

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☐ Annual Surveillance Assessment (Choose an item.)

☒ Recertification Assessment (RA 2)

☐ Extension of Scope

Client Company Name / Parent Company: J.C. Chang Holdings Sdn. Bhd.
Client Company / Parent Company Address: Unit 30-01, Level 30, Menara Landmark, No. 12, Jalan Ngee Heng, 80000 Johor Bahru, Johor, Malaysia
Certification Unit: Melewar Palm Oil Mill (Melewar Production Unit)
Location of Certification Unit: KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia
Date of Final Report: 24/03/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	J.C. Chang Holdings Sdn. Bhd.		
RSPO Membership Number	2-0029-06-000-00	Membership Approval Date	10/5/2006
Address	Unit 30-01, Level 30, Menara Landmark, No. 12, Jalan Ngee Heng, 80000 Johor Bahru, Johor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Melewar Palm Oil Mill (Melewar Production Unit)		
Location / Address	Certification unit: Melewar Palm Oil Mill, KM 45, Jalan Lahad Datu – Sandakan 91100 Lahad Datu, Sabah, Malaysia		
Website	www.carotino.com		
Management Representative	Wong Chun Wei	E-mail	wongcw@jcc.com.my
Telephone	+607 2231633 (Head Office)	Facsimile	+607 224 1546 (Head Office)

2. Certification Information			
Certificate Number	RSPO 651276	Certificate Start Date	07/02/2024
Date of First Certification	07/02/2014	Certificate Expiry Date	06/02/2029
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	100mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
50450565MSPO4	MSPO 2530-4:2013 General Principles for Palm Oil Mills	DQS Certification (M) Sdn Bhd	04.07.2025
50450559MSPO3	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders		04.07.2025
50450565 MSPO SCCS	MSPO Supply Chain Certification Standard 2018		04.07.2025
EU-ISCC-Cert-DE119-60233406	International Sustainability and Carbon Certification	ASG CERT GmbH	02.05.2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Melewar POM	KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia	5°16'21.50" N	118°03'12.40" E
Gerola Estate	CL 095310919, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5° 12' 18.74" N	118° 2' 4.56" E
Tye Yang Estate	CL 095311407, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5° 14' 33.03" N	117° 59' 58.59" E
Melewar Estate 1	CL 095310400, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5° 15' 49.11" N	118° 3' 48.66" E
Pahang Oil Palm 2 Estate	CL 095317285, 17490, 17516, 17507, 21421, Kinabatangan, Sabah, Malaysia	5° 17' 37.88" N	118° 8' 21.87" E
Pahang Oil Palm 3 Estate	CL 095317285, 17534, 17525, 25983, Kinabatangan, Sabah, Malaysia	5° 22' 27.72" N	118° 8' 18.62" E
Muis Melewar Plantation 1	CL 105426784, Tawau, Sabah	4° 27' 33.26" N	117° 50' 54.19" E
Muis Melewar Plantation 2	CL 245360523, Mukim Sungai Binuang, Ulu Tingkayu, Kunak, Sabah	4° 39' 51.43" N	117° 54' 07.83" E
Hwa Li 2	CL 095327218, CL 095310731, Mukim Tenegang Koyah, Kinabatangan 90200, Kinabatangan Sabah	5°19'29.00" N	118°02'45.00" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Gerola Estate	1,403.37	-	184.03	1,587.40	88.41
Tye Yang Estate	3,352.62	-	407.28	3,759.90	89.17
Melewar Estate 1	1,978.42	-	344.76	2,323.18	85.16
Pahang Oil Palm Estate 2	2,564.44	-	288.28	2,852.72	89.89
Pahang Oil Palm Estate 3	2,391.11	-	228.19	2,619.30	91.29
Muis Melewar Plantation 1	2,056.01	54.19	209.80	2,320.00	88.62
Muis Melewar Plantation 2	1,481.00	-	312.00	1,793.00	82.60
Hwa Li 2	2,811.62	-	195.64	3,007.26	93.49
Total	18,038.59	54.19	2,169.98	20,262.76	89.02

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Gerola Estate	187.05	870.33	-	345.99	1,216.32	187.05
Tye Yang Estate	595.69	2,079.55	47.27	630.11	2,756.93	595.69
Melewar Estate 1	237.21	1,427.13	139.88	174.20	1,741.21	237.21
Pahang Oil Palm Estate 2	311.62	666.79	606.83	979.20	2,252.82	311.62
Pahang Oil Palm Estate 3	500.46	445.33	-	1,445.32	1,890.65	500.46
Muis Melewar Plantation 1	6.00	584.30	1,435.81	29.90	2,050.01	6.00
Muis Melewar Plantation 2	129.24	-	1,351.76	-	1,351.76	129.24
Hwa Li 2	188.30	493.20	1,862.16	267.96	2,623.32	188.30
Total (ha)	2,155.57	6,566.63	5,443.71	3,872.68	15,883.02	2,155.57
Note: Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Feb 2023 - Jan 2024)	Actual (Dec 2022 – Nov 2023)		Forecast (Feb 2024 - Jan 2025)
		Previous license period (Dec 22 - Jan 23)	Current license period (Feb 2023 - Nov 2023)	
Gerola Estate	17,790.00	4,427.58	21,023.61	26,686.00
Tye Yang Estate	56,049.24	9,161.45	46,533.18	60,081.00
Melewar Estate 1	40,950.80	6,565.11	30,523.26	41,141.00
Pahang Oil Palm Estate 2	43,388.71	-	77.28	21,627.00
Pahang Oil Palm Estate 3	25,740.00	5,429.73	12,728.02	40,557.00
Muis Melewar Plantation 1	25,600.00	-	11.93	10.00
Muis Melewar Plantation 2	28,039.00	-	16.54	16.00
Hwa Li 2	21,547.08	-	-	4,977.00
Total	259,104.83	136,497.69		195,095.00
Notes:				
1) Pahang Oil Palm Estate 2 and Hwa Li 2 had just been included in the certification scope in 01/11/2023. Hence the zero figure for the period of Dec 22-Jan 23. For Hwa Li 2, the management decided to classify the crop as certified starting from 01/12/2023.				
2) No crop from Muis Melewar Plantation 1 and Muis Melewar Plantation 2 for the period of Dec 22-Jan 23 due to logistics constraint as the locations of the two supply bases are in Tawau and Kunak districts respectively.				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Feb 2023 - Jan 2024)	Actual (Dec 2022 – Nov 2023)		Forecast (Feb 2024 - Jan 2025)
		Previous license period (Dec 22 - Jan 23)	Current license period (Feb 2023 - Nov 2023)	
Melewar Estate 2		-	31.28	
Total		31.28		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Feb 2023 - Jan 2024)	Actual (Dec 2022 – Nov 2023)		Forecast (Feb 2024 - Jan 2025)
		Previous license period (Dec 22 - Jan 23)	Current license period (Feb 2023 - Nov 2023)	
Third parties/smallholders	-	3,272.39	15,652.85	-
Sharikat Keratong Sdn Bhd	-	5,043.32	31,097.00	-
Hwa Li 2	-	7,773.94	35,834.93	-
Total	-	98,674.43		-
Notes:				
Hwa Li 2 was only certified in 01/11/2023. the management decided to classify the crop as certified starting from 01/12/2023.				

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit (Dec 2022 - Nov 2023)				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Dec-22	14,350.55	8,517.51	22,868.06
2	Jan-23	11,233.32	7,572.14	18,805.46
3	Feb-23	10,513.94	8,198.00	18,711.94
4	Mar-23	12,294.62	9,539.04	21,833.66
5	Apr-23	10,690.94	8,245.98	18,936.92
6	May-23	13,055.56	10,088.49	23,144.05
7	Jun-23	9,814.77	8,614.16	18,428.93
8	Jul-23	7,205.07	8,492.69	15,697.76
9	Aug-23	8,742.39	9,272.54	18,014.93
10	Sep-23	13,056.54	9,906.62	22,963.16
11	Oct-23	13,158.83	7,387.51	20,546.34
12	Nov-23	12,413.66	2,839.75	15,253.41
TOTAL		136,530.19	98,674.43	235,204.62

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated last year (Feb 2023 – Jan 2024)	Actual (Dec 2022 – Nov 2023)		Forecast (Feb 2024 – Jan 2025)	
	Previous license period (Dec 22 - Jan 23)	Current license period (Feb 2023 - Nov 2023)		
FFB	FFB		FFB	
285,944.83 mt	25,583.87 mt	110,946.32 mt	195,095.00 mt	
	TOTAL	136,530.19 mt		
CPO (OER: 21.75%)	CPO (OER:20.87 , 20.80%)		CPO (OER: 19.56%)	
62,193.00 mt	5,338.45 mt	23,075.84 mt	38,153.47 mt	
	TOTAL	28,414.28 mt		
PK (KER: 4.99%)	PK (KER:4.03 , 4.11%)		PK (KER: 5.00 %)	
14,268.65 mt	1,031.90 mt	4,556.36 mt	9,752.23 mt	
	TOTAL	5,588.26 mt		
Notes: Significant reduction in production for the forecast due to the removal of Pelita Estate from the scope.				

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Dec-22	3,031.44	576.00
2	Jan-23	2,307.01	455.90
3	Feb-23	2,131.83	447.61
4	Mar-23	2,487.13	549.06
5	Apr-23	2,209.86	472.08
6	May-23	2,760.36	551.61
7	Jun-23	2,051.92	366.08
8	Jul-23	1,416.02	285.50
9	Aug-23	1,772.82	342.91
10	Sep-23	2,720.39	551.53
11	Oct-23	2,768.29	584.23
12	Nov-23	2,757.20	405.75
TOTAL		28,414.28	5,588.26

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11. Summary of Actual Volume sold					
Current License period (Feb 2023 - Nov 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	72.36	-	-	14,031.35	14,103.71
PK (MT)	4,064.13	-	-	-	4,064.13
Credits	10,000.00	-	-	-	10,000.00
Previous License period (Dec 2022 - Jan 2023)					
CPO (MT)	4,699.85	-	-	1,019.61	5,719.46
PK (MT)	1,201.48	-	-	-	1,201.48
Credits	-	-	-	-	-
Notes:					
- Differential in sold volumes with actual production is based on accounting methods that UoC is using either through carry forward before and after license period					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Non-disclosure	Non-disclosure	4,772.21	5,265.61
TOTAL			4,772.21	5,265.61

11B. Records of certified CPO & PK Sold under other schemes since the last audit (Dec 2022 - Nov 2023)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (Dec 2022 - Nov 2023)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Non-disclosure	15,050.96	-
TOTAL		15,050.96	-

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11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	Non-disclosure	12626	5,000.00
2	Non-disclosure	12609	2,864.00
3	Non-disclosure	11781	1,000.00
4	Non-disclosure	11744	1,136.00
TOTAL			10,000.00

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year			Actual			Forecast		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A
Note: 1 mt = 1 credit						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
1	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639

Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **04/12/2023 -08/12/2023**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 26/10/2023.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on **05/02/2024**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

Meetings were held with stakeholders to seek their views on the performance of the certification unit with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer 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. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

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This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification 2)	Year 2 (ASA3-1)	Year 3 (ASA3-2)	Year 4 (ASA3-3)	Year 5 (ASA3-4)
Melewar Palm Oil Mill	✓	✓	✓	✓	✓
Gerola Estate	✓		✓		✓
Tye Yang Estate	✓		✓		✓
Melewar Estate 1	✓		✓		✓
Pahang Oil Palm Estate 2		✓		✓	
Pahang Oil Palm Estate 3	✓		✓		✓
Muis Melewar Plantation 1		✓		✓	
Muis Melewar Plantation 2		✓		✓	
Hwa Li 02		✓		✓	

Tentative Date of Next Visit: December 2, 2024 - December 6, 2024

Total Number of Mandays: 15

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2.2 BSI Assessment Team

Name	Role	Competency
Valence Shem (VSH)	Team Leader	<p>Education: Holds a Bachelor of Technology BTech (Hons.) Industrial Technology, University of Science Malaysia.</p> <p>Work Experience: He has more than 20 years of working experience with 9 years in oil palm plantation industry and 13 years in management system auditing since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS, MSPO and SMETA.</p> <p>Training attended: He has completed ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Assessor Course, MSPO Awareness Training, ISO 45001 Lead Auditor Course, SMETA Auditor training, HCV-HCS training and RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Mohd. Razaleigh Mohamad (MRM)	Team Member	<p>Education: Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p>Work Experience: He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p>Training attended: He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C and SCCS).</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input checked="" type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

Amir bin Bahari (ABB)	Team Member	<p>Education: Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia & a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p>Work Experience: He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for various schemes including RSPO and MSPO for various accredited certification bodies.</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course Endorsed RSPO P&C Refresher Training, HCV Awareness for RSPO/ MSPO auditors and RSPO HCV Audit Guidelines.</p> <p>Aspect covered in this audit:</p> <p>Language proficiency: He is fluent in both verbal/written in Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Mohamed Hidhir bin Zainal Abidin (MHZ)	Team Member	<p>Education: Holds a Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years 2) Auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO since 2012 <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course in 2012 4) Endorsed RSPO P&C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014 6) Endorsed RSPO SCCS Lead Auditor Course 7) SMETA Auditor training <p>Language proficiency: Fluent in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Assigned to close Critical NCR on-site.</p>
Dr. Suhaili Sahari	Peer Reviewer	<p>Education:</p> <p>Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthered his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advanced his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p>

		<p>Work Experience:</p> <p>Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001:2015 Lead Auditor and Internal Auditor 2) ASI reviewer training 3) Safety and Health 4) ISO 14001:2015 Standard 5) RSPO Standards: RSPO P&C 2018 MY-NI 2019 6) MSPO Standards: MS 2530: 2013 part 1, 2, 3 and 4 7) Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 8) HACCP MS 1480:2019 9) GAP Standard: GLOBALGAP, Euro GAP 10) MSPO Peer Reviewer Training 2 - 2017 by MPOCC. <p>Expertise:</p> <p>General Management, Auditing, Environment and Plantation Management.</p>
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Accompanying Persons:

Name	Role
Zulkifli bin Kamarol Zaman	Observer

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment

Date	Time	Subjects	VSH	MRM	ABB	ZKZ
Monday 04/12/2023	0900-0915	Opening meeting: • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation)	✓	✓	✓	✓
	0915-1300	<u>Melewar Estate 1</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and documentation review.	✓	✓	✓	✓
	1300-1400	Lunch break				
	1400-1630	<u>Melewar Estate 1</u> Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓
Tuesday 05/12/2023	0900-1300	<u>Pahang Oil Palm 3 Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓	✓
	1300-1400	Lunch break				
	1400-1630	<u>Pahang Oil Palm 3 Estate</u> Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓	✓

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Date	Time	Subjects	VSH	MRM	ABB	ZKZ
Wednesday 06/12/2023	0900-1300	<u>Melewar POM</u> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓	✓
	1000-1300	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-	✓
	1300-1400	Lunch break				
	1400-1630	<u>Melewar POM</u> Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓	✓
	1630-1700	Interim closing briefing				
Thursday 07/12/2023	0900-1300	<u>Tye Yang Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and documentation review.	✓	✓	✓	✓
	1300-1400	Lunch break				
	1400-1630	<u>Tye Yang Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and documentation review.	✓	✓	✓	✓
	1630-1700	Interim closing briefing				
Friday 08/12/2023	0900-1300	<u>Gerola Estate</u> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.),	✓	✓	✓	✓

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		agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.				
	1300-1400	Lunch break				
	1400-1530	<u>Gerola Estate</u> Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓	✓
	1530-1600	Interim closing briefing	✓	✓	✓	✓
	1600-1630	Audit team discussion & preparation for closing meeting	✓	✓	✓	✓
	1630-1700	Closing meeting	✓	✓	✓	✓
	1700	Audit team travels to Sandakan and hotel check-in	✓	✓	✓	✓

NC Closure Assessment Plan

Date	Time	Subjects	MHZ
Monday 05/02/2024	1000-1015	Opening Meeting <ul style="list-style-type: none"> Opening Presentation by Audit team leader Briefing on the verification plan 	✓
	1015-1230	Major NC verification <ul style="list-style-type: none"> 2429106-202311-M1 – Document review and management/worker's interview 2429106-202311-M2 – Document review and management/worker's interview\ 2429106-202311-M3 – Document review and management/worker's interview 2429106-202311-M4 – Document review and management/worker's interview 	✓
	1230-1330	Lunch break	
	1330	Continue with unfinished elements. Closing meeting - conclusion and recommendation	✓

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The plan includes all current subsidiaries, estates and mills that is under management control.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. However, recently JC Chang Group have purchased properties from a RSPO certified company i.e. TSH Resources Berhad namely Lahad Datu Palm Oil Mill, Ong Yah Ho Estate and Gomantong Estate and the estates has been renamed as Hwa Li 2. Other than that, purchase done from 3 outgrowers (Raygold Gold Trading, Segar Teguh Sdn Bhd and Jaguhamoni Sdn Bhd) with total area of 180.92ha which take over process was carried out on 23rd February 2022. Disclosure form has been submitted to RSPO on 22/09/2022 and obtained approval by RSPO on 15/06/2023. Scope extension has been conducted on 28-30/08/2023 and the estates has been RSPO certified. For Lahad Datu Palm Oil Mill, plan for certification is in year 2025.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. However, recently JC Chang Group have purchased properties from a RSPO certified company i.e. TSH Resources Berhad namely Lahad Datu Palm Oil Mill, Ong Yah Ho Estate and Gomantong Estate and the estates has been renamed as Hwa Li 2. Other than that, purchase done from 3 outgrowers (Raygold Gold Trading, Segar Teguh Sdn Bhd and Jaguhamoni Sdn Bhd) with total area of 180.92ha which take over process was carried out on 23rd February 2022. Disclosure form has been submitted to RSPO on 22/09/2022 and obtained approval by RSPO on 15/06/2023. Scope extension has been conducted on 28-30/08/2023 and the estates has been RSPO certified. For Lahad Datu Palm Oil Mill, plan for certification is in year 2025.	Complied

Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No, scope extension has been conducted on 28-30/08/2023 as per mentioned in the time bound plan and approved by RSPO on 15/06/2023.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No, there is no changes. The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. Scope extension for 2 estates (Hwa Li 2 and Pahang Oil Palm Estate 2) which has been purchased in 2021 has been conducted on 28-30/08/2023.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there is no lapses. The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. Scope extension for 2 estates (Hwa Li 2 and Pahang Oil Palm Estate 2) which has been purchased in 2021 has been conducted on 28-30/08/2023.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no fundamental failure. The Group has achieved 100% RSPO certification for all existing Operating Units under the management of JC Chang Group at ended year of 2021. Scope extension for 2 estates (Hwa Li 2 and Pahang Oil Palm Estate 2) which has been purchased in 2021 has been conducted on 28-30/08/2023.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	As of to date there are no replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12. It has been further confirmed through Global Risk Assessment Systems (GRAS).	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new development since January 1 st 2010. It has been further confirmed through Global Risk Assessment Systems (GRAS).	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	No land conflict.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported and found during the onsite audit.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the	Lahad Datu POM	Complied

RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	IA has yet to be conducted due to the mill has been ceasing its operation since its acquisition on 24/02/2022. Recomencing operation on 17/10/2023 – therefore IA expected to be conducted in January 2023.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable since there is no scheme smallholders.	Not Applicable

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year
				Latitude	Longitude				
Asia Production Unit	Malaysia	Asia Palm Oil Mill	KM45 Off Jalan Lahad Datu-Sandakan, 91100 Lahad Datu, Sabah	5.2923	118.2076	43.3800	Certified		2013
		Asia Oil Palm Estate 2	Sungai Tenegang, CL 095317383, Tenegang / Koyah, Kinabatangan, Sabah, Malaysia.	5.3047	118.1991	2,980.6200	Certified		2013
		Hwa Li 3	KM45, Jalan Lahad Datu-Sandakan	5.3449	118.3054	4,388.7100	Certified		2013
		Melewar Estate 2	KM45, Jalan Lahad Datu-Sandakan	5.2662	118.1598	2,023.4000	Certified		2013
Carotino Production Unit	Malaysia	Carotino Palm Oil Mill	PT 116, Lot No. 3840, Mukim Ulu Lepar, 26500 Kuantan, Pahang.	3.8162	102.8174	16.8000	Certified		2010
		Asia Oil Palm Estate 1	Lot 23599,23594,23595,23596,23597,23598, Mukim Ulu lepar, 26500 Kuantan, Pahang.	3.8279	102.7972	2,167.4200	Certified		2010
		Carotino Estate	Lot 2389, Mukim Bera, Bera, Pahang.	2.8453	102.7248	1,659.2100	Certified		2010

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		Hwa Li 1	LOT 51, 52, 53, 54, 55, 56, 415, 406, 513, 523,524 ,317, 318, Mukim Keratong, Rompin, Pahang.	2.7440	103.0330	2,157.4000	Certified		2010
		Maran Estate	Lot 929,6460, 245, 351, 957, 930, Mukim Ulu Lepar, 26500 Kuantan, Pahang.	3.7426	102.8454	2,120.4000	Certified		2010
		Pahang Oil Palm Estate 1	Lot No 23604, 23605, 23600, 23601, 23602, 23603, 23606, 23607 & 23608, Mukim Ulu Lepar, 26500 Kuantan, Pahang.	3.8098	102.8206	2,153.1000	Certified		2010
Melewar Palm Oil Mill	Malaysia	Melewar Palm Oil Mill	CL 095310400, KM46, Jalan Sandakan - Lahad Datu, Kinabatangan, Sabah, Malaysia	5.2726	118.0534	70.7700	Certified		2014
		Gerola Estate	CL 095310919, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5.2052	118.0346	1,587.4000	Certified		2014
		Hwa Li 2	CL 095327218, CL 095310731, Mukim Tenegang Koyah, Kinabatangan 90200, Kinabatangan Sabah	5.3247	118.0458	3,007.2600	Certified		2023
		Melewar Estate 1	CL 095310400, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5.2636	118.0635	2,252.4100	Certified		2014
		Muis Melewar Plantation 1	CL 105426784, Tawau, Sabah	4.4592	117.8484	2,320.0000	Certified		2022
		Muis Melewar Plantation 2	CL 245360523, Mukim Sungai Binuang, Ulu Tingkayu, Kunak, Sabah	4.6643	117.9022	1,793.0000	Certified		2022

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		Pahang Oil Palm Estate 2	CL095317285, 17490, 17516, 17507, 17534, 17525, 25983, 38695, 38702, 38711, 38720, 38757, 38739, 39012, 38999, 39003, 38748, Kinabatangan, Sabah, Malaysia	5.2939	118.1394	2,852.7200	Certified		2014
		Pahang Oil Palm Estate 3	CL095317285, 17490, 17516, 17507, 17534, 17525, 25983, 38695, 38702, 38711, 38720, 38757, 38739, 39012, 38999, 39003, 38748, Kinabatangan, Sabah, Malaysia	5.3744	118.1385	2,619.3000	Certified		2014
		Tye Yang Estate	CL 095311407, Mukim Sg. Koyah, Kinabatangan, Sabah, Malaysia	5.2425	117.9996	3,759.9000	Certified		2014
	Malaysia	Lahad Datu Palm Oil Mill	CL 095327218, Mukim Tenegang Koyah, Kinabatangan 90200, Kinabatangan Sabah	5.3197	118.0425	15.7300	Not Certified	2025	

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were four (4) Critical; one (1) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Melewar Palm Oil Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2429106-202311-M1	Issued Date	08/12/2023
Due Date	07/03/2024	Closure Date	17/02/2024
Indicator & Category (Critical / Minor)	2.1.1 (Critical)		
Statement of Nonconformity:	A requirement under the Environmental Quality (Clean Air) Regulations 2014 was not complied with.		
Requirement Reference:	The Unit of Certification complies with legal requirements.		
Objective Evidence:	<p>There was no written notification to DOE for the installation of Gen-set at the following estates: There was no written approval or notification to DOE for the installation of Gen-set of 100 kVA and above at the following estates:</p> <p>i) Pahang Oil Palm 3 Estate - 1 unit having a capacity of 160 kVA</p> <p>ii)Tye Yang Estate - 1 unit with capacity of 200 kVA</p> <p>iii)Gerola Estate - 2 units of 101 kVA and 120 kVA respectively</p> <p>This is to comply with Regulation 5 of Environmental Quality (Clean Air) Regulations 2014</p>		
Corrections:	<p>Internal Control Team (ICT) and Sustainability/Administrative Manager have immediately generated a time bound plan to implement the said requirement. The implementation plan is inclusive of Asia Production Unit and Melewar Production Unit. The steps of implementation are as following:</p> <ol style="list-style-type: none"> 1) To study the requirement of written notification for Genset under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. 2) To obtain information with regards to the Genset available in the estates within the stipulated time frame. 3) To obtain at least three separate quotations from several service providers. The price and service offered will be discussed and analyzed. 4) Selection of service provider to assist with the application submission to Department of Environmental (DOE). 5) To generate a 3-year or 5-year progressive plan for each operating unit on the written notification submission to DOE. The selected service provider will help on the preparation and planning. 6) Selected service provider to commence data gathering, document preparations and submission to DOE. Communication with the service provider with the estates on the progress must be documented properly. 		

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Root Cause Analysis:	Estate management was not fully aware on the requirement involving the application of written notification to Department of Environmental (DOE). Previously, it was known that the private installation license (Lesen bagi Pemasangan Persendirian) acquisition from Energy Commission is assumingly sufficient to adhere applicable laws related to estate's Genset.
Corrective Actions:	<p>1) A standardized legal register will be established to ensure the register is updated consistently throughout the Group. The legal register will then be circulated to all operating units via email.</p> <p>2) Internal Control Team (ICT) and Sustainability/Administrative Manager will update the register should there is any amendment/changes/additional of laws and regulations applicable to oil palm industry and will communicate with all operating units via email.</p> <p>3) Upon receiving the updates, estate/mill will treat the information as law changes or new law. Communication with all relevant personnel will be performed with regards to the law changes/new law requirement wherever necessary, followed with implementation whichever applicable.</p> <p>4) Evidence of law changes communication and implementation will be recorded and documented properly.</p>
Assessment Conclusion:	<p>Major NC close out verification:</p> <p>1) Requirement under EQ, Clean Air Regulation 2014 has been reviewed by management team and a companywide time bound plan (TBP) is established to achieve 100% compliance in obtaining genset's written notification for all JC Chang/Carotino estates. Sherman Services & Supply has been appointed to assist the application submission to DOE. Refer to PO ref: PO00016618 dated 8/2/24 under Tye Yang Estate was verified. Under JC Chang (TBP) dated 17/2/24, timeline for 2024 completion as per below:</p> <ul style="list-style-type: none"> - Onsite data collection/visit (March - April 2024) - Submission to DOE (May - August 2024) <p>2) Latest revision of legal register dated 17/2/24 was verified with the inclusion of EQ, Clean Air Regulation 2014. Email circulation from HQ dated 3/2/23 to all operating units were sighted.</p> <p>Implemented actions were found to be sufficient to close the major NC on 17/02/2024. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2429106-202311-M2	Issued Date	08/12/2023
Due Date	07/03/2024	Closure Date	17/02/2024
Indicator & Category (Critical / Minor)	2.3.1 (Critical)		
Statement of Nonconformity:	The information required by this indicator for the associates of the registered direct suppliers has yet to be completely made available.		
Requirement Reference:	<p>For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins 		

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	<ul style="list-style-type: none"> • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license
Objective Evidence:	It was found that some of the registered direct suppliers also have the crop of their associates sent together under their names, which in some cases had caused the yield/ha being as high as 79 mt/ha/year. However, the information about geo-location of FFB origins, evidence of the ownership status, and valid MPOB license, of those associates has yet to be made completely available.
Corrections:	<p>Consultation to all FFB suppliers have been made to identify which suppliers is involved in this scenario. Those suppliers which been identified to having a crop of their associates sent together under their names is requested to provide with the following documents/information's:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • Valid MPOB license
Root Cause Analysis:	FFB agreement between mill and direct FFB suppliers have been made, and information on geo-location of FFB origins, evidence of ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, and valid MPOB license was obtained. However, the receival of the crop have consigned and delivered together with other indirect suppliers. Yet, management was not aware on this case as no proper monitoring was performed to monitor the volume of crop received from the respective suppliers (yield/ha/month).
Corrective Actions:	<p>1. Mill to review the SOP of Reception Station. For any additional of associates of FFB sent together under the direct suppliers are required to provide the following evidence prior to the delivery:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • Valid MPOB license <p>2. Mill to amend the contract agreement under the first schedule of the agreement, to update the details for additional of associates of FFB sent together under the direct suppliers, which including</p> <ul style="list-style-type: none"> • MPOB license No. • FFB source origins (Land Title No.) • Date of Planting • Planted hectare <p>Additional column for FFB receive monitoring which highlighting tonnage/hectare based on land title provided will be added. Should there any unusual volume of FFB receive (3-4mt/ha/month or 35mt/ha/year), management will communicate with the related suppliers on the matter for justification. All records of implementation should be documented properly.</p>
Assessment Conclusion:	Major NC close out verification:

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	<ol style="list-style-type: none"> 1) List of latest FFB supplier has been updated with related details of geo-location, ownership status and MPOB license have been updated. 2) The newly revised SOP, CCP/01-07/2023-MOM dated 12/12/2023 was verified under reception station to include; "additional of associates of FFB sent together under the direct suppliers are required to provide the following evidence prior to the delivery: <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • Valid MPOB license 3) Revised FFB agreement, i.e., Zulkifli Bin Sarahintu has included the first schedule for declaration (MPOB license No., FFB source origins (Land Title No.), Date of Planting, Planted hectare) and including FFB monitoring column. 4) FFB received monitoring for January 2024 was verified. Relevant associate FFB suppliers volume (yield/ha) has been monitored on monthly basis to ensure all source of FFB received are traceable and coming from legal source. <p>Implemented actions were found to be sufficient to close the major NC on 17/02/2024. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity			
NCR Ref #	2429106-202311-M3	Issued Date	08/12/2023
Due Date	07/03/2024	Closure Date	17/02/2024
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	The implementation of control measure for working at height was not consistently demonstrated.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	The estates have identified the hazard of working at height for FFB transportation from estate's ramp to mill. The ramp attendants at Pahang OP 3, Tye Yang, and Gerola estates were seen to be using the safety harness while working on top of the FFB loaded lorry bin. However, there was no evidence that the lorry drivers were using safety harness while working at the same place to set up (Pahang Oil Palm 3 Estate) and/or take off (at the mill) the net which is used to cover the FFB in the lorry bin.		
Corrections:	<p>Pahang Oil Palm Estate 3:</p> <ol style="list-style-type: none"> 1. Briefing to ramp attendant and all drivers on their job scope and the matter that only ramp attendant is permitted to perform the work at height (setting up FFB net) is carried out. No drivers are allowed to climb up on the lorry to set up FFB net. <p>Melewar Palm Oil Mill:</p>		

	<p>1. Meeting was conducted to discuss on the matter to handle the issue of lorry drivers taking off FFB net at mill premise without safety harness.</p> <p>2. Management will build a facility outside the mill gate which equipped with safety harness for all drivers to use to perform work at height (take off FFB net).</p> <p>3. Review SOP of CCP 1 Reception Station, to capture the restriction of estates FFB loaded lorry to enter the mill prior to taking off the FFB net outside the mill premise by using the facility provided.</p>
Root Cause Analysis:	<p>At the estate level, FFB net was set up by FFB ramp attendant itself where he is fully equipped with PPE (safety harness) except for Pahang Oil Palm 3 Estate due to estate did not carry out proper briefing to ramp attendant all drivers on their job scope where the FFB net should be set up by ramp attendant instead of the driver do by itself after FFB loaded into the lorry. At mill site, no facility available for the lorries driver to take off the FFB net either outside or inside the mill premise.</p>
Corrective Actions:	<p>Pahang Oil Palm Estate 3:</p> <ol style="list-style-type: none"> 1. Activity of working at height (setting up FFB net) will be included in the annual training for ramp attendant. Continuous briefing will be carried out to all drivers to remind them to not perform the said activity. 2. Newly recruited driver will be briefed on the procedure prior to commence to work. 3. All records of training and briefing should be documented properly. <p>Melewar Palm Oil Mill:</p> <ol style="list-style-type: none"> 1. Mill management to ensure the facility which was built is inspected regularly to ensure it is in good and safe condition to be used. 2. Mill management to communicate with all FFB suppliers to conduct a briefing to their drivers on the requirement to use the facility provided to take of FFB net. 3. Retraining the person responsible (security guard) on the specific changes on the procedure in Reception Station will be performed. 4. Security guard to ensure activity of working at height (taking off FFB net) by all drivers is performed by using the facility provided (safety harness). Failure to, the mill will not allow the driver to enter the mill and communicate with the estate management involved for further action. 5. All records of implementation will be documented properly.
Assessment Conclusion:	<p>Major NC close out verification:</p> <ol style="list-style-type: none"> 1) Briefing records on working at height was carried out on 9/12/2024 (ramp attendant) and 2/2/2024 (lorry driver) were carried out on Pahang Oil Palm Estate 3. Annual training plan for 2024 has incorporated working at height as part of routine training for estate. Job Hazard Analysis (JHA) and HIRARC dated 9/12/2023 has included related hazard and control while working at height in the plantation. 2) Meeting minute dated 13/12/2023 to discuss on the matter to handle the issue of lorry drivers taking off FFB net at mill premise without safety harness was sighted. 3) Construction of facility outside mill date has been completed in January 2024 and equipped with safety harness for all drivers to use to perform work at height (take off FFB net).

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	<p>4) Review of SOP for CCP1 - reception station, doc. no. CCP/01-07/2023-MOM dated 12/12/2023 was sighted. Related precautionary action and clause 3: guard house responsibilities have been updated in the SOP.</p> <p>5) Briefing to FFB supplier/driver/security department was carried out on 1/2/2024. Inspection of facility by security department was verified. Refer to checklist. WSI-001 dated 1/2/24. No issue of PPE/lifeline/body harness reported in the checklist and all in good working condition.</p> <p>Implemented actions were found to be sufficient to close the major NC on 17/02/2024. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity			
NCR Ref #	2429106-202311-M4	Issued Date	08/12/2023
Due Date	07/03/2024	Closure Date	17/02/2024
Indicator & Category (Critical / Minor)	3.8.16 (Critical)		
Statement of Nonconformity:	Removal of certified stock in the RSPO PalmTrace was not made for volumes sold as conventional.		
Requirement Reference:	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>		
Objective Evidence:	In the previous license period (Feb 2022 to Jan 2023), there were 1,019.61 mt of certified CPO sold as conventional. However, there was no removal of certified stock made in the RSPO PalmTrace.		
Corrections:	During this certification period, the Mill will make lump sum shipping Announcement removals starting from April 2023 until November 2023 for RSPO certified products are sold a conventional in RSPO IT Platform, while will continue to make removals within 2 months once after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date in accordance with the updated SOP.		
Root Cause Analysis:	The person responsible for the documentation is not fully aware of the RSPO certification volume sold under conventional should be removed in the RSPO IT Platform where there is no specific indication of notification in the Mill procedure.		
Corrective Actions:	<p>1. Mill to review the SOP of SCC Standard Mass Balance Calculation, to capture the specific requirements for the person responsible for making a Shipment Announcement in the RSPO IT platform when RSPO certified products CSPO & CSPK) are sold as conventional no more than two months after the date of dispatch shipment documentation.</p> <p>2. Distribution list of the acceptance reviewed standard operating procedures (SOP) will be updated accordingly.</p>		

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	<p>3. Mill to check the appointment letter of the responsible person on announcement of Palm Trace to monitor the removal done on the production of CPO & PK every 2 months in detail.</p> <p>4. Retraining the person responsible on the specific changes on the procedure in the RSPO IT Platform and CCP monitoring form to be performed. All records of implementation should be documented properly.</p>
Assessment Conclusion:	<p>Major NC close out verification:</p> <ol style="list-style-type: none"> 1) Removal record as at 5/2/2024 was verified via palmtrace. Total of 4,966.51 mt of CSPK, 10,979.2 mt of CSPO has been removed from account. 2) Review of SOP, SC/MBC-10/2023-MOM dated 12/12/2023 under clause 6.14: shipping announcement shall be carried out not more than 2 months after dispatch. 3) Distribution of the review SOP, date 12/12/2023 was sighted together with the record of briefing and training for the relevant PIC. <p>Implemented actions were found to be sufficient to close the major NC on 17/02/2024. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2429106-202311-N1	Issued Date	08/12/2023
Due Date	07/01/2024	Closure Date	"Open"
Indicator & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	A mechanism to check consistent implementation of procedures is in place.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>There were 2 estates without a complete confined SW storage structure i.e., without door and wall. This is being described in SOP no F/014 -01/2015 revision date 07/01/2017 among others stating that "...the entire storage area should be considered as restricted area; store shall be locked..."</p> <ol style="list-style-type: none"> i) Melewar Estate 1 ii) Pahang Oil Palm 3 Estate 		
Corrections:	<p>Management to build permanent fence, door, and wall particularly for the Scheduled Waste store with lock. Person in charge to carry out weekly Scheduled Waste inspection to ensure the store (including fence) is in good condition. Briefing is conducted to the person in charge and relevant personnels to understand the requirement.</p>		
Root Cause Analysis:	<p>Management is not fully understood on the requirement of Scheduled Waste store should be fenced and locked in accordance of Group's procedure F/014. There was a gap on the implementation as management is considering the whole estate workshop fence is sufficient to cover the requirement of "store shall be locked" for the Scheduled Waste Store as the estates workshop is locked at all times and only authorized person is allowed to enter the area</p>		

Corrective Actions:	Briefing to all level of workforce on the requirement will be conducted during morning muster to instil their awareness of Scheduled Waste management. Scheduled Waste store will be declared as restricted area and no unauthorized person is allowed to enter the area. All records of implementation should be documented properly.
Assessment Conclusion:	The correction and corrective action plans are accepted. Evidence of implementation shall be verified in the next assessment visit.

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good cooperation from the management team in the assessment activity.
PF 2	Retrieval of relevant documents was efficient.
PF 3	High interest was shown by the sampled workforce in implementing the RSPO Standard requirements.

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2286620-202212-M1	Issued Date	09/12/2022
Due Date	08/03/2023	Closure Date	02/03/2023
Indicator & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	Evidence of legal compliance to Labour Ordinance Sabah Cap. 67 was not effectively demonstrated.		
Requirement Reference:	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		
Objective Evidence:	<p><u>Melewar POM</u></p> <p>Employee ID: G0446, designation: Fireman</p> <p>The said worker has been suspended from work in August 2022 (from 14 to 27/8/2022) and October 2022 (from 6 to 19/10/2022) due to continuously absent from work for more than two consecutive working days without prior leave from his employer. Inquiry process was carried out however there was no clear evidence of inquiry panel decision for the worker's misconduct and related punishment made to the said worker.</p> <p>Reference is made to Section 13 (2) of Sabah Labour Ordinance under termination of contract for special reasons; (2) For the purposes of an inquiry under subsection (1), the employer may suspend the employee from work for a period not exceeding two weeks but shall pay him not less than half his wages for such period: Provided that if the inquiry does not disclose any misconduct on the part of the employee, the employer shall forthwith restore to the employee the full amount of wages so withheld.</p>		
Corrections:	1. Domestic inquiry is carried out properly by involving 3rd party to conduct the investigation.		

	<p>2. Evidence of inquiry is provided:</p> <p>i. Letter of reason by the said employee</p> <p>ii. Minutes of Inquiry hearing.</p> <p>Evidence of decision made for further action by the management regarding the worker's misbehaviour provided and briefed to the said worker.</p>
Root Cause Analysis:	<p>Domestic inquiry was conducted but documented evidence on action taken was not properly observed due to management receiving an explanation letter from said worker on the same day that the case occurred after he received a warning letter from the management. Thus, verbal inquiry was carried out instead by the management but no documented evidence on decision made by management towards misconduct done by the queried worker thus leads to misconduct of inquiry procedure.</p>
Corrective Actions:	<p>For any workers misconduct occurrence in future, management will observe legal requirement for that particular before taking any action. Briefing to all level of workforces on the rules and regulations, highlighting on the need of informing his/her supervisor, and supervisor responsibility to inform the assistant manager in charge prior to their absence to work, taking into account if there are any emergency cases where workers absent to work prior to informing his/her supervisor.</p> <p>In the event of recurrence of this case, proper investigation and inquiries will be performed accordingly. Investigation to be taken will be strictly following the requirements under Labour Ordinance and advice from Jabatan Tenaga Kerja. Briefing to all level of workforce on the procedure of domestic inquiry based on Labour Ordinance will be conducted for their knowledge. Evidence of action taken will be briefed to the involved parties and record of communication will be documented properly.</p>
Assessment Conclusion:	<p>Major NC Close Out Verification:</p> <p>i) Person in charge to monitor any of worker's misconduct is the mill assistant manager, Mr Tang Peng Rhu.</p> <p>ii) Appointment of Domestic Inquiry (DI) panel by General Manager to ensure independency of panel for the DI process. No involvement of mill management observed based on DI panel list which from internal auditor team and estate management team.</p> <p>iii) DI Invitation letter to the said worker send on 12/12/2022. The worker allowed to appoint one (1) person as witness/observer during prosecution process.</p> <p>iv) Minute of meeting for Domestic Inquiry (DI) on 13/12/2022 was sighted. Details of DI process recorded and reported. Sighted DI panel's decision and verdict which written clearly in the report. Half pay salary during suspension period will not be reimbursed based on DI verdict.</p> <p>v) Interview with DI panel has confirmed on the understanding of process and independency of panel when conducting DI.</p> <p>Based on submitted evidence, it was found that implementation of corrective action effective to close the previous Major NC on 2/3/2023. Continuous implementation taken will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Procedure has been established in the document "Guideline on domestic inquiry" document number E/028-01/2023 dated 25/05/2023 and the procedure has been disseminated and communicated to assistant and staff on 26/05/2023 for Tye Yang</p>

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	<p>Estate and as per interview, they can demonstrate their understanding on the process.</p> <p>Appointment letter as person in charge for each operating units can be sighted which the manager and the assistant is responsible to handle any issues related to misconduct.</p> <p>As per interview, the process of domestic inquiry included several steps which are issuance of a show cause letter, suspension of employee, preparing and carrying out for the domestic inquiry hearing.</p> <p>There are no workers has been terminated for all operating units and has been confirmed through interview with sample workers and documentations.</p> <p>Implementation of the corrective action plan is found effective, hence, the Major Non- conformities remained closed.</p>
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Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2286620-202212-M2	Issued Date	09/12/2022
Due Date	08/03/2023	Closure Date	02/03/2023
Indicator & Category (Critical / Minor)	3.6.2 (Critical)		
Statement of Nonconformity:	The effectiveness of H&S plan was inadequately monitored.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<p>Industrial Code Of Practice for Safe Working in Confined Space 2010 (ICOP) under 11.2 health requirement stated that; The employer shall ensure that his authorized entrant intending to work in confined space are certified physically and mentally fit determined by an occupational health doctor (OHD).</p> <p>Based on Permit To Work (PTW) dated 21/7/22, no evidence of health declaration form and health certificate by OHD to show that all authorized entrant (AESP) assigned were physically fit prior to confined space entry programme.</p>		
Corrections:	Latest authorized entrant (AESP) assigned intending to work in confined space will be sent to undergo physical and mental assessment by an OHD specifically for working in confined space. Management will get quotation from the OHD to carry out the health surveillance.		
Root Cause Analysis:	Management was not fully aware of the ICOP for Safe Working in Confined Space 2010 requirements endorsed by DOSH especially on the specific requirement of No. 11 Health Requirements of Persons Working in Confined Space where mentioned requirements was not captured in any MPOM's confined space procedures thus, the requirement was not adhered.		
Corrective Actions:	Newly Authorized Entrant and Standby Person for Confined Space (AESP) will undergo medical examination for working in confined space, and certified by OHD prior to confined space entry program. This health requirement should be done once in every two years on the AESP personnel. This requirement will be added into the company's Confined Space Entry Procedure under the section of 'Responsibilities' for further reference and action. No personnel are allowed by the management to carry out work in confine space prior to undergo health examination by OHD and		

	issued with health fitness certificate. As a part of implementation, confine space entry programme will be observed and followed accordingly. Management will review and update wherever necessary related to ICOP requirement in the entry program for confine space. All evidence of implementation will be performed accordingly.
Assessment Conclusion:	<p>Major NC Close Out Verification:</p> <ul style="list-style-type: none"> i) Health examination was carried for 13 confined space personnel on 21/12/2022 to 17/1/2023 and carried out by OHD, HQ/16/DOC/00557. Based on report dated 31/1/2023, all 13 confined space personnel were found to be fit to work. ii) SOP for confined space entry programme has been updated and include related responsibilities and detailed out the process flow for the entry programme. iii) Since the last audit, there was no confined space entry programme carried out. A mock entry programme was presented which detailed out the person in charge involved, health declaration and issuance/cancellation of permit for entry programme. <p>Corrective action taken was found to be effective to close the major NC on 2/3/2023. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	From the 13 personnel, 1 had resigned in Dec 2022. The remaining 12 still maintain their Kad Perakuan Latihan issued by NIOSH where the expiry dates are all the same i.e., 20/09/2024. The SOP, Confined Space Entry Procedure (MPOM/CS/Rev01/2023) was still maintained unchanged. Since the last audit, there was no confined space entry programme carried out. No recurrence of non-conformity. Thus, the NCR remains closed.

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2286620-202212-M3	Issued Date	09/12/2022
Due Date	08/03/2023	Closure Date	02/03/2023
Indicator & Category (Critical / Minor)	2.1.2 (Critical)		
Statement of Nonconformity:	The implementation of the documented system for ensuring legal compliance was not effectively demonstrated.		
Requirement Reference:	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
Objective Evidence:	Melewar POM has obtained the approval from the DOE for the upstream and downstream river water sampling points in line with Clause No. 19 of the DOE's License compliance schedule. However, based on site verification using GPS device, the actual water samples were not taken from the approved sampling points as the following details:		
	Sampling points Location of approved sampling points Location of actual samples taken		
	Sampling Points	Location of approved sampling points	Location of actual samples taken
	Upstream	5°16'22.4292"N 118°02'34.9116"E	5°15'47.31"N 118°03'19.64"E

	Downstream	5°17'35.6892"N 118°04'52.734"E	5°16'40.87"N 118°03'40.19"E
Corrections:	<p>Mill management will follow the original sampling points which approved earlier by Department of Environmental (DOE) for taking river water sample. Immediate action to relocate the sampling points and will take river water sample at these points during next sampling process.</p> <p>Application on the sampling point location approval has been sent to the Department of Environment (DOE) Kota Kinabalu, Sabah for acknowledgement and verification, and a copy was sent to Sandakan branch.</p>		
Root Cause Analysis:	<p>Appropriate sampling points for river water analysis was not taken correctly due to monitoring and confirmation of the task is not performed by staff in charge. Further to that, supervision and monitoring by assistant in charge to the staff in charge was not performed accordingly. Previous minor NC could not be closed due to the assumption of verbal explanation on the cause of previous NC is acceptable since the NC was only due to person in charge showing incorrect sampling points during previous audit. Miscommunication led to auditor believing those points were approved by DOE and did not tally with actual sampling points. Mill personnel assumed showing wrong sampling point on the map led to NC.</p>		
Corrective Actions:	<p>1.Assistant in charge will supervise and monitor the process of taking river water sampling to ensure the sample are taken from approved sampling point.</p> <p>2.Mill management to re-examine the exact water sampling location as per approved sampling points by checking the GPS of the sampling points and map respectively. Assistant Manager should confirm the mentioned location to prevent any deviation from the original coordinate location.</p> <p>3.Upon successfully in sampling point relocation, these points will be demarcated with appropriate signage.</p> <p>4.Training to be given to the person responsible in taking river water sample prior conducting sampling method.</p> <p>5.Any issue arises from the sampling result, mill should take appropriate action to rectify it immediately. All records of implementation should be kept accordingly.</p>		
Assessment Conclusion:	<p>Major Close Out Verification:</p> <p>Evidence of DOE's acknowledgement and approval dated 26/1/23 was verified. Refer to letter ref: JAS. SHQ.600-3/1/032(16). The agreed sampling points for upstream (5°15'47.04" N, 118°03'19.4502"E) and downstream (5°16'40.6344" N, 118°03'40.179"E). Related training and briefing was given to person in charge on the sampling process and location of agreed location. Related records of meeting dated 10/12/22 and training dated 11/12/22 was made available for verification. Corrective action taken was found to be effective to close the major NC on 2/3/2023. Continuous implementation will be further verified in the next assessment.</p>		
Effectiveness Closure (for previous audit closed Critical NC):	<p>The following was made during the audit site visit on 06/12/2023.</p> <p>Letter dated 26/01/2023 from DOE to the Mill Manager MPOM in reply to the letter dated 10/12/2022 to confirm agreement on the location of water sampling upstream and downstream. The mill had also established a map to show the location of sampling point with marking of geo-location.</p>		

	<p>Site visit was also made on 06/12/2023 to confirm the location and also verification via interview with the laboratory analyst responsible for the sampling duty taken on monthly basis. Training was also made dated 05/05/2023 in respective to water treatment and sampling.</p> <p>Hence the NCR remains closed.</p>
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Previous Audit Minor Non-conformity			
NCR Ref #	2286620-202212-N1	Issued Date	09/12/2022
Due Date	08/12/2023	Closure Date	08/12/2023
Indicator & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Evidence of legal due diligence of contracted third party was not effectively demonstrated.		
Requirement Reference:	Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p><u>POP2 estate</u></p> <p>Evidence of due diligence is demonstrated via declaration between contractor based on Sustainability contract, E023-01/2019 with reference to Procedure of Due Diligence and Improvement, E/019- 01/2019 dated 12/8/2019. Verification records for due diligence process was sighted however VISA/PLKS/permit for 2 foreign workers under AG Enterprise was not made available for verification.</p>		
Corrections:	Management will communicate with contractor to get necessary document as evidence of compliance towards legal requirements as stated and agreed in the signed due diligence form.		
Root Cause Analysis:	Management is failed to provide the required documentations for auditor verification as the document is not available onsite. This due to slow response from the contractor in providing the required documents during the audit. Thus, unavailability document for verification leads to non-conformity.		
Corrective Actions:	<p>Person in charge on the documentation preparation and update will be monitored and supervised by assistant manager to ensure all related document which subject to be audited is readily available for record, audit verification and whenever required. Supporting document which require to be requested from other parties will be perform accordingly. In case of delay of respond from the requested party, person in charge should perform follow up on that matter and evidence of follow up should be documented as tracking record. Evidence of action taken and implementation will be documented properly.</p>		
Assessment Conclusion:	<p>Among the evidence verified in the sampled estates were:</p> <ol style="list-style-type: none"> 1) Employment contract of contractors' workers. Review of the contracts showed that the essential elements such as wages, working hours, leave entitlement, and conditions to terminate contract were clearly spelt out in the agreement. 2) Review of pay slips showed that the wages were paid in accordance with the Minimum Wage Order 2022. 		

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	<p>3) Legal documentation of workers such as passports and work permits were found to be valid at the point of verification.</p> <p>4) Appointed persons in-charge at each sampled operating unit were able to demonstrate good knowledge about the criteria to be monitored during the due diligence process.</p> <p>Evidence of implementation of the correction and corrective action was found to be sufficient to close the Minor NCR. There was no recurrence of non-conformity. Continuous effective implementation shall be verified in the next assessment visit.</p>
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Previous Audit Minor Non-conformity			
NCR Ref #	2386863-202308-N1	Issued Date	30/08/2023
Due Date	08/12/2023	Closure Date	08/12/2023
Indicator & Category (Critical / Minor)	6.5.3 (Minor)		
Statement of Nonconformity:	Identification and assessment for new mother has not been done.		
Requirement Reference:	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.		
Objective Evidence:	As per interview with hospital assistant for both operating units, they're unable to demonstrate their understanding on new mother. Further verification done, it has been confirmed that no identification and assessment for new mother (with kids below than 24 months. Interview with one new mother with kids below than 24 months confirmed the statement.		
Corrections:	Management will brief the estate hospital assistant and gender committee on the definition of new mother by RSPO and requirement to conduct the assessment of new mother. List of dependents will be established and updated by person in charge to identify the kids below 24 years old and assessment will be conducted to a new mother with kids below 24 months.		
Root Cause Analysis:	Records for kids below than 2 years (24 months) has been done by the Estate Hospital Assistant but the identification and assessment not documented properly by the management.		
Corrective Actions:	<p>1) Person in charge will continuously update the list of dependants in the estate and informed the management if any kids below than 2 years (24 months) identified.</p> <p>2) If any kids below 24 months was identified, gender committee together with the estate hospital assistant will conduct an interview with the new mother to identify her needs and forward to the manager for review and approval.</p> <p>3) Upon approval by the manager, provision of the new mother needs will be provided accordingly and evidence of such provision to be documented properly.</p> <p>4) All record of implementation will be documented properly.</p>		
Assessment Conclusion:	<p><u>Melewar Estate Div. 01</u></p> <p>There is no new mother has been identified in the Melewar Estate Div. 01. It has been identified base on the dependent list that has been updated and interview with the female workers. Communication of the RSPO requirement of new mother has been done during the gender committee meeting.</p>		

Pahang Oil Palm Estate 03

1. Communication on the requirement of new mothers' assessment has been conducted on 10/10/2022 to all gender committee, further verification has been done by auditor through interview, gender committee representative unable to demonstrate her understanding on definition of new mother base on RSPO standard.
2. List of dependents has been established and updated in the document "Particular of dependent" for workers dependent and total 34 dependents have been listed. 2 kids has been identified below than 24 months which born on 04/08/2022 and 28/07/2022
3. New mother assessment has conducted new mother assessment for both kids on 05/10/2023 and the new mother requested for breast feeding break every 2 hours and request for the estate management to provide transportation for vaccination as per schedule. Both requests has been approved by the management on 06/10/2023

Melewar POM

1. Communication of the needs of new mother assessment and definition of new mother has been conducted on 12/09/2023 to all the member of gender committee.
2. List of dependent updated in 3 different documents. For staff, list of dependent updated in "Staff and dependent for fiscal year 2023, version 7" and while for workers, it has been updated in the "List of dependent".
3. New mother assessment has been conducted for 2 new mothers on 22/11/2022 and 10/04/2023. there is no special needs that has been raised by both new mother during the assessment.

Tye Yang Estate

1. List of dependents has been updated as at November 2023, which has list out total 150 dependent. It has been found out there is no dependent that below than 24 months has been identified.
2. Communication on RSPO requirement for new mother has been done on 11/09/2023 with attendance of all gender representative that has been elected.
3. There no new mother has been identified and has been confirmed by auditor through site visit to creche and interview with female workers.

Gerola Estate

1. List of dependents has been updated in November 2023 which listed all dependent for local and foreign workers.
2. There is no new mother has been identified since then there is no new mother assessment has been conducted on 16/06/2023.
3. Communication of the RSPO requirement for new mother assessment

Correction and corrective action were found to be effectively implemented to close the NCR.

Previous Audit Minor Non-conformity			
NCR Ref #	2386863-202308-N2	Issued Date	30/08/2023
Due Date	04/12/2023	Closure Date	04/12/2023
Indicator & Category (Critical / Minor)	6.1.4 (Minor)		
Statement of Nonconformity:	Pregnancy test has been made compulsories for all chemical handlers.		
Requirement Reference:	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.		
Objective Evidence:	Pregnancy test conducted for all chemical handler in Pahang Oil Palm 02 Estate which part of the mechanism to ensure there is no pregnant women handling chemical. However, there is no mechanism established for workers that refuse to be tested especially for single and widow female workers. It has been confirmed through interview with hospital assistant.		
Corrections:	Management will brief the estate hospital assistant on the requirement of pregnancy testing and the right of the workers to refuse to be tested. Female workers will also be briefed on their right to refuse to be tested especially for single/unmarried and widow female workers.		
Root Cause Analysis:	Management is performing pregnancy tests as a prevention of chemical exposure to any pregnant or breastfeeding woman but without obtaining proper consent by all woman especially single/unmarried/widow woman prior conducting such tests.		
Corrective Actions:	<p>1) Management will consult all female workers in the estate who are involved in chemical handling. Their opinion and concern with regards to the pregnancy test will be recorded in a minute meeting and management will analyst all the response from the said female workers.</p> <p>2) Those who disagree to be tested will be exempted from the monthly pregnancy test. A written letter from the mentioned female workers should be provided to the management as documented evidence on their refusal.</p> <p>3) Pregnancy tests will be still carried out for those who agree to be tested as precautionary measure to determine their pregnancy status while still working with or handling chemical.</p> <p>4) Management will also issue official letters to them as a method to inform them that there is no discrimination act with regards to the pregnancy test have been conducted.</p> <p>5) An official memo will also be posted at the main noticeboard with regards to the mentioned issues.</p> <p>6) All related documentation will be kept accordingly.</p>		
Assessment Conclusion:	<p><u>Pahang Oil Palm Estate 03</u></p> <ol style="list-style-type: none"> There is a memo has been posted at the main notice board regards to the able refuse to be test for pregnancy. Consultation with the female workers that handle chemical has been done on 16/09/2023 which one of the mechanism to gained information about the pregnancy test that will be conducted to all chemical handlers. 		

	<p>3. Agreement by the female workers which agreed to be tested for pregnancy. There is no female workers disagree to be tested. Which has been confirmed through interview and agreement records.</p> <p><u>Melewar POM</u></p> <ol style="list-style-type: none"> 1. There is only 1 female workers in the Melewar POM which handling chemical, which work as sampling girl at lab station. 2. There is no pregnancy test has been conducted since the female workers still single and refusal agreement sighted dated 04/01/2023 signed by the workers. Interview has been done with the worker and she can demonstrate her understanding on her rights to reject for pregnancy test. 3. Sighted memo on the female workers right to reject to be tested for pregnancy test has been posted at the main notice at the office and clinic <p><u>Tye Yang Estate</u></p> <ol style="list-style-type: none"> 1. A system has been established which all female workers that handling chemical need to fill up form "Surat Akuan menjalani ujian air kencing untuk kehamilan (UPT) bulanan bagi pekerja wanita yang mengendalikan bahan kimia". As per verified, there is 3 female workers that refuse to be tested. Further interview with the female workers handling chemical confirmed that pregnancy test has not been tested for the said female workers. 2. Sighted memo on the female workers right to reject to be tested for pregnancy test has been posted at the main notice at the office and clinic. <p><u>Gerola Estate</u></p> <ol style="list-style-type: none"> 1. Communication on the procedure for pregnancy test all female workers handling chemical on 29/09/2023 by hospital assistant, Madlina Jimmy. 2. A system has been established which all female workers that handling chemical need to fill up form "Surat Akuan menjalani ujian air kencing untuk kehamilan (UPT) bulanan bagi pekerja wanita yang mengendalikan bahan kimia". 3. Sighted memo on the female workers right to reject to be tested for pregnancy test has been posted at the main notice at the office and clinic <p>Correction and corrective action were found to be effectively implemented to close the NCR.</p>
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Previous Audit Opportunity for Improvement																																						
OFI#	Description																																					
OFI 1	<p>OFI Statement: 2286620-202212-I1 <u>Indicator 6.2.6</u> The management is still in the midst of finalizing the prevailing wages calculation and incorporate the new Minimum Wages Order 2022 which effective from 1st May 2022. The current basis of calculation is referred to the previous Minimum Wages Order 2020. This will be further verified in the next assessment.</p> <p>Verification / Follow-up actions: SOP Living wages (LW) has been established and documented in the document title "Implementation plan for living wage (LW)" document number E/027-02/2023 and 07/11/2023. The assessment has been done through data collection from financial year 20/21 until financial year 22/23. Information that has been collected is average wages received for all operating units located Pahang and Sabah states (Mill and Estate) and benefits in kinds that has been provided by the operating. Comparison has been made based on the LW benchmark calculation that has been extracted from report of household expenditure survey 2016, Annex 3, overview of LW for Malaysia from RSPO Guidance for implementing a living wage. Details of calculation as per below :</p> <table border="1"> <thead> <tr> <th rowspan="2"></th><th colspan="2">Pahang</th><th colspan="2">Sabah</th></tr> <tr> <th>Mill</th><th>Estate</th><th>Mill</th><th>Estate</th></tr> </thead> <tbody> <tr> <td>Actual average salary (RM)</td><td>1,635.32</td><td>1,519.85</td><td>2,077.20</td><td>1,338.64</td></tr> <tr> <td>In kind benefits</td><td>214.43</td><td>310.60</td><td>679.97</td><td>299.71</td></tr> <tr> <td>Prevailing wages (RM)</td><td>1,840.01</td><td>1,849.93</td><td>3,251.30</td><td>1,945.11</td></tr> <tr> <td>Benchmark (RM)</td><td>1,492.73</td><td></td><td></td><td>1,137.91</td></tr> <tr> <td>GAP</td><td>(347.28)</td><td></td><td></td><td>(807.20)</td></tr> </tbody> </table>					Pahang		Sabah		Mill	Estate	Mill	Estate	Actual average salary (RM)	1,635.32	1,519.85	2,077.20	1,338.64	In kind benefits	214.43	310.60	679.97	299.71	Prevailing wages (RM)	1,840.01	1,849.93	3,251.30	1,945.11	Benchmark (RM)	1,492.73			1,137.91	GAP	(347.28)			(807.20)
	Pahang		Sabah																																			
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GAP	(347.28)			(807.20)																																		
OFI 1	<p>OFI Statement: 2386863-202308-I1 <u>Indication 3.6.1</u> The estates have identified fallen palms as one of the hazards in the field that could potentially cause injury or death. One of the recommended control measures written in the HIRARC is to eliminate the potentially fallen palms by cutting them off. The implementation of the control measure can be further enhanced by addressing it in more systematic manner.</p> <p>Verification / Follow-up actions: Marking of Ganoderma infected palms was done using fertiliser bag. This meaning of the marking was then communicated to all workers regularly during morning muster to create awareness and therefore workers are alert when approaching these palms especially during strong wind. Interview with sampled workers showed that the communication was effective.</p>																																					
OFI 2	OFI Statement:																																					

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2386863-202308-I2Indication 6.7.3

The PPE to be worn for some operations stated in the HIRARC can be further improved by mentioning the type of PPE specifically instead of using general term such as "Proper PPE".

Verification / Follow-up actions:

The types of PPE have now been specifically mentioned in the HIRARC. General term is no longer used.

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CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2286620-202212-M1	Critical	6.2.3	09/12/2022	Closed out on 02/03/2023
2286620-202212-M2	Critical	3.6.2	09/12/2022	Closed out on 02/03/2023
2286620-202212-M3	Critical	2.1.2	09/12/2022	Closed out on 02/03/2023
2286620-202212-N1	Minor	2.2.2	09/12/2022	Closed out on 08/12/2023
2386863-202308-N1	Minor	6.5.3	30/08/2023	Closed out on 08/12/2023
2386863-202308-N2	Minor	6.1.4	30/08/2023	Closed out on 08/12/2023
2429106-202311-M1	Critical	2.1.1	08/12/2023	Closed out on 17/02/2024
2429106-202311-M2	Critical	2.3.1	08/12/2023	Closed out on 17/02/2024
2429106-202311-M3	Critical	3.6.1	08/12/2023	Closed out on 17/02/2024
2429106-202311-M4	Critical	3.8.16	08/12/2023	Closed out on 17/02/2024
2429106-202311-N1	Minor	3.3.2	08/12/2023	Open

3.4 Stakeholders and previous landowner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Melewar Palm Oil Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer 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 later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

Structured worker interviews with male and female workers and staff were held in private at the workplace. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal stakeholder- Female workers	Estate and mill workers	Face to face
Government agencies	Mr Omar, Perkeso Lahad Datu	Phone call
Government agencies	Puan Shawana, JTK Lahad Datu	Phone call
FFB supplier	Haji Odeng (Smallholder)	Face to face
Local communities	Sakka bin Mendong, Kampung Paris 02 Noorham bin Hamid, Kampung Koyah B	Face to face
Neighbouring estate	Teck Guan Plantations Berhad- Kokorotus Estate	Face to face

Stakeholders comment	
1	<p>Feedbacks: Female workers</p> <p>2 gender representatives for each operating have been interviewed. Based on the interview, there is evidence that all female workers can participate in gender committee and has been invited for meeting that will be conducted every 6 months. As per interview, it has been confirmed that grievance procedure for any harassment has been communicated and all representatives can demonstrate their understanding on the procedure. Other than that, pregnancy test has not been conducted for female workers but only self-assessment on pregnant symptom such as menstrual delay will be submitted online on monthly basis. Representative also has been asked on discrimination and has been confirmed there is no discrimination has been practiced. All female workers received same benefits, leave and others. New mother assessment has been conducted for each operating units and has been confirmed by one of representative which also new mother.</p> <p>Audit Team verification and response: No further verification required.</p>
2	<p>Feedbacks: Mr Omar, Perkeso Lahad Datu</p>

	<p>There is no issues has been highlighted concerning all operating units the Melewar Production Units where all contribution has been made in timely manner and as per workers salary. There is no cases of claim has been received by Perkeso. He also mentioned that Perkeso is ready to provide any consultation required.</p> <p>Audit Team verification and response: No further verification required.</p>
3	<p>Feedbacks: Puan Shawana, JTK Lahad Datu</p> <p>Puan Shawana mentioned that there is no complaint/grievances related to labour has been received by JTK for all operating units in Melewar Production Units. She mentioned she has been invited for stakeholders consultation however unable to attend the consultation due to other assignment. She mentioned has been communicated with the consultation and communication procedure through email that has been sent to her</p> <p>Audit Team verification and response: No further verification required.</p>
4	<p>Feedbacks: Sakka bin Mendong, Kampung Paris 02 & Noorham bin Hamid, Kampung Koyah B</p> <p>Most of the villagers works as public and government servant, village works and own their own oil palms farm. Based on the on the interview, it has been confirmed that good relationships have been between both parties. They also mentioned that there are no operation/ activities in estates and POM that give adverse effect to the local communities. Any vacancies in estate/POM will be posted at notice board and nearby coffee shops at the village area. As per interview, some villagers work in the estate and POM. There are no cases of pollution has happened and identified by the villagers. There are also no issues of land dispute/ customary right land in estate/POM</p> <p>Audit Team verification and response: No further verification required.</p>
5	<p>Feedbacks: Teck Guan Plantations Berhad - Kokorotus Estate</p> <p>Kokorotus Estate is located around 5 km from Melewar Production units They are boundaries established with drainage and pole. There is no land dispute which both estates have their own legal ownership from Sabah state government. Good relationships has been maintained and issues will be discussed through meeting and phone call. He also aware method/mechanism of communication if there is any issues related to land</p> <p>Audit Team verification and response: No further verification required.</p>

List of land owner / user contacted

Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as there were no agreements between the previous owners. Nonetheless, as the current owners are subsidiaries of Carotino/JC Chang Group, the terms & condition of the Country Lease titles such as Cultivation of Oil Palm and/or Agricultural Crop of Economic Value are adhered to.					



Previous landowner / user comment

	Feedbacks: NA
	Audit Team verification and response: NA

3.5 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Melewar Palm Oil has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Melewar Palm Oil is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Valence Shem	Name: Lee Min Khin
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: J.C. Chang Holdings Sdn Bhd
Title: Lead Auditor	Title: Groups Plantations Controller
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 19/02/2024	Date: 20/02/24

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	<p>List of documents that has been made publicly available and can be requested by stakeholders has been outline in the document consultation and communication procedure has been documented on the document title "Guidelines on mechanism for information requests by stakeholders" reference number E/006-08/2019 dated 12/08/2019. As per verification by the auditor, there is evidence that all document that has been specified in RSPO P&C has been classified as publicly available. List of document that has been made public</p> <ol style="list-style-type: none"> 1. Soil and water conservation 2. Riparian zone management 3. HCV report 4. Waste management 5. Water management 6. Pollution prevention 7. Social impact assessment 8. Safety and health plan 9. Consultation and communication procedure 10. Joint consultative committee minutes meeting 11. Any other document that related to RSPO P&C certification 	Complied

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1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	There is evidence that all document has been established either in English and Bahasa Malaysia and can be access to all stakeholders through the consultation and communication procedure established in the document "Guidelines on mechanism for information requests by stakeholders" reference number E/006-08/2019 dated 12/08/2019.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Any records of request will be maintained in the logbook title "Records of request/responses" and has been verified for each operating unit. There is no information request has been recorded only request for assistance and contribution by the stakeholders. As interview with sample stakeholders, confirmed that there is no information has been requested by them.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	Consultation and communication procedure has been documented on the document title "Guidelines on mechanism for information requests by stakeholders" reference number E/006-08/2019 dated 12/08/2019. Procedure has been communicated and explained to stakeholders during the stakeholder's consultation that has been conducted on 16/11/2023 for all operating units with attendance of most of the stakeholders that has been listed in the stakeholders list. The procedure also has been disclosed and made available which has been posted at the notice board and verified during the site visit by auditor.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	List of stakeholders has been maintained in each operating units has been updated on annual basis or if there is any amendment or additional stakeholders. For Melewar Estate, there are 3 schools has been listed as stakeholders which are SMK Paris, Sekolah Kebangsaan Paris 03 and Committee Learning Centre (CLC) Melewar Estate 01.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Policy code of ethical conduct sighted in "Polisi Pencegahan Rasuah" dated 04/09/2015 signed by Mr Tee Swee Kee, plantation director. Stated in the	Complied

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	- Minor compliance -	policy that the company will not tolerate for any unethical conduct for business transaction and operations.																												
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	A system has been implemented to oversee the tendering process, requiring all contractors interested in the project to submit quotations and gain approval from the plantation controller. Samples were collected from contract workers, and the tender process involved receiving two quotations. The contract was ultimately awarded to the contractor with the lowest quoted price, which had received approval from the general manager.	Complied																											
Principle 2: Operate legally and respect rights																														
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.																														
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	JC Chang Group - Melewar Production Unit continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and Internal Control Team (Sustainability) personnel. The estates and mill had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were; <table><tr><td></td><td>Gerola Estate - Permit/license</td><td>Validity</td></tr><tr><td>1</td><td>License Air receiver, SB PMT1603</td><td>13/02/2024</td></tr><tr><td>2</td><td>License Air receiver, SB PMT1241</td><td>13/02/2024</td></tr><tr><td>3</td><td>MPOB license no 50254200-2000</td><td>31/07/2024</td></tr><tr><td>4</td><td>MPOB license no 50254380-2000</td><td>31/07/2024</td></tr><tr><td>5</td><td>MPOB license no 50254110-2000</td><td>31/07/2024</td></tr><tr><td>6</td><td>MPOB license no 50206140--2000</td><td>31/12/2023</td></tr><tr><td>7</td><td>MPOB license no 61936501-1000</td><td>30/06/2024</td></tr><tr><td>8</td><td>Lesen Perpasangan Persendirian ref 2023/0160</td><td>11/08/2024</td></tr></table>		Gerola Estate - Permit/license	Validity	1	License Air receiver, SB PMT1603	13/02/2024	2	License Air receiver, SB PMT1241	13/02/2024	3	MPOB license no 50254200-2000	31/07/2024	4	MPOB license no 50254380-2000	31/07/2024	5	MPOB license no 50254110-2000	31/07/2024	6	MPOB license no 50206140--2000	31/12/2023	7	MPOB license no 61936501-1000	30/06/2024	8	Lesen Perpasangan Persendirian ref 2023/0160	11/08/2024	Non-compliance
	Gerola Estate - Permit/license	Validity																												
1	License Air receiver, SB PMT1603	13/02/2024																												
2	License Air receiver, SB PMT1241	13/02/2024																												
3	MPOB license no 50254200-2000	31/07/2024																												
4	MPOB license no 50254380-2000	31/07/2024																												
5	MPOB license no 50254110-2000	31/07/2024																												
6	MPOB license no 50206140--2000	31/12/2023																												
7	MPOB license no 61936501-1000	30/06/2024																												
8	Lesen Perpasangan Persendirian ref 2023/0160	11/08/2024																												

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		9	PD Kinabatangan Lesen Perniagaan ref 2023/2444	31/12/2023		
		10	JTK - Wages deduction ref 2022/0199	07/08/2024		
		11	JTK - Penggajian Pekerja Asing ref 01261/0041	04/03/2024		
		12	JTK - Penggajian Pekerja Asing ref 01261/0892	13/02/2024		
		13	KPDNHEP Permit diesel 15000 L ref S005228	24/02/2024		
		14	KPDNHEP Permit Petrol 1200 L ref S005228	24/02/2024		
		15	Metrology Corporation W/Bridge ref B2013473	Eff 29/11/23		
			Tye Yang Estate - Permit/license	Validity		
		1	License Air receiver, SB PMT 13847	13/02/2024		
		2	License Air receiver, SB PMT 9834	13/02/2024		
		3	MPOB license no 61807101-1000	31/03/2024		
		4	MPOB license no 50200110-2000	30/04/2024		
		5	Metrology Corporation W/Bridge ref B1693350	Eff 21/01/23		
		6	Lesen Perpasangan Persendirian ref 2023/1226	18/05/2024		
		7	JTK - Wages Deduction - Ref 2022/0198	07/08/2024		
		8	JTK - Penggajian Pekerja Asing ref 0061	22/02/2024		
		9	KPDNHEP Permit diesel 25000L ref S003667	01/07/2024		
		10	KPDNHEP Permit Petrol 100L/day ref S00448	15/05/2024		
		11	PD Kinabatangan Lesen Perniagaan ref 2023/1003	31/12/2023		
		12	PD Kinabatangan Lesen Perniagaan ref 2023/1542	31/12/2023		
		13	PD Kinabatangan Lesen Perniagaan ref 2023/1543	31/12/2023		

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		Melewar Estate 1- Permit/license	Validity
1		License Air receiver, SB PMT 1242	03/05/2024
2		MPOB license no 502061402000	31/12/2023
3		MPOB license no 618074011000 Nursery	31/03/2024
4		MPOB license no 503488702000	31/03/2024
5		JTK - Wages deduction ref PMT 113/2022/0172	24/07/2024
6		JTK - Penggajian Pekerja Asing ref 0112	02/03/2024
7		KPDNHEP Permit storage diesel 18000L ref 05151	29/09/2024
8		KPDNHEP Permit storage Petrol 200L ref 0996	05/09/2024
9		PD Kinabatangan Lesen Pernagaan ref 1046/2023	31/12/2023
10		Metrology Corporation W/Scale ref DE08014623	17/02/2024
		Pahang Oil Palm 3 Estate - Permit/license	Validity
1		License Air receiver, SB PMT 1236	26/07/2024
2		Lesen Perpasangan Persendirian ref 2022/03289	30/10/2024
3		MPOB license no: 502246-302000	31/07/2024
4		MPOB license no: 6162470-11000 Nursery	29/02/2024
5		KPDNHEP Diesel 18000L Petrol 1200 ref 04/2004	18/01/2024
6		JTK - Penggajian Pekerja Asing ref 01261/0064	09/03/2024
7		JTK - Potongan Upah ref PMT/113/2022/0287	30/10/2024
8		Metrology Corporation W/B A ref B1693823	26/02/2024

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		9	PD Kinabatangan Lesen Perniagaan ref 2023/893	31/12/2023		
		10	Permit Institusi Pend Swasta ref XZ8D012(AB)	02/08/2024		
			Melewar Palm Oil Mill - Permit/license	Validity		
		1	MPOB license: 50010670-4000	30/11/2024		
		2	Suruhanjaya Tenaga ref LP12/1/9/1817	20/06/2027		
		3	PD Kinabatangan Lesen Perniagaan ref 2023/893	31/12/2023		
		4	Lesen Pengilangan (Palm Oil Fibre) ref A019115	Eff 16/10/13		
		5	JTK - Penggajian Pekerja Asing ref 10401/0056	07/03/2024		
		6	JTK - Potongan Upah ref PMT/113/2022/0228	08/09/2024		
		7	DOE Jadual Pematuhan - ref 04849	30/06/2024		
		8	KKM - Permit Sodium Hydroxide ref SC007/2023	31/12/2023		
		9	KPDNKS Permit diesel 45000 ref S005269	16/10/2025		
		10	Metrology Corporation W/B A ref 163650129	15/11/2024		
		11	Metrology Corporation W/B B ref 222351668	22/12/2024		
		13	Water tube boiler No 2PMD 10444	21/09/2024		
		14	Water tube boiler No 3 SB PMD 2626	01/02/2025		
		15	Back pressure receiver PMT 105658	21/09/2024		
		16	Vaccum Drier no 3 PMT 143781	21/09/2024		
		17	Vaccum Dearator no 1 PMT 40696	21/09/2024		
		18	Air Receiver Tank SB PMT 11193	01/02/2025		
		19	Sterilizer No 1 PMT 105363	19/05/2024		

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		20	Sterilizer No 2 PMT 105621	01/02/2025	All				
		21	Sterilizer No 3 PMT 89193	21/09/2024					
		22	Air Receiver Tank PMT 122414	21/09/2024					
		23	Air Receiver Tank SB PMT 13607	01/02/2025					
		24	Air Receiver Tank PMT 40764	21/09/2024					
		25	Steam Receiver SB PMT 81364	01/02/2025					
		26	Air Compressor SB PMT 14065	21/09/2024					
		27	Air Receiver PMT 122412	21/09/2024					
		documents were including the DOSH report were sighted and verified.							
		Factory and Machinery Act 1967 –							
The following competency requirements for the MPOM were verified:									
	License no	Ref no	Regn Date						
1	Steam Engineer G 1	008/2017	12/01/2017						
2	Steam Engineer G 2	051/2014	16/04/2014						
3	Engine Driver G2	1 Person - H/ED/64/02	31/07/2002						
4	Chargeman A1	PJT-2B-0349-2018	08/05/2018						
5	AGT	HQ/18/AGTES/01/02824	12/12/2024						
6	AESP	12 Persons	20/09/2024						
7	BOFA	5 Persons	27/08/2025						
8	CEPSWAM	05614	30/10/2023						
9	CEPPOME	2318856	16/01/2024						
10	FFB Grabber	3 Persons	1/12/2019						

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		<p>Air Monitoring</p> <p>a) Particulate – Stack sampling was carried out twice annually. b) Noted that monitoring was conducted on (at 12.0%) CO₂.</p> <table border="1"> <thead> <tr> <th>Boiler no</th><th>Date</th><th>Dust concentration</th><th>EQA std</th></tr> </thead> <tbody> <tr> <td>SB PMD 2626</td><td>11/08/23</td><td>122.0 mg/m³</td><td>150 mg/m³</td></tr> <tr> <td>SB PMD 2626</td><td>27/05/23</td><td>113.20 mg/m³</td><td>150 mg/m³</td></tr> </tbody> </table> <p>The stack sampling was carried out by Multi Serve Sdn Bhd. The mill has installed ESP projected to commission in Feb 2024.</p> <p>MPOB License approved for a 384000 FFB mt processed in a year. The mill processed 245806 mt thus complying with the stipulated tonnage.</p> <p>There was no written approval or notification to DOE for the installation of Gen-set of 100 kVA and above at the following estates. This is to comply with Regulation 5 of Environmental Quality (Clean Air) Regulations 2014.</p> <p>a) Pahang Oil Palm 3 Estate - 1 unit having a capacity of 160 kVA. b) Tye Yang Estate - 1 unit with capacity of 200 kVA c) Gerola Estate - 2 units of 101 kVA and 120 kVA respectively</p> <p>Hence an NCR AB 01 of 2023 is raised.</p>	Boiler no	Date	Dust concentration	EQA std	SB PMD 2626	11/08/23	122.0 mg/m ³	150 mg/m ³	SB PMD 2626	27/05/23	113.20 mg/m ³	150 mg/m ³	
Boiler no	Date	Dust concentration	EQA std												
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2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. Melewar Production Unit adopted the JC Chang Group SOP on Mechanism to made changes in Legal Requirements. Refer doc. no. E/005-08/2021 dated 13/12/2021. In the SOP has stated that the Headquarters has subscribed with Malaysia Gazette On – Line with website www.lawnet.com.my. The Head for the Internal Control Team will access the subscribed website at the end of every month to track any relevant changes.</p>	Complied												

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		<p>a) Each estate/mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person-in-charge and approved by the respective Managers.</p> <p>b) The ICT team are responsible to track changes and the information was disseminated to all its plantations and Mill department. Among the applicable legal and included in the legal register are</p> <ul style="list-style-type: none"> - Pesticides Act 1974 and Regulations, - Environmental Quality Act 1974 and Regulations, - Factories and Machinery Act 1967 and Regulations, - Occupational Safety and Health Act 1994, - Employment Act 1955, - Labour Act 1955 - Children & Young Person (Employment) Act 2010 - Industrial Relations Act 1967, - Children and Young Persons (Employment) Act 1966 - MPOB Regulations (Licensing) 2005. - Min retirement age Act 2012 - Passport Act 1996 - Uniform Building By-Laws 1984 <p>The latest legal register was updated on respective dates as reviewed by the Sustainability Manager based in Head Office among others as listed below;</p>	
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		<div>i. 04/10/2022 - Employment Social and Security Act 1969 Act 4 Employment Insurance System Act 2017 Act 800 ii. 06/05/2022 - Minimum Wages Order 2022. iii. 11/02/2022 - Perintah Levi Keuntungan Biasa Pindaan 2021</div>																																																	
2.1.3	<div>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -</div>	<div>All the estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 4 estates, during the field inspection confirmed that they were clearly marked and maintained.</div> <table><tr><td></td><td>Estate</td><td>Field</td><td>Boundary</td><td>Field</td><td>Boundary</td></tr><tr><td>1</td><td>Gerola</td><td>PR22A</td><td>Yayasan Sabah</td><td>PM96D</td><td>Ldg Kokoratus</td></tr><tr><td>2</td><td>Gerola</td><td>PR22A</td><td>Forest Reserve</td><td>PM18B</td><td>Haranky Estate</td></tr><tr><td>3</td><td>Melewar 1</td><td>PM13 A</td><td>Kg PARIS 3</td><td>PM15B</td><td>Sykt Keratong</td></tr><tr><td>4</td><td>Melewar 1</td><td>PM14 A</td><td>Ldg TOMACO</td><td>-</td><td>-</td></tr><tr><td>5</td><td>Pahang OP 3</td><td>PM96 C</td><td>Penderosa Estate</td><td>PM96B</td><td>Jayatas Sdn Bkd</td></tr><tr><td>6</td><td>Pahang OP 3</td><td>PM96 A</td><td>GPB Tenegang</td><td>PM95B</td><td>KJS Resources</td></tr><tr><td>7</td><td>Tye Yang</td><td>PM09 A</td><td>Kg PARIS 3</td><td>PM12A</td><td>THP Ldg Sg Koyah</td></tr></table>		Estate	Field	Boundary	Field	Boundary	1	Gerola	PR22A	Yayasan Sabah	PM96D	Ldg Kokoratus	2	Gerola	PR22A	Forest Reserve	PM18B	Haranky Estate	3	Melewar 1	PM13 A	Kg PARIS 3	PM15B	Sykt Keratong	4	Melewar 1	PM14 A	Ldg TOMACO	-	-	5	Pahang OP 3	PM96 C	Penderosa Estate	PM96B	Jayatas Sdn Bkd	6	Pahang OP 3	PM96 A	GPB Tenegang	PM95B	KJS Resources	7	Tye Yang	PM09 A	Kg PARIS 3	PM12A	THP Ldg Sg Koyah	Complied
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		8	Tye Yang	PR22A	Kg Sg Koyah	PM09A/ 1	Kg PARIS 3		
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.									
2.2.1	A list of contracted parties is maintained. - Minor compliance -	The sampled operating units have maintained list of all contracted parties in their list of stakeholders and updated from time to time. The lists were made available for verification.						Complied	
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	<p>All contracts (short and long term), contain specific clauses on meeting applicable legal requirements which were spelt out under the term and conditions of J.C. Chang's Sustainability Compliances Contract with Operating Unit Under J.C. Chang Group [ref.: E023-01/2019, dated 12/08/2019].</p> <p>Evidence of due diligence is demonstrated via declaration between contactor based on Sustainability contract, E/023-012019 with reference to Procedure of Due Diligence and Improvement, E/019- 01/2019 dated 12/08/2019. A questionnaire entitled "Questionnaire on Legal Compliance and Ethical Conduct [ref.: E/024-02/2020, dated 20/02/2020] is utilised to record the evidence of compliance of the contractors. Among the criteria evaluated by the operating unit using the form are</p> <ul style="list-style-type: none"> - compliance towards legal, e.g., trading license, permits, MPOB license, etc. - history of land tenure details - understanding about the terms & conditions stipulated in the contract agreements 						Complied	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Verification of the sampled contract agreements showed that there are clauses for disallowing child, forced and trafficked labour. Generally, this is spelt out in the J.C. Chang's Sustainability Compliances Contract with						Complied	

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	- Minor compliance -	Operating Unit Under J.C. Chang Group [ref.: E023-01/2019, dated 12/08/2019].	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Melewar POM has established geo-location information for all directly source of FFB documented in Stakeholder List (FFB Supplier). Among the information available is:</p> <ul style="list-style-type: none"> • FFB supplier name, • Person responsible, • Address and contact no., • MPOB License and expiry date and • Geo-location coordinate. <p>It was found that some of the registered direct suppliers also have the crop of their associates sent together under their names, which in some cases had caused the yield/ha being as high as 79 mt/ha/year. However, the information about geo-location of FFB origins, evidence of the ownership status, and valid MPOB license, of those associates has yet to be made completely available. Thus, a non-conformity report was assigned due to this lapse.</p>	Non-compliance
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>Melewar POM is receiving only direct sourced FFB from its own 8 supplying estates, sister estates and 42 smallholders/outside as reviewed in the FFB supplier list dated 01/12/2023.</p>	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			

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3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Both the estates and mill continued to commit to long term economic and financial viability. The annual budgets for 2022/23 to 2025/26 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton, per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estates adopted the following format for the annual budget.</p> <table><tr><td></td><td>Gerola Estate</td><td>2022/23</td><td>2023/24</td><td>2024/25</td><td>2025/26</td></tr><tr><td>1</td><td>Mature Ha</td><td>1216.32</td><td>21017.82</td><td>1017.82</td><td>1201.87</td></tr><tr><td>2</td><td>Immature Ha</td><td>187.05</td><td>385.55</td><td>385.55</td><td>201.50</td></tr><tr><td>3</td><td>Total Ha</td><td>1403.37</td><td>1403.37</td><td>1403.37</td><td>1403.37</td></tr><tr><td>4</td><td>FFB Tons</td><td>25158</td><td>25897</td><td>26611</td><td>27144</td></tr><tr><td>5</td><td>Yield /Ha</td><td>20.68</td><td>25.44</td><td>26.14</td><td>22.58</td></tr><tr><td colspan="6"></td></tr><tr><td></td><td>Melewar 1Estate</td><td>2022/23</td><td>2023/24</td><td>2024/25</td><td>2025/26</td></tr><tr><td>1</td><td>Mature Ha</td><td>1427.13</td><td>1427.13</td><td>1660.76</td><td>1834.96</td></tr><tr><td>2</td><td>Immature Ha</td><td>551.29</td><td>551.29</td><td>317.766</td><td>143.46</td></tr><tr><td>3</td><td>Total Ha</td><td>1978.42</td><td>1978.42</td><td>1978.42</td><td>1978.42</td></tr><tr><td>4</td><td>FFB Tons</td><td>36138</td><td>36865</td><td>39786</td><td>42695</td></tr><tr><td>5</td><td>Yield /Ha</td><td>25.32</td><td>25.83</td><td>23.96</td><td>25.32</td></tr><tr><td colspan="6"></td></tr><tr><td></td><td>Pahang OP 3</td><td>2022/23</td><td>2023/24</td><td>2024/25</td><td>2025/26</td></tr><tr><td>1</td><td>Mature Ha</td><td>1633.83</td><td>1650.00</td><td>1609.34</td><td>1676.74</td></tr></table>		Gerola Estate	2022/23	2023/24	2024/25	2025/26	1	Mature Ha	1216.32	21017.82	1017.82	1201.87	2	Immature Ha	187.05	385.55	385.55	201.50	3	Total Ha	1403.37	1403.37	1403.37	1403.37	4	FFB Tons	25158	25897	26611	27144	5	Yield /Ha	20.68	25.44	26.14	22.58								Melewar 1Estate	2022/23	2023/24	2024/25	2025/26	1	Mature Ha	1427.13	1427.13	1660.76	1834.96	2	Immature Ha	551.29	551.29	317.766	143.46	3	Total Ha	1978.42	1978.42	1978.42	1978.42	4	FFB Tons	36138	36865	39786	42695	5	Yield /Ha	25.32	25.83	23.96	25.32								Pahang OP 3	2022/23	2023/24	2024/25	2025/26	1	Mature Ha	1633.83	1650.00	1609.34	1676.74	Complied
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			2	Immature Ha	292.40	202.48	286.89	225.00						
			3	Total Ha	1926.23	1852.48	1896.23	1901.74						
			4	FFB Tons	31097	40557	36557	38023						
			5	Yield /Ha	19.03	24.58	22.72	22.68						
				Tye Yang Estate	2022/23	2023/24	2024/25	2025/26						
			1	Mature Ha	2298.63	2833.23	2438.93	2756.93						
			2	Immature Ha	1053.99	519.39	913.69	595.69						
			3	Total Ha	3352.62	3352.62	3352.62	3352.62						
			4	FFB Tons	40617	57013	60081	65653						
			5	Yield /Ha	17.67	21.27	21.10	21.29						
			6	RM/mt FFB	x	x	x	x						
			7	RM/ha	x	x	x	x						
			Similarly, the mill has a business plan prepared annually in the form of year budget and the projection for 4 years prepared as guidance for future planning. The business plan among others contains;											
			a) FFB Processing & CPO/CPK production forecast											
			b) Extraction Ratios – OER / KER,											
			c) Cost of production											
			- Administration / labour overhead											
			- Processing cost labour, maintenance, consumables											
			- Depreciation and head office charges-											

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		<div>- EVIT running accounts</div> <div>- CAPEX - capital expenditure.</div> <table><tr><td></td><td>Year</td><td>2022/23</td><td>2023/24</td><td>2024/25</td><td>2025/26</td></tr><tr><td>1</td><td>FFB processed</td><td>245806</td><td>185607</td><td>187409</td><td>196604</td></tr><tr><td>2</td><td>OER</td><td>20.95</td><td>19.92</td><td>20.33</td><td>20.21</td></tr><tr><td>3</td><td>KER</td><td>4.05</td><td>5.21</td><td>5.26</td><td>5.15</td></tr><tr><td>4</td><td>Administration</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>5</td><td>Processing cost</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>6</td><td>Depreciation</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>7</td><td>H Q charges</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>8</td><td>RM/mt FFB</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>9</td><td>RM/mt CPO</td><td>x</td><td>x</td><td>x</td><td>x</td></tr></table>		Year	2022/23	2023/24	2024/25	2025/26	1	FFB processed	245806	185607	187409	196604	2	OER	20.95	19.92	20.33	20.21	3	KER	4.05	5.21	5.26	5.15	4	Administration	x	x	x	x	5	Processing cost	x	x	x	x	6	Depreciation	x	x	x	x	7	H Q charges	x	x	x	x	8	RM/mt FFB	x	x	x	x	9	RM/mt CPO	x	x	x	x	
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8	RM/mt FFB	x	x	x	x																																																										
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3.1.2	<div>An annual replanting programme projected for a minimum of five years with yearly review, is available.</div> <div>- Minor compliance -</div>	<div>The long-range replanting programs (LRRP) until 2027 were sighted on all the Estates. The program is reviewed annually and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows:</div> <table><tr><td></td><td>Estate</td><td>2023</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td></tr><tr><td>1</td><td>Gerola Estate</td><td>0.00</td><td>198.50</td><td>0.00</td><td>0.00</td><td>147.49</td></tr><tr><td>2</td><td>Melewar Estate 1</td><td>218.00</td><td>206.36</td><td>0.00</td><td>0.00</td><td>139.88</td></tr><tr><td>3</td><td>Pahang Palm Oil 3</td><td>292.40</td><td>202.48</td><td>286.89</td><td>225.00</td><td>220.73</td></tr></table>		Estate	2023	2024	2025	2026	2027	1	Gerola Estate	0.00	198.50	0.00	0.00	147.49	2	Melewar Estate 1	218.00	206.36	0.00	0.00	139.88	3	Pahang Palm Oil 3	292.40	202.48	286.89	225.00	220.73	Complied																																
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3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The Management Review was held on a Group basis chaired by the Plantation Controller incorporating all estates and mill in the CU.</p> <p>The</p> <table><tr><td></td><td>Estate/Mill</td><td>Date</td><td>Attendee</td><td>Date</td><td>Attendee</td></tr><tr><td>1</td><td>Gerola Estate</td><td>05/10/23</td><td>34</td><td>29/09/22</td><td>31</td></tr><tr><td>2</td><td>Melewar Estate 1</td><td>05/10/23</td><td>34</td><td>29/09/22</td><td>31</td></tr><tr><td>3</td><td>Pahang Palm Oil 3</td><td>05/10/23</td><td>34</td><td>29/09/22</td><td>31</td></tr><tr><td>4</td><td>Tye Yang Estate</td><td>05/10/23</td><td>34</td><td>29/09/22</td><td>31</td></tr><tr><td>5</td><td>Melewar POM</td><td>05/10/23</td><td>34</td><td>29/09/22</td><td>31</td></tr></table> <p>agenda discussed among others includes the following;</p> <ul style="list-style-type: none">a) Results of internal audits / External Auditsb) Customer feedbackc) Process performance and product conformityd) Status of preventive & corrective actionse) Complaints and Grievancesf) Changes that could affect the management systemg) Recommendation for improvementh) ISCC related information		Estate/Mill	Date	Attendee	Date	Attendee	1	Gerola Estate	05/10/23	34	29/09/22	31	2	Melewar Estate 1	05/10/23	34	29/09/22	31	3	Pahang Palm Oil 3	05/10/23	34	29/09/22	31	4	Tye Yang Estate	05/10/23	34	29/09/22	31	5	Melewar POM	05/10/23	34	29/09/22	31	Complied
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Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.																																							
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The Continuous Improvement Plan for the Estates are documented in Doc ref no N/002-04/2019 dated 13/08/2018 among others having the following initiatives:</p> <ul style="list-style-type: none">a) Optimizing the yield of the supply baseb) Reduction in use of pesticides through	Complied																																				

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		<ul style="list-style-type: none"> i. implementation of IPM and monitoring cost of weeding ii. Mowing inter rows with rotor slasher iii. Use EFB to circle mulch at young plants c) Pollution Prevention Plan - Encourage EFB application d) Environmental impacts <ul style="list-style-type: none"> i. Establishment of riparian buffer zone ii. Plan for Biodiversity Conservation iii. Enhance water conservation and soil erosion control e) Waste reduction f) Pollution and greenhouse gas (GHG) emissions g) Impacts on communities, workers, and smallholders h) Integrated management of Buffer Zone and other conservation areas i) SOP Compliance <p>The sampled operating units are implementing the action plans accordingly. Progress of the plans were also discussed in the management review meetings. The mill similarly had plan for the operation among others as summarized below;</p> <ul style="list-style-type: none"> a) Commissioning of ESP anticipated in Feb 2024 for the Boiler Station to improve dust particulate performance b) Pesticide usage - to concentrate on grass cutting for the compound upkeep c) Scrap iron collection - to expedite collection and maintained cleanliness of mill compound and for safety purposes. d) Housekeeping standard of the mill compound to be continuously improved <p>Continuous improvement plan has established for all operating units in the document title "Continuous improvement plan for estates" document number N/002-03/2013 dated 27/06/2013.</p>	
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		<p>The plan included improvement plan that covers both aspect environment and social.</p> <p>For social aspect, the management has continuous improvement plan as follows.</p> <ol style="list-style-type: none"> Communication of the employment contract and briefing of the employment term and condition To communicate the consultation and communication procedure and to ensure effective implementation of the procedure to ensure good relationship between the stakeholders and the management has been maintained. To routine monitoring on the workers medical condition through the monthly medical check-up and year medical surveillance. To ensure that workers has been paid according to decent living wages. To ensure that line site is in good condition and has been monitored through the weekly line site inspection. <p>There is evidence that the continuous improvement plan has been implemented and has been verified base on the records of training, records, interview with workers and site visit to line site inspection.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting,</p>	<p>The Certification Unit has filled their RSPO metrics template version 2.1. Based on verification through various documents such as land titles, JKPP report, employees register, computer software recording system, to name a few, the data reported in the metrics template were found to be accurate.</p>	Complied

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	and information provided to Certification Body and feedback via RSPO Secretariat is required. - Minor Compliance -		
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -	<p>Melewar Production Unit continued to use the documents established by JC Chang Holdings among others as follows;</p> <ul style="list-style-type: none"> a) Group SOP and Guidelines b) Palm Oil Mill Lab Process Control Procedure / Oil Mill Lab operations & Test Method Guidelines c) RSPO Supply Chain Manual / Guidelines d) Occupational Safety and Health Manual / Guidelines e) Laboratory Process Control Manual f) Security Guidelines. <p>In addition, technical guidelines as listed in the MPOB Agricultural Reference Manual were also used. In general, the documents included operation activities in the estates and the mills from;</p> <ul style="list-style-type: none"> a) seedlings in nursery to planting of young palms. b) plantation upkeep to mill FFB receipt, grading, processing. c) quality analysis and dispatch of CPO & PK. d) security in the estates and mill. <p>Contents of the Manual were disseminated to the workers through;</p> <ul style="list-style-type: none"> a) morning muster b) mill weekly briefings c) training as ad hoc and programmed basis. <p>The Manuals and SOP are also kept in the administration office to facilitate reference by any interested parties. Site inspection and interview with</p>	Complied

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		<p>workers confirmed that the SOP had been implemented and the employees understood the requirements of the SOP.</p> <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines. The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Both estates and the mill had an established mechanism to perform checking to ensure consistent implementation of procedures.</p> <p>Estates Operations</p> <p>The monitoring of the SOP implementation is made by all levels of the supervisory personnel with records maintained and checked. Among others the records maintained are;</p> <ul style="list-style-type: none"> a) Daily production/work records for the core activities at the estates b) field cost book / chemical consumption record c) mature/immature field work program <ul style="list-style-type: none"> - fertilizer application, - herbicide spraying, / rat baiting, - Harvesting and collection of FFB. - Water management action plan in relation to trenches / drain management / desilting program. <p>All the above records were kept for a minimum period of 12 months. In addition, the management adopted the following check and balances through visit of the following dept /superiors</p> <ul style="list-style-type: none"> a) Agronomic advisory report and fertilizer recommendation minimum 2x/year to monitor matters relating to; <ul style="list-style-type: none"> - nutrient deficiency, fertilizer program, 	Non-compliance

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		<ul style="list-style-type: none">- pest & disease ganoderma infection, rat and RB attack,- EFB mulching program for the year etc. <p>b) Plantation Controller visit performing assessment relating to;</p> <ul style="list-style-type: none">- land use, capital expenditure, general charges,- oil palm (mature & immature area) field condition- crop performance and cost- vehicles & equipment, amenities,- labour and security etc- Replanting activities at PR 2022/23- Replanting activities by Contractors are monitored to ensure compliance against the JC Chang and industry standards. <p>Internal audit by the Sustainability and ICT Unit scheduled 2x/year for each unit. The exercise is to inspect and monitor compliance on ISCC/MSPO/RSPO standard requirement. Results from assessment of which are tabled and discussed during the Management Review.</p> <p>The mechanisms as established have been implemented. This is verified via the records maintained in all units daily, monthly and annually. Estates are monitored to ensure compliance against the SOP standard and factors relating to ESH.</p> <table><tr><th colspan="3">Estates</th></tr><tr><th></th><th>Areas</th><th>Action/Activities</th></tr><tr><td rowspan="3">1</td><td rowspan="3">Daily</td><td>Supervision by field staff/Assist/Manager</td></tr><tr><td>Report of daily activities/costings/variation</td></tr><tr><td>WA group - digital supervision</td></tr><tr><td rowspan="5">2</td><td rowspan="5">Schedule</td><td>Quarterly ESH meeting</td></tr><tr><td>ICT team visits on sustainability compliance</td></tr><tr><td>Internal audits by HQ personnel</td></tr><tr><td>Annual EPMC</td></tr><tr><td>External audit RSPO /MSPO</td></tr></table>	Estates				Areas	Action/Activities	1	Daily	Supervision by field staff/Assist/Manager	Report of daily activities/costings/variation	WA group - digital supervision	2	Schedule	Quarterly ESH meeting	ICT team visits on sustainability compliance	Internal audits by HQ personnel	Annual EPMC	External audit RSPO /MSPO	
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		<p>There were 2 estates without a complete confined SW storage structure i.e., without door and wall. This is being described in SOP no F/014 - 01/2015 revision date 07/01/2017 among others stating that "...the entire storage area should be considered as restricted area; store shall be locked..."</p> <p>a) Melewar Estate 1 b) Pahang Oil Palm 3 Estate</p> <p>Hence a non-conformity report was raised.</p>																																																	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The implementation of SOP are monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The	Complied																																																

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		<p>monitoring is made via supervision and records maintenance. The estates among others maintained the following records.</p> <ul style="list-style-type: none"> a) work program / Field cost books b) bin cards, Harvesting Intervals, c) Monthly Estate Report and Account, d) Monthly Operations, monthly rainfall, e) pest and diseases monthly return, f) agrochemical monthly consumption g) harvesting details i.e., daily inspection report - yield improvement program, h) summary of machinery running hours i) harvesting records detailing the number of bunches harvested j) quantity of loose fruit collected by each harvesters. k) Monthly FFB production, etc. <p>Similarly for the mill, the monitoring records maintained among others were related to;</p> <ul style="list-style-type: none"> a) monitoring of effluent / black smoke b) Processing & produce parameters c) Dispatches / scheduled wastes etc. d) monitoring consistent implementation of procedures through internal audit e) daily shift report for the process performance. f) There was a flow chart showing method for monitoring compliance of requirements including legal requirements. g) Internal audits are performed once a year minimum. <p>Activities carried out by contractors are being monitored via the following among others;</p> <ul style="list-style-type: none"> a) to obtain work permit for confined spaces or work at height in the Mill 	
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		<ul style="list-style-type: none"> b) evidence of competency for specialized work/job c) The mill supervisors and engineers will be onsite to monitor the work. d) The estates ensure that the contractors are providing PPE, suitable working equipment and machinery. <p>Records of follow up action, if any, are retained where necessary.</p>	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new planting in all the estates visited. This is verified through the following document/facts.</p> <ul style="list-style-type: none"> a) Hectare statement compared to the previous year. b) Interviews with the management. c) Field visits and verification. <p>The assessment of both the above was made in the Social & Environmental Impact Assessment including a Preliminary Management Review compiled on 13 July 2011 by Wild Asia (Malaysia) for JC Chang Group's Asia and Melewar Production Units, Sabah Malaysia. Thereafter the management plan titled The Environmental and Social Improvement Plan-Sabah are established and subject to annual review by respective estates and mill. The recent being in 24/08/2023 and had incorporated among other sections of energy, waste, water and social and environmental management plan. The plans are among others aimed;</p> <ul style="list-style-type: none"> a) To assess current condition based on identified potential aspects b) To verify presence of protected & conservation areas that could be significantly affected. c) To assess the social & environmental impact on the affected areas/stakeholders arising from the estate/mill activities.to reduce and 	Complied

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		<p>control the pollution (negative impacts) and action plan to sustain the environmental impact (positive) has been developed with details in;</p> <ul style="list-style-type: none"> i. Untuk Impak Negatif Alam Sekitar Paling Ketara ii. Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang iii. Pelan Tindakan (Action Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang Dan Mengawal Pencemaran (Impak Positif) <p>d) To comply with various sustainability certification schemes</p> <p>The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas. The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. All the above documents were updated accordingly respectively. These contents are reviewed annually for any revision and updates.</p> <p>Social and environmental impact assessment has been conducted on 26/05/2011 and the report can be sighted in the document "Social & environmental impact assessment including a preliminary management review" done by Wild Asia (Malaysia). There is evidence that the assessment has been conducted in participatory ways where several stakeholders has been interviewed as part of mechanism to collect information and details of stakeholders interviewed has been outlined in the report with the outcome responded.</p> <p>Several issues have been highlighted such as</p>	
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		<ol style="list-style-type: none"> 1. Management needs to ensure that workers has been paid according to DLW and Malaysia minimum wages 2. Sundry shops monitoring 3. Employment contracts need to be signed by all workers. 4. Overtime limits for POM workers 5. Improvement in housing conditions <p>The above issues, which were identified in 2011, have been addressed long ago. Nonetheless, the certification unit continues to implement their action plans especially in the improvement of housing conditions.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The Environmental and Social Improvement Plan - Sabah for 2022/23 had been established. The plan among others incorporated the objectives, category, action, frequency, person in charge and monitoring period. Among others issues as extracted below:</p> <ol style="list-style-type: none"> a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor's workers and to maintain housing and facilities provided to workers). b) To contribute to local communities' development c) PPE issuance and compliance for employees d) Domestic waste disposal to the internal landfill sites e) CSR issuance of welfare gifts during festive months. f) Enhance understanding on safety guidelines in mill. g) Health awareness among employees. h) To maximize recycling program at mill/estate i) To enhance sale of excessive shell to licensed buyer j) Audio metric test awareness among employees. 	Complied

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		<p>The aspect and impact analysis for all the mill/estate operations are documented and revised annually. In the comprehensive report, the study of aspect and impact are aimed to;</p> <ul style="list-style-type: none"> a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG Development and implementations. Management of slope and soil erosion. Soil degradation and problematic soil to maximize recycling program at mill/estate to enhance sale of excessive shell to licensed buyer <p>The aspect and impact covered the following activities/operations documented among others;</p> <table border="1"> <tr> <td colspan="4">Estate - Activities / Operations</td></tr> <tr> <td>1</td><td>Management of empty containers</td><td>8</td><td>Vehicle maintenance by contractors</td></tr> <tr> <td>2</td><td>Circle spraying</td><td>9</td><td>EFB application</td></tr> <tr> <td>3</td><td>Poisoning of VOPs/ woodies</td><td>10</td><td>Fertilizer storage /application</td></tr> <tr> <td>4</td><td>Rat baiting</td><td>11</td><td>Grass slashing</td></tr> <tr> <td>5</td><td>Diesel Reception</td><td>12</td><td>Chemical's storage</td></tr> <tr> <td>6</td><td>Triple rinsing</td><td>13</td><td>Construction of building</td></tr> <tr> <td>7</td><td>Landfill Management</td><td>14</td><td>Replanting</td></tr> <tr> <td colspan="4"></td></tr> <tr> <td colspan="4">Palm Oil Mill - Activities /Operations</td></tr> <tr> <td>1</td><td>Effluent treatment</td><td>8</td><td>EFB storage</td></tr> </table>	Estate - Activities / Operations				1	Management of empty containers	8	Vehicle maintenance by contractors	2	Circle spraying	9	EFB application	3	Poisoning of VOPs/ woodies	10	Fertilizer storage /application	4	Rat baiting	11	Grass slashing	5	Diesel Reception	12	Chemical's storage	6	Triple rinsing	13	Construction of building	7	Landfill Management	14	Replanting					Palm Oil Mill - Activities /Operations				1	Effluent treatment	8	EFB storage	
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			2	Engine room operations	9	Laboratory	The mill had the	
			3	Boiler operations	10	Workshop operations		
			4	CPO storage	11	Sterilization		
			5	Diesel Reception/storage	12	Chemicals storage		
			6	Triple rinsing	13	Scheduled wastes storage		
			7	Monsoon Drain	14	Canteen		
			following initiatives for improvement of both social and environmental enhancement.					
				MPOM	Management Plan			
			1	Social	New water o/head tank for housing RM50K			
			2	Operations	Submersible pump for ETP RM80K			
			3	Operations	1 Unit Boiler chimney RM275K			
			4	Operations	Biogas Geo tube site RM66K			
			5	Social	School Bus for Children RM40K			
			6	Social	Maintenance of housing building RM180K			
			7	Social	Electricity facilities upgrading RM167K			
The input is gathered from the meeting minutes i.e., in a participatory method among others via the following forum;								
a) Gender Committee, JCC Meeting								
b) Safety Meeting, EPMC								
c) Complaint & Request from internal & external stakeholders								

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		<p>and muster briefing).</p> <p>The activities involved discussion with the estate/mill management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas.</p> <p>Management plan has been established for social aspect and can be sighted in the document title "Environmental and social improvement plan-Sabah" for financial year 2022/2023. Several management plans has been established and listed. Sample has been taken as per below</p> <ol style="list-style-type: none"> 1. Delay of foreign workers renewal due to status legislation- the management need to comply to group policy and need to appoint person in charge and need to submit permit renewal 3 months before the permit expiry. 2. Worker's payment- The management need to ensure that all payment rate has been made clear and to display the statement of employment in working terms and condition at the notice board. 3. Working hours- the management will communicate the working hours to all workers and to monitor workers working hours. 4. Accommodation- Line site inspection will be done by the person in charge through the checklist that has been established and to rectify all the issues that has been identified. <p>Sundry shop pricing- The management need to monitor the shop pricing and compare to the nearest shops and if the price is higher than contact agreement, consultation will be done.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The Environmental and Social Improvement Plan - Sabah had been established available for each unit were available having information i.e. issues, management plan, PIC and time frame. The input is gathered from the meeting minutes</p> <ol style="list-style-type: none"> a) Gender Committee, JCC Meeting b) Safety Meeting, EPMC 	Complied

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		<p>c) Complaint & Request from internal & external stakeholders and muster briefing).</p> <p>The activities involved discussion with the estate/mill management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas.</p> <p>The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. Feedback was obtained through dialogue / meeting with stakeholders recent being on 16/11/2023 a combined meeting with all the Production Units and the mill</p> <p>Verification has been done by auditor on the implementation of the social management plan. Details as per below</p> <ol style="list-style-type: none"> 1. Monitoring of the sundry shops pricing has been done by the persons in charge and sighted in the document "Perbandingan Harga Barang Kedai" which has been compared with nearest shops. There is evidence that the sundry shops pricing is reasonable comparing to the nearest shops. 2. Line site inspection has been conducted by the hospital assistant for each operating unit. There is evidence that the line site inspection has been weekly basis and as per actual condition. 3. Details pay and condition has been documented in the employment contract that has been signed by both parties (employer and employee). The employment contract has been established in Bahasa Malaysia. 	
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		<p>For piece rate works, it has been documented in the guideline rates for field operation, Panduan harga bagi pelbagai jenis kerja” which outline all the rate for piece rate works.</p> <p>4. There is no issues of pending of renewal work permit where all passport has been submit for renewal 3 months before the audit.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Sighted in the document title “Guidelines on procedure or system of recruitment, selection, hiring, promotion, retirement, and termination document number E020-01/2019 dated 12/08/2019. The recruitment procedure has been made available which it has been classified as publicly available document.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>There is evidence that the employment procedure has been implemented and the records has been maintained in the personal file.</p> <p>For recruitment, selection and hiring, the document that has been verified is job application records, medical check-up, interview records, employment contract that has been signed by both parties and offer letter. Sample has been taken for recruitment that has been done in year 2023.</p> <p>There is no promotion, retirement and termination of workers has been done in year 2023. It has been verified base on master list of workers, interview with sample workers.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mill had identified and reviewed significant hazards & risks for all operations and determined the appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment.</p> <p>The certification unit has reconducted their CHRA on 20-23/07/2023 for all the estates as their current CHRA were due for renewal. The assessment</p>	Non-compliance

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		<p>was conducted by Safetech Solution, assessor reg. no.: HQ/15/ASS/00/364. The reports are expected to be ready on the second week of Dec 2023.</p> <p>HIRARC is subject for a review in event of the following:</p> <ol style="list-style-type: none"> 1) Change in work process 2) Revision/changes in legislative requirement 3) Occurrence of accidents <p>Appropriate risk control measures were determined and implemented for the respective activities and operation.</p> <p>Nonetheless, the implementation of control measure for working at height was not consistently demonstrated. It was noted that the estates have identified the hazard of working at height for FFB transportation from estate's ramp to mill. The ramp attendants at Pahang OP 3, Tye Yang, and Gerola estates were seen to be using the safety harness while working on top of the FFB loaded lorry bin. However, there was no evidence that the lorry drivers were using safety harness while working at the same place to set up (Pahang Oil Palm 3 Estate) and/or take off (at the mill) the net which is used to cover the FFB in the lorry bin. Thus, a non-conformity was assigned.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Among the established H&S plans to address health and safety risks to people were adherence of safe operating procedures, OHS awareness & training, engineering control at workplace, and donning of PPE to name a few. The effectiveness of these plans was monitored through various means such as accident/incident reporting, regular health surveillances, internal audits, workplace inspections, and OHS committee meetings, to name a few.</p>	Complied
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and</p>	<p>Training programme FY 2023 for both estates and mill were made available for verification. The programme has the information about target date, target group, subject matter, trainer, actual date done, venue, conducted</p>	Complied

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	which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -	by, no. of participants. Generally, the programme consists of training on OHS, environment, best practices, and social.	
3.7.2	Records of training are maintained. - Minor Compliance -	The training records were made available for verification. Based on samples, the training records consists of training materials, attendance records, and evaluation reports.	Complied
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	Training on SCCS was conducted in various sessions based on job area of the personnel, e.g.: <ul style="list-style-type: none"> • CPO & PK dispatch – 23/03/2023 • Reception – 16/08/2023 and 15/11/2023 • Laboratory – 09/11/2023 • Extraction – 15/11/2023 • Grading – 15/09/2023 	Complied
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	NA as Melewar POM opted for MB model.	Complied
3.8.2	Mass Balance Module	Melewar Palm Oil Mill receives both certified and non-certified FFB. Therefore, qualifies for the Mass Balance supply chain system and module.	Complied

	A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	The volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products, were verified.	
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report (see Table 10).	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The parent company (JC Chang Group) is the member of RSPO. Membership No.: 2-0029-06-000-00 since 05/03/2010. Palmtrace member ID: RSPO_PO1000000527 (Carotino/JC Chang Group - Melewar Production Unit).	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p>	<p>a) The current supply chain procedure for Melewar Palm Oil mill is addressed in Standard Operating Procedure for SCC Standard Mass Balance Calculation. Refer doc. no. SC/MBC-08/2022-MOM dated 03/03/2022. Among the elements covered in the procedure are:</p> <ul style="list-style-type: none"> - Function - Mass balance calculation - Definition of periodical - Purchasing good in boundary - Mechanism for handling no-conforming oil palm products - Record keeping - Sales and good out 	Complied

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	<p>c) Identification of 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 mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<ul style="list-style-type: none"> - Training - Outsourced activities - Claims - Complaints and grievances <p>b) Complete and up-to-date records related to supply chain were well maintained by the mill. Among the records verified were inventory records, daily production reports, mass balance accounting, training on supply chain records, and incoming and outgoing material and products shipping documents, to name a few.</p> <p>c) The mill manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. Based on interview with the mill manager, he was able to explain and demonstrate the implementation of the company's supply chain procedures.</p> <p>d) The mill has documented procedures (as mentioned above for the incoming FFB, processing, ensuring no contamination and outgoing palm products (CPO and PK).</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall</p>	<p>Melewar POM has established SOP for Internal audit written as Guideline for Internal Auditing and Management Review of The Sustainability and Supply Chain System; Doc. Ref. # T001-03/2018; Doc. Date: 3/6/2018 was established. Latest internal audit was conducted on 17-19/08/2023 by three auditors from JC Chang's Internal Control Team unit. As a result of the internal audit, there was no NCR raised.</p>	Complied

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	be subject to management review at least annually. The mill shall maintain the internal audit records and reports.		
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>i) When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) and in some cases, estate's weighbridge tickets to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g., of information available in the estate's dispatch tickets is as follows:</p> <ul style="list-style-type: none"> • FFB Delivery Note No. • Estate's names • Date & time of delivery • Field No. <p>E.g., of information available in the estate's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Name of estates • Field No. • Name of driver • Vehicle no. • Weighbridge ticket no. • Date & time of delivery • Total bunches • Seal no. • Net weight <p>ii) There has been no projected overproduction for the period under reviewed. Nonetheless, the mill is aware of the action to be taken should there be any.</p> <p>iii) Should there be any non-conforming FFB and/or documents it will be handled according to supply chain procedure.</p>	Complied
3.8.8	Sales and Goods Out	Melewar POM ensured the required information is available in document form. Based on the sampled sales/purchase contracts, all the required	Complied

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	<p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>information by the standard was made available in several documents such as weighbridge tickets, delivery order, goods received notes, and commercial invoice to name a few.</p>	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 	<p>Outsourcing activities in only involves transportation of products, i.e., CSPO and CSPK, subjected to the buyers' contractual requirements. Management of the outsourcing activities was based on the procedure CCP/07-06/2021-MOM, Critical control point 7: CPO and PK dispatch and Transportation dated 15/11/2021.</p> <p>The Procedure System Management & Documentation; CCP14 Outsourcing Activities; Version 2 (CCP/14-02/2019) dated 13/09/2019 states that the site has legal ownership of all input materials to be included in outsourced processes.</p> <p>The requirement for the transport contractors shall at all times reserve the right of the CB to ensure that certification body (CB) has access to the</p>	Complied

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	<p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	outsourcing contractor or operation if an audit is deemed necessary was stated in the contract addendum.	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of all contractors used for the physical handling of CSPO is listed under the contractors list for year 2023.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No change of names and contract details of transporter for the physical handling of RSPO certified oil palm products.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p>	<p>i) The mill has maintained the accurate, complete, up-to-date, and accessible records and reports covering all aspects of this standard, which among others are:</p> <ul style="list-style-type: none"> - Mass balance accounting - FFB dispatch documents from supplying estates - Daily Production Report - CPO and PK Transportation documents - Training records - Internal audit reports 	Complied

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	<p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>ii) Records are kept for 7 years as addressed in their Standard Operation Procedure for SCC Standard Mass Balance Calculation; Record Keeping. Doc Ref No: SC/MBC-07/2021-AOM; dated 13/08/2021.</p> <p>iii) NA as the mill opted for MC model.</p> <p>iv) Verification of the MB accounting showed that:</p> <p>a) all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK were recorded and balanced on a three-monthly basis.</p> <p>b) all volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to the mill's actual OER/KER</p> <p>c) all deliveries of certified CPO and PK were made from positive stock.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-</p>	<p>NA as the mill opted for MB model.</p>	Complied

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	certified oil palm products, including during transport and storage to strive for 100% separation.		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping announcement in the RSPO PalmTrace platform is carried out by the mill when RSPO certified products are sold as certified to buyers.</p> <p>In the previous license period (Feb 2022 to Jan 2023), there were 1,019.61 mt of certified CPO sold as conventional. However, there was no removal of certified stock made in the RSPO PalmTrace. Thus, a non-conformity was assigned due to this lapse.</p>	Non-compliance
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	Corporate communication which highlighting its RSPO membership and/or its commitment to the objectives and principles of RSPO was seen made on the company's website.	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <p>A. display its RSPO membership status</p> <p>B. display the RSPO web address (www.rspo.org)</p> <p>C. state that the member supports the work of RSPO</p> <p>D. state the member's history with regard to RSPO</p> <p>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</p>	Verification of the company's website showed that the parent company has highlighted their RSPO membership status, and commitment to meet the standard requirements. There was no RSPO Trademark used.	Complied

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4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	The mill does not use the RSPO corporate logo in any of their communication tools such as company's website, letterhead, business cards, and flyers to name a few.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	The mill does not make any statement that may lead to believe that RSPO memberships by itself implies the selling of RSPO certified oil palm product.	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." 	The mill does not make any statements that highlight their RSPO certification status and product-related claims.	Complied
4.6	RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:	NA as the mill is an RSPO member under its parent company, J.C. Chang Holdings Sdn Bhd.	Not Applicable

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	<p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>		
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	NA as no product specific communication was made.	Not Applicable
5.1.2	Product-specific communications are voluntary.	NA as no product specific communication was made.	Not Applicable
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must	NA as no product specific communication was made.	Not Applicable

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	be shown immediately under or next to the RSPO Label or the statement itself.		
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	NA as no product specific communication was made.	Not Applicable
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 	NA as no product specific communication was made.	Not Applicable
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	NA as no product specific communication was made.	Not Applicable

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5.2 Off pack claims		
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	NA as no off-pack claim was made.
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	NA as no off-pack claim was made.
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	NA as no off-pack claim was made.
5.3 On pack claims		

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5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	NA as no on-pack claim was made.	Not Applicable
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	NA as no on-pack claim was made.	Not Applicable
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	NA as no on-pack claim was made.	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	NA as no on-pack claim was made.	Not Applicable

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	D) For Products covered with Book and Claim (B&C): <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim.	NA as no on-pack claim was made.	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	NA as no on-pack claim was made.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	NA as no on-pack claim was made.	Not Applicable
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	NA as no on-pack claim was made.	Not Applicable
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	NA as no on-pack claim was made.	Not Applicable
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	NA as the mill opted for MB model.	Not Applicable
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	NA as the mill opted for MB model.	Not Applicable
Messaging			
	Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:	NA as the mill opted for MB model.	Not Applicable

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	<ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 		
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO Trademark that includes the tag "CERTIFIED"; or • RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	NA as the mill opted for MB model.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	Complied

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	of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.		
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	No evidence of storytelling in product related communication. Hence, this requirement is not applicable.	Not Applicable
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	NA as no product-specific communications labelling was made by the facility.	Not Applicable
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			

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4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Human right policy established and documented in " Social & Human right policy" signed by Mr tee Swee Kee, plantation director dated 14/11/2019. Stated commitment by the management to comply with ILO recommendation, prohibiting retaliation against HRD, complainant and community spokesperson, and other social issues. Other than that, the management will respect human right in term of reproductive right, free of association, and freedom of speech.</p> <p>There is evidence that policy has been communicated to the workers during the morning muster call. While for stakeholders, it has been done during the stakeholders meeting on 16/11/2023.</p> <p>Details of the training of each operating units as per below Melewar Estate:15/02/2023 Melewar POM:01/08/2023 and 03/10/2023 Tye Yang Estate:04/01/2023 Gerola Estate:16/11/2023</p> <p>As per interview, there is evidence workers and stakeholders able to demonstrate their understanding on the policy that has been established.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>As per verification through interview with workers, local communication and site visit, there is evidence that all operating units did not instigate violence and any harassment in their operations. It has been agreed all the personnel interview which come from different category such as gender, origin countries, types of workers, races and others.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without</p>	<p>A systems to resolve any issues, complaint and grievances has been established and documented in the document "SOP on mechanism for complaints and grievances" document number E/001-07/2019 dated 12/08/2019. Stated in the procedure the channel/mechanism to lodge any</p>	Complied

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	<p>risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>complaint which through the JCC meeting, gender committee meeting and also complaint box that has been established. While for external stakeholders, it can be done through the person in charge that has been appointed for all operating units.</p> <p>The steps of resolving any complaint has been set into 4 steps. Details as per below</p> <ol style="list-style-type: none"> 1) Step 1, Complaint to the field supervisor/ staff in charge and consultation need to be done within 7 days and responded within 10 days of the complaint 2) Step 2, If there is complaint unable to be resolve in step 1, complainer need to escalate the issues to Senior assistant and consultation to be done in 5 days and resolved within 7 days from the complaint received. 3) Step 3, If the complaint is still unable to be resolved in step 4, complaint need to be escalated to the Manager and consultation 4) need to be done within 3 days and need to be resolved within 5 days 5) Step 4, if the complaint unable to be resolved in step 3, the complainer can escalate the complaint to head quarters and investigation need to do within 3 days and resolved in 5 days. The plantations director is final, and complainer has right to appoint representative or mediator 	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>There is evidence that the procedure is in place which has been communicated to all the workers during the morning muster call. As per interview with sample workers, there is evidence that all workers can demonstrate their understanding the complaint procedure and channel for complaint. There is no illiterate parties has been identified in all operating units. Training records conducted has been verified and details as per below</p> <p>Melewar Estate:15/02/2023</p> <p>Melewar POM:01/08/2023 and 03/10/2023</p> <p>Tye Yang Estate:04/01/2023</p>	Complied

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		Gerola Estate:16/11/2023	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	As per verification for each operating units, there is no complaints other than housing repair has been received. Log book for any complaint has been recorded and established. While for housing repair, it has been recorded in the "Buku Laporan Kerosakkan & Baik Pulih Kawasan Perumahan". There is evidence that all the complaint has been responded according to the timeline as stated in the procedure. Interview with the workers also confirmed that they have been keep inform on the complaint the has been received.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Stated in the grievance procedure, that for final steps of resolving any grievance, that the directors` decision is final unless there are further arrangement to proceed for the independent arbitrations. This includes option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers as well as the option of a third-party mediator.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	As per verification, there is evidence that the contribution has been done through the consultation with stakeholders during the stakeholders` consultations and through the communication and consultation procedure that has been established. As per interview with stakeholders such as local communities, they said that the management has consulted with them on any contribution required and method to request for any complaint. Records of contribution made has been maintained and details as per below. <u>Melewar Estate 01</u> 1. Contribution to SMK Paris on 04/08/2023 total RM250 for Hari Anugerah Cemerlang 2. Contribution to Lahad Datu Middle School dated 21/09/2023.	Complied

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		<ol style="list-style-type: none"> Contribution to Sekolah Kebangsaan Paris 3 dated 09/10/2023 for Sambutan Jubli Perak Contribution to Kelab Sukan & Rekreasi Jabatan Pertanian Sabah on 14/09/2023 for Malam Pertanian Jabatan Pertanian Sabah. <p><u>Tye Yang Estate</u></p> <ol style="list-style-type: none"> Contribution to CLC Tye Yang Estate for Indonesia Independent Days on 15/08/2023 Contribution to SK Paris 3 on 09/10/2023 for Sambutan Jubli Perak Contribution to Lahad Datu Middle School for educational funds on 26/10/2023 <p><u>Gerola Estate</u></p> <ol style="list-style-type: none"> Contribution to Pemaju Mukim Paris for repairing the KAFA building on 24/11/2023. Contribution of hamper to Majlis Apresiasi dan Graduasi Tahun 06 to SK Paris 3 on 10/02/2023 Contribution of money to SK Paris 3 for Program Kem Outreach to SK Paris 3 on 21/07/2023 <p>Contribution to SK Paris 3 on 09/10/2023 for Sambutan Jubli Perak</p>	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.	<p><u>Melewar Estate 01/Melewar POM</u></p> <p>There are 2 land titles for Melewar Estate 01 and details as per below</p> <ol style="list-style-type: none"> Land title no. 095310400, country lease 095310400 dated 06/12/1977 between the Sabah states government, director of land & survey and Melewar Properties Sdn Bhd and term of use is for 	Complied

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	<p>- Critical (Major) compliance -</p>	<p>agriculture from period 01/01/1979 until 31/12/2077. Melewar POM is in the land title with total 70.77Ha</p> <p>2. Land title number 095311185 under Kemajuan Perusahaan Kayu Sarawak (KPK) Sdn Bhd dated 26/11/1980 and leased until 31/12/2077.</p> <p>Melewar Properties Sdn. Bhd and Kemajuan Perusahaan Kayu Sarawak (KPK) Sdn Bhd is the company under J.C Chang Plantations Sdn Bhd which has been verified base on the memo signed by Group Financial Controller, Mr Lam Yoke Lee dated 06/05/2022</p> <p><u>Tye Yang Estate</u></p> <p>There are 3 leasing documents for Tye Yang estate and has been verified by the auditor. Details as per below</p> <ol style="list-style-type: none"> 1. Ownership under Tye Yang Plantations (Sabah) Sdn Bhd, land title number CL095311407; lot number 81092771; 3038 ha leasing expired at 31/12/2080. 2. Ownership under RKKL Holdings Sdn Bhd, land title number CL095311710; lot number 83092724; 895.70 ha leasing expired at 31/12/2081. 3. Ownership under Sri Mulia Sdn Bhd, land title number CL095311729; lot number 83092723; 359.40ha leasing expired at 31/12/2081. <p>Tye Yang Plantations (Sabah) Sdn Bhd, RKKL Holdings Sdn Bhd and Sri Mulia Sdn Bhd is the company under J.C Chang Plantations Sdn Bhd which has been verified base on the memo signed by Group Financial Controller, Mr Lam Yoke Lee dated 06/05/2022</p> <p><u>Gerola Estate</u></p>	
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		<p>There are 4 land titles for Gerola Estate with total hectareage of 1587.40Ha. Details of lad title as per below</p> <ol style="list-style-type: none"> 1. Ownership under Gerola Estate Sdn Bhd, land title number CL095310919; 400.73Ha leasing expired at 31/12/2077. 2. Ownership under Kinakuluture Sdn Bhd, land title number CL095310928; 401.05Ha leasing expired at 31/12/2077. 3. Ownership under Pekopa Enterprise Sdn Bhd, land title number CL095310900; 401.85Ha leasing expired at 31/12/2077. 4. Melewar Properties Sdn Bhd, Land title number CL095310759, total land 384.78Ha and leasing expired on 31/12/2078. <p>Gerola Estate Sdn Bhd, Kinakulutre Sdn Bhd, Pekopa Enterprise Sdn Bhd and Melewar Properties Sdn Bhd is the company under J.C Chang Plantations Sdn Bhd which has been verified based on the memo signed by Group Financial Controller, Mr Lam Yoke Lee dated 06/05/2022</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	All operating units has been leased from the Sabah Land Department, state of Sabah and can be sighted document of leasing that has been detail up in the indicator 4.4.1	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>Stakeholders' consultation has been done on 16/11/2023 where there is several local communities has been consulted if there is any issues related to land. As per minutes meeting, there is no issues of land has been highlighted.</p> <p>Further verification has been done with local communities from Kampung Paris 3 and Kampung Koyah B, it has been confirmed that consultation has been done by the operating units under Melewar Certification Units and there is no issues related to lands.</p>	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	The management for both operating units has established communication and consultation procedure documented in SOP on Mechanisms for communication and consultation document reference number E/004-08/2019 dated 12/08/2019 title SOP on mechanism for communication and	Complied

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	- Minor compliance -	consultation. Stated in the procedure, 3 mechanisms has been established which is through Joint consultative committee (JCC) at least once every 3 months, through grievance procedure and suggestion box. There is no consent has been raised and the management if there are any issues arise through the consultation and communication mentioned above.	
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	Stakeholders' consultation has been done on 16/11/2023 where there is several local communities has been consulted if there is any issues related to land. As per minutes meeting, there is no issues of land has been highlighted. Further verification has been done with local communities from Kampung Paris 3 and Kampung Koyah B, it has been confirmed that consultation has been done by the operating units under Melewar Certification Units and there is no issues related to lands. There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable	Not Applicable
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Maps with appropriate scale sighted in the land title for all operating units as per stipulated in the indicator 4.4.1 and also sighted estate maps that has been developed by ICT team with scale of 1:10,600metres	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	Relevant information has been listed documented in the document Guidelines on mechanism for information requests by stakeholders reference number #E/006-08/2019 which has outline all document that publicly available including relevant information related to transfer of lease. As per interview, there is evidence that the SOPs has been communicated to the stakeholders.	Complied

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4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	Not applicable since there is no customary right lands involved in the leasing agreement. The land has been leased from Sabah land department, Sabah state and details as in indicator 4.4.1	Not Applicable
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	There is no evidence of any local community land involved and so this indicator is not applicable.	Not Applicable
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p><u>Melewar Estate 01/Melewar POM</u></p> <p>There are 2 land titles for Melewar Estate 01 and details as per below</p> <ol style="list-style-type: none"> 1. Land title no. 095310400, country lease 095310400 dated 06/12/1977 between the Sabah states government, director of land & survey and Melewar Properties Sdn Bhd and term of use is for agriculture from period 01/01/1979 until 31/12/2077. Melewar POM is in the land title with total 70.77Ha 2. Land title number 095311185 under Kemajuan Perusahaan Kayu Sarawak (KPK) Sdn Bhd dated 26/11/1980 and leased until 31/12/2077. <p>Melewar Properties Sdn. Bhd and Kemajuan Perusahaan Kayu Sarawak (KPK) Sdn Bhd is the company under J.C Chang Plantations Sdn Bhd which has been verified base on the memo signed by Group Financial Controller, Mr Lam Yoke Lee dated 06/05/2022</p> <p><u>Tye Yang Estate</u></p>	Complied

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		<p>There are 3 leasing document for Tye Yang estate and has been verified by the auditor. Details as per below</p> <ol style="list-style-type: none"> 4. Ownership under Tye Yang Plantations (Sabah) Sdn Bhd, land title number CL095311407; lot number 81092771; 3038 ha leasing expired at 31/12/2080. 5. Ownership under RKKL Holdings Sdn Bhd, land title number CL095311710; lot number 83092724; 895.70 ha leasing expired at 31/12/2081. 6. Ownership under Sri Mulia Sdn Bhd, land title number CL095311729; lot number 83092723; 359.40ha leasing expired at 31/12/2081. <p>Tye Yang Plantations (Sabah) Sdn Bhd, RKKL Holdings Sdn Bhd and Sri Mulia Sdn Bhd is the company under J.C Chang Plantations Sdn Bhd which has been verified base on the memo signed by Group Financial Controller, Mr Lam Yoke Lee dated 06/05/2022</p> <p><u>Gerola Estate</u></p> <p>There are 4 land titles for Gerola Estate with total hectarage of 1587.40Ha. Details of lad title as per below</p> <ol style="list-style-type: none"> 1. Ownership under Gerola Estate Sdn Bhd, land title number CL095310919; 400.73Ha leasing expired at 31/12/2077. 2. Ownership under Kinakuluture Sdn Bhd, land title number CL095310928; 401.05Ha leasing expired at 31/12/2077. 3. Ownership under Pekopa Enterprise Sdn Bhd, land title number CL095310900; 401.85Ha leasing expired at 31/12/2077. 4. Melewar Properties Sdn Bhd, Land title number CL095310759, total land 384.78Ha and leasing expired on 31/12/2078. <p>Gerola Estate Sdn Bhd, Kinakulutre Sdn Bhd, Pekopa Enterprise Sdn Bhd and Melewar Properties Sdn Bhd is the company under J.C Chang</p>	
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		Plantations Sdn Bhd which has been verified base on the memo signed by Group Financial Controller, Mr Lam Yoke Lee dated 06/05/2022	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	There is no new planting for all operating units. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	There is no new planting for all operating units. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	There is no new planting for all operating units. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the</p>	There is no new planting for all operating units. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Complied

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	legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -		
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There is no new planting for all operating units. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no new planting for all operating units. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	As per interview with local communities, land that has been leased are not inhabited by communities in voluntary isolation where the land has been planted with oil palm and with the oldest age profile is 25 years old.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Documented in the "Guideline For Identifying Legal And Customary Rights And Identifying People Entitled To Compensation (reference# E/002-05/2019 date 12/08/2019). Stated in the procedure that of there is any claim of legal or customary right lands, the operating units need to verify the records provided the claimant especially the land title to verify the authenticity of the claim. Further verification must be done from the external parties such as state & district land office, district office, village head and other village.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and	Documented in the "Guideline for identifying legal and customary rights and identifying people entitled to compensation reference# E/002-05/2019 date	Complied

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	implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	12/08/2019 clause #3.0 where the procedure has outline the process of identifying the compensation. Terrain, soil types, vegetation, accessibility of the claim area must be accessed and documented and to calculate on the quantum compensation.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	Not applicable since there is no scheme smallholders.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	Not applicable since there is no claim from any parties since the day of audits.	Not Applicable
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	There are no local peoples that has been identified having legal, customary or user rights. However, procedure has been documented in the "Guideline for identifying legal and customary rights and identifying people entitle to compensation reference# E/002-05/2019 date 12/08/2019. Stated in the procedure that of there is any claim of legal or customary right lands, the operating units need to verify the records provided the claimant especially the land title to verify the authenticity of the claim. Further verification must be done from the external parties such as state & district land office, district office, village head and other village.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	There are no local peoples that has been identified having legal, customary or user rights. However, procedure has been documented in the "Guideline for identifying legal and customary rights and identifying people entitle to compensation reference# E/002-05/2019 date 12/08/2019 clause #3.0 where the procedure has outline the process of identifying the compensation. Terrain, soil types, vegetation, accessibility of the claim area	Complied

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	- Critical (Major) compliance -	must be accessed and documented and to calculate on the quantum compensation.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	There are no communities that have lost access and rights. It has been verified based on the lease document and interview with the local communities.	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Not applicable since there is no dispute identified during the audit. It has been confirmed base on the lease document, grievance records and interview with the local communities	Not Applicable
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Not applicable since there is no dispute identified during the audit. It has been confirmed base on the lease document, grievance records and interview with the local communities	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable	Not applicable since there is no dispute identified during the audit. It has been confirmed base on the lease document, grievance records and interview with the local communities	Not Applicable

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	customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -		
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Not applicable since there is no dispute identified during the audit. It has been confirmed base on the lease document, grievance records and interview with the local communities	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous period prices paid for FFB has been classified as publicly available and has been showed at the weighbridge station on daily basis which accessible for all smallholders. It has been confirmed through interview with one of the sample smallholders.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	There is evidence that FFB pricing has been explained to smallholders on 14/03/2023 during the stakeholder's consultation which will be conducted on annual basis. Interview with the sample smallholders confirmed that he has been explained on the FFB pricing and has also been verified by the auditor through minutes meeting and attendance records.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Fair pricing has been provided to smallholders which has been calculated base on the MPOB pricing that has been provided by Malaysia Palm Oil Board (MPOB) on monthly bases. The FFB pricing will be calculated base on the deduction to Palm Oil CESS, Sabah government sales tax, POM processing charges and also depending to Oil Extraction Rate and Kernel Extraction Rate (KER). Sample has been taken for month September'23 and November'23	Complied

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5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	There is evidence that all smallholder regardless of the category gender, origin, races have right for decision making. All smallholders have right to choose to send their FFB to which FFB or collection centre. Other than that, payment has been 100% given to the smallholders without any deduction.	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Sample of contract agreement verified for total 5 smallholders that supplying FFB to Melewar POM and can be sighted in the document "Sales and purchase agreement (Perjanjian Jual Beli). As verification, there is evidence that the agreement is fair and transparent and has been signed by both parties. Details of sample contract agreement as per below</p> <ol style="list-style-type: none"> 1) Marni bin Zulkifli 2) Masni binti Zulkifli 3) Jayatas Sdn Bhd 4) Sahanu bin Dengge 5) Hasmia bin Bahtiar 	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	There is evidence that agreed payment has been made in timely manner. It has been verified through payment document which is payment voucher and interview with FFB supplier. Payment for FFB will be done on monthly basis and not later than 5 th every month. Sample of has been taken for month Mar'23, June'23 and September'23	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	Calibration of the weighbridge has been done on 15/11/2023, serial number 222351668 and 23/12/2023, serial number 163650129 done by Metrology Corporation Malaysia Sdn. Bhd.	Complied

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5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Not applicable since there is no smallholder certified under RSPO Independent Smallholders Standard.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	A system to resolve any issues, complaint and grievances has been established and documented in the document "SOP on mechanism for complaints and grievances" document number E/001-07/2019 dated 12/08/2019. Stated in the procedure the channel/m	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Consultation with smallholder has been conducted on 16/11/2023 with several smallholder that supplying. The consultation include discussion to improve their livelihood and their interest in RSPO certification. As respond from the consultation, there is no smallholders that interested to be certified. This has been further confirmed through interview with local communities/smallholders by auditor.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Smallholder support programme has been developed and implemented which sighted 2 activities has been done which FFB grading by MPOB on 14/03/2023 and chemical handling training conducted on 16/11/2023	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	All smallholders that supplying to Melewar is legal all of them already acquired MPOB licences for selling FFB. Hence this indicator is not applicable	Not Applicable

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5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable since there is no scheme smallholders.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	As per conversation with the management, smallholders support program will be reviewed on annual basis. Latest revision sighted that has been done 03/01/2023t	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	On August 12, 2019, an Equal Opportunities Policy was instituted and endorsed by Mr. Tee Swee Kee, the Plantation Director. This policy is accessible in both Malay and English languages and serves to prohibit discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	As per interview, there is no discrimination has been practices for local communities, women, and migrant workers where they have been treated fairly and equally in term of salary and benefits. All the workers entitled minimum wages, same benefits, and accommodations. Sample of newly recruited workers in year 2023 from different categories, origin and gender has been interviewed and confirmed that there is no recruitment fees that has been charged.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	There is evidence that recruitment, selection, and hiring has been done based on skills and capabilities. It has been verified based on the interview records and assessment records prior to the recruitment. The assessment include qualification, previous jobs and working experience. While for training, it has been verified that all workers have been trained according	Complied

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		of nature of jobs. There is no promotion has been identified in all operating units for year 2022 and 2023.	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p><u>Pahang Oil Palm Estate 03</u></p> <ol style="list-style-type: none"> 1. There is a memo has been posted at the main notice board regards to the able refuse to be test for pregnancy. 2. Consultation with the female workers that handle chemical has been done on 16/09/2023 which one of the mechanism to gained information about the pregnancy test that will be conducted to all chemical handlers. 3. Agreement by the female workers which agreed to be tested for pregnancy. There is no female workers disagree to be tested. Which has been confirmed through interview and agreement records. <p><u>Melewar POM</u></p> <ol style="list-style-type: none"> 1. There is only 1 female workers in the Melewar POM which handling chemical, which work as sampling girl at lab station. 2. There is no pregnancy test has been conducted since the female workers still single and refusal agreement sighted dated 04/01/2023 signed by the workers. Interview has been done with the worker and she can demonstrate her understanding on her rights to reject for pregnancy test. 3. Sighted memo on the female workers right to reject to be tested for pregnancy test has been posted at the main notice at the office and clinic <p><u>Tye Yang Estate</u></p> <ol style="list-style-type: none"> 1. A system has been established which all female workers that handling chemical need to fill up form "Surat Akuan menjalani ujian 	Complied

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		<p>air kencing untuk kehamilan (UPT) bulanan bagi pekerja wanita yang mengendalikan bahan kimia". As per verified, there is 3 female workers that refuse to be tested. Further interview with the female workers handling chemical confirmed that pregnancy test has not been tested for the said female workers.</p> <p>2. Sighted memo on the female workers right to reject to be tested for pregnancy test has been posted at the main notice at the office and clinic.</p> <p><u>Gerola Estate</u></p> <p>1. Communication on the procedure for pregnancy test all female workers handling chemical on 29/09/2023 by hospital assistant, Madlina Jimmy.</p> <p>2. A system has been established which all female workers that handling chemical need to fill up form "Surat Akuan menjalani ujian air kencing untuk kehamilan (UPT) bulanan bagi pekerja wanita yang mengendalikan bahan kimia".</p> <p>3. Sighted memo on the female workers right to reject to be tested for pregnancy test has been posted at the main notice at the office and clinic.</p>	
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Procedure for gender committee has been established and documented in the SOP on mechanisms for communication and consultation, gender group (female) consultation document E/004-08/2019 title consultation for employees & other stakeholders document number 12/08/2019.</p> <p>Gender committee need to be established in all operating units as part of communication and consultation mechanism and also for one of the mechanism to lodge any complaint.</p> <p><u>Pahang Oil Palm Estate 03</u></p>	Complied

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		<p>Gender committee has been established for the estate and has been chaired by the chief clerk, Mdm. Hasnawati Lauding and Puan Rohaya Jahrin as secretary. There are 4 workers representative has been elected through the election paper.</p> <p><u>Melewar POM</u></p> <p>There is evidence that gender committee has been established for Melewar POM and can be sighted through the organization chart for the gender committee updated on 12/12/2022 which has been chaired by Pn. Sabarina binti Abu which consist of employee and employer representative. Latest meeting has been conducted on 27/06/2023. During the meeting, the committee has discussed issues on sexual harassment, mechanism to lodge any complaint, new mother assessment and other issues related to female.</p> <p><u>Tye Yang Estate</u></p> <p>Gender committee for Tye Yang Estate has been established and has been chaired by Puan Harma binti Azis and Puan Khatijah Mairin as secretary. Latest meeting has been conducted on 22/12/2022 and 22/06/2023. During the meeting, all committee has been communicated on the policy related such as sexual harassment, non-discrimination and reproductive right policy.</p> <p><u>Gerola Estate</u></p> <p>Gender committee has been established and has been chaired by Pn Maimunah binti Didin and Pn Madlina Jimny as secretary. Latest meeting has been conducted on 16/06/2023 and 22/12/2022.</p>	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	As per interview with sample of workers from different categories such gender, races, origin countries, religion and other, it has been confirmed that all workers have been equally. For daily rate, the payment is according	Complied

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		to Minimum Wages Order 2022 which are RM57.70. While for piece rate works, all workers has been paid base on the piece rate has been established by each types of works.	
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	<p>All operating units adopt the local employment act which Sabah Labor Ordinance 1967 revision September 2020 and also Minimum Wages Order 2022. There is no collective agreement for all operating units under Melewar Production Unit.</p> <p>Details pay and condition has been documented in the employment contract that has been signed by both parties (employer and employee). The employment contract has details employment condition and details up in the indicator 6.2.2. The employment contract has been established in Bahasa Malaysia.</p> <p>There is evidence that all workers have been explained on the employment contract and has been verified based on the training records and interview with the workers which can demonstrate their understanding on the employment contract.</p> <p>For piece rate works, it has been documented in the guideline rates for field operation, Panduan harga bagi pelbagai jenis kerja” which outline all the rate for piece rate works.</p>	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	<p>Employment contract has been made available for each worker for both operating units which has detailing payments and conditions of employment. There are 2 types of workers salary payment which are through daily basis (RM57.70/days) and piece rate basis which has been stipulated in the rate for piece rate works document. Leave, holiday entitlement, period of notice and working hours has been clearly mentioned in the employment contract which is in compliance with Sabah Labour</p>	Complied

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	- Critical (Major) compliance -	<p>Ordinance. It has further verified base on payslips for sample workers for month March'23, June'23 and September'23</p> <p>A Guidelines on Workers Employment for Casual and Temporary Employee have been established. Refer to document, ref. no. E/021-01/2018 dated 15/11/18. The guidelines have included the commitment to ensure.</p> <ul style="list-style-type: none"> - Prohibit the use of illegal temporary or migrant workers. Legalization must be initiated without undue delay and completed with 6 months. - workers' entitlement to housing and basic amenities which are at par with statutory requirements. - free of discrimination, coercion or violence - no form of any contract substitution is not allowed. - minimum wages to be provided as per requirement. <p>Based on pay slips, employment contracts, check roll reviewed, the estates are able to demonstrate the implementation of this Policy.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>There is evidence compliance of legal requirement which JC Chang Melewar production units adopts and complied with Sabah Labour ordinance. There evidence that workers work for 8 hours starting from 6am until 2pm with half and hours breaks. While for POM, from 8am until 4pm for shift and 4pm to 12 pm for shift B.</p> <p>Verification has been done for overtime there is compliance with legal requirement where did not exceeds 104 hours.</p> <p>Workers has been entitle for 14 days of outpatient sick leave and 60 days for warded and will be paid of total average salary as per previous. Other than that workers entitle for public holiday total 15 days and also annual leave base on years of services.</p> <p>While for women, they are entitled for 60 days of maternity leave.</p>	Complied

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		All the requirement of Sabah Labour ordinance has been verified through the employment contract, sample of pay slips, interview with sample workers and also during the site visit.	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>There is evidence that both operating units provide adequate housing for all the workers which all married couple will be provided with 1 house with 2 bedrooms, 1 toilet and kitchen.</p> <p>Water supplies has been provided for water catchment area that has been treated by the estate itself. Electricity has been supplied through genset for 24 hours and from the interview, there is no issues on electric supply.</p> <p>Each estates have their own clinic which has been managed by qualified hospital assistant. As site visit, sighted that the clinic have sufficient equipment and medical supplies for minor cases. Any major/critical cases will be referred to nearest government clinic or hospital in Sandakan town.</p> <p>While for education, there are community learning centre (CLC) for both operating units which established with cooperation between the company and Indonesia government. The facility has been provided by the estate management and estates also pay salary for 2 additional teachers. For local kids, the management has provided transport to travel to Kampung Paris which the local government school located.</p> <p>There are also sport facilities (football field, volleyball court), mosque, kids day-care, canteen and sundry shops in the estate compound.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	Both operating units has established sundry shops in the estate compound where it has been contracted to 3 rd parties. There is evidence that pricing has been monitored by the management on monthly basis to ensure that the price is affordable to the workers. It has been further confirmed by auditor during site visit where sample items have been sell at reasonable price. Interviewed with sample workers confirmed that sundry shops provide adequate and sufficient food for daily used.	Complied

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6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with</i></p>	<p>SOP Living wages (LW) has been established and documented in the document title “Implementation plan for living wage (LW)” document number E/027-02/2023 and 07/11/2023. The assessment has been done through data collection from financial year 20/21 until financial year 22/23. Information that has been collected is average wages received for all operating units located Pahang and Sabah states (Mill and Estate) and benefits in kinds that has been provided by the operating. Comparison has been made based on the LW benchmark calculation that has been extracted from report of household expenditure survey 2016, Annex 3, overview of LW for Malaysia from RSPO Guidance for implementing a living wage. Details of calculation as per below</p> <table><tr><th rowspan="2"></th><th colspan="2">Pahang</th><th colspan="2">Sabah</th></tr><tr><th>Mill</th><th>Estate</th><th>Mill</th><th>Estate</th></tr><tr><td>Actual average salary (RM)</td><td>1,635.32</td><td>1,519.85</td><td>2,077.20</td><td>1,338.64</td></tr><tr><td>In kind benefits</td><td>214.43</td><td>310.60</td><td>679.97</td><td>299.71</td></tr><tr><td>Prevailing wages (RM)</td><td>1,840.01</td><td>1,849.93</td><td>3,251.30</td><td>1,945.11</td></tr><tr><td>Benchmark (RM)</td><td>1,492.73</td><td></td><td></td><td>1,137.91</td></tr><tr><td>GAP</td><td>(347.28)</td><td></td><td></td><td>(807.20)</td></tr></table>		Pahang		Sabah		Mill	Estate	Mill	Estate	Actual average salary (RM)	1,635.32	1,519.85	2,077.20	1,338.64	In kind benefits	214.43	310.60	679.97	299.71	Prevailing wages (RM)	1,840.01	1,849.93	3,251.30	1,945.11	Benchmark (RM)	1,492.73			1,137.91	GAP	(347.28)			(807.20)	Complied
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	<p><i>the RSPO Guidance for Implementing a Decent Living Wage</i> (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>There are no casual and temporary workers that have been recruited for all operating units under Melewar Certification Units. All the employees are permanent employees.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Statement recognising freedom of association sighted and posted at the notice board for workers reference. For Pahang Oil Palm 02 Estate, the statement has been signed by the estate manager, Mr Christopher Kuhong. It has been established in both Bahasa Malaysia and English. It has been communicated to all the workers during morning muster call and has been</p>	Complied

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		further verified by auditor through interview. Training has been conducted as per below Melewar Estate: 15/02/2023 Melewar POM: 01/08/2023 and 03/10/2023 Tye Yang Estate: 04/01/2023 Gerola Estate: 16/11/2023	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	There is no workers union has been identified, registered and subscript by any workers for both operating units. However, the management has taken initiative to establish joint consultative committee which the representative will be elected by the workers itself. JCC meeting for each operating units has been conducted every 3 months, and sighted in minutes meeting that has been prepared by the chief clerk. Several issues has been discussed such as labour housing, working hours, overtime entitlement, and activities that has been planned. All the issues has been responded according as per communication and consultation procedure/grievance procedure. Minutes meeting has been documented in Bahasa Malaysia and has been classified as publicly available document.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	As per interview with the workers for both operating units, there is evidence that workers representative has been elected by the workers and without interference of the management. Sighted document of election, such as election paper, summary of results.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Formal policy for child protection and prohibition of child labour has been documented in the document title "Polisi Perlindungan kanak-kanak" that has been signed by Plantation director, Tee Swee Kee dated 20/02/2020	Complied

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	- Minor compliance -	For contracted parties, they need to sign additional agreement title "Kontrak pematuhan kemampanan dengan unit operasi di bawah kumpulan JC Chang Stated in the compliance contract that contractor will comply with the legal requirement, disallowing child labour, force labour and trafficked labour in the business activities.	
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	Minimum age requirement has been met by all sample operating units which all the workers has been recruited is above than 18 years old. It has been verified base on workers master list, personnel of file and interview with sample workers. It has been clearly stated in the "Child protection policy" dated 20/02/2020 that has been signed by Mr Tay Chwee Leong that the company will only recruited workers that age more than 18 years old.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There is no young persons has been recruited for all sample operating units. It has been verified based on the list of workers, interview with workers and also site visit. All workers that have been recruited is more than 18 years old according to months.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	The policy which pledges to eliminate all forms of child labour is displayed at prominent places near the office and workers' housing. Based on the documents sighted, communication about its no child labour policy were communicated to all levels of employees as evidenced from training records	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Sexual harassment policy has been documented in the document title "Polisi Gangguan Seksual" dated 01/07/2012 that has been signed by plantation director, Mr Tee Swee Kee. Stated in the policy that the management will promote a workplace that is free of sexual harassment and sexual harassment of employees in the workplace is not tolerated. There is evidence that policy has been communicated to the workers during the morning muster call	Complied

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		<p>Melewar Estate:15/02/2023 Melewar POM: 01/08/2023 and 03/10/2023 Tye Yang Estate: 04/01/2023 Gerola Estate: 16/11/2023</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Policy for reproductive right has been documented in document number E/015-01/2015 title "Policy of reproductive right" that has been signed by plantation director. As stated in the policy that women`s reproductive rights may include right to birth control, freedom from coerced sterilization and contraception, right for education and access in order to make free and informed reproductive choices. There is evidence that policy has been communicated to the workers during the morning muster call</p> <p>Melewar Estate:15/02/2023 Melewar POM: 01/08/2023 and 03/10/2023 Tye Yang Estate: 04/01/2023 Gerola Estate: 16/11/2023</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -</p>	<p><u>Melewar Estate Div. 01</u> There is no new mother has been identified in the Melewar Estate Div. 01. It has been identified base on the dependent list that has been updated and interview with the female workers. Communication of the RSPO requirement of new mother has been done during the gender committee meeting.</p> <p><u>Pahang Oil Palm Estate 03</u></p> <ol style="list-style-type: none"> 1. Communication on the requirement of new mothers' assessment has been conducted on 10/10/2022 to all gender committee, further verification has been done by auditor through interview, gender committee representative unable to demonstrate her understanding on definition of new mother base on RSPO standard. 	Complied

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		<ol style="list-style-type: none"> List of dependents has been established and updated in the document "Particular of dependent" for workers dependent and total 34 dependents have been listed. 2 kids has been identified below than 24 months which born on 04/08/2022 and 28/07/2022 New mother assessment has conducted new mother assessment for both kids on 05/10/2023 and the new mother requested for breast feeding break every 2 hours and request for the estate management to provide transportation for vaccination as per schedule. Both requests has been approved by the management on 06/10/2023 <p><u>Melewar POM</u></p> <ol style="list-style-type: none"> Communication of the needs of new mother assessment and definition of new mother has been conducted on 12/09/2023 to all the member of gender committee. List of dependent updated in 3 different documents. For staff, list of dependent updated in "Staff and dependent for fiscal year 2023, version 7" and while for workers, it has been updated in the "List of dependent". New mother assessment has been conducted for 2 new mothers on 22/11/2022 and 10/04/2023. there is no special needs that has been raised by both new mother during the assessment. <p><u>Tye Yang Estate</u></p> <ol style="list-style-type: none"> List of dependents has been updated as at November 2023, which has list out total 150 dependent. It has been found out there is no dependent that below than 24 months has been identified. 	
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		<ol style="list-style-type: none"> 2. Communication on RSPO requirement for new mother has been done on 11/09/2023 with attendance of all gender representative that has been elected. 3. There no new mother has been identified and has been confirmed by auditor through site visit to creche and interview with female workers. <p><u>Gerola Estate</u></p> <ol style="list-style-type: none"> 1. List of dependents has been updated in November 2023 which listed all dependent for local and foreign workers. 2. There is no new mother has been identified since then there is no new mother assessment has been conducted on 16/06/2023. 3. Communication of the RSPO requirement for new mother assessment 	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>A system has been established and documented in the Standard Operating Procedure (SOP) titled "Mechanism for Handling Complaints and Grievances," document number #E/001-07/2019, dated 12/08/2019. This document outlines the process for addressing complaints and grievances. It specifies that individuals can raise or lodge complaints and grievances through designated channels, which include the Joint Consultative Committee, Gender Committee, and the suggestion/complaint box.</p> <p>The procedure also emphasizes that management will not engage in any form of retaliation against the complainant, and the anonymity of complainants will be safeguarded. The complaint process is organized into four distinct levels. It commences with the receipt and recording of complaints, followed by a response from the supervisor or person-in-charge. It is essential that responses are provided within a maximum of 7 days as per the defined stages.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			

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6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Based on interviews with the workers, and observations made, the following were verified:</p> <ol style="list-style-type: none"> a. Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Indonesian workers has been interviewed and confirmed that passport has been kept by the workers itself. It has been confirmed during site visit to line site where verification passport has been kept at their house. b. Charging of recruitment fee: Workers are not charged any recruitment fees. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees. c. Involuntary overtime: Based on interviews conducted with the workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work. Sighted written consent from workers to work overtime for both estates. d. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There are no terms and condition for any resignation and the flight tickets will bear by the operating units. e. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview that confirmed that there is no loan/borrowing money given by the management to the workers. There is also no recruitment fee charged to the workers, hence confirmed that there is no debt bondage implemented. As per interview, there is no cost borne by the workers during the recruitment process. From the 	Complied
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		<p>workers respond, they only used money which is for their own goods. Other cost has been paid by the management.</p> <p>Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by the management via Merchante System and can be withdrawn at the nearest agent or ATM and sighted evidence of payment that has been signed by the workers. There is evidence that there were no workers' wages being withheld by the management. It has been further confirmed through interview with the workers.</p>																																			
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>It has been verified that no temporary or migrant workers has been employed. All workers has been employed permanently by the management. It has been confirmed through interview and document review (master list of workers, employment contract) and site visit.</p>	Complied																																		
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.																																					
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mill management have conducted the regulated quarterly safety committee meeting with the participation of workers representative. The latest organizational charts were made available and observed that the compositions were in accordance with the legal requirements. Minutes of meetings were made available for verification which dated stated as follows:</p> <table><tr><th rowspan="2">OU</th><th colspan="4">Quarter and dates</th></tr><tr><th>03/2023</th><th>02/2023</th><th>01/2023</th><th>04/2022</th></tr><tr><td>Melewar 1</td><td>09/09</td><td>09/06</td><td>09/03</td><td>09/12</td></tr><tr><td>Pahang 3</td><td>22/09</td><td>23/06</td><td>24/03</td><td>15/12</td></tr><tr><td>Melewar mill</td><td>12/10</td><td>28/07</td><td>28/04</td><td>12/01</td></tr><tr><td>Tye Yang</td><td>25/10</td><td>26/07</td><td>26/04</td><td>25/01</td></tr><tr><td>Gerola</td><td>23/11</td><td>17/08</td><td>17/05</td><td>17/02</td></tr></table>	OU	Quarter and dates				03/2023	02/2023	01/2023	04/2022	Melewar 1	09/09	09/06	09/03	09/12	Pahang 3	22/09	23/06	24/03	15/12	Melewar mill	12/10	28/07	28/04	12/01	Tye Yang	25/10	26/07	26/04	25/01	Gerola	23/11	17/08	17/05	17/02	Complied
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		<p>Generally, among the agenda discussed in the meetings are:</p> <ul style="list-style-type: none"> • Confirmation of minutes previous meeting • Workplace inspection report • ERP Team report • Report of accident, dangerous occurrence, occupational poisoning, and occupational disease • Records of first aid kit utilisation • Other matters • Suggestion and complaint related to OHS <p>Workplace inspections were made prior to the committee meeting. The respective operating units' managers were appointed as the chairman.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The procedures for accident and emergencies have been established. There is formation of ERP Team & ERP for all the identified incidences. In addition, the procedures have been simplified in a flow chart form and displayed for information of all employees in the estates/mill. Among the emergency situations identified and procedures established are:</p> <ol style="list-style-type: none"> 1) Landslide – procedure no. U/001-01/2015 2) Building evacuation – procedure no. U/002-01/2015 3) Intrusion – procedure no. U/003-01/2015 4) Riot – procedure no. U/004-01/2015 5) Typhoon – procedure no. U/005-01/2015 6) Chemical spillage – procedure no. U/001-01/2015 7) Flood – procedure no. U/001-01/2015 <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. ERT members have been provided with training on emergency procedures appropriate to their respective workplace and level of risk.</p>	Complied

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		<p>The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid kits were available at various points in the estate office, workshop, and store. The estate distributed the first aid kits to the mandores and brought along to the field during operations.</p> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA (Lost Man Day MC). Records of accidents were summarized in the JKPP 8 form annually and submitted to the authority (Dept. of Safety & Health) as regulated. Records are well kept in the office for verification.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The management provides appropriate PPE to the employees in accordance with HIRARC and Safe Operating Procedure. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e., apron, safety shoes, rubber boots, N95 mask, respirator, cartridge, helmet, goggles, gloves, etc.), date of PPE received and receipt acknowledgement by the recipient. On site verification and interview with workers showed that the appropriate PPE was provided for free and worn accordingly.</p> <p>Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing were provided and well maintained.</p>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well maintained and managed. Records of medical inventory, VMO visits and patients treated were made available for verification.</p> <p>The sampled estates are subscribing to SOCSO to cover the accident insurance for all their workers. Latest monthly contributions were verified and confirmed with the following details:</p>	Complied

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		<table> <tr> <th>Operating units</th><th>Transaction date</th><th>Payment receipt Ref. No.</th><th>No. of employees covered</th></tr> <tr> <td>Melewar 1</td><td>11/11/2023</td><td>20230005673065</td><td>213</td></tr> <tr> <td>Pahang 3</td><td>08/11/2023</td><td>20230005607578</td><td>208</td></tr> <tr> <td>Melewar mill</td><td>07/11/2023</td><td>PV1123-033</td><td>158</td></tr> <tr> <td>Tye Yang</td><td>09/11/2023</td><td>ACR112230241877</td><td>370</td></tr> <tr> <td>Gerola</td><td>11/11/2023</td><td>ACR112230266723</td><td>130</td></tr> </table>	Operating units	Transaction date	Payment receipt Ref. No.	No. of employees covered	Melewar 1	11/11/2023	20230005673065	213	Pahang 3	08/11/2023	20230005607578	208	Melewar mill	07/11/2023	PV1123-033	158	Tye Yang	09/11/2023	ACR112230241877	370	Gerola	11/11/2023	ACR112230266723	130	
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	The RSPO's Lost Time Injury Frequency Rate (LTIFR) metrics was used to record the number of lost time injuries and total hours worked for the period of Jan – Dec of 2022. Verification against the certification unit's other records such as JKPP 8 found the data is accurate.	Complied																								
Principle 7: Protect, conserve and enhance ecosystems and the environment																											
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																											
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	<p>The Estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <p>a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOP ref L/001-06/2017 dated 07/05/2017.</p> <p>b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as Turnera subulata, Cassia cobanensis, Antigonon leptopus, along the roadsides and designated points in the fields and also within the nursery</p>	Complied																								

		<p>perimeter. To develop beneficial plant nursery comprised of the beneficial plant.</p> <p>c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of Pests and Diseases had been continued. These monthly detection and observations were carried by staff.</p> <p>d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PC/Agronomist. Baiting are continued until bait acceptance threshold level</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the 4 estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in mill and estates by burning ever since the JC Chang Group practiced zero burning as per the policy in:</p> <p>a) P01-SOP-Section 01/2011 - Under felling/clearing & land preparation</p> <p>b) Environmental Policy signed by the Plantation Director dated 12/08/2019</p> <p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The justification of all pesticides used in the estate were documented in the following documents:</p> <p>1) Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/008-14/2016)</p>	Complied

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		<p>2) Justifications for Pesticide Usage under IPM (Weedicides) (B/009-10/2015)</p> <p>3) Weeding Regime & Practices (B/004-01/2008)</p> <p>The documents provide the guideline on type of agrochemical use, target pest/weed/disease, weed situation, recommended chemical brand name, application rate, and method of application. Verification of chemical register, chemical issuance records, and site visits showed that the pesticides used were in accordance with the justification in the procedures.</p>	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estates. Based on the records, the total a.i. per ha for 2022 at all the sampled estates was less than 1 lt a.i./ha for both matured and immature areas.</p>	Complied
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in the documents mentioned in Indicator 7.2.1.</p> <p>The implementation in the field is consistent with the SOP established.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There was no evidence of prophylactic use of pesticide at all the sampled estates.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p>	<p>Based on the sampled estates' Chemical Register using OSHA regulated format, CHRA, and site visit, there were only class III & IV chemicals used by the estates. There were also no pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, used.</p>	Complied

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	<p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>		
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers, and herbicides sprayers. This is also in-line with the recommendation by the CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained for verification at all the sampled estates.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides were kept in the designated stores at all the sampled estates in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were equipped with locks, ventilation and accessibility was limited to authorized personnel only. Appropriate hazard signage was also put up to create awareness. Valid Safety Data Sheets with appropriate languages were also kept in the stores.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste contractors. The visited estates use the empty chemical containers as premix containers to transport chemical premix to the field for chemical spraying operations. The accumulated chemical</p>	Complied

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		containers are then disposed through licensed waste collector. Verified the sample records of disposal as follows: <ul style="list-style-type: none"> • Pahang Oil Palm Estate 3 – Disposal through LD Recycle Enterprise dated 03/11/2023 • Hwa Li 2 Estate – Disposal through LD Recycle Enterprise dated 15/08/2023 	
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	Aerial of pesticides was not practiced by any of the sampled estates.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	The estates had carried out the annual surveillance for their pesticide operators according to the recommendation stated in the CHRA. Surveillance reports by the authorised Occupational Health Doctors were kept by the estates for reference and follow up the necessary actions. The last surveillances were carried out on 04/08/2023 (Pahang Oil Palm Estate 3), 15/08/2023 (Tye Yang Estate), and 18/08/2023 (Gerola Estate) by an OHD (reg. no.: HQ/16/DOC/00/557). Based on the reports, all the workers were found to be fit or working.	Complied
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	Based on site observation and verification of employee master list medical surveillance reports from the OHD, there is no evidence that work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>The Mill and Estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2022/23 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below;</p> <ul style="list-style-type: none"> a) Air - Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG b) Water - Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down c) Land - Scheduled waste, domestic waste and industrial/process waste. <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2023 reviewed annually. The waste generated from the mill/estates operations as shown below:</p> <ul style="list-style-type: none"> a) Scheduled waste - Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries b) Domestic waste - rubbish from the mill/estate complex and employees' quarters c) Industrial waste - Fiber, palm kernel shell, boiler ash, scrap iron d) Sewage - Sewage from housing/office complex <p>The pollution identified from the mill/estate activities:</p> <ul style="list-style-type: none"> a) Black smoke - Emission from Boilers/vehicles/engines b) Odor & gases - Activities from the effluent treatment c) Leakage of lubricant - Storage & vehicle maintenance 	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>Both the mill and estate had established SOP for chemical handling. The SOP of handling of chemicals is available in the Group SOP and Guidelines established in Aug 2011</p>	Complied

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	<p>- Minor compliance -</p>	<p>a) SOP ref H/005-02/2015 titled Chemical purchase, storage, handling and disposal dated 03/08/2015.</p> <p>b) Prosedur Kerja Selamat</p> <ul style="list-style-type: none">- Prosedur membancuh Racun di PREMIX- Pengendalian Bahan Kimia- Pengurusan Bahan Buangan <p>c) SW Ref F/014-04/2017 dated 07/01/2017 SW labeling storage and documentation item v</p> <p>The Waste Management Plan 2022/23 has been established prepared by Sustainability /ICT and verified by the Assistant Engineer/Assistants/Manager.</p> <p>Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The mill and estates scheduled waste are disposed to Lagenda Bumimas Sdn Bhd Kota Kinabalu registered with DOE. DOE approval letter dated 26/01/2023 was sighted and verified.</p> <p>Clinical Waste SW404 are despatched to Sedafiat Sn Bhd K Kinabalu. Letter dated 18/09/2023 has reference and verified that collection are made via collection of the VMO Klinik Mabello.</p>								
		<table><tr><td></td><td>Mill</td><td>Date</td><td>SW305</td><td>SW 409</td><td>SW410</td><td>SW322</td></tr></table>		Mill	Date	SW305	SW 409	SW410	SW322	
	Mill	Date	SW305	SW 409	SW410	SW322				

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1	Melewar POM	05/12/23	3.0000	0.9868	0.1850	-
	Melewar POM	17/06/23	-	-	0.1780	-
	Melewar POM	09/06/23	2.4000	0.8734	0.1340	0.1742
	Estate	Date	SW 305	SW 409	SW410	SW322
1	Melewar Estate 1	270/6/23	2.2000	0.1440	0.1740	-
2	Melewar Estate 1	21/12/22	1.8000	0.3200	0.0400	-
3	Pahang Oil Palm 3	23/06/23	2.2270	0.1080	0.2420	-
4	Pahang Oil Palm 3	23/11/22	-	0.3600	-	-
5	Pahang Oil Palm 3	15/11/22	0.2100	-	0.1000	-
6	Tye Yang Estate	25/09/23	4.2440	0.2890	0.3210	-
7	Tye Yang Estate	15/03/23	3.3000	0.4690	0.2940	-
8	Gerola Estate	02/08/23	-	-	0.1674	-
9	Gerola Estate	10/06/23	1.5000	0.2740	0.1920	-
10	Gerola Estate	29/11/22	1.2570	0.1990	0.1360	-
SW 404 - Clinical Waste. (Unit in mt)						
	Estate / Mill	Date	Quantity	-	Date	Quantity
1	Pahang Oil Palm 3	26/09/23	0.0052	-	-	-
2	Melewar Estate 1	01/09/23	0.0001	-	14/07/23	0.0001

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3	Tye Yang Estate	06/02/23	0.0002	-	13/05/22	0.0002
4	Gerola Estate	09/03/23	0.0003	-	20/12/22	0.0001
5	Melewar POM	07/11/23	0.00035		11/10/23	0.0003

Domestic waste for the operating units in Melewar Production Unit were disposed as follows;

- a) MPOM and Melewar Estate 1 - to Melewar Estate 1 landfill PM13A5
- b) Pahang Oil Palm Estate 3 - internal landfill located at PM95B/D2
- c) Tye Yang Estate - internal landfill located at PM95A/A2
- d) Gerola Estate - internal landfill located at PM12B/D3

Training in relation to environment as shown below;

	Subject	ME 1	POPE3	Gerola	Tye Yang	MPOM
1	Company Policy	15/02/23	11/01/23	16/11/23	04/01/23	02/5/23
2	MSPO/RSPO	15/02/23	04/01/23	16/11/23	04/01/23	03/10/23
3	Zero Burning	19/04/23	19/07/23	18/05/23	30/08/23	01/11/23
4	Buffer Zone	21/05/23	10/05/23	26/08/23	15/04/23	01/11/23
5	RTE Awareness	21/05/23	07/04/23	20/07/23	05/04/23	01/11/23
6	Recycling	21/06/23	15/09/23	20/11/23	08/05/23	01/09/23
7	Line site waste	21/06/23	19/07/23	17/01/23	28/06/23	01/9/23
8	SW M/gment	21/06/23	15/09/23	28/01/23	28/06/23	24/10/23
9	Pollution Device	30/06/23	10/08/23	22/10/23	10/07/23	16/8/23

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7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>All the estates in the Melewar Production Unit practices of "Zero open burning" is enforced and elaborated in the Group Environmental Policy dated 12/08/2019 signed by the Plantation Director and also included in the following guidelines in:</p> <p>a) SOP ref no A/016 - 10/2023 revision date 14/02/2023 - replanting for under felling/clearing & land preparation</p> <p>b) SOP in Land Preparation for Terracing ref A/016- 10/2023 dated 14/02/2023</p> <p>The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. The estates in the Melewar Production Unit had replanting program spanned over the forthcoming years as shown in 3.1.2. There was no evidence that fire had been used to prepare land for replanting in the estates. No fire was used for waste disposal.</p>	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>The estates in the Melewar Production Unit continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the Group SOP and Guidelines among others.</p> <p>a) Standard Operating Procedures on fertilizer recommendation and foliar analysis (SOP) 2011</p> <p>b) "Guidelines On River Management"</p> <p>c) Pictorial Safety Standards and Security Guidelines (PSS).</p>	Complied

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		<div>d) Laboratory Process Control Manual e) Security Guidelines</div> <p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>																			
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. SOP ref no C/027-01/2017 dated 31/05/2017. The agronomic assessment and fertilizer recommendation was conducted by Agronomy of Plantation Department Head Office to formulate the FY2023/24 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been carried out in all estates. Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on annual basis. The latest being:</p> <table><tr><td></td><td>Estate</td><td colspan="2">Foliar Analysis</td><td colspan="2">Soil Analysis</td></tr><tr><td></td><td></td><td>Report Date</td><td>Report No</td><td>Report Date</td><td>Report No</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>		Estate	Foliar Analysis		Soil Analysis				Report Date	Report No	Report Date	Report No							Complied
	Estate	Foliar Analysis		Soil Analysis																	
		Report Date	Report No	Report Date	Report No																

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		<table><tr><td>1</td><td>Gerola Estate</td><td>01/03/2023</td><td>R23/2/342</td><td>01/03/2023</td><td>R23/2/226</td></tr><tr><td>2</td><td>Melewar Estate 1</td><td>01/03/2023</td><td>R23/2/339</td><td>27/02/2023</td><td>R23/2/225</td></tr><tr><td>3</td><td>Pahang Palm Oil 3</td><td>20/03/2023</td><td>R23/3/50</td><td>08/04/2023</td><td>R22/3/2022</td></tr><tr><td>4</td><td>Tye Yang Estate</td><td>04/03/2023</td><td>R23/3/62</td><td>06/03/2023</td><td>R23/2/313</td></tr></table> <p>All foliar and soil sampling & analysis was conducted by KLK - KDC Laboratory Tawau. Reports were sighted and verified.</p>	1	Gerola Estate	01/03/2023	R23/2/342	01/03/2023	R23/2/226	2	Melewar Estate 1	01/03/2023	R23/2/339	27/02/2023	R23/2/225	3	Pahang Palm Oil 3	20/03/2023	R23/3/50	08/04/2023	R22/3/2022	4	Tye Yang Estate	04/03/2023	R23/3/62	06/03/2023	R23/2/313												
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4	Tye Yang Estate	04/03/2023	R23/3/62	06/03/2023	R23/2/313																																	
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>All the estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates had applied records of EFB (20-40 kg/palm) application in mt in 2022/23 was as follows:</p> <table><tr><td></td><td>Estate</td><td>Field no</td><td>Ha</td><td>Mt</td></tr><tr><td>1</td><td>Gerola Estate</td><td>Ni</td><td>Ni</td><td>Ni</td></tr><tr><td>2</td><td>Gerola Estate</td><td>Ni</td><td>Ni</td><td>Ni</td></tr><tr><td>3</td><td>Melewar Estate 1</td><td>PR22B</td><td>17.99</td><td>413.75</td></tr><tr><td>4</td><td>Melewar Estate 1</td><td>PR23A</td><td>53.07</td><td>1224.85</td></tr><tr><td>5</td><td>Pahang Oil Palm 3</td><td>PM95B</td><td>8.71</td><td>59.24</td></tr><tr><td>6</td><td>Pahang Oil Palm 3</td><td>PM18A</td><td>9.38</td><td>63.78</td></tr></table>		Estate	Field no	Ha	Mt	1	Gerola Estate	Ni	Ni	Ni	2	Gerola Estate	Ni	Ni	Ni	3	Melewar Estate 1	PR22B	17.99	413.75	4	Melewar Estate 1	PR23A	53.07	1224.85	5	Pahang Oil Palm 3	PM95B	8.71	59.24	6	Pahang Oil Palm 3	PM18A	9.38	63.78	Complied
	Estate	Field no	Ha	Mt																																		
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		<table><tr><td>7</td><td>Tye Yang Estate</td><td>Pr23a</td><td>22.97</td><td>468.66</td></tr><tr><td>8</td><td>Tye Yang Estate</td><td>PM15A2</td><td>5.25</td><td>178.73</td></tr><tr><td>8</td><td>Tye Yang Estate</td><td>PM16A3</td><td>5.47</td><td>186.00</td></tr></table>	7	Tye Yang Estate	Pr23a	22.97	468.66	8	Tye Yang Estate	PM15A2	5.25	178.73	8	Tye Yang Estate	PM16A3	5.47	186.00																		
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7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, fertilizer application monitoring forms, etc. Review of the records revealed that the actual fertilizers applied in 2022/23 was in line with the program. The following fertilizers were applied in the estates on recommendation by the Agronomist.</p> <table><tr><td></td><td>Fertiizer</td><td>Kg/palm</td><td>application month</td></tr><tr><td>1</td><td>Comp 10.5</td><td>2.50-3.00</td><td>Mac - May</td></tr><tr><td>2</td><td>Comp 10.3.7</td><td>2.7-3.00</td><td>Sept - Oct</td></tr><tr><td>3</td><td>NK Mix</td><td>2.50-3.00</td><td>July - Sept</td></tr><tr><td>4</td><td>PMg Mix</td><td>2.00</td><td>May - June</td></tr><tr><td>5</td><td>Borate</td><td>0.10</td><td>Oct - Nov</td></tr><tr><td>6</td><td>Amm Chloride</td><td>3.00</td><td>Jan - Feb</td></tr><tr><td>7</td><td>Azomite</td><td>0.50-1.75</td><td>Jan - Feb</td></tr></table>		Fertiizer	Kg/palm	application month	1	Comp 10.5	2.50-3.00	Mac - May	2	Comp 10.3.7	2.7-3.00	Sept - Oct	3	NK Mix	2.50-3.00	July - Sept	4	PMg Mix	2.00	May - June	5	Borate	0.10	Oct - Nov	6	Amm Chloride	3.00	Jan - Feb	7	Azomite	0.50-1.75	Jan - Feb	Complied
	Fertiizer	Kg/palm	application month																																
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.																																			

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7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table><tr><td>No</td><td>Gerola</td><td>Melewar 1</td><td>Pahang OP 3</td><td>Tye Yang</td></tr><tr><td>1</td><td>K/batangan</td><td>K/batangan</td><td>K/batangan</td><td>K/batangan</td></tr><tr><td>2</td><td>Kretam</td><td>Lungmanis</td><td>Lungmanis</td><td>Lungmanis</td></tr><tr><td>3</td><td>-</td><td>Kretam</td><td>Kretam</td><td>Kretam</td></tr><tr><td>4</td><td>-</td><td>-</td><td>Klias</td><td>Rumdi</td></tr><tr><td>5</td><td>-</td><td>-</td><td>Rumdi</td><td>-</td></tr></table> <p>There were no other problem soils (e.g. podzols and acid sulphate soils) on the 4 estates.</p>	No	Gerola	Melewar 1	Pahang OP 3	Tye Yang	1	K/batangan	K/batangan	K/batangan	K/batangan	2	Kretam	Lungmanis	Lungmanis	Lungmanis	3	-	Kretam	Kretam	Kretam	4	-	-	Klias	Rumdi	5	-	-	Rumdi	-	Complied
No	Gerola	Melewar 1	Pahang OP 3	Tye Yang																													
1	K/batangan	K/batangan	K/batangan	K/batangan																													
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3	-	Kretam	Kretam	Kretam																													
4	-	-	Klias	Rumdi																													
5	-	-	Rumdi	-																													
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>The Melewar Production Unit estates visited continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by policy in:</p> <p>c) SOP ref no A/016 - 10/2023 revision date 14/02/2023 - replanting for under felling/clearing & land preparation</p> <p>d) Environmental Policy dated 12/08/2019</p> <p>e) SOP in Land Preparation for Terracing ref A/016- 10/2023 dated 14/02/2023</p> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop mucuna bracteata had been planted along certain slopes by the</p>	Complied																														

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		<p>management. Large areas with neprolepis biserrata in the inter rows were sighted during the visit. The slope maps were provided by the Plantations Department with details as follows:</p> <table><tr><td></td><td>Topography</td><td>Gerola</td><td>Melewar 1</td><td>Pahang OP 3</td><td>Tye Yang</td></tr><tr><td>1</td><td>0-6</td><td>24.11</td><td>13.90</td><td>17.96</td><td>20.79</td></tr><tr><td>2</td><td>6-10</td><td>7.07</td><td>10.90</td><td>1.45</td><td>13.81</td></tr><tr><td>3</td><td>10-15</td><td>49.14</td><td>30.25</td><td>23.48</td><td>5.38</td></tr><tr><td>4</td><td>15-25</td><td>19.68</td><td>44.96</td><td>28.45</td><td>34.13</td></tr><tr><td>5</td><td>>25</td><td>0.00</td><td>0.00</td><td>28.66</td><td>0.11</td></tr><tr><td></td><td>Total</td><td>100.00</td><td>100.00</td><td>100.00</td><td>100.00</td></tr></table>		Topography	Gerola	Melewar 1	Pahang OP 3	Tye Yang	1	0-6	24.11	13.90	17.96	20.79	2	6-10	7.07	10.90	1.45	13.81	3	10-15	49.14	30.25	23.48	5.38	4	15-25	19.68	44.96	28.45	34.13	5	>25	0.00	0.00	28.66	0.11		Total	100.00	100.00	100.00	100.00	
	Topography	Gerola	Melewar 1	Pahang OP 3	Tye Yang																																								
1	0-6	24.11	13.90	17.96	20.79																																								
2	6-10	7.07	10.90	1.45	13.81																																								
3	10-15	49.14	30.25	23.48	5.38																																								
4	15-25	19.68	44.96	28.45	34.13																																								
5	>25	0.00	0.00	28.66	0.11																																								
	Total	100.00	100.00	100.00	100.00																																								
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>This compliance being addressed in the "Environmental Policy under Slope and River Protection" signed by the Plantation Director dated 12/08/2019 also statement in the Environmental Management Plan 2022/23 on the steep slope stating the following among others;</p> <p>"Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".</p>	Complied																																										
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																																													
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil surveys are made and available in a soil map at the estates. Topographic contour maps are also available which are both used to manage the drainage and road works in the estates. The Soil Series Maps are issued by the Plantations Department respectively for individual estates. However, the auditor verified there is no new planting activity in the 4 estates visited.</p>	Complied																																										

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7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	This is addressed in the Environmental Policy dated 12/08/2019 signed by the Plantation Director i.e to avoid extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. However, the auditor verified there is no new planting activity in the estates visited.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are made and available in a soil map at the estates. Topographic contour map is also available which are both used to manage the drainage and road works in the estates. However, the auditor verified there is no new planting activity in the 4 estates visited.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no new planting and no peat soil availability in the 4 estates visited. There is 109.40 ha of peat soil available in Pahang Oil Palm Div 2 Estate. However, this estate was not sampled as part of Melewar Production Unit. The estate has on diversion despatched FFB to Melewar Palm Oil Mill thus in the GHG data attributed to the availability of peat soil.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	There is no new planting and no peat soil availability in the 4 estates visited. There is 109.40 ha of peat soil available in Pahang Oil Palm Estate 2. However, this estate was not sampled as part of Melewar Production Unit. The estate has on diversion despatched FFB to Melewar Palm Oil Mill thus in the GHG data attributed to the availability of peat soil. At the company level, peat inventory had been submitted to RSPO Secretariat which include the peat area in Pahang Oil Palm Estate 2.	Complied
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no new planting and no peat soil availability in the 4 estates visited. There is 109.40 ha of peat soil available in Pahang Oil Palm Div 2 Estate. However, this estate was not sampled as part of Melewar Production Unit. The estate has on diversion despatched FFB to Melewar Palm Oil Mill thus in the GHG data attributed to the availability of peat soil.	Not Applicable

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7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting and no peat soil availability in the 4 estates visited.</p> <p>The Management however had established the water and ground cover management programme is documented in the C/030 - 01/2020 dated 04/02/2020 - New Guideline for Peat Management. All individual estates and mill had their respective water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. b) Contingency during water shortage. c) Field water management - side pit construction d) Adequate field drains e) Reuse/recycle waste water. f) Peat soil water management 	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting and no peat soil availability in the 4 estates visited. There is 109.40 ha of peat soil available in Pahang Oil Palm Estate 2. However, this estate was not sampled as part of Melewar Production Unit. Nonetheless, as reported in the previous assessment, Pahang Oil Palm Estate 2 has conducted their drainability assessment. The estate has on diversion despatched FFB to Melewar Palm Oil Mill thus in the GHG data attributed to the availability of peat soil.</p>	Complied

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7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting and no peat soil availability in the 4 estates visited. There is 109.40 ha of peat soil available in Pahang Oil Palm Div 2 Estate. However, this estate was not sampled as part of Melewar Production Unit. The estate has on diversion despatched FFB to Melewar Palm Oil Mill thus in the GHG data attributed to the availability of peat soil.</p>	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting and no peat soil availability in the 4 estates visited. There is 109.40 ha of peat soil available in Pahang Oil Palm Div 2 Estate. However, this estate was not sampled as part of Melewar Production Unit. The estate has on diversion despatched FFB to Melewar Palm Oil Mill thus in the GHG data attributed to the availability of peat soil.</p>	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The mill water management plan 2022/23 has been established with the recent review made on respectively by the estate and mill This plan is incorporated in the Environmental and Social Improvement Plan - Sabah for Melewar Production Unit. Among others the plan therein has emphasized on;</p> <p>a) rainwater harvesting for cleaning purposes, b) water from the reservoir/catchment for the mill operations c) continual training for workers on water efficiency consumption, d) desilting of water reservoir to retain the reservoir optimal capacity. e) The action plan in event of draught/water pollution. f) Rainfall statistics / Records</p> <p>The estate similarly possessed the following water management plan. Among others containing the following initiatives.</p>	Complied

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				Activity	Threat	Action Plan		
			1	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer CU as non-spraying activities.		
			2	General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.		
			3	Line site	Pollution Draught Wastage	Every house is supplied with containers. Awareness on water usage efficiency. Outsource from neighboring estates.		
			4	Drain upkeep	Interruption water flow at drainage system.	Periodic desilting Building of sandbags at specific points to contain water (weirs)		
			5		Water pollution	Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank Adhere SW management procedure to avoid pollution caused by SW.		

		The Mill Identification & Management of Wastewater 2022/23 among others as summarized below;				
			location	Wastewater produced	Treatment/containment	Reuse/recycle / disposal method
	1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system	
	2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain	
	3	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	
	4	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	
	5	Laboratory	Cleaning water	Process drains	Monsoon drain	
	6	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed vendor.	

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		All employees have access to clean water as the main source is from the mill or own estates water treatment plant. The water supplies are for the entire estates/mill complex and community.																			
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the estate and mill catchment. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In certain areas Guatemala grass / Vertivar sp were planted along the riverbanks. Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the Group SOP and Guidelines ref C/001-01/2008 dated 15/09/08. The buffer zones established are as follows:</p> <table><tr><td></td><td>River width</td><td>Buffer CU</td></tr><tr><td>1</td><td>>40 meters</td><td>50 meters</td></tr><tr><td>2</td><td>20 - 40 meters</td><td>40 meters</td></tr><tr><td>3</td><td>10 - 20 meters</td><td>20 meters</td></tr><tr><td>4</td><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>5</td><td>< 5 meters</td><td>5 meters</td></tr></table> <p>Buffer zones areas identified for the estate and mill are as follows;</p> <p>a) Melewar 1 Estate - Sungai Koyah b) Pahang OP 3 Estate - Internal water courses leading to Sg Koyah c) Tye Yang Estate - Internal water courses leading to Sg Koyah d) Gerola Estate - Internal water courses.</p> <p>Based on field visits at the riparian zones, the maintenance and restoration of the zones were found to be in-line with the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves.</p>		River width	Buffer CU	1	>40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Complied
	River width	Buffer CU																			
1	>40 meters	50 meters																			
2	20 - 40 meters	40 meters																			
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4	5 - 10 meters	10 meters																			
5	< 5 meters	5 meters																			

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		<p>The estates reviewed the environmental performances during the annual Jawatankuasa Alam Sekitar meeting</p> <p>a) Melewar 1 Estate - 20/11/2023 - 22 participants b) Pahang OP 3 Estate - 08/02/2023 - 17 participants c) Tye Yang Estate - 26/07/2023 - 36 participants d) Gerola Estate - 17/08/2023 - 19 participants</p> <p>The agenda among others discussing the following;</p> <p>a) Polisi Alam Sekitar b) Kawalan Pencemaran Alam Sekitar. c) Lapuran Aspek RTE/HCV d) Lapuran Kawasan Zon Penampungan Sungai e) Larangan Pemburuan Haram f) SW Management g) General Discussion of other Environmental Issues</p> <p>The mill held quarterly EPMC to discuss on the environmental issues. Minutes of meeting dated 12/10/2023, 15/08/2023 and 02/12/2022 and 18/09/2022. Agenda discussed are similar to the meeting held by the estates except for additional effluent, biogas operations and ETP monitoring, The mill made monthly water samples at 2 points in the river nearby i.e hulu & hilir Sg Koyah. Similar annual sampling for the estates were made in respective watercourse identified within and within perimeter results as shown below. No major issues were noted/recorded.</p> <table><tr><td></td><td colspan="2">Melewar POM</td><td colspan="2">04/11/2023</td><td colspan="2">04/10/2023</td></tr><tr><td></td><td>Parameter</td><td>unit</td><td>U/strea m</td><td>D/strea m</td><td>U/strea m</td><td>D/strea m</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>		Melewar POM		04/11/2023		04/10/2023			Parameter	unit	U/strea m	D/strea m	U/strea m	D/strea m								
	Melewar POM		04/11/2023		04/10/2023																			
	Parameter	unit	U/strea m	D/strea m	U/strea m	D/strea m																		

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		1	PH	-	6.4	6.4	6.6	6.7		
		2	BOD	mg/L	2	2	2	2		
		3	COD	mg/L	31	35	31	31		
		4	T Solids	mg/L	408	468	208	216		
		5	S Solids	mg/L	173	210	84	98		
		6	O & G	mg/L	2	2	2	2		
		7	A Nitrogen	mg/L	<1	<1	<1	<1		
		8	T Nitrogen	mg/L	3	3	2	2		
				Estate	Melewar Estate		Pahang OP Estate 3			
					15/11/2023		01/11/2023			
			Parameter	unit	Sg Koyah	Sg Koyah	Point A	Point B		
		1	pH	-	6.4	6.6	6.2	6.4		
		2	BOD	mg/L	2	3	2	4		
		3	COD	mg/L	3	31	28	44		
		4	DO	mg/L	51.9	64.2	83.0	76.0		
		5	S Solids	mg/L	190	54	7	21		
		6	A Nitrogen	mg/L	<1	<1	<1	<1		

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			<table><tr><td></td><td>Estate</td><td></td><td colspan="2">Tye Yang Estate</td><td colspan="2">Gerola Estate</td></tr><tr><td></td><td></td><td></td><td colspan="2">11/4/2023</td><td colspan="2">04/12/2023</td></tr><tr><td></td><td>Parameter</td><td>unit</td><td>Entrance</td><td>Exit</td><td>Entrance</td><td>End Point</td></tr><tr><td>1</td><td>pH</td><td>-</td><td>6.4</td><td>6.5</td><td>6.5</td><td>6.8</td></tr><tr><td>2</td><td>BOD</td><td>mg/L</td><td>2</td><td>2</td><td>2</td><td>2</td></tr><tr><td>3</td><td>COD</td><td>mg/L</td><td>35</td><td>38</td><td>31</td><td>31</td></tr><tr><td>4</td><td>DO</td><td>mg/L</td><td>88.8</td><td>90.8</td><td>65.1</td><td>82.7</td></tr><tr><td>5</td><td>S Solids</td><td>mg/L</td><td>57</td><td>2</td><td>14</td><td>3</td></tr><tr><td>6</td><td>A Nitrogen</td><td>mg/L</td><td><1</td><td><1</td><td><1</td><td><1</td></tr></table>		Estate		Tye Yang Estate		Gerola Estate					11/4/2023		04/12/2023			Parameter	unit	Entrance	Exit	Entrance	End Point	1	pH	-	6.4	6.5	6.5	6.8	2	BOD	mg/L	2	2	2	2	3	COD	mg/L	35	38	31	31	4	DO	mg/L	88.8	90.8	65.1	82.7	5	S Solids	mg/L	57	2	14	3	6	A Nitrogen	mg/L	<1	<1	<1	<1	
	Estate		Tye Yang Estate		Gerola Estate																																																														
			11/4/2023		04/12/2023																																																														
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5	S Solids	mg/L	57	2	14	3																																																													
6	A Nitrogen	mg/L	<1	<1	<1	<1																																																													
			Results for the water analysis are made by KLK -KDC Laboratory Tawau Sabah. Domestic water analysis is made at Dyanakey Laboratories Sdn Bhd Sandakan taken annually.																																																																
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitors the effluent and submits to DOE through 'Borang Penyata Suku Tahunan'.				Complied																																																													
			<table><tr><td>Sample date</td><td>Std</td><td>04/07/23</td><td>03/08/23</td><td>05/09/23</td></tr><tr><td>PH</td><td>5.-9.</td><td>8.00</td><td>8.10</td><td>7.30</td></tr><tr><td>BOD</td><td>20</td><td>12.00</td><td>19.00</td><td>18.00</td></tr><tr><td>COD</td><td>-</td><td>133.00</td><td>294.00</td><td>211.00</td></tr><tr><td>Total solids</td><td>-</td><td>1008.00</td><td>2580.00</td><td>1392.00</td></tr><tr><td>S Solids</td><td>200</td><td>10.00</td><td>51.00</td><td>8.00</td></tr><tr><td>Oil & grease</td><td>20</td><td>7.00</td><td>8.00</td><td>8.00</td></tr></table>	Sample date	Std	04/07/23	03/08/23	05/09/23	PH	5.-9.	8.00	8.10	7.30	BOD	20	12.00	19.00	18.00	COD	-	133.00	294.00	211.00	Total solids	-	1008.00	2580.00	1392.00	S Solids	200	10.00	51.00	8.00	Oil & grease	20	7.00	8.00	8.00																													
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		<table><tr><td>A Nitrogen</td><td>150</td><td>1.00</td><td>1.00</td><td>1.00</td></tr><tr><td>Total N</td><td>200</td><td>7.00</td><td>14.00</td><td>12.00</td></tr></table> <p>Melewar Palm Oil Mill DOE (license no 004849 validity until 30/06/2024) was for water discharge requirement of which is BOD less than 20 mg/l. The mill in the interim has made the following initiative for the BOD reduction among others as stated below.</p> <p>a) Expand width and height of Effluent Pond bund through annual desilting of effluent pond in phases. This is to improve retention with possible overflowing.</p> <p>b) Operations of shredder plant to produce shredded fibre at reduced 55% moisture.</p>	A Nitrogen	150	1.00	1.00	1.00	Total N	200	7.00	14.00	12.00																															
A Nitrogen	150	1.00	1.00	1.00																																							
Total N	200	7.00	14.00	12.00																																							
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording (water usage per mt in 2022/23 of fresh fruit bunches (FFB) below; Base line is 1.24 ratio</p> <table><tr><td>No</td><td>2022/23</td><td>Water m3</td><td>FFB /mt</td><td>Water /FFB</td></tr><tr><td>1</td><td>July</td><td>10055</td><td>14962</td><td>0.67</td></tr><tr><td>2</td><td>Aug</td><td>8886</td><td>19879</td><td>0.45</td></tr><tr><td>3</td><td>Sept</td><td>23907</td><td>20874</td><td>1.15</td></tr><tr><td>4</td><td>Oct</td><td>19920</td><td>23034</td><td>0.86</td></tr><tr><td>5</td><td>Nov</td><td>15467</td><td>24327</td><td>0.64</td></tr><tr><td>6</td><td>Dec</td><td>20470</td><td>22868</td><td>0.90</td></tr><tr><td>7</td><td>Jan</td><td>6450</td><td>18805</td><td>0.34</td></tr></table>	No	2022/23	Water m3	FFB /mt	Water /FFB	1	July	10055	14962	0.67	2	Aug	8886	19879	0.45	3	Sept	23907	20874	1.15	4	Oct	19920	23034	0.86	5	Nov	15467	24327	0.64	6	Dec	20470	22868	0.90	7	Jan	6450	18805	0.34	Complied
No	2022/23	Water m3	FFB /mt	Water /FFB																																							
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		<table><tr><td>8</td><td>Feb</td><td>6006</td><td>18712</td><td>0.32</td></tr><tr><td>9</td><td>Mac</td><td>6981</td><td>21834</td><td>0.32</td></tr><tr><td>10</td><td>Apr</td><td>8259</td><td>18937</td><td>0.44</td></tr><tr><td>11</td><td>May</td><td>20772</td><td>23144</td><td>0.90</td></tr><tr><td>12</td><td>June</td><td>17558</td><td>18429</td><td>0.95</td></tr><tr><td></td><td>Total</td><td>164731</td><td>245806</td><td>0.67</td></tr></table> <p>There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.</p>	8	Feb	6006	18712	0.32	9	Mac	6981	21834	0.32	10	Apr	8259	18937	0.44	11	May	20772	23144	0.90	12	June	17558	18429	0.95		Total	164731	245806	0.67	
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	Total	164731	245806	0.67																													
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																																	
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2022/23. The Environment Management Plan for efficiency of fossil fuel usage are detailed below: <table><tr><td></td><td>Target</td><td>Objective</td><td>Action plan</td></tr><tr><td>1</td><td>Backhoe, tractor</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel</td></tr><tr><td>2</td><td>Van / Supervisory vehicle</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel</td><td>to record vehicle activity in order to eliminate waste activity which consume fuel.</td></tr></table>			Target	Objective	Action plan	1	Backhoe, tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel	to record vehicle activity in order to eliminate waste activity which consume fuel.	Complied																	
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			using mobile equipment	to turn off vehicle engine during idle time. Scheduled servicing for optimal performance																																																																																					
<p>The diesel utilization for the mill and estates is provided in the below table. Units in Diesel L/FFB mt for 2022/2023 Financial Year Total diesel usage in MPOM is 242858 liters.</p> <table> <tr> <th>Mth</th><th>MPOM</th><th>GE</th><th>ME1</th><th>POP3</th><th>TYE</th></tr> <tr> <td>July</td><td>2.40</td><td>7.41</td><td>10.97</td><td>10.25</td><td>11.39</td></tr> <tr> <td>Aug</td><td>1.12</td><td>5.58</td><td>8.06</td><td>9.78</td><td>9.79</td></tr> <tr> <td>Sept</td><td>0.97</td><td>5.07</td><td>6.29</td><td>10.40</td><td>9.05</td></tr> <tr> <td>Oct</td><td>0.76</td><td>3.89</td><td>4.88</td><td>10.09</td><td>8.13</td></tr> <tr> <td>Nov</td><td>0.70</td><td>4.16</td><td>4.46</td><td>9.07</td><td>7.51</td></tr> <tr> <td>Dec</td><td>0.68</td><td>4.67</td><td>4.73</td><td>9.40</td><td>7.07</td></tr> <tr> <td>Jan</td><td>1.56</td><td>4.48</td><td>5.10</td><td>9.30</td><td>10.24</td></tr> <tr> <td>Feb</td><td>0.86</td><td>5.44</td><td>5.59</td><td>9.26</td><td>11.36</td></tr> <tr> <td>Mac</td><td>0.76</td><td>6.46</td><td>5.42</td><td>9.76</td><td>11.92</td></tr> <tr> <td>April</td><td>0.89</td><td>5.18</td><td>5.95</td><td>19.55</td><td>10.66</td></tr> <tr> <td>May</td><td>0.90</td><td>5.03</td><td>4.53</td><td>9.28</td><td>9.33</td></tr> <tr> <td>Jun</td><td>0.80</td><td>5.91</td><td>5.39</td><td>10.29</td><td>10.62</td></tr> <tr> <td>Total/L</td><td>242858</td><td>128837</td><td>207845</td><td>359740</td><td>539475</td></tr> </table>						Mth	MPOM	GE	ME1	POP3	TYE	July	2.40	7.41	10.97	10.25	11.39	Aug	1.12	5.58	8.06	9.78	9.79	Sept	0.97	5.07	6.29	10.40	9.05	Oct	0.76	3.89	4.88	10.09	8.13	Nov	0.70	4.16	4.46	9.07	7.51	Dec	0.68	4.67	4.73	9.40	7.07	Jan	1.56	4.48	5.10	9.30	10.24	Feb	0.86	5.44	5.59	9.26	11.36	Mac	0.76	6.46	5.42	9.76	11.92	April	0.89	5.18	5.95	19.55	10.66	May	0.90	5.03	4.53	9.28	9.33	Jun	0.80	5.91	5.39	10.29	10.62	Total/L	242858	128837	207845	359740	539475
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		<table><tr><td>B/line</td><td>0.99</td><td>5.27</td><td>4.79</td><td>9.40</td><td>10.16</td></tr></table> <p>The estate and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none">a) Infrastructure of estates,b) Community sizec) No. of vehicles / age of machine.d) To reduce reliance on fossil fuel by utilization of methane gas from Biogas Plant to generate electricity.e) Weather interference / crop production volume <p>There is no opportunity for the estates to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p>	B/line	0.99	5.27	4.79	9.40	10.16	
B/line	0.99	5.27	4.79	9.40	10.16				
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.									
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Melewar Production Unit Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none">a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment.b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.	Complied						

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7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Melewar Production Unit Mill and Estates has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the estates.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. which covers estate and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations are;</p> <p>a) Air - Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</p> <p>b) Water - Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</p> <p>c) Land - Scheduled waste, domestic waste and industrial/process waste.</p>	Complied

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		<p>Melewar Palm Oil Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS during the audit. The system was found to be in functional condition. Data from the stack is connected online to DOE office. Boiler smoke emission data are within the DOE limit. An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p>The stack sampling was carried out by Multi Serve Sdn Bhd The mill has</p> <table border="1"> <thead> <tr> <th>Boiler no</th><th>Date</th><th>Dust concentration</th><th>EQA std</th></tr> </thead> <tbody> <tr> <td>SB PMD 2626</td><td>11/08/23</td><td>122.0 mg/m3</td><td>150 mg/m3</td></tr> <tr> <td>SB PMD 2626</td><td>27/05/23</td><td>113.20 mg/m3</td><td>150 mg/m3</td></tr> </tbody> </table> <p>installed ESP projected to commission in Feb 2024.</p> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2023 reviewed annually. The waste generated from the mill/estates operations as shown below:</p> <ol style="list-style-type: none"> Scheduled waste - Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries Domestic waste - rubbish from the mill/estate complex and employees' quarters Industrial waste - Fiber, palm kernel shell, boiler ash, scrap iron Sewage - Sewage from housing/office complex <p>The pollution identified from the mill/estate activities:</p> <ol style="list-style-type: none"> Black smoke - Emission from Boilers/vehicles/engines 	Boiler no	Date	Dust concentration	EQA std	SB PMD 2626	11/08/23	122.0 mg/m3	150 mg/m3	SB PMD 2626	27/05/23	113.20 mg/m3	150 mg/m3	
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		b) Odor & gases - Activities from the effluent treatment c) Leakage of lubricant - Storage & vehicle maintenance															
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area																	
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	There was no land preparation of existence or new planting in Melewar Production Unit Mill and Estates by burning ever since JC Chang Group practiced zero burning as per the policy in: a) SOP ref no A/016 - 10/2023 revision date 14/02/2023 Policy or replanting for the Group under felling/clearing & land preparation b) Environmental Policy dated 12/08/2019 JC Chang Group has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	Complied														
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	This is established in the ERP procedure ref no U/002-01/2015 dated 28/01/2015. Therein containing a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill The procedure was formalized by Sustainability & Risk Unit for use in all operating units in JC Chang Group Estates and mills. Training related to fire drill /prevention were held respectively all the estates and mill. Among others the related session as shown below; <table><tr><td></td><td>Subject</td><td>ME 1</td><td>POPE3</td><td>Gerola</td><td>Tye Yang</td><td>MPOM</td></tr><tr><td>1</td><td>Company Policy</td><td>15/02/23</td><td>11/01/23</td><td>16/11/23</td><td>04/01/23</td><td>02/5/23</td></tr></table>		Subject	ME 1	POPE3	Gerola	Tye Yang	MPOM	1	Company Policy	15/02/23	11/01/23	16/11/23	04/01/23	02/5/23	Complied
	Subject	ME 1	POPE3	Gerola	Tye Yang	MPOM											
1	Company Policy	15/02/23	11/01/23	16/11/23	04/01/23	02/5/23											

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			2	MSPO/RSPO	15/02/23	04/01/23	16/11/23	04/01/23	03/10/23		
			3	First Aid /ERP	29/03/23	21/07/23	18/10/23	08/06/23	21/6/23		
			4	Fire Drill	22/11/23	01/07/23	22/11/23	25/01/23	24/10/23		
			5	Zero Burning	19/04/23	19/07/23	18/05/23	30/08/23	01/11/23		
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Both the estates and the mill in the Melewar Production Unit held engagement with the stakeholders via briefing sessions during the stakeholders meetings. Information in slides form in relation to the following was made to all present a) Penerangan dasar Kemampanan Kumpulan JC Chang b) Company Policy Briefing c) Briefing on fire engagement program involving affected stakeholder and neighbouring owners to the respective JC Chang Estates. d) Program Pencegahan Kebakaran / Fire Drill Program e) Function and roles of ERT and ERP procedure for fire f) Environmental Conservation Program by JC Chang Group g) HCV / Buffer Zone / RTE Protection Program. h) Enhance working relationship with community / stakeholders The entire CU estates and mill held a combined meeting on 16/11/2023 with 91 participants present. Also present in the meeting was the Ketua Balai Bomba Kinabatangan on the fire prevention program within the Kg Paris community involving the property of JC Chang estates.									Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.											
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.	Except for Muis Melewar Plantation 1 Estate, there is no declared area as HCV in the other estates of the certification unit. Nonetheless, Muis Melewar Plantation 1 Estate was not sampled in this assessment. The audit findings									Complied

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	<p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	also confirmed that there is no new planting in the Melewar Production Unit Estates.	
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	Except for Muis Melewar Plantation 1 Estate, there is no declared area as HCV in the other estates of the certification unit. Nonetheless, Muis Melewar Plantation 1 Estate was not sampled in this assessment. The audit findings also confirmed that there is no new planting in the Melewar Production Unit Estates.	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly</p>	Except for Muis Melewar Plantation 1 Estate, there is no declared area as HCV in the other estates of the certification unit. Nonetheless, Muis Melewar Plantation 1 Estate was not sampled in this assessment. The sampled estates have established and documented Biodiversity management Plan 2022/23. This being established during the management meetings / discussion, stakeholder meeting (recent dated 17/10/2023 with 23	Complied

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	<p>managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>attendees), EPMC, dialogue with workers during muster and audits. Generally, among the plans established were:</p> <ul style="list-style-type: none"> a) maintaining signage b) continue to record Biodiversity monitoring such as wildlife sighting, encroachment and illegal hunting c) enhancing Biodiversity awareness among employees. <p>The estates continued to train the workers on Biodiversity /HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer Zone areas were erected at the HCV area. Noted during site visit, all the signage was well maintained.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>Except for Muis Melewar Plantation 1 Estate, there is no declared area as HCV in the other estates of the certification unit. Nonetheless, Muis Melewar Plantation 1 Estate was not sampled in this assessment. The audit findings also confirmed that there is no new planting in the Melewar Production Unit Estates.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The management and monitoring plan for Biodiversity areas was established and reviewed annually. There were displays of signage made at site i.e.</p> <ul style="list-style-type: none"> a) No fishing, no manuring, b) no spraying, no slashing, no swimming <p>There were programs held by the estates to all employees in pertaining to the awareness of Biodiversity areas and RTE species. Interview with the employees concluded that training and briefing were made during the ad-hoc session and morning muster. This is also emphasized during the training held by the estates/mill. Employees are aware of the following reminders;</p> <ul style="list-style-type: none"> a) An offence to capture, harm, kills any wildlife. 	Complied

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		<p>b) Disciplinary measures shall be taken if found violating company rules.</p> <p>c) Riparian buffer CU to be free from any chemical's application/pollution</p> <p>d) Relevant signs NO HUNTING NO FELLING ALLOWED</p> <p>Among others the training held as follows;</p> <table><tr><td></td><td>Subject</td><td>ME 1</td><td>POPE3</td><td>Gerola</td><td>Tye Yang</td><td>MPOM</td></tr><tr><td>1</td><td>Company Policy</td><td>15/02/23</td><td>11/01/23</td><td>16/11/23</td><td>04/01/23</td><td>02/5/23</td></tr><tr><td>2</td><td>MSPO/RSPO</td><td>15/02/23</td><td>04/01/23</td><td>16/11/23</td><td>04/01/23</td><td>03/10/23</td></tr><tr><td>3</td><td>Zero Burning</td><td>19/04/23</td><td>19/07/23</td><td>18/05/23</td><td>30/08/23</td><td>01/11/23</td></tr><tr><td>4</td><td>Buffer Zone</td><td>21/05/23</td><td>10/05/23</td><td>26/08/23</td><td>15/04/23</td><td>01/11/23</td></tr><tr><td>5</td><td>RTE Awareness</td><td>21/05/23</td><td>07/04/23</td><td>20/07/23</td><td>05/04/23</td><td>01/11/23</td></tr></table>		Subject	ME 1	POPE3	Gerola	Tye Yang	MPOM	1	Company Policy	15/02/23	11/01/23	16/11/23	04/01/23	02/5/23	2	MSPO/RSPO	15/02/23	04/01/23	16/11/23	04/01/23	03/10/23	3	Zero Burning	19/04/23	19/07/23	18/05/23	30/08/23	01/11/23	4	Buffer Zone	21/05/23	10/05/23	26/08/23	15/04/23	01/11/23	5	RTE Awareness	21/05/23	07/04/23	20/07/23	05/04/23	01/11/23	
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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Educational activities on RTE species were made through few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of capturing the RTE species. There also record of Biodiversity areas monitoring sampling in all the estates assessed on monthly basis. RTE monitoring are also being made with feedback made to the management on any sightings.</p>	Complied																																										
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>Except for Muis Melewar Plantation 1 Estate, there is no declared area as HCV in the other estates of the certification unit. Nonetheless, Muis Melewar Plantation 1 Estate was not sampled in this assessment. The audit findings also confirmed that there is no new planting in the Melewar Production Unit Estates.</p>	Complied																																										

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Melewar Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2022** for **Melewar Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	0.81	OER	20.95
PKO	0.81	KER	4.07

Production	t/yr	Land Use	Ha
FFB Process	245,806.28	OP Planted Area	27,292.54
CPO Produced	51,489.90	OP Planted on peat	109.40
PKO Produced	10,007.487	Conservation (forested)	0.00
		Conservation (non-forested)	692.86
		Total	27,401.94

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	88,042.32	0.46	281.72	0.29	0.00	0.00	88,324.04	
CO ₂ Emission from fertilizer	10,071.46	0.06	63.05	0.07	0.00	0.00	10,134.51	
NO ₂ Emission	7,274.50	0.04	40.03	0.04	0.00	0.00	7,314.53	
Fuel Consumption	3,106.74	0.02	12.51	0.01	0.00	0.00	3,119.25	
Peat Oxidation	71.98	0.00	0.00	0.00	0.00	0.00	71.98	
Sink								
Crop Sequestration	-67,747.83	-0.35	-207.68	-0.21	0.00	0.00	-67,955.51	
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Total	40,819.17	0.21	189.63	0.20	6,254.11	0.00	47,262.91	

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	2,665.17	0.01
Fuel Consumption	757.72	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-934.56	0.00
Sales of EFB	0.00	0.00
Total	2,488.33	0.01

Summary of Kernel Crusher Emission and Credit (if applicable)

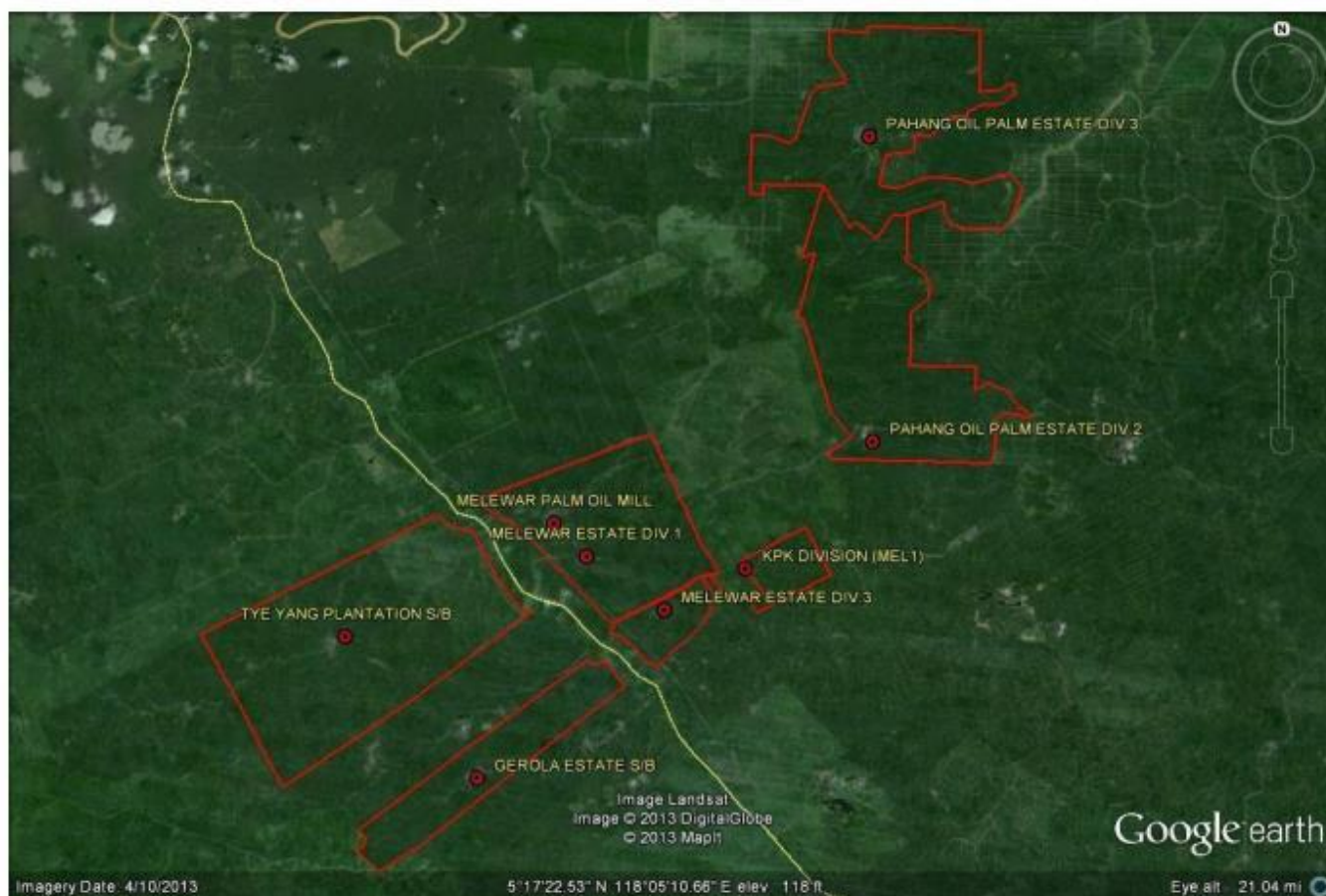
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	40
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	60

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map

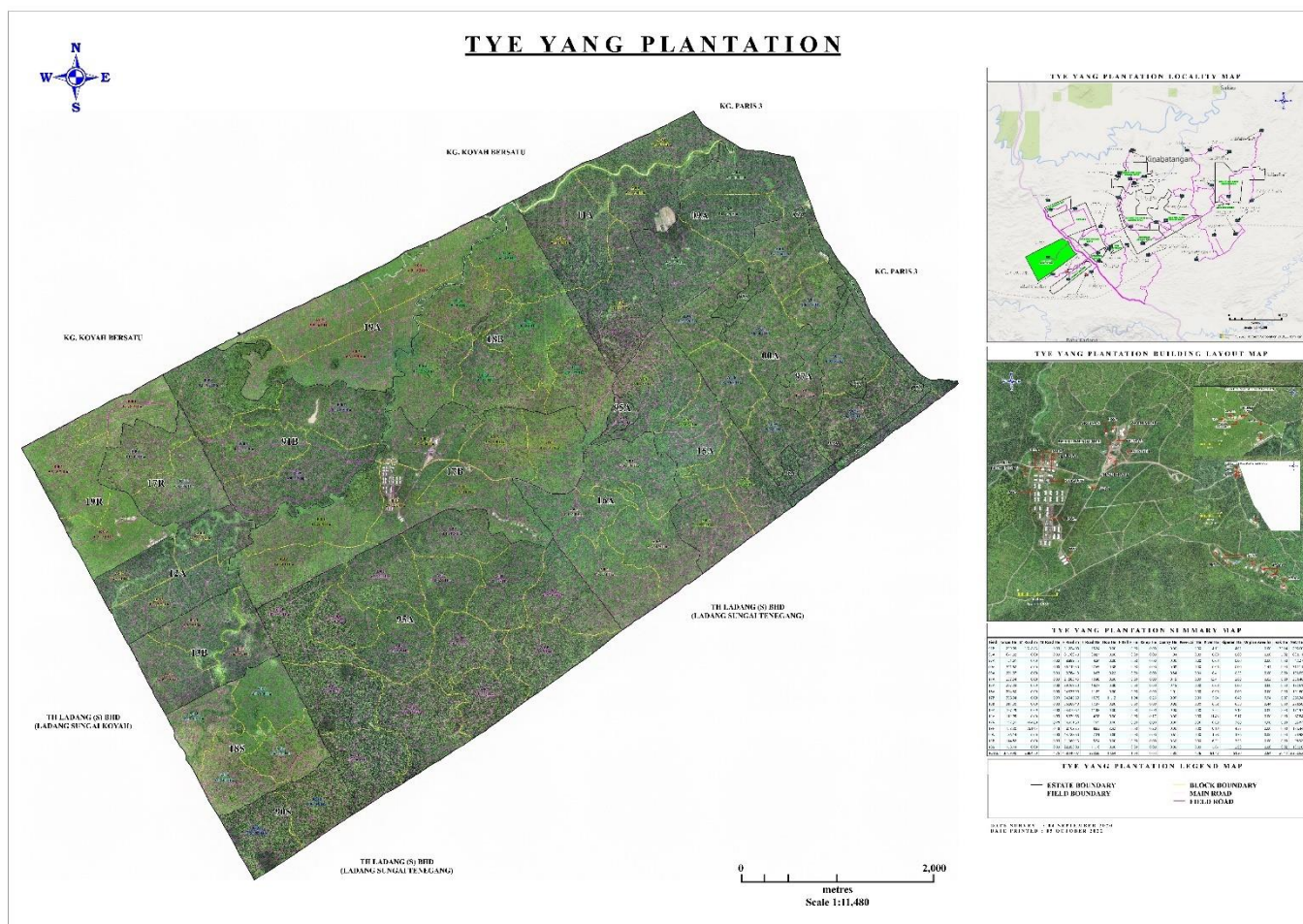
Gerola Estate



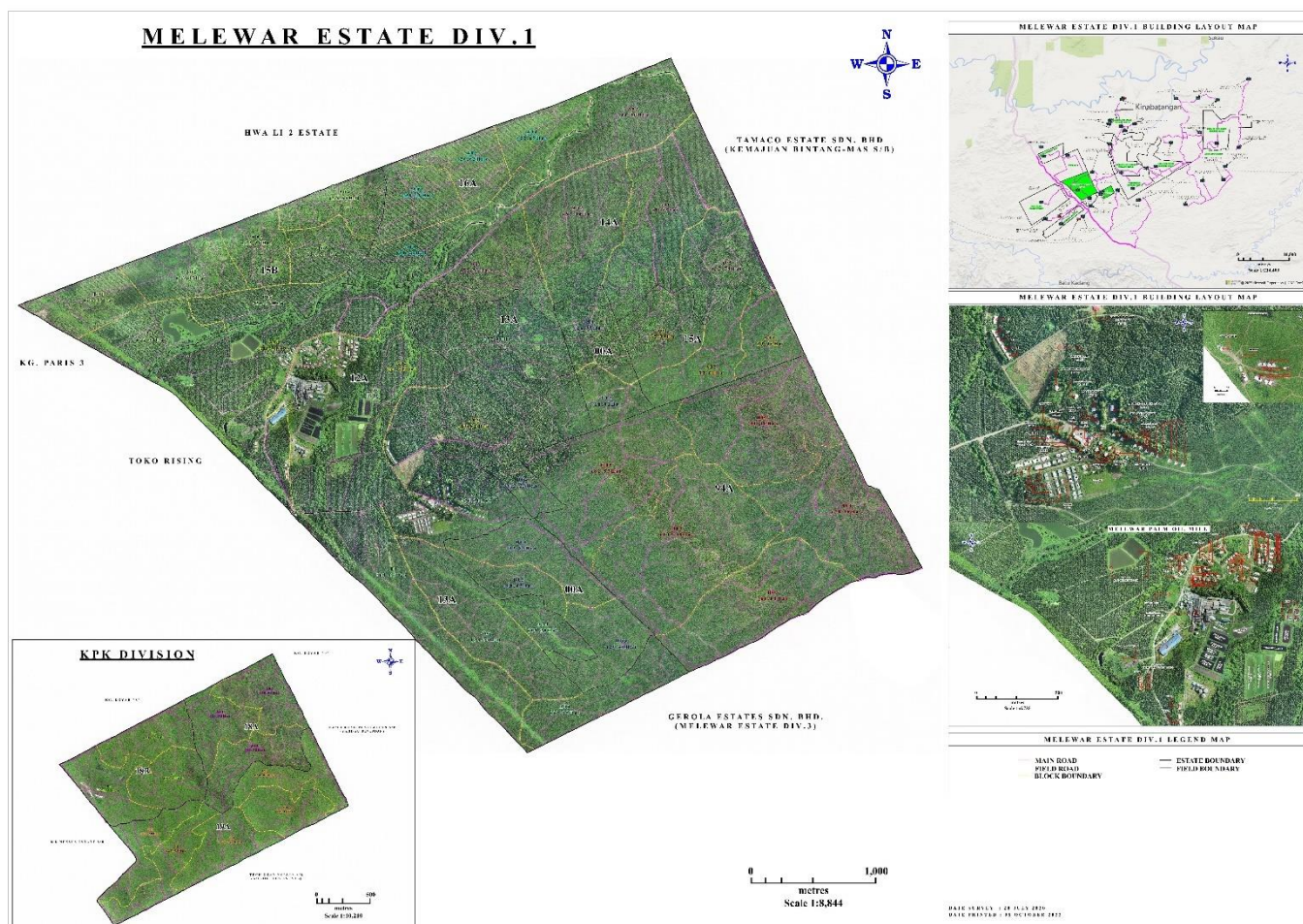
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Tye Yang Estate



Melewar Estate 1



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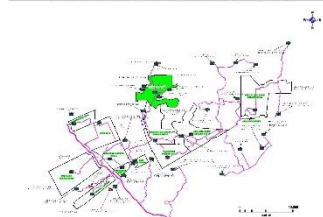
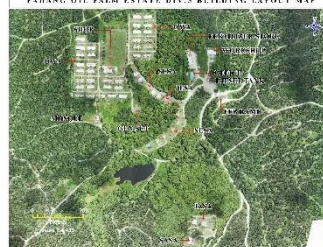
Pahang Oil Palm Estate 3

PAHANG OIL PALM ESTATE DIV. 3

TICO ESTATE SDN. BHD.



PAHANG OIL PALM ESTATE DIV-3 LOCALITY MAP

[illegible]

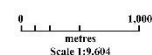
DAHANG DUE PAINE ESTATE DIV 2 & MINNABY MAP

[illegible]

PAHANG OIL PALM ESTATE DIV. 3 LEGEND MAP



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Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other:
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied			
Number of samples			
Remarks			

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
Total									
Note: * are smallholders sampled in this audit.									

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Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure