consulted were Kinabatangan Land strict Office, Kinabatangan District Police, Kinabatangan Hospital, surrounding villages [Kg 2, 3, Kg Koyah Bersatu], Kinabatangan land and survey district, Department of Environment WWF Malaysia, Environment Protection Department of Sabah (EPD), Sabah Forestry Dept tangan District), Yayasan Sabah Corp. Minute of the above stakeholder meeting is	Comply?	
High Co Price aff Ide sig The HC made a Section consulta and Dis Paris 1, (DOE), (Kinaba maintain The HC relevant Summa	includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).  Findings  Inservation Value (HCV) assessment has been conducted and cover the following: esence of protected areas that could be significantly affected by the grower or miller; onservation status (e.g. IUCN status), legal protection, population status and habitat equirements of rare, threatened, or endangered (RTE) species that could be significantly fected by the grower or miller.  In entification of HCV habitats, such as rare and threatened ecosystems, that could be guificantly affected by the grower or miller;  V assessment was conducted by Wild Asia. Report dated July 2014 [project ref. no.: P170] is vailable to the audit team for verification.  3 of the summary report states that the HCV assessment has been conducted with the ation with the relevant stakeholders. Among stakeholders consulted were Kinabatangan Land strict Office, Kinabatangan District Police, Kinabatangan Hospital, surrounding villages [Kg 2, 3, Kg Koyah Bersatu], Kinabatangan land and survey district, Department of Environment WWF Malaysia, Environment Protection Department of Sabah (EPD), Sabah Forestry Dept tangan District), Yayasan Sabah Corp. Minute of the above stakeholder meeting is need and be made available.  V report also included Biodiversity overview (section 4.0) and both the planted area itself and the wider landscape-level considerations (Section 5.1 of the HCV report and Section 1.1 of the	Comply?	

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Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity		
HCV 1: Area which has high bio-diversity in particular those neighbouring to Bukit Piton Forest Reserve which is classified as Class 1 Reserve Forest under the Sabah Forest Enactment, 1968.		
<ul> <li>In addition, the report summary also specifies the potential HCV which is listed as follows:</li> <li>HCV 3: Potential Key fauna species which are listed as endangered under the Wildlife Conservation Enactment, 1997 detected in Bukit Piton FR based on the study and transact survey conducted under the joint collaboration wildlife monitoring programme between WWF and Yayasan Sabah. Among the species detected such as Orang Utan (<i>Pongo pygmaeus</i>), Proboscis Monkey (<i>Nasalis larvatus</i>), Bornean Cat (<i>Catopuma badia</i>), Flat-headed cat, (<i>Prionailurus planiceps</i>), Bornean Pygmy Elephant (<i>Elephas maximus borneensis</i>) etc.</li> </ul>		
Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.	Major	
Findings	Comply?	
No RTE present within the Haranky Estate as reported by Wild Asia.	Yes	
There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated 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	
Findings	Comply?	
Haranky has policies to protect RTE species which is incorporated with Environmental Policy "Protection and Conservation of wildlife by banning all forms of hunting". The policy is signed by the Group Chief Executive Officer on 24/10/2014.	Yes	
Latest training on HCV entitled High Conservation Value (HCV) Class 1, conducted on 15/5/2016 by the Assistant Manager of the Estate and the appointed Honorary Wildlife Warder of Haranky Estate ( <i>Warded Kehormat Hidupan Liar</i> ). The training was attended by 69 employees from various sections i.e. workers (estate & Mill), staff (including executive).		
Among the actions taken to implement the conservation programmes are setting aside 20 m of buffer zone along the estate's boundary bordering with Bukit Piton FR. There is no application of agrochemicals allowed in the designated buffer zone.		
Signage to educate and provide awareness on the prohibited act and activities along the buffer zone has been erected. Marking of trees along the boundary with red & white paints are implemented and very visible during the inspection.		
Besides, Kwantas also periodically conducted the monitoring of wild life signs & encroachment signs on a weekly basis. For this purpose, the patrolling reports dated 5 July, 12 July and 19 July 2017 are available and are verified by the audit team. Based on the reports, the audit team observed that the patrol encounter no signs of encroachment. However, evidence of wildlife foot prints is observed during the patrol session dated 19 July 2017 of which pictorial evidence has been captured by the personnel conducting the patrol session. Interview with the appointed Honorary Wildlife Warden indicates that for any signs of wildlife either evidence of footprints, wildlife's droppings or nesting area/tree will be reported and subsequently be notified to the Department of Wildlife as well as the WWF; whose body conducting the wildlife study in Bukit Piton FR for their information and reference.		
The disciplinary rules are governed by the Wildlife Conservation Enactment, 1997 which is communicated through the HCV training by the Wild Life Department to the employees.		
<ul> <li>Where a management plan has been created there shall be ongoing monitoring:</li> <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 management plan.</li> </ul>	Minor	
Findings		
No RTE present within the Haranky Estate as reported by Wild Asia.	Yes	
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	
Findings	Comply?	

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ased on the HCV assessment, there is no HCV detected with respect to the existing rights of local	V
ommunities.	Yes
riterion 5.3:	
aste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible ma  3.1 All waste products and sources of pollution shall be identified and documented	
·	Major
Findings astes generated are identified through EAI assessment and listed in the Waste Management Plan	Comply
DP 5.3 dated 1/12/2016. Among the waste identified and registered are used lubricants, empty esticide container, used batteries, tyre & tubes, domestic wastes (both non and recyclable wastes), emestic waste water, EFB, PK shell, POME, boiler ash.	Yes
N recording is done through the eSwis platform. Types of SW declared are SW305, SW306, N409 and SW410.	
ne quality of waste water from line-site is tested through a sampling process taken at nearby stream r any significant pollutant originated from line site. Latest test report is available dated 13/5/2017 ab ref. no.: 20170513/09A) by Dynakey Laboratories Sdn Bhd (SAMM No. 576) – incoming (W1) & utgoing (W2). Based on results, there is evidence of pollutants contributed from the line-site e.g. betteram vs. downstream; whereby the levels of the following parameters are recorded:  BOD (6ppm vs. 48ppm);  COD (45ppm vs. 383ppm);  SS (38ppm vs. 90ppm);	
AN (0.02ppm vs. 8ppm). The variance of the reading (increase of levels) indicating the presence of pollutants in the water prived from the line site. For this highlighted issue, the action plans have been developed under later management plan [SOP 4.0, dated 27/1/2017] i.e. to replace land drainage to concrete culvert and de-silting the septic tank. This plan is expected to be completed by June 2018. This plan also has been included in the financial budget for the FY2017/18 covering the septic tank upkeep, new toilet, construction of new drains, etc.	
ther sources of pollutions are also listed in the Waste Management Plan such as workshop, line- te, office, store, canteen, effluent pond, boiler.	
irpose.	
3.2 All chemicals and their containers shall be disposed of responsibly.	Major
Findings	Comply
Findings  mpty chemical containers are categorised as SW by the company under the code of SW409. For e mill, all empty chemical containers i.e. from boiler operation, water treatment plant and laboratory e also categorised as scheduled wastes. The disposal of these wastes is done in accordance to the W regulations.  erification of inventory records showed that the movements of the empty chemicals containers are	Yes
Findings  mpty chemical containers are categorised as SW by the company under the code of SW409. For e mill, all empty chemical containers i.e. from boiler operation, water treatment plant and laboratory e also categorised as scheduled wastes. The disposal of these wastes is done in accordance to the W regulations.  erification of inventory records showed that the movements of the empty chemicals containers are osely monitored and in compliance with SW regulations.  A waste management and disposal plan to avoid or reduce pollution shall be documented	
Findings  mpty chemical containers are categorised as SW by the company under the code of SW409. For e mill, all empty chemical containers i.e. from boiler operation, water treatment plant and laboratory e also categorised as scheduled wastes. The disposal of these wastes is done in accordance to the W regulations.  erification of inventory records showed that the movements of the empty chemicals containers are posely monitored and in compliance with SW regulations.	Yes
Findings  mpty chemical containers are categorised as SW by the company under the code of SW409. For e mill, all empty chemical containers i.e. from boiler operation, water treatment plant and laboratory e also categorised as scheduled wastes. The disposal of these wastes is done in accordance to the W regulations.  erification of inventory records showed that the movements of the empty chemicals containers are osely monitored and in compliance with SW regulations.  A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.	Yes
Findings  Impty chemical containers are categorised as SW by the company under the code of SW409. For e mill, all empty chemical containers i.e. from boiler operation, water treatment plant and laboratory e also categorised as scheduled wastes. The disposal of these wastes is done in accordance to the N regulations.  Perification of inventory records showed that the movements of the empty chemicals containers are essely monitored and in compliance with SW regulations.  A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.  Findings  astes are managed through the wastes management plan as mentioned in 5.3.1. There is no	Yes Minor Comply
Findings  Impty chemical containers are categorised as SW by the company under the code of SW409. For e mill, all empty chemical containers i.e. from boiler operation, water treatment plant and laboratory e also categorised as scheduled wastes. The disposal of these wastes is done in accordance to the N regulations.  Perification of inventory records showed that the movements of the empty chemicals containers are essely monitored and in compliance with SW regulations.  A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.  Findings  astes are managed through the wastes management plan as mentioned in 5.3.1. There is no	Yes Minor Comply
Findings  Impty chemical containers are categorised as SW by the company under the code of SW409. For e mill, all empty chemical containers i.e. from boiler operation, water treatment plant and laboratory e also categorised as scheduled wastes. The disposal of these wastes is done in accordance to the N regulations.  Perification of inventory records showed that the movements of the empty chemicals containers are except monitored and in compliance with SW regulations.  A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.  Findings  astes are managed through the wastes management plan as mentioned in 5.3.1. There is no observation of use of fire for wastes disposal during field verification.  Fiterion 5.4:  Efficiency of fossil fuel use and the use of renewable energy is optimized.	Yes Minor Comply
Findings  Impty chemical containers are categorised as SW by the company under the code of SW409. For e mill, all empty chemical containers i.e. from boiler operation, water treatment plant and laboratory e also categorised as scheduled wastes. The disposal of these wastes is done in accordance to the N regulations.  Perification of inventory records showed that the movements of the empty chemicals containers are except monitored and in compliance with SW regulations.  A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.  Findings  astes are managed through the wastes management plan as mentioned in 5.3.1. There is no observation of use of fire for wastes disposal during field verification.  Fiterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimized.  A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy	Yes Minor Comply
Findings  Impty chemical containers are categorised as SW by the company under the code of SW409. For e mill, all empty chemical containers i.e. from boiler operation, water treatment plant and laboratory e also categorised as scheduled wastes. The disposal of these wastes is done in accordance to the W regulations.  Perification of inventory records showed that the movements of the empty chemicals containers are essely monitored and in compliance with SW regulations.  A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.  Findings  Pastes are managed through the wastes management plan as mentioned in 5.3.1. There is no eservation of use of fire for wastes disposal during field verification.  Priterion 5.4:  Efficiency of fossil fuel use and the use of renewable energy is optimized.	Yes  Minor  Comply  Yes

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#### Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity

constant road works maintenance - indicators to reflect whether the action plan is effective has been established i.e. less than 1.01 lt/mt for the mill and less than (2016 actual) for estate

#### Criterion 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, or comparable guidelines in other regions.	Minor
Findings		Comply?
There is no evidence of the usage of fire for replanting development.		Yes
Based on field verification, the audit team observed that no trace of burning at the replanting fields is identified. In contrast, palm trunks were felled and chipped. Commitment to zero burning is also stated in Zero Burning Policy Statement and Environmental Policy Statement, signed by the Group Chief Executive Officer dated 24/10/2014.		
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, or comparable guidelines in other regions.	Minor
Findings		Comply?
Not applicable as no use of fire for replanting.		Yes

#### Criterion 5.6:

Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored. Preamble: Growers and millers commit to reporting on operational greenhouse gas emissions. However, it is recognized that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognized that it is not always feasible or practical to reduce or minimize these emissions. Growers and millers commit to an implementation period until the end of December 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

this communent with the support of all other stakeholder groups of the RSPO.		
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	Major
Findings		Comply?
Assessment of all polluting activities has been conducted including gaseous emissions, particulate/soot emissions and effluent through EAI assessment. Consequently, action plans were developed thereafter.		Yes
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimize them implemented.	Major
Findings		Comply?
The company is looking forward to establish a bio-gas plant in the near future as their commitment to reduce GHG emission from the effluent treatment plant. Nonetheless, since this project involves huge investment, the management has just reached at the early stage of planning at the point of this audit.		Yes
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
Findings		Comply?
Januar Devala	on of GHG has been calculated using PalmGHG calculator. GHG Calculation was done for y to Dec 2016 activities. The results have been submitted to RSPO on 11/7/2017 [e-mail to idevi]. Results: ate = 14,008.44 tCo2e = 0.83 tCO2/FFB = 11.31 tCO2/Ha	Yes
2) Mill = 3.760.42 tCo2e = 0.23 tCO2/FFB		

#### Principle 6: Responsible Consideration of Employees and of Individuals and Communities Affected by Growers and Millers

#### Principle 6: Responsible Consideration of Employees and of Individuals and Communities affected by **Growers and Millers**

#### Criterion 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.

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6.1.1	A social impact assessment (SIA) including records of meetings shall be documented.	Major
	Findings	Comply
The docu	mented Social Impact Assessment for Haranky Unit dated 21 January 2015 is available.	Yes
The document listed a series of sections relating to social of that specifies methodology, social assessment and continuous improvement of social impact assessment.		100
general v and term	covers any changes to estate/ Mill demographic, changes to national Laws and regulations, work / labour conditions on equal opportunities, rights to freedom of association, contracts as and conditions of work, wages, facilities and amenities, custom and cultures and the ogy of SIA, social program and continuous improvement of SIA.	
amount o	is acted as the medium for an active impact assessment document where a reasonable of consideration has been given to mitigate social impacts articulated by the internal and stakeholders; for employees and surrounding local communities affected by the plantations	
	n a Social Action Plan is established on annual basis with a view to resolve social issues sly, in terms of clearly outlining the responsibilities for mitigation and monitoring.	
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties.	Major
	Findings	Comply
	which has been conducted on 12-16 January 2015; conducted with the participation of the	Yes
stakeholders.  Records of meeting with the stakeholders covering the external stakeholders such as FFB suppliers and local communities; while formulizing the SIA are maintained.		
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, including responsibilities for implementation.	Major
	Findings	Comply
The document i.e. Social Action Plan Progress Monitoring Form has been established with the consultation with the internal and external stakeholders and are available and specifies the time bound plan as well as the status of implementation of each of the identified issues such as:		Yes
new rate of wages implementation;		
• pr	icing mechanism of the FFB;	
OSH compliance for contractorsThe Social Action Plan also incorporates the responsibilities for mitigation and monitoring of each identified social aspects.		
	t team also observed that the monitoring and revision of the time bound is conducted and as necessary. The record of such revision and monitoring is maintained.	
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
	Findings	Comply
	ve Social Action Plan Progress Monitoring Form observed to be updated and reviewed with the latest review conducted on May 2017. The audit team observed that the revision the changes of all identified social impact to the present and periodic practice.	Yes
annually	Particular attention shall be paid to the impacts of smallholder schemes (where the	Minor
annually		17111101
annually includes t	plantation includes such a scheme).  Findings	Comply
nnually cludes t		

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Growers	6: Responsible Consideration of Employees and of Individuals and Communities affect and Millers	ed by
	open and transparent methods for communication and consultation between growers and/or ies and other affected or interested parties.	millers, loca
6.2.1	Consultation and communication procedures shall be documented.	Major
	Findings	Comply?
	edure for communication and consultation procedures is in place and is documented in Free, Prior and Informed Consent Procedures (Ref. No.: D 2.3.1) dated 1 Jan 2015.	Yes
should ar	I, the above-mentioned procedures describe the procedures and mechanism to be taken y stakeholders (being the external or internal) wish to communicate with the company on s concerning their interest.	
6.2.2	A management official responsible for these issues shall be nominated.	Minor
	Findings	Comply?
Unit. The	pany has appointed the Cadet Assistant Manager as the social liaison officer for Haranky appointment letter for the social liaison officer has been established, authorized by the mager and be made available to the auditor during the audit.  A list of stakeholders, records of all communication, including confirmation of receipt and	Yes
6.2.3	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
	Findings	Comply?
A list of st	akeholders is available	Yes
	seholders are representatives from the non- governmental organizations, village atives, small holders, management representatives, worker representatives and workers.	
Meetings	conducted by Haranky Estates and Mill are as below:	
estates 2. Meetin and m	ng with external stakeholders (government and non-government organization), neighboring is and smallholders, contractors/suppliers dated 13 June 2017; g with external stakeholders (NGOs, government and private) with regards to the updates anagement of the Bukit Piton FR. The meeting was attended by 9 personnel representing ove stakeholder groups and conducted on 19 December 2016.	
by the coresulted of Haranky	of action taken in accordance to the result of the stakeholder meetings are well maintained mpany; for instance stakeholder meeting for the management of the Bukit Piton FR has in the need to continuously monitor along the border; bordering the FR (Blocks 26 and 27 of 2 Estate); for any inappropriate and suspicious evidence and/or activities. Such records in verified by the auditor during the audit.	
Manager	with the appointed Honorary Wildlife Warden (HWW) in Haranky Estates i.e. the Estate states that the monitoring report is to be presented to the stakeholders during the next cheduled on October 2017 for further discussion and inputs.	
	6.3:  a mutually agreed and documented system for dealing with complaints and grievances, which by all affected parties.  The system, open to all affected parties, shall resolve disputes in an effective, timely and	is impleme
6.3.1	appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.	Major
TI	Findings	Comply?
	edure for resolving grievances and disputes is in place and is documented in document e Procedure and Dispute Resolution (Ref. No.: D 1.5.1) dated 21 June 2017.	Yes
	ore the procedure to resolve the grievances involving land issues is established. Among a mechanism highlights the way of resolving the grievances through the following steps: Negotiation;	
• Direct		
<ul><li>Arbitra</li><li>Native</li></ul>	tion using independent arbitrator if Direct Negotiation is not able to solve the grievance; Court if Arbitration is not able to solve the grievance; and ourt as the ultimate platform if Native Court is not able to solve the grievance.	

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	6: Responsible Consideration of Employees and of Individuals and Communities affect	ed by
-	and Millers	.00 2)
The audit	team observed that the company has established the specific records to solicit and records	
all compl	aints and disputes arise from all stakeholders in the External/Internal Grievance Record	
Book.		
As of the	date of the Main Assessment Audit, there are no complaints received from outsiders and	
workers	except on certain normal matters pertaining to the broken/obsolete amenities within the	
workers li	ine site and request of replacement of PPEs.	
The audit	team also observed that the above procedures have been made known to all internal and	
external s	stakeholders through both JCC Meeting and stakeholders meeting respectively.	
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome	Major
0.5.2	shall be available.	iviajoi
	Findings	Comply?
	blished grievance procedures specify the estimated time that required to be taken for each	Yes
of the pro	cess to be addressed before proceed to the subsequent process.	
	e Main Assessment Audit the External/Internal Grievance Record Book are viewed and all	
request a	nd grievances are recorded on a case by case basis stating following items:	
<ul><li>the de</li></ul>	tails of the complainant,	
<ul><li>the da</li></ul>	te complaints recorded; and	
<ul><li>the ac</li></ul>	tion taken following the complaints raised.	
As of the	date of the Main Assessment Audit, there are no complaints received from outsiders and	
workers	except on certain normal matters pertaining to the broken/obsolete amenities within the	
workers l	ne site and request of replacement of PPEs.	
Any neg	otiations concerning compensation for loss of legal, customary or user rights are dealt with thr	
system t	otiations concerning compensation for loss of legal, customary or user rights are dealt with thr hat enables indigenous peoples, local communities and other stakeholders to express their vice	
Any neg system t represer	otiations concerning compensation for loss of legal, customary or user rights are dealt with thre that enables indigenous peoples, local communities and other stakeholders to express their vietative institutions.	ews through
Any neg system t	otiations concerning compensation for loss of legal, customary or user rights are dealt with thr hat enables indigenous peoples, local communities and other stakeholders to express their vice	
Any neg system t represer	otiations concerning compensation for loss of legal, customary or user rights are dealt with thr hat enables indigenous peoples, local communities and other stakeholders to express their vientative institutions.  A procedure for identifying legal, customary or user rights, and a procedure for identifying	ews through
Any neg system t represer 6.4.1	otiations concerning compensation for loss of legal, customary or user rights are dealt with thre hat enables indigenous peoples, local communities and other stakeholders to express their vientative institutions.  A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.  Findings	Major Comply?
Any neg system t represer 6.4.1	otiations concerning compensation for loss of legal, customary or user rights are dealt with thre hat enables indigenous peoples, local communities and other stakeholders to express their vientative institutions.  A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.  Findings  does not have any land disputes. But a system to resolve land disputes is documented in	ews through Major
Any neg system t represer 6.4.1	otiations concerning compensation for loss of legal, customary or user rights are dealt with thre hat enables indigenous peoples, local communities and other stakeholders to express their vientative institutions.  A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.  Findings  does not have any land disputes. But a system to resolve land disputes is documented in afflict Management Procedures (ref. No.: A 4.3.2) dated 1 Jan 2015.	Major Comply?
Any neg system t represer 6.4.1 Haranky	otiations concerning compensation for loss of legal, customary or user rights are dealt with thre hat enables indigenous peoples, local communities and other stakeholders to express their view tative institutions.  A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.  Findings  does not have any land disputes. But a system to resolve land disputes is documented in afflict Management Procedures (ref. No.: A 4.3.2) dated 1 Jan 2015.  A procedure for calculating and distributing fair compensation (monetary or otherwise)	Major Comply?
Any neg system t represer 6.4.1 Haranky Land Cor	otiations concerning compensation for loss of legal, customary or user rights are dealt with thre hat enables indigenous peoples, local communities and other stakeholders to express their view tative institutions.  A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.  Findings  does not have any land disputes. But a system to resolve land disputes is documented in afflict Management Procedures (ref. No.: A 4.3.2) dated 1 Jan 2015.  A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way,	Major Comply?
Any neg system t represer 6.4.1 Haranky Land Cor	otiations concerning compensation for loss of legal, customary or user rights are dealt with thre hat enables indigenous peoples, local communities and other stakeholders to express their view tative institutions.  A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.  Findings  does not have any land disputes. But a system to resolve land disputes is documented in afflict Management Procedures (ref. No.: A 4.3.2) dated 1 Jan 2015.  A procedure for calculating and distributing fair compensation (monetary or otherwise) 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	Major Comply?
Any neg system t represer 6.4.1 Haranky Land Cor	otiations concerning compensation for loss of legal, customary or user rights are dealt with thre that enables indigenous peoples, local communities and other stakeholders to express their view tative institutions.  A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.  Findings  does not have any land disputes. But a system to resolve land disputes is documented in afflict Management Procedures (ref. No.: A 4.3.2) dated 1 Jan 2015.  A procedure for calculating and distributing fair compensation (monetary or otherwise) 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;	Major Comply? Yes
Any neg system t represer 6.4.1 Haranky Land Cor	otiations concerning compensation for loss of legal, customary or user rights are dealt with thre hat enables indigenous peoples, local communities and other stakeholders to express their view tative institutions.  A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.  Findings  does not have any land disputes. But a system to resolve land disputes is documented in afflict Management Procedures (ref. No.: A 4.3.2) dated 1 Jan 2015.  A procedure for calculating and distributing fair compensation (monetary or otherwise) 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	Major Comply? Yes
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Principle 6: Responsible Consideration of Employees and of Individuals and Communities affected by
Growers and Millers

Findings

In general, all of the workers are employed on a contract basis with the term of contract of every 2

Comply? Yes

With regard to documented workers contract and payment, the auditing team observed that there is evidence of documentation of rates of pay, contracts of employment, terms and conditions of employment made available in languages understood by workers or explained carefully by management personnel of the individual operating unit.

The official appointment letter of staff (for instance the assistant manager) contain the following elements:

- Job description;
- Work location;
- · Salary;
- · Increment and bonus;
- Duration of employment:

years for both local and foreigners.

- Public holidays (12 days per annum, including four (4) compulsory holidays, i.e. Labour Day, Agong's Birthday, National Day and State Governor's Birthday;
- Annual leave:
- Medical benefit, i.e. free medical attention;
- · Group insurance coverage;
- Employees Provident Fund (EPF);
- · Notice of Termination;
- Transfers:
- · Other employment; and
- · Confidentiality.

The Employment Contract for migrant workers, in general contains the following:

- Job description i.e. General or Harvester Workers;
- Contract duration and hours i.e. 8 hours from 6am to 2 pm with resting time from 10 am to 11 am:
- · Work location i.e. field;
- Employee responsibility;
- Wage calculation (80% basic piece rate and 20% statutory benefits, i.e. public holiday, sick leave, sick pay, overtime, annual leave and rest days) with daily pay of RM 35.38/day;
- Overtime;
- Public holidays (11 days per annum, including four (4) compulsory holidays, i.e. Labour Day, Agong's Birthday, National Day and State Governor's Birthday;
- Leave: public holidays, sick leave, hospitalisation, annual leave and rest days. All of the leave days are included in the salary and will be paid accordingly;
- Facilities: housing, transportation, medical treatment at estate clinic, insurance;
- Deduction of levy to the Malaysian Government;
- · Legal working age: 18-50 years; and
- Termination of work permit.

With regard to salary, the company is implementing Minimum Wages Order 2016 which requires the minimum wage to be set at 920. The company starts to implement the MWO2016 in December 2016 and hence there are arrears of payment of 5 months beginning July 2016 until November 2016. Such arrears have been reimbursed to the workers in April, May and June salary. Evidence of salary arrears have been verified and are made available to the auditor during the audit.

The audit team observed that every worker is paid above the recently government decreed minimum wage i.e. RM920/month and this is well in line with the company's commitment. The estates also encourage the workers to keep on improving their productivities in order to earn more. Samples of payslip are checked and it was evident that most workers earned more than the minimum wage. A couple of spraying workers and their mandore were interviewed on whether they understood the

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## Principle 6: Responsible Consideration of Employees and of Individuals and Communities affected by Growers and Millers

various pay or deduction items contained in their payslips.

Several payslips (for month of June 2017) have been verified for the following workers:

Name	Work Field
Hendri Beddu	Harvester
Kasman Maro	Harvester
Rohana Hakim	Harvester
Oktovianus Paling	Harvester
Amri Jumain	Mandore (Harvester)
Mores Beri	Harvester
Kahar Bambang	Mandore (Sprayer)
Asfar Sangkala	Tractor Driver
Juliana Rasyid	General Worker (Sprayer)
Merianti Paling	General Worker (Sprayer)
Sima Basman	General Worker (Sprayer)
Petrius Lina Magang	General Worker (Manuring)
Syamsul Suparjo	General Worker (Manuring)
Merlinda Loro Castello	Office Girl
Fitriyana Sabtu	General Clerk
Irmayanti Maming	General Clerk

Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.

Major

#### **Findings**

Pay and condition of employment are clearly documented and detailed within the employment contract that among other specifies the following:

Comply? Yes

- Job description i.e. General or Harvester Workers;
- Contract duration and hours i.e. 8 hours from 6am to 2 pm with resting time from 10 am to 11 am:
- Work location i.e. field;
- Employee responsibility;
- Wage calculation (80% basic piece rate and 20% statutory benefits, i.e. public holiday, sick leave, sick pay, overtime, annual leave and rest days) with daily pay of RM 35.38/day;
- Overtime
- Public holidays (11 days per annum, including four (4) compulsory holidays, i.e. Labour Day, Agong's Birthday, National Day and State Governor's Birthday;
- Leave: public holidays, sick leave, hospitalisation, annual leave and rest days. All of the leave days are included in the salary and will be paid accordingly;
- Facilities: housing, transportation, medical treatment at estate clinic, insurance;
- Deduction of levy to the Malaysian Government;
- · Legal working age: 18-50 years; and
- · Termination of work permit.

Several contracts verified for the following workers:

Name	Work Field
Hendri Beddu	Harvester
Kasman Maro	Harvester
Rohana Hakim	Harvester
Oktovianus Paling	Harvester
Amri Jumain	Mandore (Harvester)
Mores Beri	Harvester
Kahar Bambang	Mandore (Sprayer)
Asfar Sangkala	Tractor Driver
Juliana Rasyid	General Worker (Sprayer)
Merianti Paling	General Worker (Sprayer)
Sima Basman	General Worker (Sprayer)

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Growers and Millers	ed by
Petrius Lina Magang General Worker (Manuring)	
Syamsul Suparjo General Worker (Manuring)	
Merlinda Loro Castello Office Girl	
Fitriyana Sabtu General Clerk  Irmayanti Maming General Clerk	
Irmayanti Maming General Clerk	
Observed the employment contract has been briefed to workers by management officials during the signing of the contract as stated above. In addition, the auditing team also notes that the contract has been written in a language understood by the workers. The briefing conducted by the company's top	
management also is in the language understood by them.	
Interview with the workers during the audit confirmed that they have been briefed of the contract before signing. They also could demonstrate their understanding of the rules and condition stated in the contract.	
Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.	Minor
Findings	Comply?
The organization provides adequate housing with average 2 workers in a room as well as medical is provided for free with clinics available in the estates. Workers are provided with clean treated water as well as domestic waste disposal service is available.  There is an estate clinic with a hospital assistant to treat minor injury and sickness. Education at primary level is supported (building of school) for children from the estate as well as the surrounding area. Social, cultural and recreational activities and places of worship are supported. Public health services provided in housing areas. Physical amenities are provided, effectively operated and maintained to a standard equivalent to an urban authority.	Yes
Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.	Minor
Findings	Comply?
Workers have access to the grocery shops and markets within the estates as well as the neighbouring estates and communities.  As far as grocery shops within the estates, there is evidence of action taken by the company to monitor the goods price sold at the sundry shops within the estates by comparing the price with the neighbouring estates and town.	No
However, the audit team observed that the monitoring process is not comprehensive whereby it is not	
guided with the input obtained and received from the <i>Kementerian Perdagangan Dalam Negeri, Koperasi dan Kepenggunaan</i> which is the enforcement and regulatory government body for the daily goods, controlled goods and their prices for Malaysia.	
Minor NCR 05.	
Oritorian C.C.	
Criterion 6.6:  There The employer respects the rights of all personnel to form and join trade unions of their choice an collectively. Where the right to freedom of association and collective bargaining are restricted under law facilitates parallel means of independent and free association and bargaining for all such personnel.	
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	ers themselves.			
6.6.2	Minutes of meet documented.	ings with main trade	unions or workers representatives shall be	Minor
		Fi	ndings	Comply
elected ir managem working fi Harvesi Carrier Genera Tide ga Driver le Sprayee Manure For mill, t Assista Weighb Worksh Storeke Laborat Security	n a democracy manent. Currently, the led: ter; and Cutters; all Workers; ate; oaders; r; and er.  the committee can nt supervisor; oridge workers; nop; eeper; tory workers;	nts JCC that is 100 Inner by their colleac e workers represent	ndings  Ow democracy elected members. All members are gues that is verified and approved by the estate's togetative consist of 12 members covering the following the following sollowing work division:	Yes
<ul> <li>Process</li> <li>The up-to appointment as a mem</li> <li>In practice</li> </ul>	Il workers; and sing workers.  o-date organization ent letter for each sharp of the commit the comm	of the representative tee. cussed concerning the	ble indicating the members of the committee. At a savailable highlighting the role and responsibilities the workers right i.e. safety, health, minimum wages the mosting will be channelled to the estate's to	,
Process  The up-to appointment as a mem  In practic child labor	all workers; and sing workers.  o-date organization ent letter for each aber of the commit the, all matters discour and anti-discour	of the representative tee. cussed concerning the rimination during the	e is available highlighting the role and responsibilities	,
Process The up-to appointmas a mem In practic child labor managem	Il workers; and sing workers.  o-date organization ent letter for each aber of the commit the, all matters discour and anti-discount by the chairm.	of the representative tee. cussed concerning the rimination during the	e is available highlighting the role and responsibilities one workers right i.e. safety, health, minimum wages be meeting will be channelled to the estate's top committee members.	,
Process The up-to appointmas a mem In practic child laboranagem	Il workers; and sing workers.  o-date organization ent letter for each aber of the commit the, all matters discour and anti-discount by the chairm.	of the representative tee.  cussed concerning the rimination during the an together with its to	e is available highlighting the role and responsibilities one workers right i.e. safety, health, minimum wages be meeting will be channelled to the estate's top committee members.	,
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<ul> <li>Process</li> <li>The up-to appointm as a mem</li> <li>In practic child labor managem</li> </ul>	Il workers; and sing workers.  o-date organization ent letter for each aber of the commit the, all matters discour and anti-discount by the chairm.	of the representative tee.  cussed concerning the rimination during the an together with its to as been conducted a	e is available highlighting the role and responsibilities  ne workers right i.e. safety, health, minimum wages he meeting will be channelled to the estate's top op committee members. he follows:	,

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Growers and Millers  Any form of discrimination based on race, sector national origin, religion, dischility, gender, sexual origin.	tation
Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orier union membership, political affiliation, or age, is prohibited.	ntation,
A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.	Major
Findings	Comply
There is a publicly available equal opportunities policy 1 June 2014 which states the company's commitment to respect the right of female workers and does not practice discrimination based on race, caste, national, origin, disability, gender, sexual orientation, union membership, political affiliation, or age.	Yes
The audit team observed that the policy is made available to the stakeholders in the company's website as well as being briefed to the stakeholders during the stakeholders meeting.  Observed also that the policy is found to be posted on the company's notice board in the language	
understood by the workers.	
Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against	Major
Findings	Comply?
No evidence that employees have been discriminated by the company. Interviews with field workers (Indonesian), women workers as evidence.	Yes
Evidences of non-discriminated includes the followings:	
Priority employment for local priorities	
Women right	
Provide free hospitalization, clinic etc.	
As far as complaints is concerned, the auditing team observed that there is no evidence of complaints pertaining to the discrimination against races, nationality, sex as well as workers groups.	
Interview with the workers during the Main Assessment Audit also confirmed that there is no arising complaint pertaining to the discrimination against races, nationality, sex as well as workers groups.	
It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.	Minor
Findings	Comply?
The audit team observed that the company keep and maintain a record of their workers work credential and medical history within the Employee Register Documentation.	Yes
The company is found to be implementing indiscriminatory policy during the recruitment, selection, hiring and promotion process as per stated in the Legalisation and Recruitment of Workers Document.	
The recruitment, selection and hiring of workers are based on skills, capabilities and medical fitness according to job scope. The positions held by workers are commensurate with their skills and experience i.e., Boilerman, Lab Supervisor, Engine Room Operator and Mill Supervisor at POM. General workers (foreign workers) are mostly based on medical fitness confirmed by Hospital Assistant (HA).	
<u>Criterion 6.9:</u> 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
Findings	Comply?
A policy on sexual harassment is signed by the Group CEO on dated 1 June 2014. The policy was also written in the Malay language and displayed on the notice boards. No evidence or practices that	Yes
contradict this policy are observed.	

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Mustar Ground alinia and		ployees and of Individua	als and Communities affect	ed by
Muster Ground, clinic and office.				
Based on interview conducted with field, office employees and gender committee members, there are no records of sexual harassment received from employees. Grievance record book ( <i>Buku Aduan Gangguan Seksual</i> ) is available specifically to record complains related to sexual harassment.				
Based on records, the G follows:	Gender Committee Meet	ing has been conducted	for the visiting estates as	
	Venue	Date		
Haranky POM 20 October 2016				
	Haranky Estate	14 April 2017		
	tect the reproductive rig and communicated to all	hts of all, especially of wo levels of the workforce.	omen, shall be	Major
	Fin	dings		Comply?
authorized by the Group (	CEO dated 1 June 2014	is available.	Vomen Reproductive Right"	Yes
at the Notice Board at the		<u> </u>	all employees by displaying	
		n respects anonymity and implemented, and comm	protects complainants unicated to all levels of the	Minor
	Fin	dings		Comply?
The flow chart entitled	"Reporting Sexual Har	assment" is available ir	n both English and Malay	Yes
languages.				
A mechanism for recording harassment is also available. No evidence or practices that contradict this policy were observed. Interview with the workers shows that the company provides fair and just treatment to women. Grievance mechanism for sexual harassment is in place. A documented sexual harassment grievance mechanism exists.				
treatment to women. Grie	evance mechanism for s		any provides fair and just	
treatment to women. Grie harassment grievance me	evance mechanism for sechanism exists.	exual harassment is in p	any provides fair and just lace. A documented sexual	nesses
treatment to women. Grie harassment grievance me	evance mechanism for sechanism exists.  and millers deal fairly an	exual harassment is in p	any provides fair and just lace. A documented sexual	nesses. Minor
treatment to women. Grie harassment grievance me	evance mechanism for sechanism exists.  and millers deal fairly an ast prices paid for Fresh	exual harassment is in p	any provides fair and just lace. A documented sexual	
treatment to women. Grie harassment grievance me	evance mechanism for sechanism exists.  and millers deal fairly an ast prices paid for Fresh	d transparently with smal Fruit Bunches (FFB) sha	lany provides fair and just lace. A documented sexual lace. A documented sexual lace. Iholders and other local busing lall be publicly available.	Minor Comply?
Criterion 6.10: Growers a 6.10.1 Current and p  FFB from external supplie  The FFB price is determ	evance mechanism for sechanism exists.  and millers deal fairly an ast prices paid for Freshers are also one of FFB section the input the copy of the letter sechanism for	d transparently with smale Fruit Bunches (FFB) shadings source for Haranky POM.	lany provides fair and just lace. A documented sexual lace. A documented sexual lace. Iholders and other local busing lall be publicly available.	Minor
Criterion 6.10: Growers a 6.10.1 Current and p  FFB from external supplie  The FFB price is determaditor also observed that the notice wall at the weight Random interview condurant disputes (Internal and satisfied with the FFB grand stating that the gradient of the satisfied with the gradient of the satisfied with the FFB grand stating that the gradient of the satisfied with the FFB grand stating that the gradient of the satisfied with the gradient of the satisfied with the FFB grand stating that the gradient of the satisfied with the gradient of the satisfied with the FFB grand stating that the gradient of the satisfied with the FFB grand stating that the gradient of the satisfied with the satisfi	evance mechanism for sechanism exists.  and millers deal fairly an ast prices paid for Freshers are also one of FFB section in the copy of the letter section in the copy of the Mill.	d transparently with smale Fruit Bunches (FFB) shared by the MPO tated the periodic price solliers indicates that there Record Book) whereby d by the FFB grader. Haing the rules and guidance	lany provides fair and just lace. A documented sexual lace. A documented sexual lholders and other local busing all be publicly available.	Minor Comply?
Criterion 6.10: Growers a 6.10.1 Current and p  FFB from external supplie  The FFB price is determ auditor also observed that the notice wall at the weige Random interview condu and disputes (Internal as satisfied with the FFB grand stating that the gradi response has been forwal Evidence shal mechanisms for the response for the satisfied with the FFB grand stating that the gradi response has been forwal Evidence shal mechanisms for the response for the satisfied with the FFB grand stating that the gradi response has been forwal Evidence shal mechanisms for the response for the satisfied with the FFB grand stating that the grading response has been forwal mechanisms for the satisfied with the FFB grand stating that the grading response has been forwal mechanisms for the satisfied with the satisfied with the FFB grand stating that the grading response has been forwal mechanisms for the satisfied with the FFB grand stating that the grading response has been forwal mechanisms for the satisfied with the satisfied with the satisfied with the satisfied with the grading response has been forwal mechanisms for the satisfied with the satisfied	evance mechanism for sechanism exists.  and millers deal fairly an ast prices paid for Freshers are also one of FFB since the copy of the letter significance ading process performeng mechanism is followed to the FFB supplier I be available that growed or FFB and inputs/service.	d transparently with smale Fruit Bunches (FFB) shared in FFB grader. Have and guidances for their information.	Industrial provides fair and just lace. A documented sexual lace. In lace and other local busing all be publicly available.  B on a monthly basis. The lace by the MPOB is paste on is incidence of complaints the FFB suppliers are not ranky POM has responded	Minor Comply?
Criterion 6.10: Growers a 6.10.1 Current and p  FFB from external supplie  The FFB price is determ auditor also observed that the notice wall at the weige Random interview condu and disputes (Internal as satisfied with the FFB grand stating that the gradi response has been forwal Evidence shal mechanisms for the response for the satisfied with the FFB grand stating that the gradi response has been forwal Evidence shal mechanisms for the response for the satisfied with the FFB grand stating that the gradi response has been forwal Evidence shal mechanisms for the response for the satisfied with the FFB grand stating that the grading response has been forwal mechanisms for the satisfied with the FFB grand stating that the grading response has been forwal mechanisms for the satisfied with the satisfied with the FFB grand stating that the grading response has been forwal mechanisms for the satisfied with the FFB grand stating that the grading response has been forwal mechanisms for the satisfied with the satisfied with the satisfied with the satisfied with the grading response has been forwal mechanisms for the satisfied with the satisfied	evance mechanism for sechanism exists.  and millers deal fairly and ast prices paid for Fresh ers are also one of FFB shined based on the input the copy of the letter symbridge of the Mill.  In the copy of the Mill.  In the copy of the Mill.  In the copy of the Supplier of External Grievance ading process performeng mechanism is followed to the FFB supplier of the available that growed or FFB and inputs/service mill or plantation).	d transparently with smale Fruit Bunches (FFB) shared in FFB grader. Have and guidances for their information.	Iholders and other local busing all be publicly available.  B on a monthly basis. The et by the MPOB is paste on is incidence of complaints the FFB suppliers are not ranky POM has responded be outlined by MPOB. Such	Minor Comply? Yes
Criterion 6.10: Growers a 6.10.1 Current and p  FFB from external supplie  The FFB price is determ auditor also observed thathe notice wall at the weige Random interview condu and disputes (Internal are satisfied with the FFB grand stating that the grading response has been forwal Evidence shalm mechanisms for control of the response to the satisfied with the FFB grand stating that the grading response has been forwal Evidence shalm mechanisms for control of the response to work and the satisfied with the FFB grand stating that the grading response has been forwal Evidence shalm mechanisms for control of the response to work and the satisfied with the	and millers deal fairly an ast prices paid for Freshers are also one of FFB shined based on the input the copy of the letter shind external Grievance ading process performent of the FFB supplier of FFB and inputs/service mill or plantation).  Fin hitted the pricing mechaleeting that is conducted.	d transparently with smale Fruit Bunches (FFB) shared Fruit Bunches (FFB) grader. Have shared Fruit Fr	Iholders and other local busing all be publicly available.  B on a monthly basis. The et by the MPOB is paste on is incidence of complaints the FFB suppliers are not ranky POM has responded be outlined by MPOB. Such	Minor Comply? Yes  Major
Criterion 6.10: Growers a 6.10.1 Current and p  FFB from external supplied  The FFB price is determated auditor also observed that the notice wall at the weight and disputes (Internal and satisfied with the FFB grammand stating that the grading response has been forwated been forwated and stating that the grading response has been forwated and stating that the grading response has been forwated and stating that the grading response has been forwated and stating that the grading response has been forwated and stating that the grading response has been forwated and stating that the grading response has been forwated and stating that the grading response has been forwated and stating that the grading of the stating response has been forwated and control of the response of the stating respon	and millers deal fairly an ast prices paid for Freshers are also one of FFB shined based on the input the copy of the letter shbridge of the Mill.  In the copy of the letter shbridge of the Mill.  In the copy of the letter shbridge of the Mill.  In the copy of the letter shbridge of the Mill.  In the copy of the letter shbridge of the Mill.  In the copy of the letter shbridge of the Mill.  In the copy of the letter shbridge of the FFB supplier of the FFB supplier of the FFB supplier of the available that grower or FFB and inputs/service mill or plantation).  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the letter shbridge of the Mill.  Fin the copy of the Mill.  Fin the co	d transparently with smale fruit Bunches (FFB) shared from the smale from the small from the sma	Iholders and other local busing all be publicly available.  Be on a monthly basis. The set by the MPOB is paste on a suppliers are not ranky POM has responded be outlined by MPOB. Such all FFB pricing, and pricing (where these are under the set of the CPO observed that the meeting setsing of FFB to ensure that hing has been conducted in	Minor Comply? Yes  Major Comply?

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Growers and Millers	ffected by
Findings	Comply?
Despite the above, the auditor observed that there is no evidence of contractual agreement sign between the POM and FFB suppliers.	ned No
Minor NCR 06	
6.10.4 Agreed payments shall be made in a timely manner	Minor
Findings	Comply?
With reference to above finding, the auditor also observed that there is no basis and guidance for to timeline of the payment of the FFB supplied to the POM by the FFB suppliers  Minor NCR 07	the No
Criterion 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
Findings  The individual estates and the mill have a very basic form of corporate social responsibility (CS)	Comply?
<ul> <li>which usually involves stakeholders, in particular local communities and smallholders approaching the company for contributions and donations on various occasions such as:</li> <li>Religious celebrations;</li> <li>For the upkeep and maintenance of access roads to local villages,</li> <li>Family day;</li> <li>School sports day;</li> <li>Request to use estates facilities;</li> <li>Blood donation campaign; and</li> <li>Providing security support for local communities.</li> </ul> Contribution to workers also is evident such as providing the usage of facilities for wedding event, the donation following to death of workers, during the wedding of the workers as well as donation medical treatment of workers who suffer from serious illness such as cancer. All activities and contribution rendered are recorded in the External and Internal Grievance Records.	the for
Book for each of the financial year.	ora
Book for each of the financial year.  Where there are scheme smallholders, there shall be evidence that efforts and/or	Minor
Book for each of the financial year.  Where there are scheme smallholders, there shall be evidence that efforts and/or	Minor
Book for each of the financial year.  6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  Findings	
Book for each of the financial year.  6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  Findings  No scheme smallholders in the supply base.  Criterion 6.12:  No forms of forced or trafficked labour are used.	Minor Comply? n.a.
Book for each of the financial year.  6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  Findings  No scheme smallholders in the supply base.  Criterion 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.	Minor Comply? n.a.  Major
Book for each of the financial year.  6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  Findings  No scheme smallholders in the supply base.  Criterion 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.  Findings  A policy on human rights that also includes statement on prohibition of forced labour has be established that is dated 10 Feb 2015 and signed by the Group CEO. The policy is also written in Malay language and displayed on the notice boards. No evidence or practices that contradict to	Minor Comply? n.a.  Major Comply? Yes
Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  Findings  No scheme smallholders in the supply base.  Criterion 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.  Findings  A policy on human rights that also includes statement on prohibition of forced labour has be established that is dated 10 Feb 2015 and signed by the Group CEO. The policy is also written in the Malay language and displayed on the notice boards. No evidence or practices that contradict the policy are observed.	Minor Comply? n.a.  Major Comply? Yes
Book for each of the financial year.  6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  Findings  No scheme smallholders in the supply base.  Criterion 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.  Findings  A policy on human rights that also includes statement on prohibition of forced labour has be established that is dated 10 Feb 2015 and signed by the Group CEO. The policy is also written in the Malay language and displayed on the notice boards. No evidence or practices that contradict to policy are observed.  The above policy specifies the following:	Minor Comply? n.a.  Major Comply? Yes the this
Book for each of the financial year.  6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  Findings  No scheme smallholders in the supply base.  Criterion 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.  Findings  A policy on human rights that also includes statement on prohibition of forced labour has be established that is dated 10 Feb 2015 and signed by the Group CEO. The policy is also written in Malay language and displayed on the notice boards. No evidence or practices that contradict to policy are observed.  The above policy specifies the following:  Strict compliance with all relevant national laws and regulations and where possible go beyone.	Minor  Comply?  n.a.  Major  Comply?  Yes  the  this

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Principle 6: Responsible Consideration of Employees and of Individuals and Communities affects Growers and Millers	ed by
need to possess for executing their job;	
Ensure workers original identity documents should only be voluntary kept by the company, thus ensuring freedom of movement;	
Ensure workers have freedom of movement or leaving the place of work or living quarters when not working;	
Ensure overtime is voluntarily;	
Commitment to only work with licensed recruitment agents who comply with all applicable laws and company codes of conduct;	
Ensure mechanisms are in place for responding to complaints of forced labor from employees;	
Develop awareness of the policy to all workers;	
Check and review continually to ensure that all efforts are effective; and	
To ensure that the policy is well communicated to all stakeholders.	
No evidences of force labour evidenced during the audit.	
Interview with the workers during the audit also confirmed the above matters whereby they are required to sign the agreement on a yearly basis and that they agree to submit their passport to the company to be kept on behalf of them for safety reason. In addition, the interview also confirmed that the company does not pose any restriction for them to take their passport i.e. especially when they want to go back to Indonesia for celebrating festival.	
6.12.2 Where applicable, it shall be demonstrated that no contract substitution has occurred.	Minor
Findings	Comply?
There is no contract substitution by the company. Based on records, the workers are found to be signing one single contract that is established as per in the Section 18 of Sabah Labour Ordinance (Chapter 67) Amendment 2005.	
6.12.3 Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented.	Major
Findings	Comply?
Haranky POM and Estates employed foreign workers that are contracted on a long-term contract basis i.e. 2 years/contract cycle. No temporary workers are employed to date.  Policy on Foreign Workers is also available.	
Criterion 6.13: Growers and millers respect human rights.	
6.13.1 A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).	Major
Findings	Comply?
A policy on human rights has been established that is signed by the Group CEO on dated 1 June 2014. The policy was also written in the Malay language and displayed on the notice boards. No evidence or practices that contradict this policy are observed. The policy also has been duly communicated to the workers during the JCC Meeting as well as Gender Committee Meeting held at each of the respective estates and mill.	
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.	Major
Findings	Comply?
All children of foreign workers are attending Humana School usually until age of 12. Following to the HUMANA session (after 12 years age), all of the children will be sent to Community Learning Centre (CLC) (for Indonesian Children) and another HUMANA that is located in Sandau.	Yes
Both the CLC and HUMANA is located around 7 km from the estates and the children are transported to the schools using the chartered transportation appointed by the estate management. For the	

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# Principle 6: Responsible Consideration of Employees and of Individuals and Communities affected by Growers and Millers

transportation fees, the company is providing the subsidy for each of the children to be transported to the school.

#### **Principle 7: Responsible Development of New Plantings**

This requirement is not applicable because there is no new planting after November 2005

#### Principle 8: Commitment to Continuous Improvement in Key Areas of Activity

Principle 8: Commitment to Continual Improvement in Key Areas of Activity			
Criterion	Criterion 8.1:		
	and millers regularly monitor and review their activities and develop and implement action plar rable continual improvement in key operations.	ns that allow	
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:		
	<ul> <li>Reduction in use of pesticides(Criterion 4.6);</li> <li>Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>Waste reduction (Criterion 5.3);</li> <li>Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>Social impacts (Criterion 6.1);</li> <li>Optimising the yield of the supply base.</li> </ul>	Major	
	Findings	Comply?	

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#### Principle 8: Commitment to Continual Improvement in Key Areas of Activity

Continuous Improvement Plan has been established as per in the document Continuous Improvement Plan (Ref. No.: 8.0 rev 2/0) dated 27 Dec 2016. The improvement plan outlined issues highlighted as per in the EAland SIA as well as other reporting means i.e. internal audit as well as external audit. Example of the items outlined are as follows:

Yes

- Compliance with legal requirement:
  - Minimum usage of chemical in pest control;
  - Update of the legal register laws and regulations;
  - Supply chain and traceability (specific for POM);
  - Enhancing the knowledge of all stakeholders.
- · Reduction usage of Pesticides:
  - Reduction of paraguat limited to immature palm;
  - Enhancement of spraying technique;
  - Maintaining balanced ground vegetation and soil conditions
- Usage of Biological Control Agent
  - Barn owl;
  - Beneficial plant.
- Environmental Impact:
  - Soil erosion and land slides road maintenance programme, fronds stacking etc;
  - Construction of biogas plant to mitigate methane emission;
  - Monitoring of BOD level;
  - Protection of Riparian Buffer zones;
  - o Wildlife Corridor maintenance of border along the Bukit Piton Forest Reserve.
- Waste reduction:
  - FFB by-product utilizing the EFB as part of fuel in boiler to generate electricity;
  - Applying EFB mulching on the ground
  - Scheduled Waste Management appointing licensed scheduled waste collector
  - Implementing triple rinsing;
- Pollution and Greenhouse Gas (GHG):
  - Stack emissions monitoring smoke emission to be in compliance with EQA 1974;
  - GHG emission collecting, calculating and monitor the GHG data;
  - o Raising awareness implementing policies and procedures related to environmental
- Optimizing the FFB yield:
  - Utilization of buffalo harvesting on flat area @1 bufallo/25ha covering 700ha within the Haranky Estates.
- Social Impact:
  - o Constant engagement with stakeholders through stakeholder consultations;
  - Labour rights workers welfare, wages etc;
  - Occupational Safety and Health;
  - Enhancing the workers housing;
  - Installation of RO water dispenser for drinking water to be utilized by workers as a free drinking water;
  - FFB suppliers enhance traceability and trade with FFB suppliers.

#### 3.3 Supply Chain Requirements

The **Haranky Palm Oil Mill** has decided to use **Module E** in this assessment. Findings and objective evidence collected during the assessment are outlined in below. Results for each indicator from each of the operational areas were evaluated to provide an assessment of conformity. A statement is provided for each of the RSPO indicators in order to support the findings of the assessment team.

#### 3.3.1 Module D (CPO Mills): Identity Preserved

Not Applicable.

#### 3.3.2 Module E (CPO Mills): Mass Balance

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#### Module E- CPO Mills: Mass Balance

**D1: Definition:** Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.

#### E2: Explanation

Requirements		Findings	Comply?
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.	The POM has projected FFB, CPO and PK production for financial year 2017/2018 in Budget 2017-2018.  The projected volume for Haranky production unit FY2017/2018 are as below: a. FFB Production:	Yes
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).	This is Main Assessment, the POM has yet to be registered in RSPO IT platform.	n.a

#### **E3: Documented Procedures**

	Requirements	Findings	Comply?
E.3.1	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:  a) Complete and up to date procedures covering the implementation of all the elements in these requirements; 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.	The POM has established written procedures relating to the implementation of RSPO Supply Chain procedure as evident in SCCS CPO Mass Balance (A6.1.1). The company procedure for supply chain is up to date and covering all elements required in RSPO Supply Chain Certification Standard 2014.  The POM has identified Mr. Perumal Rajoo, Mill Manager as the Management Representative. Letter of appointment is evident dated 18 Dec 2014 signed by Mr. Lain Chen Ying, Group HR Manager.	Yes
E.3.2	The site shall have documented procedures for receiving and processing certified and noncertified FFBs.	The company is using Mass Balance model for the Supply Chain certification. Procedure related to FFB receiving is explained in Receiving Third Party Sourced FFB. All RSPO certified FFB received will be stamped with RSPO Certified and recorded in FFB Incoming Form.  As the POM choose to use MB model, processed FFBs and CPO produced are recorded into Mass Balance table.	Yes

#### E4: Purchasing and Goods In

	Requirements	Findings	Comply?
E.4.1	The site shall verify and document the volumes of certified and noncertified FFBs received.	As to the date of audit, the POM has not received any RSPO certified FFB.	Yes

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		All incoming sustainable and non-sustainable FFB are	
		recorded into FFB Processing Mass Balance Table.	
E.4.2	The site shall inform the CB	SCCS CPO Mass Balance procedure has indicated a	Yes
	immediately if there is a projected	mechanism to inform certification body for any	
	overproduction of certified tonnage.	projected overproduction (Section 7: Over	
		Declaration).	
E5: Rec	ord Keeping		
	Requirements	Findings	Comply?
E.5.1	<ul> <li>a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</li> <li>b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short. (ie product can be sold before it is in stock.)</li> <li>For further details refer to Module C.</li> </ul>	<ul> <li>a. The POM will records all FFB received in FFB Processing Mass Balance Table. As to the date of audit, the POM has not received any RSPO certified FFB. Template of Mass Balance table is evident established on a 3 months basis.</li> <li>b. All volumes of CPO and PK that are delivered or deducted are correctly calculated as evident in Template of Mass Balance table. As to the date of audit, the POM has not received any RSPO certified materials.</li> <li>c. SCCS CPO Mass Balance procedure has clearly mentioned that the POM can only deliver in a positive stock (Section 5.5.3).</li> </ul>	Yes
E.5.2	In cases where a mill outsources activities to an independent (not	Not applicable.	n.a
	owned by the same organization)		
	palm kernel crush, the crush still		
	falls under the responsibility of the		
	mill and does not need to be		
	separately certified. The mill has to		
	ensure that the crush is covered		
l J	through a signed and enforceable		

#### 3.4 Non-Conformances Raised in this Assessment

As outlined, objective evidence was obtained separately for each of the RSPO Indicators and criterion for the mills and estates. The results for each indicator from each of the operational areas were evaluated to provide an assessment of conformity. A statement is provided for each of the RSPO indicators in order to support the findings of the assessment team. Details statement of non-conformance raised in this audit are summarized in Appendix 4.

#### 3.5 Status of Non-Conformities Previously Identified

Status of non-conformities identified in previous assessment is summarized in Appendix 5.

#### 3.6 Noteworthy Positive Comments

#### 3.7 Issues Raised by Stakeholders

A list of stakeholders contacted and their feedback (if any) is included as Appendix 3.

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#### 4. CERTIFIED ORGANIZATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

#### 4.1 Assessment Conclusion and Recommendation

The audit team concludes that the organization  $\boxtimes$  has /  $\square$  has not established and maintained its management system in line with the Roundtable on Sustainable Palm Oil (RSPO) Principles and Criteria for the Production of Sustainable Palm Oil 2013 (Malaysian National Interpretation of RSPO Principles and Criteria for Sustainable Palm Oil Production 2014) and RSPO Supply Chain Certification Standard (21 November 2014) standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

#### 4.2 Acknowledgement of Internal Responsibility and Formal Sign-off Assessment Findings

#### Signing by the Kwantas Corporation Berhad

I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents and audit findings as presented in this document.

#### Lalso confirm:

- · Acceptance of liability in execution of the instructions given.
- That this company was made aware that the findings of the audit team are tentative; pending review and decision making by the duly designated representatives of Bureau Veritas Certifications.
- That during the closing meeting all agenda items was covered by the Lead Auditor.

Acknowledge by:		Signature
Name	Mohd Badrul Nizam Bin Ahamad	
Position	Plantation Administration Manager	
Date	1 <sup>st</sup> Nov 2017	$\mathcal{W}$

#### Signing by the Bureau Veritas Certification Hong Kong Ltd.

I the undersigned, being the Lead Auditor, confirm that this report is an accurate record of the findings and of the closing meeting. I further confirm that the summary of the findings as presented in this report are a true representation of the actual findings of the audit team.

Acknowledge by:		Signature
Name	Muhammad Shazaley Abdullah	
Position	Lead Auditor	T. V.
Date	30 Oct 2017	0 1

### **APPENDIX 1: TIMEBOUND PLAN**

**Kwantas Corporation Berhad** is a member of RSPO and has been involved in the certification since 2<sup>nd</sup> April 2014; the membership number with RSPO is 1-0150-14-000-00.

**Kwantas Corporation Berhad** owns and operates **01** refineries, **03** palm oil mills and **18** oil palms estates, together with **03** operating unit covering approximately **29,444.54** ha in Sabah and Sarawak, Malaysia. **Kwantas Corporation Berhad** has developed a time-bound plan for the phased implementation of the RSPO P&C, commencing with mills and estates. **Kwantas Corporation Berhad** will use the experience gained from achieving certification of the first few mills and estates to implement the RSPO P&C in parallel with the remainder of its operations.

Bureau Veritas Certification assessment team considers that **Kwantas Corporation Berhad** is on track which is reasonable and challenging, given the widespread geographic locations of its properties and the resources required.

Time Bound Plan			
Requirement	Findings and any action required	Compliance	
Does the plan include all subsidiaries, estates and mills?	The plan has included all subsidiaries under the KWANTAS Group. There are 03 operating units covering 29,444.54Ha.	Yes	
Is the time bound plan challenging? Age of plantations. Location. POM development Infrastructure. Compliance with applicable law.	The established time bound plan is challenging in the light that out of a total of 29,444.54ha, 16,444.54ha is a newly acquired land which is a newly planted area to be assessed under the NPP Verification of the RSPO.  All plantation production units within the time bound plan is located either in Sabah or Sarawak of Malaysian Island of Borneo with the matured planted oil palm tree is located in Sabah.  The company has allocated adequate technical facilities and personnel appropriate to the scale and intensity of the plantation management units of Kwantas. Kwantas has a dedicated sustainability team to manage and implement the RSPO P&C.  Aside of Haranky POM, Kwantas is also lining another two (2) POM i.e. Mewah and Pintasan POM to be certified under the RSPO P&C under separate production unit. The two POMs and its supply base are envisaged to be certified in 2018 and 2021 respectively.  As reflected earlier, all POM and its supply bases are located in Sarawak and Sabah, hence the compliance of the laws are against the laws of Sarawak and Sabah. Aside of the sets of laws of both Sarawak and Sabah, as a Malaysian based company; Kwantas is also obliged to comply with the Federal Laws of Malaysia.	Yes	
Have there been any changes since the last audit? Are they justified?	Not Applicable. This is Main Assessment Audit.	N/A	
If there have been changes, what	Not Applicable. This is Main	N/A	

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circumstances have occurred?	Assessment Audit.	
Have there been any stakeholder comments?	There are some comments articulated by the Stakeholders consulted during the audit. All of their remarks and comments has been addressed during the audit. Details are captured in the audit report.	Yes
Have there been any newly acquired subsidiaries?	The company is currently in the midst of acquiring new land (13,000Ha) in Sarawak.	Yes
	The land consists of state land and Native Customary Rights land. The land acquisition has included FPIC processes.	
Have there been any isolated lapses in implementation of the plan?	This is Main Assessment Audit. The assessment of this section will be verified during the next audit (Surveillance Audit)	N/A

## **Un-Certified Units or Holdings**

Note: Companies may demonstrate compliance by clear evidence of a self-audit (i.e. an internal audit for all subsidiaries, estates and Palm Oil Mills)

Requirement	Findings and any action required	Compliance
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Kwantas has conducted the Internal Review through the commencement of the Internal Auditing process. The timebound plan is found to be reviewed during the internal review and the positive confirmation of the targeted time bound plan is specified in the internal review.	Yes
No replacement after dates defined in NIs Criterion 7.3:  • Primary forest.  • Any area identified as containing High Conservation Values (HCVs).  • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.	All of the production units of Kwantas (including the newly acquired area in Sarawak) are not originally a primary forest i.e. has been planted with the oil palm plantation.  As far as HCV assessment, Kwantas has conducted the HCV assessment for Mewah and Pintasan production unit. On the other hand, for the newly acquired areas in Sarawak, Kwantas is in the process of conducting the HCV assessment.	Yes
Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure.	As reflected earlier, Kwantas is acquiring new areas and expending its oil palm plantation which also involving new planting.  For the above purpose, Kwantas has established close engagement with RSPO for the guidance on the way forward.	Yes
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	As of the date of the audit BVC does not receive any input from any stakeholders or from Kwantas with respect to the existing land conflict occur with any entity or local communities.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in	As of the date of the audit BVC does not receive any input from any	Yes

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accordance with RSPO criterion 6.3.	stakeholders or from Kwantas with respect to the labor disputes occur with their workers.	
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Kwantas has conducted the Internal Review through the commencement of the Internal Auditing process. The timebound plan is found to be reviewed during the internal review and the positive confirmation of the targeted time bound plan is specified in the internal review.	Yes
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	BVC does not receive any input from any stakeholders on the legal transgression or breach for all Kwantas' production unit, during the stakeholder notification period and during the onsite audit conducted for Haranky production unit.	Yes

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Date	Time	Auditors	Location	Activity
23 Jul 2017	0915 - 1435	MSA, VS		Auditors Travelling (KUL-BKI-LDU)
(Sunday)	1500 - 1750	MFJ		Auditor Travelling (KUL-SDK)
	Team 1  0830 - 1400  Team 2	MFJ	<ul> <li>DOSH Office Sandakan, Sabah;</li> <li>EPD Office, Sandakan, Sabah;</li> <li>Department of Land Office, Kinabatangan</li> </ul>	External Stakeholders Consultation  a. Department of Occupational Safety and Health, Sandakan  b. Environment Protection Department, Sandakan  c. Land Survey Department, Kinabatangan
	Tealli Z			Opening Meeting
	0830 - 0900		Haranky POM	a. Introduction of Audit Team     b. Introduction of BVC Malaysia     c. General certification system process     d. Presentation of Pre-Assessment Result     e. Discussion on audit programme
				Field Inspection
24 Jul 2017 (Monday)	0900 - 1230	MSA, VS	Haranky 1 Estate	<ul> <li>a. Field Operations (Spraying, Harvesting, Manuring, etc.)</li> <li>b. Boundary Stone</li> <li>c. High Conservation Value Area</li> <li>d. Riparian/Watercourses Protection</li> <li>e. Waste Management Plan</li> <li>f. Storage Facilities</li> <li>g. Workers Housing</li> <li>h. Etc.</li> </ul>
	1230 - 1400		Lui	nch Break
	1400 - 1700	MSA, VS, MFJ	Haranky 1 Estate	a. Policies b. Aspect and Impact Assessment (Social, Environment, Etc.) c. Management Plan (Water, Waste, Environment, HCV, Social, Etc.) d. Records (Training, Meeting, Accidents, Etc.) e. Integrated Pest Management f. Etc.
	1800		Discus	ssion of Day 1
	Team 1			
25 Jul 2017 (Tuesday)	0830 - 1230	MFJ	<ul> <li>Immigration         Department, Lahad         Datu, Sabah;</li> <li>Gerola Estate, JC         Chang Group;</li> <li>Kampung Paris 3;</li> <li>WWF Sabah Branch         (Interview in Haranky         1 Estate)</li> </ul>	External Stakeholders Consultation  a. Immigration Department, Lahad Datu b. Neighbouring Estate c. Neighbouring Communities d. NGO's
	Team 2			
	0900 - 1230	MSA, VS	Haranky 2 Estate	Field Inspection  a. Field Operations (Spraying, Harvesting,

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	1230 - 1400			Manuring, etc.) b. Integrated Pest Management c. Replanting Area (if any) d. Waste Management Plan e. Storage Facilities f. Workers Housing g. Workshop h. Etc.
	1230 - 1400			Document Review
	1400 - 1700	MSA, VS, MFJ	Haranky 2 Estate	<ul> <li>a. Aspect and Impact Assessment (Social, Environment, Etc.)</li> <li>b. Management Plan (Water, Waste, Environment, HCV, Social, Etc.)</li> <li>c. Records (Training, Meeting, Accidents, Etc.)</li> <li>d. Integrated Pest Management</li> <li>e. Etc.</li> </ul>
	1730		Discu	ssion of Day 2
	0900 - 1000	MFJ	Haranky POM	Stakeholder Meeting with:  FFB Suppliers; and Contractors
26 Jul 2017 (Wednesday)	0900 - 1230	MSA, VS	Haranky POM	Site Inspection  a. FFB Receiving Ramp b. Processing Unit c. Delivery Areas d. Waste Treatment Plant e. Etc.
(1100110000)	1230 - 1400		Lu	ınch Break
	1400 - 1700	MSA, VS, MFJ	Haranky POM	Document Review  a. Supply Chain Certification Procedure b. Incoming FFB Record c. Delivered CPO Record d. Mass Balance Table e. Quality Management Documents f. Etc.
	0900 - 1230	MSA, VS, MFJ	Haranky POM	Final Document Review
27 Jul 2017	1230 - 1400		Lu	ınch Break
(Thursday)	1400 - 1530		Haranky POM	Closing Meeting  a. Presentation of Audit Findings b. Discussion c. Recommendation for Certification
28 Jul 2017	0725 - 1220	MSA, VS, MFJ		Auditors Travelling (LDU-BKI-KUL)

Note: \* MSA = Muhamad Shazaley Abdullah, VS = Valence Shem, MFJ = Mohd Faisal Jaafar

## **APPENDIX 3: LIST OF STAKEHOLDERS CONTACTED**

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Contacted Smallholder	Feedback/Comments Received	Verification or Follow-Up Required by
Department of Occupational Safety and Health (DOSH), Sandakan	Accidents records and investigation. There have been accidents occur reported by Kwantas with specific accidents occurred in Haranky Unit. According to the Department, the company has been proactive to report the accidents through JKKP 6 Form. On annual basis, the company has also submitted the JKKP 8 Form to the Department in line with the regulations.	The audit team has verified and confirmed that the company has been reporting all accidents occur via JKKP 6 and JKKP 8. Details of the findings are captured in the main body of the audit report.
on 24 July 2017 @9.30am	<ul> <li>Invitation to the Occupational Safety and Health (OSH) Meeting. The Department commented on the company's effort to invite them for the OSH Meeting. The company also has provided the copy of the minutes of the meeting should the department is not able to attend the meeting.</li> </ul>	The audit team has verified and confirmed that the company has invited the department during the meeting. Details of the findings are captured in the main body of the audit report.
Environmental Protection Department, Sandakan on 24 July 2017 @10.30am	EIA for replanting. The department voicing their concerns on the EIA for replanting that has been conducted; but yet to be approved.	The audit team has verified on the issues raised by the Department. Action has been taken by the company to appoint the consultant to perform and conduct the EIA for replanting. Currently the EIA has been completed and has been submitted to the company's HQ for further action on getting the EIA approved.
Department of Land and Survey, Kota Kinabatangan on 24 July 2017 @3.30pm	<ul> <li>No pertinent issues highlighted by the Department. The company has been complying with the rules set by the department in particular the need to comply with the rules set under Land Ordinance. According to the Department, all land titles belong to Haranky has been changed to Oil Palm or Agricultural Crop for Economic Value as per its intended usage.</li> </ul>	The auditor has verified and confirmed that all land titles is for the purpose of Oil Palm or Agricultural Crops of Economic Values. Details of the findings is as per in the main body of the audit report.
Immigration Department, Lahad Datu on 25 July 2017 @9.30am	The Department indicates that Kwantas has been constantly engaging with them on the issuance and renewal of work permit of their workers.	<ul> <li>The audit team has verified the input received from the Department. The audit team confirms that the company is found to be maintaining the update of the workers work permit.</li> <li>As for renewal process, for any situation where the workers permit is due for expiry, the audit team observed that the company has taken action to apply for renewal prior to the expiry of the work permit. Example of application official letter (Ref No.: P&amp;A/02/IMM/1706-3857) dated 7 June 2017 issued by the company to the Immigration Department of Lahad Datu which has been acknowledge receipt by the Department on the same date.</li> </ul>
	Moreover, the company has been engaged through the periodical stakeholder consultation/meeting.	The audit team has verified the records of the stakeholder meeting in particular the meeting held with the external stakeholder and confirmed that the Department has been invited for the meeting and that they have attended the meeting dated 13 June 2017.
Neighboring Estate (Gerola Estate) in Gerola Estate on	<ul> <li>The company has been constantly engaging with the estate through the</li> </ul>	The audit team has verified the records of the stakeholder meeting in particular

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25 July 2017 @11.30am	periodical stakeholder consultation/meeting.  • Moreover, the estate has also been visited by Haranky Estate for a specific programme and schedule	the meeting held with the external stakeholder and confirmed that the estate has been invited for the meeting and that they have attended the meeting dated 13 June 2017.  • As for the visit by Haranky Estate, the audit team has verified and confirmed that the latest visit has been conducted in April 2017 of which the sustainability team of Kwantas together with the Manager and Assistant Manager participated the visit.
Local Communities of Kampung Paris 3 in Kg. Paris 3 on 25 July 2017 @2.30pm	<ul> <li>The company has been constantly engaging with the communities through the periodical stakeholder consultation/meeting.</li> <li>There is no other issue articulated with respect to the company's management and operations on the communities' daily livelihood.</li> </ul>	of the stakeholder meeting in particular the meeting held with the external stakeholder and confirmed that the estate has been invited for the meeting and that they have attended the meeting dated 13 June 2017.
NGO (WWF), Lahad Datu in Haranky Estate on 25 July 2017 @3.00pm	<ul> <li>The company has been constantly engaging with the organization through the periodical stakeholder consultation/meeting.</li> <li>Exchanging input and maintaining the security and safety with respect to the management of the Bukit Piton FR that is bordering the Haranky Estate.</li> </ul>	<ul> <li>For the two inputs received from the NGO, the audit team has verified and confirmed that the company has participated the meeting with the NGO together with other stakeholder such as Yayasan Sabah, Forestry Department and Sabah Wildlife Department on the updates of the management and joint collaboration of management of the Bukit Piton FR. The meeting has been conducted on 19 Dec 2016.</li> <li>Besides the above, Records of action taken following to the stakeholder meetings conducted are found to be maintained by the company; for instance stakeholder meeting for the management of the Bukit Piton FR has resulted on the need to continuously monitor along the border; bordering the FR (Blocks 26 and 27 of Haranky 2 Estate); for any inappropriate and suspicious evidence and/or activities. Such records have been verified by the auditor during the audit.</li> <li>In addition, such action plan has also been incorporated in the Continuous Improvement Plan which is also verified by the audit team during the audit.</li> </ul>
FFB Suppliers from surrounding communities in	Concerns pertaining to the charge imposed by the company for the suppliers (residing within the Haranky Estates) to supply the FFB to other POM	Verification has been made by the auditor to determine the genuinity of the issues raised by the stakeholders. The auditor observed that Haranky POM has issued a circular dated 19 November 2015 that among other specifies that for any charge that has been imposed by the company, Haranky will reimburse the amount charged by the end of each of the month period.
Haranky PŎM on 26 July 2017 @10.00am	FFB grading process	Refer to the main body of the audit report. Haranky POM has responded and stating that the grading mechanism is following the rules and guidance outlined by MPOB. Such response has been forwarded to the FFB suppliers for their information.
	<ul> <li>Rejection of the FFB and process to determining the OER of the CPO and CPKO is not clear</li> </ul>	Refer to the main body of the audit report. Haranky POM has transmitted the pricing mechanism and means to

determine the OER for the CPO and CPKO through the Meeting that is conducted with the FFB Suppliers. Observed that the meeting was conducted on 19 May 2017.  • Following to the above meeting, the POM also has conducted a training session for the FFB suppliers pertaining to the FFB grading as well as the correct selection and harvesting of FFB to ensure that correct and ripe FFB is harvested in order to maximize the OER. The training has been conducted in Haranky POM and Haranky 1 Estate on 13 June 2017.

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#### **Summary:**

In summary, the stakeholder meetings conducted found no pertinent issues against the company's operation except on some occasion which further clarification is needed to be obtained from the company during the audit to confirm the validity.

Interview sessions conducted in free atmosphere without the presence of the company's representative.

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All input articulated from the stakeholders are anonymous.

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## **APPENDIX 4: NON CONFORMITIES RAISED IN THIS AUDIT**

NCR No.	M01		Date Issued	27/07/2017
Category	Major		Due Date	26/09/2017
Statements of	ts/Indicators	irrigation system to let environment  (16) no stack sampling was sampling was conducted i  (29) No evidence that bou	lated in mill DOE's lid s item harge point was Rate) overflow pipes at the effluent flow of as conducted in 2018 in 2016 in dary noise test has location plan of wat	cense (#003528) were found  not labelled with "TAKAT  the last trenches of the land ut from the trenches to the  while there is only one stack  been done  ter sampling stations at Koyah
Objective Ev	ridence(s)	Objectives evidence for each ite (5) effluent final discharge point (9) the mill has installed overflow system to let the effluent flow of (16) no stack sampling was don in 2016 (29) No evidence that boundary (37) No evidence that the location	was not labelled with which pipes at the last treat tr	th "TAKAT PELEPASAN" enches of the land irrigation to the environment one stack sampling was done done
Root Cause	Analysis	inadequate written proce	uirements stated in dure on compliance lan was not availa	s: JadualPematuhan item as e with legal requirements, ble. and legal compliance
Corrective A	ction	labelled.	discharge pond has	been marked and correctly  a land irrigation has been

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	consultant.)
	(29) Boundary Noise Exposure test for HPOM was done on 16th August 2017. Monitoring conducted and report produced by Rehpro Scientific Sdn.Bhd. Acknowledgment from DOE on Noise emission monitoring report upon reviewed.
	(37) To determine new location for upstream sampling point as advised by DOE and to conduct sampling as per requirement basedon agreeable location of "StesenPengawasanKualiti Air di Huludan di Hilir Sungai Koyah".acknowledgement provided by DOE thru email from Pn.MardiahAliska,PegawaiKawalanKanan (Unit Perlesenan) JabatanAlamSekitar Sabah, on 24 <sup>th</sup> August 2017.
Preventive Action	(5), (9), (16), (29) & (37) HPOM was identified all legal and law requirements related to JadualPematuhan DOE's license (#003528) prepared legal compliance monitoring plan for compulsion. Annual compliance checklist has been update and monthly monitored.
Verification of Corrective Action(s)	<ul> <li>Pictures of "TAKAT PELEPASAN" (Discharge Point) signage had been put up</li> <li>Pictures of overflow pipes had been removed</li> <li>Stack Sampling report (ref.: RT033/2017/229), conducted by a competent consultant on 21/9/2017</li> <li>Boundary Noise Exposure test report (ref.: RSSB/BOUNDARYNOISE/17-004) for HarankyPOM, conducted by a competent consultant on 16/8/2017</li> <li>Location plan of the sampling points at the upstream and downstream which has been acknowledged by the DOE</li> <li>Updated annual compliance checklist which is monthly monitored.</li> <li>The corrective action and preventive action evidence was found to be adequate.</li> <li>The implementation of the preventive action shall be verified for effectiveness in the next assessment.</li> </ul>
l t	the next assessment.

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NCR No.	m02		Date Issued	27 Jul 2017
Category	Minor		Due Date	Next Surveillance
Requirement	s/Indicators	<b>4.6.10:</b> Proper disposal of was understood by workers and mar		
Statements of	of NC	Disposal of waste materials at Management Plan.	the landfill (Block 1	7) is not according to Waste
Objective Evi	idence(s)	During inspection at the landfill has been segregated. There lubricant container) and recycla the landfill.	is also evidence of	f schedule waste (i.e.: used
Root Cause A	Analysis	No proper final segregation prod	cess in landfill.	
		Reviewing recyclable domes and appointment of person in		ed on collection area / source
		For Office, workshop and so the items will be kept in recy		
Corrective A	ction	Recycle store has been esfinal segregation took place Quarters, workers line site at	in landfill and isolat	o keep recyclable items after ing domestic waste from staff
		To design new trenching la land efficiency.	ndfill system at bloc	k 16 to maximize usage and
Preventive A	otion	Weekly Monitoring and m Attendant.	nonthly report by I	Estate executive and Clinic
Preventive A	Cuon	Conducting regular 3R awa level in community.	reness, hygiene car	npaign and training for every
		The company has taken action all sources in the plantation and 3R plan has been communicate and 22 Aug 2017. Evidence of the verification.	d mill area. These uped to all workers thro	odated Waste Management & bugh training conducted on 17
Verification of Action(s)	of Corrective	Based on the submitted ev segregation facilities within the landfill area (segregation house	housing compound	
		The company has constructed r landfill usage as submitted to th		
		Based on the submitted evider has adequately addressed and	nce, the audit team in the hence be closed.	s in view that the Minor NCR
Status	Closed		Date of Closure	14 Sep 2017

NCR No.	M03		Date Issued	27 Jul 2017
Category	Major		Due Date	26 Sep 2017
Requirements	/Indicators	<b>4.7.2:</b> All operations where her and procedures and actions sl the identified issues. All precobserved and applied to the wo	hall be documented cautions attached to	and implemented to address
Statements of	NC	Not all operations where health addressed identified issues.	and safety is an iss	ue has been risk assessed to
Objective Evid	lence(s)	It is evident that not all operation and recorded in Borang Hamaintenance of water catchmer	HIRARC (e.g.: fiel	
Root Cause A	nalysis	HSE Committee would classi accidents and near miss reporte		
		To assess activities which are HIRARC prepared by SHE off made available to all operation a) 05 additional HIRACH prep	icer for every estate units.	and mill operations flows is
		a) oo adamona iin waar prop	area for Flararity Co.	ato.
		1. MEMOTONG RUMPUT	MENGGUNAKAN PA	RANG
		2. WATER CATCHMENT		
		3. CRECHE AYAH		
		4. PONDOK PENGAWAL		
		5. MENYELENGGARA JAL	AN	
Corrective Act	ion			
		b) 09 additional HIRACH prep	ared for HPOM	
		1. PONDOK PENGAWAL		
		2. MILL CLEANER		
		3. WIREMAN		
		4. BEKERJA DI TEMPAT T	INGGI	
		5. BEKERJA DI DALAM RU	JANG TERKURUNG	
		6. CPO DISPATCH		
		7. PEMANDU LORI CPO		
		8. PEMANDU LORI UTILIT	1	
		9. MENGAMBIL PERCONT	OHAN AIR	
Preventive Act	tion	Hazard and risk of all activitie identified and reviewed regularly		the estate and mill shall be
		The company has submitted operations by email to the audestate and mill. The HIRARC helivise).	litor. The list has inc	cluded most operations in the
Verification of Action(s)	Corrective	The company has communicat at all operations as reviewed in		
(6)		Although this evidence has been be reassessed during the next effectiveness of communication the audit team has come to a communication of the audit team has come to a communication the audit team has come to a communication of the audit team has communication of	surveillance visit to to the workers. Base	evaluate the awareness and ed on the submitted evidence,
Status	Closed		Date of Closure	14 Sep 2017
	1			<u> </u>

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NCR No.	m04		Date Issued	27 Jul 2017
Category	Minor		Due Date	Next Surveillance
Requirement	s/Indicators	<ul> <li>clearly understood by all v</li> <li>Accident procedures shall workforce.</li> </ul>	vorkers.  Il be available in the  ed in First Aid should  aid equipment shall I	
Statements of	f NC	First aid equipment is not availa	able at all worksites.	
Objective Evi	idence(s)	It is evident that the provided available at all workstation (e.g. Aid distribution Map confirms t POM.	g.: Control Room). V	erification made against First
Root Cause A	Analysis	No first aid maps being establis	hed to evaluate the s	ufficiency of first aid box.
Corrective Ad	ction	<ul> <li>accessed by the workers if</li> <li>Press station (4) = First accessed by the worker emergency.</li> <li>Supervisors' Room (5) = ground Floor.</li> </ul>	I mill sites as applical iit) irst Aid Box is locate in case of emergency t Aid Box is located rs in Press station to be easily access to ensure FFB rece	d on the top floor to be easily on the top floor to be easily and EFB press in case of ed by workers working on the iving platform was covered in
Preventive A	ction	procedure and "work char new worker orientation pro	nge" requirements on ogramme.	ees are reminded of accident a daily / weekly basis/ during ased on accident & near miss
Verification of Action(s)	of Corrective	The company has submitted en Pelan Lokasi First Aid. The POI to ensure all accident cases (if a The First Aid location has been shift briefing session as present By evaluating the submitted every provided. Thus, Minor NCR 04 is	M has provided 7 stra any) can be cater imn n communicated to a ted in the submitted of idence, the audit tea	ategic points with First Aid Box mediately.  all workers in the POM during evidence.
Status	Closed		Date of Closure	14 Sep 2017

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NCR No.	m05		Date Issued	27 July 2017
Category	Minor		Due Date	Next Surveillance
Requirement	ts/Indicators	Indicator 6.5.4: Growers and improve workers' access to adequa		
Statements of	of NC	Growers and millers is not improve worker's access to a		
Objective Ev	idence(s)	There is evidence of action price sold at the sundry showith the neighbouring estates that the monitoring process with the input from KoperasidanKepenggunaan government body for the dai Malaysia.	pps within the esta is and town. However is not comprehensing the Kementerian which is the en	tes by comparing the price er, the audit team observed ive whereby it is not guided a Perdagangan Dalam Negeri, forcement and regulatory
Root Cause	Analysis	Remarked that current mor every four month with sur estates sundry canteen was	rounding grocerie	
Corrective A	ction	Correspondence with KPDN and daily use items to set a groceries prices must be accordance to KPDNKK advi	s basis for goods displayed in the	prices in the Estate. List of
Preventive A	ction	Monthly comprehensive mo identified to observing o announcement or/ updates compliance.	n prices fluctuat	ion based on KPDNKK
		The company has taken act application to obtain the pric Department. Evidence of coteam via email on 28 August	e list for all daily go Immunication has	oods item monitored by the
		Based on the evidences s Department has responded KPDNKK's website.		
Verification of Action(s)	of Corrective	Print-screened copy of the (website version) is also attach		
		The monthly-updated price includes the price list product available to the audit team vi	ed and monitored	
		Based on the above, the audadequately addressed and he		ew that the Minor NCR has
Status	Closed	•	Date of Closure	14 Sept 2017

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NCR No.	m06		Date Issued	27 July 2017
Category	Minor		Due Date	Next Surveillance
Requirements/Indicators		Indicator 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.		
Statements of NC		There is no evidence available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.		
Objective Evic	lence(s)	The audit team observed that there is no evidence of contractual agreement signed between the POM and FFB suppliers.		
Root Cause Analysis		During earlier inception of the POM operation, HPOM has established a mutual agreement with the FFB supplier and such paperless. Agreement practice was carried on between both parties until present day as both also are on back –to-back trust basis. That was a widely practised in the industry.		
Corrective Action		A standard or/ legal contract has been draft and reviewed by the top management. Upon agreed, finalization/standardizing these endorsed contract will be circulate to all POMs assigned contractual agreement with FFB suppliers.		
Preventive Action		Briefing to all FFB suppliers during signing of contract by POM manager and to provide sufficient information on term and regulation furthermore updating on MPOB requirement and guideline.		
Verification of Corrective Action(s)		The company has submitted to the audit team via email dated 28 Aug 2017, a copy of the newly established contract that is established between the company and the FFB suppliers.		
		The audit team took note the details of the agreement which has addressed all necessary requirements such as contract validity, payment terms, signature between both parties, rate of the FFB supplied etc.		
		Nevertheless, the audit team is off the view that though the company has established the contract, actual implementation (ground implementation) of the contract has yet to be verified until the next audit (scheduled within one year upon the issuance of the certificate).		
		Based on the above, the Minor NCR is maintained and to be verified (on its implementation wise) by next Surveillance Audit.		
Status	Open		Date of Closure	-

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NCR No.	m07		Date Issued	27 July 2017
Category	Minor		Due Date	Next Surveillance
Requirements/Indicators		Indicator 6.10.4: Agreed payments shall be made in a timely manner.		
Statements of NC		Agreed payments are not ma	ide in a timely man	ner.
Objective Evidence(s)		The audit team observed that there is no basis and guidance for the timeliness of the payment of the FFB supplied to the POM by the FFB suppliers in the light that there is no agreement that has been established between the two entities.		
Root Cause Analysis		During earlier inception of the POM operation, HPOM has established a mutual agreement with the FFB supplier and such paperless. Agreement practice was carried on between both parties until present day as both also are on back –to-back trust basis. Which was a widely practised in the industry.		
Corrective Action		A standard or / legal contract has been draft and reviewed by the top management. Upon agreed, finalization / standardizing these endorsed contract with payment timeline ratified by 16 <sup>th</sup> on following month will be circulate to all POMs as signed contractual agreement with FFB suppliers.		
Preventive Action		Briefing to all FFB supplier during signing of contract and explanation on complaint and grievance procedure by POM manager. All the details will be documented and recorded.		
Verification of Corrective Action(s)		The company has submitted to the audit team via email dated 28 Aug 2017, a copy of the newly established contract that is established between the company and the FFB suppliers.		
		The audit team took note the details of the agreement which has addressed all necessary requirements such as contract validity, payment terms, signature between both parties, rate of the FFB supplied etc.		
		Nevertheless, the audit team is off the view that though the company has established the contract, actual implementation (ground implementation) of the contract has yet to be verified until the next audit (scheduled within one year upon the issuance of the certificate).		
		Based on the above, the Minor NCR is maintained and to be verified (on its implementation wise) by next Surveillance Audit.		
Status	Open		Date of Closure	-

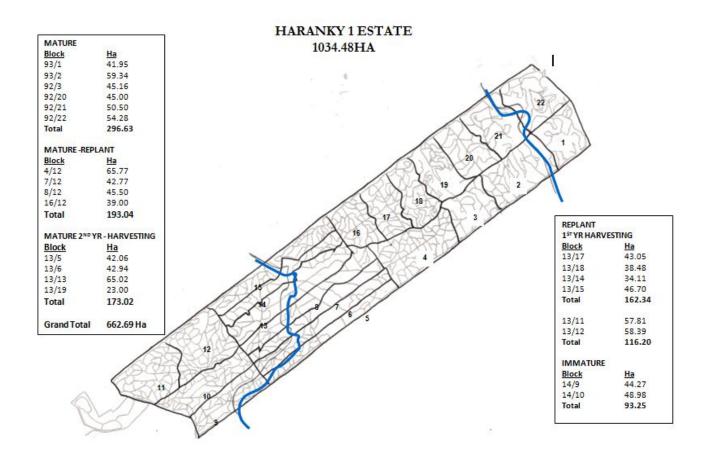
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## **APPENDIX 5: NON CONFORMITIES IDENTIFIED PREVIOUSLY**

Not applicable. This is Main Assessment.

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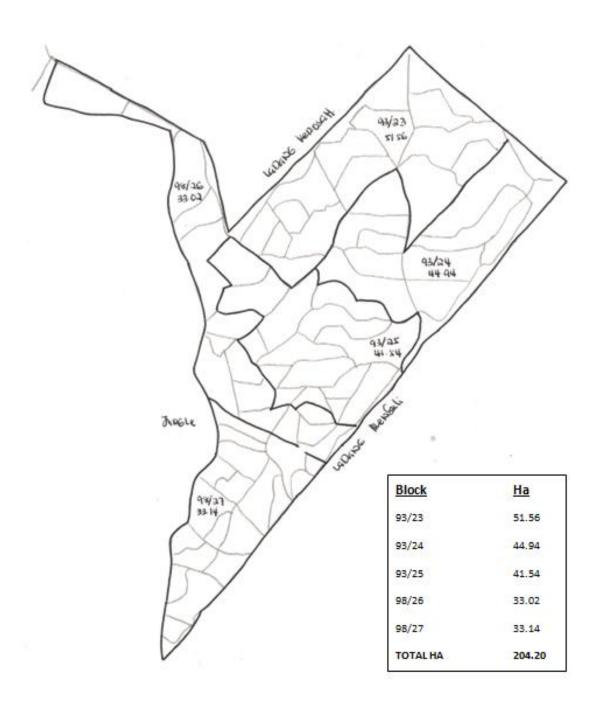
## **APPENDIX 6: LOCATION MAPS OF THE CERTIFICATION UNIT**



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#### KWANTAS LAND DEVELOPMENT SDN BHD HARANKY 2 ESTATE



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# APPENDIX 7: RECORDS OF CERTIFIED AND NON-CERTIFIED TRANSACTION SINCE LAST AUDIT

#### Monthly Records of Certified and Uncertified FFBs Received Since Last Audit (This is Main Assessment)

#### Romarks:

- If this is Main Assessment, the figures used are from the last 12 Months
- If this is Annual Surveillance Assessment, the figures used are since last audit.

No.	Month – Year	Certified Supplier (MT) (Own Estate)	Uncertified Supplier (MT)	Total (MT)
01	Jul 2016	3213.69	17402.98	20675.67
02	Aug 2016	3145.07	14658.96	17823.03
03	Sep 2016	3116.80	17286.98	20403.78
04	Oct 2016	2997.98	16527.34	19525.32
05	Nov 2016	2840.32	13244.43	16084.75
06	Dec 2016	2292.99	15103.72	17396.71
07	Jan 2017	2590.98	13455.91	16046.89
08	Feb 2017	2384.71	12803.65	15188.35
09	Mar 2017	2459.56	14728.59	17188.15
10	Apr 2017	2443.59	14685.32	17328.91
11	May 2017	3051.14	14059.90	17111.06
12	June 2017	3034.88	12764.58	15799.46
	TOTAL (MT)	33571.71	176722.36	210572.08

#### Monthly Records of Certified CPO and PK Produced Since Last Audit

#### Remarks:

- If this is Main Assessment, the figures used are from the last 12 Months
- If this is Annual Surveillance Assessment, the figures used are since last audit.

No.	Month – Year	Certified CPO (MT) (Produced from Own Estate)	Certified PK (MT) (Produced from Own Estate)
01	Jul 2016	639.52	156.83
02	Aug 2016	664.98	168.70
03	Sep 2016	646.42	177.66
04	Oct 2016	619.08	160.69
05	Nov 2016	580.28	126.11
06	Dec 2016	474.19	101.81
07	Jan 2017	511.46	130.07
08	Feb 2017	470.98	116.61
09	Mar 2017	483.80	116.83
10	Apr 2017	530.30	131.65
11	May 2017	628.84	156.83
12	June 2017	608.19	153.56
	TOTAL (MT)	6858.04	1697.35

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Monthly Records of Certified CPO and PK Sold under Palm-Trace Platforms since Last Audit (if any)				
Remarks:				
<ul><li>If this</li></ul>	is Main Assessment, this table is Not App	olicable.		
<ul><li>If this</li></ul>	is Annual Surveillance Assessment, the fi	igures used are since last audit based on RS	SPO Palm Trace transaction Report.	
No.	Transaction ID No.	Certified CPO (MT)	Certified PK (MT)	
		- nil -		

**End of Report**