

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment** (Choose an item.)
- Recertification Assessment (RA 3)**
- Extension of Scope**

Client Company Name / Parent Company: Johor Corporation
Client Company / Parent Company Address: Level 2, Persada Johor Jalan Abdullah Ibrahim, Johor Bahru, 80000, Malaysia
Certification Unit: Johor Plantations Group Berhad - Sedenak Palm Oil Mill Location of Certification Unit: Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia
Date of Final Report: 13/03/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Johor Corporation		
RSPO Membership Number	1-0080-09-000-00	Membership Approval Date	15/06/2009
Address	Level 2, Persada Johor Jalan Abdullah Ibrahim, Johor Bahru, 80000, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Johor Plantations Group Berhad - Sedenak Palm Oil Mill		
Location / Address	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia		
Website	www.kulim.com.my		
Management Representative	Wan Adlin Wan Mahmood	E-mail	wanadlin@johorplantations.com
Telephone	07-8611611	Facsimile	07-8631084

2. Certification Information			
Certificate Number	RSPO 537873	Certificate Start Date	23/01/2024
Date of First Certification	23/01/2009	Certificate Expiry Date	22/01/2029
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 3) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	90 Ton/ Hour
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
MSPO 697948	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (Malaysia) Sdn. Bhd.	29/03/2024
MSPO 697947	MSPO 2530-4:2013 General Principles for Palm Oil Mills		29/03/2024
BVC-MSPO/SC-0027	MSPO Supply Chain Certification Standard 2018	Bureau Veritas Certification	10/03/2025
A158820	MS 1500:2009	JAKIM	31/05/2025
EU-ISCC-Cert-DE119-60222022	ISCC EU	ASG Cert GmbH	24/04/2024
EU-PLUS-Cert-60222022	ISCC PLUS		24/04/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sedenak Palm Oil Mill	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia	1° 43' 47.41" N	103° 32' 21.97" E
Sedenak Estate	Lot 136, Mukim Sedenak, 81000 Kulai, Johor, Malaysia	1° 42' 48.79" N	103° 31' 36.24" E
Kuala Kabong Estate	PTD 35021, HSD 71140, Mukim Bukit Batu, Daerah Kulai, Johor, Malaysia	1° 41' 20.10" N	103° 26' 00.87" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sedenak Estate	2,617.47	26.39	164.14	2,808.00	93.21
Kuala Kabong Estate	1,622.70	12.01	83.61	1,718.32	94.44
Total	4,240.17	38.40	247.75	4,526.32	93.68

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Sedenak Estate	447.7	303.27	1,178.55	687.95	2,169.77	447.7
Kuala Kabong Estate	0.00	0.00	0.00	1,622.7	1,622.70	0.00
Total (ha)	447.7	303.27	1,178.55	2,310.65	3,792.47	447.7

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 (Jan – Dec 2023)	Actual (Sep 2022 – Aug 2023)		Forecast (Jan – Dec 2024)
		Previous license period (Sept 2022 – Dec 2022)	Current license period (Jan 2023 – Aug 2023)	
Sedenak Estate	54,203.00	15,842.70	27,740.09	41,570.00
Kuala Kabong Estate	25,160.00	4,882.26	9,879.76	21,892.00
Total	79,363.00	58,344.81		63,462.00

**Low forecast volume due to old palm and land acquisition for property development project*

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan – Dec 2023)	Actual (July 2022 – June 2023)		Forecast (Jan – Dec 2024)
		Previous license period (Sept 2022 – Dec 2022)	Current license period (Jan 2023 – Aug 2023)	
Basir Ismail Estate		2,119.15	575.36	
Siang Estate		10,436.06	5,386.09	
Rengam Estate		0.00	2,599.51	
REM Estate		0.00	592.43	
Labis Bahru Estate		806.78	0.00	
Bkt Layang Estate		3,048.82	5,725.55	
Sg Papan Estate		2,534.10	4,527.02	
Total		38,350.87		

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jan – Dec 2023)	Actual (Sept 2022 – Aug 2023)		Forecast (Jan – Dec 2024)
		Previous license period (Sept 2022 – Dec 2022)	Current license period (Jan 2023 – Aug 2023)	
3rd Party FFB Supplier	339,524.00	94,785.71	171,279.30	347,701.00
Total	339,524.00	266,065.01		347,701.00

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Sept 2022	6,509.43	27,331.84	33,841.27
2	Oct 2022	5,841.29	25,684.53	31,525.82
3	Nov 2022	10,068.84	21,727.92	31,796.76
4	Dec 2022	17,250.31	20,041.42	37,291.73
5	Jan 2023	6,683.500	16,735.7	23,419.2
6	Feb 2023	14,117.810	20,356.99	34,474.8
7	Mar 2023	4,143.840	19,377.7	23,521.54
8	Apr 2023	3,674.170	16,886.45	20,560.62
9	May 2023	5,439.280	22,946.09	28,385.37
10	June 2023	5,712.970	25,189.18	30,902.15
11	July 2023	7,214.590	24,681.06	31,895.65
12	Aug 2023	10,039.650	25,106.13	35,145.78
TOTAL		96,695.68	266,065.01	362,760.69

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Jan – Dec 2023)	Actual (Sept 2022 – Aug 2023)		Forecast (Jan – Dec 2024)
	Previous license period (Sept 2022 – Dec 2022)	Current license period (Jan 2023 – Aug 2023)	
FFB	FFB		FFB
134,363.00 mt	39,669.87 mt	57,025.81 mt	63,462.00 mt
	TOTAL	96,695.68 mt	
CPO (OER: 22.59 %)	CPO (OER: 19.07 %)		CPO (OER: 22.6 %) mt

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30,353.00 mt	7,619.57 mt	10,827.25 mt	14,342.41 mt
	TOTAL	18,446.82	
PK (KER: 6.15 %)	PK (KER: 5.33 %)		PK (KER: 6.79%%)
8,263.00 mt	2,188.15 mt	2,968.51 mt	4,309.07 mt
	TOTAL	5,156.66 mt	

**Volume estimated last year inclusive of extension of volume for FFB (55,000 mt), CPO (11,000 mt) and PK (2,750 mt), approved on 26/09/2023*

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Sept 2022	1,240.74	332.88
2	Oct 2022	1,129.09	318.67
3	Nov 2022	1,946.77	560.14
4	Dec 2022	3,302.97	976.46
5	Jan 2023	1,304.71	374.52
6	Feb 2023	2,618.15	709.01
7	Mar 2023	783.35	220.34
8	Apr 2023	710.77	197.16
9	May 2023	1,065.88	277.84
10	June 2023	1,093.90	302.62
11	July 2023	1,339.04	373.65
12	Aug 2023	1,911.45	513.37
TOTAL		18,446.82	5,156.66

11. Summary of Actual Volume sold					
Current License period (Jan 2023 – Aug 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	7,966.51	0	0	2,360.51	10,327.02
PK (MT)	2,287.64	0	0	587.68	2,875.32
Credits	0	0	0	0	0
Previous License period (Sept 2022 – Dec 2022)					
CPO (MT)	1,586.34	0	0	6,295.74	7,882.08
PK (MT)	1,386.29	0	0	853.93	2,240.22

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Credits	0	0	0	0	0
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Carry forward stock from August 2022; CPO: 991.58 mt, PK: 278 mt (less than 30 days production)

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (Sept 2022 – Aug 2023)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	ABC	Non-disclosure	1,586.34	-
2	CDE		2,961.23	-
3	FGH		2,488.22	-
4	IJK		2,517.06	-
5	LMN	Non-disclosure	-	1,386.29
6	OPQ		-	928.39
7	RST		-	644.48
8	UVW		-	714.77
TOTAL			9,552.85	3,673.93

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

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)	
1	ABC	8,656.25	1,441.62	
TOTAL		8,656.25	1,441.62	

11D. Records of Certified CPO Sold under RSPO Credits since the last audit Sept 2022 – Aug 2023			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	N/A		
TOTAL			

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Jan – Dec 2023)			Actual (Sept 2022 – Aug 2023)			Forecast (Jan – Dec 2024)		
	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)
Nil	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL						

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)
Nil	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.

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

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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 **25/09/2023 – 27/09/2023**. 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 21/08/2023, website link; <https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2023/11-5-rspo-public-notification-recertification-johor-plantations-berhad-sedenak-palm-oil-mill-english.pdf>

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 **21/12/2023**. 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 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 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

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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.

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 3)	Year 2 (ASA 3_1)	Year 3 (ASA 3_2)	Year 4 (ASA 3_3)	Year 5 (ASA 3_4)
Sedenak Palm Oil Mill	√	√	√	√	√
Sedenak Estate	√	√	√	√	√
Kuala Kabong Estate	√	√	√	√	√

Tentative Date of Next Visit: September 22, 2024 - September 25, 2024

Total Number of Mandays: 9.5 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Zainal (MHZ) Hidhir Abidin	Team Leader	<p>Education: 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 140001, 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 in both verbal/written Bahasa Malaysia and English.</p>

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		<p>Aspect covered in this audit: Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG and HCV</p>
Valence Shem (VSH)	Team Member	<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: 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: Policy and commitment, Social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue.</p>
Hafriazhar bin Mohd Mokhtar (HMM)	Team Member	<p>Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM</p> <p>Work Experience: Environmental Officer (2002-2003), Mill Engineer (2003-2008), Project Control Engineer (2008-2011), Auditor/Client Manager (2011-present)</p> <p>Training attended: Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), RSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011)</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit: RSPO supply chain requirements including RSPO Rules on Market Communication and Claims</p>
Ahmad Rofi Bin Abu Talib Khan (ARK)	Team Member	<p>Education: Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015</p> <p>Work Experience: He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years’ experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia</p> <p>Training attended: He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.</p> <p>Aspect covered in this audit: Policy and commitment, internal audit, management review, social compliance, communication, complaint and grievance procedure and implementation, water management plan, and fire prevention.</p>

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		<p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit: Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment and management plan.</p>
Dr. Suhaili Sahari	Peer Reviewer	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc. (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances 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: 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 strategize 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: General Management, Auditing, Environment and Plantation Management.</p>

Accompanying Persons:

Name	Role
Hafriazhar bin Mohd Mokhtar	Qualifying reviewer

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2.3 Assessment Plan

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

Date	Time	Subjects	MHZA	VSH	ARK	HMM
Sunday 24/09/2023	PM	Audit team travel Johor Bahru. Check in at Holiday Villa Hotel, Johor Bahru	√	√	√	√
Monday 25/09/2023	0800	Audit team travel to Sedenak POM	√	√	√	√
Sedenak POM	0830	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). • Verification on previous audit findings 	√	√	√	√
	0900 1230	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. Visit to laboratory, weighbridge and palm product storage area.	√	√	√	-
		RSPO Supply chain requirements for mill <ul style="list-style-type: none"> - Mass balance Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims 	-	-	-	√
	1230 1330	Lunch	√	√	√	√
	1330 1630	Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, OSH and training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	√	√	√	
	1630 1700	Interim Closing Briefing	√	√	√	
Tuesday 26/09/2023	0830 1230	Kuala Kabong Estate 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, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√	
	1000 1230	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-	

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	1230 1330	Lunch	√	√	√	
	1330 1630	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	√	√	√	
Wednesday 27/09/2023 Sedenak Estate	0830 1230	Sedenak Estate 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, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√	
	1000 1230	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-	
	1230 1330	Lunch break	√	√	√	
	1330 1630	Sedenak Estate 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	Closing meeting – conclusion and recommendation	√	√	√	
Thursday 28/09/2023	AM	Audit team travel back to Kuala Lumpur	√	√	√	√

Major NC close out assessment

PRELIMINARY AGENDA		
Time	Subjects	MHZ
Wednesday 20/12/2023 PM	Travel to Johor Bahru. Check in at Holiday Villa Hotel	√

PRELIMINARY AGENDA		
Time	Subjects	MHZ
Thursday 21/12/2023		
0730	Auditor travel to Sedenak and Kuala Kabong Estate	√
0830	Opening Meeting <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Briefing on the verification plan 	
0915 – 1130	Verification on previous Major NC <ul style="list-style-type: none"> i) 2398967-202309-M1 (Sedenak POM) – document review, update on the progress to comply with 2.3.2 requirement. ii) 2398967-202309-M2 (Sedenak & Kuala Kabong Estate) – document review, site visit and workers interview. 	√
1130 – 1200	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?	Yes, 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	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. The Indonesian units, PT RAJ & PT TPR were disposed on 6th July 2023.	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.	No. There have not been any new acquisitions.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No. There have no any deviations from the maximum periods requires approval by the RSPO Secretariat.	Complied

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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 has no any changes to the time-bound plan since the last audit.	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 isolated lapse in Time Bound Plan	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	There is no any fundamental failure to proceed with implementation of the plan	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.	No uncertified units of holdings under Johor Plantations Berhad. Thus, this requirement is not applicable.	Not Applicable
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No uncertified units of holdings under Johor Plantations Berhad. Thus, this requirement is not applicable.	Not Applicable
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 uncertified units of holdings under Johor Plantations Berhad. Thus, this requirement is not applicable.	Not Applicable
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No uncertified units of holdings under Johor Plantations Berhad. Thus, this requirement is not applicable.	Not Applicable
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No uncertified units of holdings under Johor Plantations Berhad. Thus, this requirement is not applicable.	Not Applicable
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the 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.	No uncertified units of holdings under Johor Plantations Berhad. Thus, this requirement is not applicable.	Not Applicable
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 uncertified units of holdings under Johor Plantations Berhad. Thus, this requirement is not applicable.	Not Applicable
Have there been any stakeholder (including NGO) consultation conducted?	No uncertified units of holdings under Johor Plantations Berhad. Thus, this requirement is not applicable.	Not Applicable

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>Not applicable as there are no scheme smallholders or scheme outgrowers under the certification unit.</p>	<p>Not Applicable</p>

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP <i>(Only applicable when revision is made)</i>			
								Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
<i>Sedenak Palm Oil Mill</i>	<i>Malaysia</i>	<i>Sedenak Estate</i>	2808	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Kuala Kabong Estate</i>	1718	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
<i>Sindora Palm Oil Mill</i>	<i>Malaysia</i>	<i>Sindora Estate</i>	3,919.06	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Basir Ismail Estate</i>	3594.4	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>REM Estate</i>	2898.9	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Sungai Papan Estate</i>	2,995.85	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
<i>Tereh Palm Oil Mill</i>	<i>Malaysia</i>	<i>Tereh Utara Estate</i>	3087.4	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Tereh Selatan Estate</i>	2707.2	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil

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		<i>Selai Estate</i>	3535.1	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Mutiara Estate</i>	3695.1	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Sungai Tawing Estate</i>	2225.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Wawasan Estate</i>	362.30	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Felda Paloh Estate</i>	1331.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Rengam Estate</i>	2418.2	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
<i>Palong Palm Oil Mill</i>	<i>Malaysia</i>	<i>Palong Estate</i>	3701.9	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Mungka Estate</i>	2898.3	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>UMAC Estate</i>	1616.3	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Labis Bahru Estate</i>	2108.2	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
<i>Pasir Panjang Palm Oil Mill</i>	<i>Malaysia</i>	<i>Pasir Panjang Estate</i>	4013.6	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Tunjuk Laut Estate</i>	2867.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		<i>Siang Estate</i>	3443.1	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil

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		Bukit Kelompok Estate	2613.8	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Pasir Logok Estate	2097.7	Certified	Nil	2009	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
Bukit Layang Estate	Malaysia	Bukit Layang Estate	397.76	Certified	Nil	12-Jul	20-Apr-22	No	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil

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 two (2) Critical; two (2) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Johor Plantations Berhad - Sedenak Palm Oil Mill 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 #	2398967-202309-M1	Issued Date	27/09/2023
Due Date	26/12/2023	Closure Date	25/12/2023
Indicator & Category (Critical / Minor)	2.3.2 (Critical)		
Statement of Nonconformity:	Johor Plantations Berhad (JPB) or previously known as KMB unable to fulfil the requirement has not registered their case to RSPO by 15 November 2022.		
Requirement Reference:	i) For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1; <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 ii) Interim Measure For Fulfilment Of Indicator 2.3.2 Of The 2018 RSPO Principles & Criteria — On Legality Of Indirect FFB Supplies All RSPO certified companies who were unable to fulfil the requirement by November 2021 must register their case with the RSPO Certification Unit by sending an email to certification@rspo.org by 31 March 2022. For the NIs, the deadline to register the case is the same for the transition period (e.g., for the Malaysia NI, the deadline to register is 15 November 2022.		
Objective Evidence:	As of 27/9/2023, Johor Plantations Berhad (JPB) or previously known as KMB has not registered the case to RSPO due to unfulfillment the evidence as listed in Indicator 2.3.1.		
Corrections:	Johor Plantations Berhad (JPB) has submitted the appeal via email for registering the case with RSPO, as specified requirement in indicator 2.3.2. We are notifying RSPO that we are unable to meet the requirement outlined in Indicator 2.3.1		
Root Cause Analysis:	Inadequate monitoring of information or notifications from RSPO on registered case to RSPO by 15 November 2022.		
Corrective Actions:	Johor Plantations Berhad (JPB) has appointed a Person in Charge (PIC) to monitor and retrieve all pertinent information from the RSPO website by quarterly.		

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	<p>Major NC close out verification:</p> <p>i) JPB has submitted an appeal for non-submission of case register to RSPO on 27/9/2023 and requesting for further extension to RSPO certification helpdesk on 12/12/23. The next revision of the P&C was not able to be endorsed and adopted at 20th General Assembly November 2023.</p> <p>ii) Appointment of PIC, executive of certification management and administration for any RSPO announcement inquiries, refer to appointment letter ref: SID/SD/ADMIN/080/23 dated 30/11/2023 was sighted. Any updates pertaining to RSPO announcement will be presented during monthly sustainability meeting</p>		
Assessment Conclusion:	<p>Implemented actions were verified found to be sufficient to close the major NC on 25/12/2023. Continuous implementation will be further verified in the next assessment.</p>		
Non-conformity			
NCR Ref #	2398967-202309-M2	Issued Date	27/09/2023
Due Date	26/12/2023	Closure Date	25/12/2023
Indicator & Category (Critical / Minor)	3.6.2 (Critical)		
Statement of Nonconformity:	<p>The risk assessment process in identifying the H&S issues and the implementation of management plan was not effectively monitored.</p>		
Requirement Reference:	<p>The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>		
Objective Evidence:	<p>i) The workplace inspection checklist verified at Kuala Kabong Estate and Sedenak Estate found that the station checked as the following:</p> <ol style="list-style-type: none"> 1. Chemical Store 2. Schedule Waste Store 3. Fertilizer Store 4. Workshop 5. Linesite 6. Lubricant / Fuel Store 7. Clinic / Medical Waste 8. Chemical Mixing Area 9. General Store <p>However, there is no inspection conducted on the workplace of the production site at both estate.</p> <p>ii) Medical Surveillance Programme 2023 for Kuala Kabong and Sedenak Estate were not carried out as per established H&S plan at respective estates.</p>		
Corrections:	<p>i. A warning letter had been issues by Estate management.</p> <p>ii. The person in charge is necessary to inspect on a weekly basis through a checklist inspection and be monitored by a supervisor.</p>		

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	i) The Medical Surveillance was conducted on 1st August 2023 for Sedenak Estate and on 2nd August 2023 for Kuala Kabong Estate.
Root Cause Analysis:	<p>i. Inadequate awareness on requirements to inspect the production site at Kuala Kabong Estate and Sedenak Estate.</p> <p>i) Lack of monitoring in conducting medical surveillance as per established OSH management plan.</p>
Corrective Actions:	<p>iii. Inspection will be carried out on weekly basis.</p> <p>iii. The penalty will be imposed to worker who failed to comply with safety and health requirement based on OSH requirement during production site inspection.</p> <p>iv. The briefing on the safety and health in workplace to the workers will be conducted during morning assembly and will be recorded accordingly.</p> <p>ii. The estate will conduct a comprehensive review of the OSH plan, ensuring its alignment with current regulatory requirements and best practices.</p> <p>iii. The estate will implement supplementary training and awareness programs for individuals responsible for medical surveillance, emphasizing the importance of adhering to the H&S plan and the repercussions of non-compliance.</p> <p>iv. The estate will prominently display the deadline for medical surveillance assessments on the noticeboard.</p> <p>Major NC close out visit:</p> <p>i) Weekly inspection was carried out by the appointed PIC and was briefed during morning muster on 1/10/23. Records of weekly inspection for October, November and December 2023 were verified for total of 9 workstation. Interview with the appointed PIC has confirmed on the understanding of workplace inspection process</p> <p>ii) Medical surveillance was carried by OHD under KPJ Hospital, ref: HQ/15/DOC/00/437 on 12/9/23 for Kuala Kabong Estate. At Sedenak Estate, medical surveillance was carried out on 1/8/2023 by the same OHD/medical practitioner.</p> <p>iii) Review of OSH plan and workplace inspection results presented in the quarterly OSH committee meeting. Latest Q4 meeting minutes for Sedenak and Kuala Kabong Estate was made available for verification.</p> <p>iv) Latest updated OSH plan has included compliance monitoring programme i.e medical surveillance, audiometric etc displayed via estate's license and permit dashboard.</p>
Assessment Conclusion:	Implemented actions were verified found to be sufficient to close the major NC on 25/12/2023. Continuous implementation will be further verified in the next assessment

Non-conformity			
NCR Ref #	2398967-202309-N1	Issued Date	27/09/2023
Due Date	27/10/2023	Closure Date	"Open"
Indicator & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	Social management and monitoring plan has not been developed with participation of affected stakeholders.		

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Requirement Reference:	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.
Objective Evidence:	Kuala Kabong Estate has been inviting food, clothing and raw material vendors inside their premise on twice a month basis to sell their goods to the workers. However, the management plan has yet to be established based on the potential risks such as legality and health requirements of the vendors, training needs related to company's policy, complaint/grievance procedure, safety hazards, and vaccination requirement for food preparation, to name a few.
Corrections:	i. Kuala Kabong Estate will conduct a meeting with vendors on 10/10/2023 to brief the company's policy, procedures & other related matters.
Root Cause Analysis:	Inadequate communication of estate regulations, policies, and procedures to stakeholders.
Corrective Actions:	ii. Kuala Kabong Estate will add new vendors to the stakeholders list, requiring them to submit relevant documents such as business licenses and food handling certificates (typhoid). iii. The estate will conduct a Social Impact Assessment (SIA) and involve vendors in the assessment process. v. The estate will revise and update the SIA report.
Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2398967-202309-N2	Issued Date	27/09/2023
Due Date	27/10/2023	Closure Date	"Open"
Indicator & Category (Critical / Minor)	6.2.7 (Minor)		
Statement of Nonconformity:	Temporary labour is used to perform core work i.e., harvesting.		
Requirement Reference:	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.		
Objective Evidence:	Kuala Kabong Estate has engaged a contractor (Binatab Sdn Bhd) to provide workers to do harvesting task for the period from 01/06/2023 to 31/07/2023. Based on the contract agreement between Binatab and their workers dated 01/06/2023, the term of employment is classified as temporary since it was stated that under Clause 4 that the period of employment is "one year".		
Corrections:	i. The contract agreement has been revised as per requirement.		
Root Cause Analysis:	Inadequate monitoring the employment contract on Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification.		
Corrective Actions:	ii. The contractor has informed the workers about the terms of their employment. iii. The contractor is required to submit the relevant documents to the estate for record-keeping.		

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Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.
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Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good cooperation given by the site management team with continuous support by SDI team from HQ

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2253186-202209-M1	Issued Date	29/09/2022
Due Date	27/12/2022	Closure Date	01/12/2022
Indicator & Category (Critical / Minor)	6.7.3 (Critical)		
Statement of Nonconformity:	The workers awareness on the importance of PPE usage and management monitoring on the PPE usage was not effectively implemented.		
Requirement Reference:	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.		
Objective Evidence:	<p><u>Sedenak Estate</u></p> <p>The estate has provided all the workers with appropriate PPE as per Safety work procedure established.</p> <p>Sighted during travelling from mill to the estate office pass by field P06, it was noted that a harvester was carrying harvesting equipment on motorbike without sickle cover and safety helmets.</p> <p>Sighted during travelling from mill to the furrow (field P04/1), it was noted that 3 harvesters were not wearing safety helmets during harvesting at P98/1.</p> <p>This was against the Safety Operation Procedure for FFB Harvesting. Refer SOP no. KULIM/PKS/OSH-1, rev. 1 dated 01/03/2021.</p>		
Corrections:	Refresher training had been conducted for 3 harvesters were not wearing PPE on 3/10/2022. In this training, we brief the importance of personal protective equipment (PPE) during harvesting operations and how to carry harvesting equipment on a motorcycle.		

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Root Cause Analysis:	Lack of monitoring by estate management and inadequate of training on the importance of PPE usage among the harvesters.
Corrective Actions:	<ol style="list-style-type: none"> 1. Refresher training will be conducted every 3 months for all workers as per training plan. 2. Random weekly inspection by field staff in estate during working hours, and the respective workers without appropriate PPE will not allowed to work as per checklist. The respective reluctant workers will be recorded to monitor their PPE usage compliance.
Assessment Conclusion:	<p><u>Major NC verification visit:</u></p> <ol style="list-style-type: none"> 1. The estate has conducted training on PPE awareness during harvesting operation and carrying harvesting equipment on motorcycle during changes of harvesting area. Reviewed the attendance list, training material, and training evaluation records for training conducted on 03/10/2022. 2. The estate has reviewed the training plan and included the PPE awareness training to be conducted every 3 months. 3. The estate has conducted PPE awareness training to all workers. Reviewed the latest training conducted on 15/10/2022. 4. The estate continuously conducted briefing on the PPE awareness. Reviewed the muster briefing records book FY 2022. reviewed latest briefing on PPE awareness dated 13/10/2022. The estate conducted PPE inspection at the workplace on weekly basis at random day. Reviewed the PPE inspection records as follows: <ol style="list-style-type: none"> a. H05 dated 25/11/2022, 18/11/2022, 21/10/2022 b. H40 dated 15/11/2022, 04/10/2022, 08/11/2022 c. G28 dated 29/11/2022, 15/11/2022, 08/11/2022 5. Noted during interview with workers, noted the satisfactory understanding on the PPE awareness. <p>Based on the site verification documented evidence provided, the CAP verified to be sufficient to address the Major NC. Hence, Major NC closed on 01/12/2022.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>The corrective actions have been diligently implemented in response to identified non-conformances. Refresher training is now conducted every 3 months for all workers in accordance with the established training plan. Training records were sighted during document verification at both Sedenak Estate and Kuala Kabong Estate.</p> <p>Additionally, a comprehensive system of random weekly inspections by field staff during working hours has been instituted in the estate. Workers found without appropriate Personal Protective Equipment (PPE) are immediately restricted from working, as per the checklist.</p> <p>Furthermore, a robust recording system has been established to monitor and ensure compliance with PPE usage. Site visit verification found that all workers are wearing appropriate PPE accordingly with the PPE matrix. Thus, the major NC remain closed.</p>

Non-conformity			
NCR Ref #	2253186-202209-N1	Issued Date	29/09/2022
Due Date	25/09/2023	Closure Date	27/09/2023

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Indicator & Category (Critical / Minor)	7.3.2 (Minor)
Statement of Nonconformity:	The procedures of labelling Schedule Waste generated was not effectively demonstrated.
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.
Objective Evidence:	<u>Sedenak Estate</u> Training on schedule waste has been conducted on 10/07/2022 at Sedenak Estate. Latest disposal has been conducted on 14/04/2022 and 28/06/2022. However, during site visit at Schedule Waste Store and document verification at Sedenak Estate, it was found that Labelling for SW409 (Plastic Pesticide Container) that generated on 10/05/2022 was labelled with Inflammable Liquid Waste (Label 1) instead of Toxic Substance (Waste) (Label 8). It was not in line with Environmental Quality (Scheduled Wastes) Regulations 2005 Section 10 Labelling Of Schedule Waste (2) Containers of scheduled wastes shall be clearly labelled in accordance with the types applicable to them as specified in the Third Schedule and marked with the scheduled waste code as specified in the First Schedule for identification and warning purposes. Other reference was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes in Malaysia, Third Schedule, Labelling Requirement For Schedule Waste.
Corrections:	<ol style="list-style-type: none"> 1. Flammable labels were immediately changed to toxic labels during the audit. 2. Refresher training had been conducted for store operator on 3/10/2022. In this training, the test was given to make sure the operator understands the training given. 3. SID will provide the scheduled waste code and description of each generated SW label are displayed at the scheduled waste store for easy reference by the SW operator.
Root Cause Analysis:	Inadequate monitoring over SW management plan by estate management.
Corrective Actions:	<ol style="list-style-type: none"> 1. Monthly Monitoring by estate management to ensure all label was appropriately in place. 2. A CEPSWAM course was arranged by HCMD on 20th – 24th November 2022 for Assistant Manager En Bussra as SW Personnel.
Assessment Conclusion:	The effectiveness on the CAP implementation will be assessed during next assessment.
Effectiveness Closure (for previous audit closed Critical NC):	Monthly monitoring was carried out by estate management to ensure proper label is pasted in accordance with Scheduled Waste Regulation 2005. Updating of 5th scheduled together with the inventory update was promptly carried out by the person in-charge. The previous NC is closed effectively with sufficient evidence of implementation on 27/9/2023. Continuous implementation will be further verified in the next assessment

Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement:

	N/A
	Verification / Follow-up actions:
	N/A

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2253186-202209-M1	Critical	6.7.3	29/09/2022	Closed out on 01/12/2022
2253186-202209-N1	Minor	7.3.2	29/09/2022	Closed out on 27/09/2023
2398967-202309-M1	Critical	2.3.2	27/09/2023	Closed out on 25/12/2023
2398967-202309-M2	Critical	3.6.2	27/09/2023	Closed out on 25/12/2023
2398967-202309-N1	Minor	3.4.2	27/09/2023	“ Open ”
2398967-202309-N2	Minor	6.2.7	27/09/2023	“ Open ”

3.4 Stakeholders and previous land owner / 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 Johor Plantations Berhad - Sedenak Palm Oil Mill 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 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 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	Estates and mill workers	Face to face
Internal	Union representatives	Face to face
Internal	Gender committee representatives	Face to face
Contractor	Binatab Sdn Bhd	Face to face
Contractor	MS Ratenam Enterprise	Face to face

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Vendor (FFB collection centre)	Nirwana Ceria Sdn Bhd	Face to face
Neighbouring community	SK Agama Felda Bukit Batu	Face to face
Neighbouring community	KLK Ladang Fraser	Face to face

Stakeholders comment	
1	<p>Feedbacks: <u>Neighbouring communities (SK Agama Felda Bukit Batu, KLK Ladang Fraser) representatives</u></p> <p>The surrounding communities have a very good relationship with the company and has been transparent to them should there be any issues of concern. There has been no undissolved issue so far and no activity of the company’s operations that could negatively impact them. The company has also always invited their representatives to attend meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. In term of contribution, occasionally the company has donated monetary and non-monetary contributions to support school’s activities.</p> <hr/> <p>Audit Team verification and response: No further issue.</p>
2	<p>Feedbacks: <u>Contractor/Vendor (Binatab, Nirwana Ceria)</u></p> <p>The contractor/vendor have a good relationship with the company where they have been providing the service for many years. They also mentioned that the award of contract was done through fair and unbiased tendering process. With regards to FFB pricing, the mill has been transparent in describing the derivation of the price. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The company has also always invited them to attend the stakeholder meetings as a transparent channel to discuss any issues of concern. They were also made to understand the mechanism to lodge complaint or grievance should there be any.</p> <hr/> <p>Audit Team verification and response: No further issue.</p>
3	<p>Feedbacks: <u>Gender committee representatives</u></p> <p>Each of the operating unit has their own gender committee, called Women Onwards (WOW). The main objectives of the committee are:</p> <ul style="list-style-type: none"> – To raise awareness, identify and address issues of concerns, opportunities, and areas for improvement for workers especially women – To create a safe community within operations where women can raise issues and concerns at work and in their lives with a focus on zero tolerance to sexual harassment and gender-biased violence <p>Briefing/training to female workers/employees on understanding the meaning of sexual harassment and domestic violence and method of reporting should it happen is part of the activities organised by the committee. Apart from that, the committee has also been given responsibility to conduct the new mother’s assessment. The management has also been very supportive with the programmes in term of financial, facilities and other resources. Since the last audit, there was no sexual harassment case reported.</p> <hr/> <p>Audit Team verification and response: No further issue.</p>

4	<p>Feedbacks: <u>Field workers (estates and mill) and Union representatives</u></p> <p>The management has been very accommodative to the workers in term of welfare. Safety at the workplace is a top priority imposed by the management. Adequate trainings and free PPE were among the main needs given by the management. With regards to welfare, housing facilities, water & electricity supply were always maintained in good conditions. Workers were also made to understand the mechanism to lodge complaint or grievance should there be any. There has been no issue with regards to delivering the terms & conditions stipulated in the employment contract so far.</p>
	<p>Audit Team verification and response: No further issue.</p>
5	<p>Feedbacks: <u>Government agency (DOSH Johor)</u></p> <p>The management has been very cooperative whenever their officials pay visit at any of the operating units and relationship has been good so far. Records and reports were well maintained in accordance with the legal requirements. The management has always included the department as one of the company's stakeholders' consultation invitee lists. No objection from the department for the certification to have their RSPO certification continued.</p>
	<p>Audit Team verification and response: No further issue.</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
Sedenak Certification Unit have already undergone 2nd Cycle of Replanting therefore this is not applicable.					



Previous land owner / user comment	
	Feedbacks: N/A
	Audit Team verification and response: N/A

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.

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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 Johor Plantations Berhad - Sedenak Palm Oil Mill 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 Johor Plantations Berhad - Sedenak Palm Oil Mill is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Wan Adlin Wan Mahmood
Company Name: BSI Services (M) Sdn Bhd	Company Name: Johor Plantations Group Berhad
Title: Lead Auditor	Title: General Manager
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: 14/01/2024	Date: 30/01/2024

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	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>The documents that are specified in the RSPO P&C were made available on site at all the sampled operating units. Among the publicly available documents are land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, summary reports, company policies and continual improvement plans. Reports and policies are accessible at the company's website: http://www.kulim.com.my and https://johorplantations.com/corporate-governance/</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the related information was available in Bahasa Malaysia and English and accessible to the stakeholders upon request. This is also communicated to the relevant stakeholders in various means such as consultation meeting. The latest meeting was conducted on 03/09/2023 at The Legends Golf and Country Club. Among the attendees were the surrounding communities, contractors & vendors, government agencies, and FFB suppliers to name a few.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Should there be any request for information that are specified in the RSPO P&C from any stakeholders, record of request can be maintained in few ways such as Enquiry register, and filing of correspondence documents e.g., email printout, and letter. There has been no request for information that are specified in the RSPO P&C from any stakeholders since the last assessment.</p>	Complied

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1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Addressed in the Communication and Consultation Procedure; SOP #SQD/SMS/1.1; Issue #1, Rev. 0, dated 01/08/2020. The procedure has the detail about the process of handling communication with the stakeholders.</p> <p>The Social Person In-Charge at respective Operating Unit as a responsible person to disclose, implement, made available and explain consultation and communication procedure to all relevant stakeholders.</p> <p>The last stakeholder consultation meeting was conducted on 03/09/2023 for the entire certification unit. Among the attendees were surrounding communities, contractors & vendors, government agencies, and FFB suppliers to name a few. Feedbacks were recorded in the minutes of meeting and have been incorporated into the social management plan.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The lists of stakeholders were last updated in September 2023 by each operating unit. Generally, the stakeholders are of various categories such as local communities, authorities, contractors, suppliers, FFB suppliers and NGOs to name a few. The lists are completed with the information about nominated representatives, contact numbers and addresses.</p>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Johor Plantations Berhad (JPB) has addressed its policy for ethical conduct in Code of Business Ethics (COBE) and Vendor Code of Business Ethics (VCOBE) and to be implemented in all business operations and transactions, including recruitment and contracts. The documents are publicly available on the company's website. Johor Plantations Berhad (JPB) has imposed the implementation of the VCOBE to all its contractors and vendors by signing the memorandum of agreement document. Copies of the signed</p>	Complied

		documents were kept by all the operating units and made available for verification.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	At the operating unit level, the system to monitor is mainly by regular checking of the contractors’ legal compliance and employees’ welfare by the management. Apart from that, annual internal audit and ABMS Internal Audit are among the methods to ensure whether the management is monitoring the compliance and implementation of the policy of the counterparties.	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 -	Sedenak Certification Unit is committed to comply with all applicable laws and regulations. Licences and permits checked as per the following: <u>Sedenak POM</u> i) DOE License @ Compliance Schedule no. 004532, validity 1/7/2023 to 30/6/2024 for processing capacity of 90 mt/hr. BOD ₃ limit is 2500 mg/l and method of discharge is land application. ii) MPOB License no. 500058304000 selling and transporting of FFB with processing capacity of 450,000 mt/year validity 6/04/2023 to 31/12/2023. iii) Diesel permit serial no. J003570 [ref.: KPDNKK.J-JB/26/5A/11/1057 (P/D) (P14)], license: Sedenak POM, diesel=19,100 liter/month, validity 15/01/21 – 15/1/24. iv) Energy commission license for private installation, license no: LP12/1/9/1822; (validity for 10 years from 6/6/2026) for 6.5 MW installation capacity. v) All UPVs and steam boiler CF’s belonged to the mill covering various equipment such as sterilizers, hoist and crane and boilers.	Complied

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		<p>- Boiler no.1 (JH PMD 80894, valid until 29/6/2024) - Vertical Sterilizer (JH PMT 90797, PMT 90798, PMT 90799, PMT 90800, PMT 90801, PMT 90802) valid until 29/06/24) vi) Permit for water abstraction, License no: 08/A/KJ/051, file no: BAKAJ/334/300/05/02/08/1 with approval for industrial total 2,000 m³/day valid until 31/12/2023.</p> <p><u>Kuala Kabong Estate</u> i) MPOB license referred to 621380002000 valid from 6/4/2023 until 31/10/2023 for 1,718.32 ha. ii) Diesel Permit ref: KPDNHEP.J.JB(PGK)5/2/1552(PD)(B), permit no.: PBKB/2023/B/J-000405), diesel quantity: 8000 litre, petrol quantity: 400 litre valid until 31/8/24. iii) Permits issued by Labour Department;</p> <ul style="list-style-type: none"> • Ref. No.: TK (NJ) U-21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor for RM 5 per month and premium not more than RM 37.50. • Ref. No.: TK (NJ) U-21 dated 31/03/2019 for sport club and recreation fee not more than RM 10.00. • Ref. No.: TK (NJ) U-21 dated 02/05/2019 for medical fee more than subsidized amount. • S/N: PP3/29/001/2008 dated 14/02/2008 for water and electricity bill not more than RM 50.00/ person. • S/N: PP3/29/002/2008 dated 14/02/2008 for mosque fund not more than RM 1/ person. <p><u>Sedenak Estate</u> i) MPOB license referred to 501224702000 valid from 6/4/2023 until 31/10/2024 for 2,808 ha. ii) Diesel Permit ref: KPDNHEP.J.JB(PGK)5/2/1552(PD)(B), permit no.: PBKB/2023/B/J-000405), diesel quantity: 8000 litre, petrol quantity: 400 litre valid until 31/8/24</p>	
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<p>2.1.2</p>	<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>Sedenak POM certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU’s operation. Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, Workers’ Minimum Standard of Housing and Amenities Act, Minimum Wages order 2020 to name a few. Other related legal for COVID19 pandemic under Prevention and Control of Infectious Diseases (Measure Within The Infected Local Areas) Regulation 2020 was also has been identified. Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office. Kulim (Malaysia) Berhad have centralised system for tracking any changes in the law.</p>	<p>Complied</p>
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of Kulim (M) Berhad to indicate the legal boundaries are through construction of trenches. This was confirmed through the field visit. Apart from that, erection of concrete slab with GPS coordinate/peg no. along the boundaries was also commonly practiced and clearly visible.</p> <p>Sedenak Estate – trenches and markers available along the boundary with smallholders (P04A/01) and Felda Bukit Permai (P06/03)</p> <p>Kuala Kabing Estate – trenches and markers available along the boundary with Felda Bukit Batu (P99/02)</p>	<p>Complied</p>

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 -	A list of contracted parties is maintained accordingly. Verified the List of Contract Register 2023 at all the sampled operating units where all the contractors engaged by the operating units were included.	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 -	All the contractors, including FFB suppliers have signed an agreement prior to provide any services. The agreement has a specific clause requiring the contractors to comply with all applicable legal requirements. Due diligence was also conducted by the operating units to ensure evidence of legal compliance is made available especially when it comes to obtaining permits, licenses, and employees' welfare. Based on samples, the meeting of applicable laws by the contractors is satisfactorily demonstrated.	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. - Minor compliance -	An addendum to the Contact Agreement has the specific clause disallowing child, forced and trafficked labour, where all the contractors had agreed and signed. Based on verification on site, interview with sampled contractors, and evidence of due diligence, there was no evidence that child, forced and trafficked labours were engaged by any contractors.	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <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 - Critical (Major) compliance -	FFB Supplier List 2023 incorporated the details of information on geo-location of FFB origins, Evidence of the ownership status to the land or valid use of land by the grower/smallholder, Supporting documents (Agreement) for claims and Valid MPOB license. The mill has 2 estates supplying Certified FFB within the certification scope. The mill also receives non-certified FFB from 24 outside FFB Suppliers (19 FFB Traders and 5 Estates).	Complied

		The mill has compiled the evidence for all its suppliers on the 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 and valid MPOB license.	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. - Minor compliance -	As instructed under interim measure for fulfilment of indicator 2.3.2 of the 2018 RSPO principles & criteria — on legality of indirect ffb supplies, all RSPO certified companies who were unable to fulfil the requirement by November 2021 must register their case with the RSPO Certification Unit by sending an email to certification@rspo.org by 31 March 2022. For the NIs, the deadline to register the case is the same for the transition period (e.g., for the Malaysia NI, the deadline to register is 15 November 2022. JPB or previously known as KMB unable to fulfil the requirement has not registered their case to RSPO by 15 November 2022. Thus, a major NC was issued.	Non-compliance
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.			
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	JPB Sedenak management unit has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Annual business plan in the form of annual budget and the projection for 5 years (2023-2028) were prepared as guidance for future planning. Components of business plan included: i) FFB processed and OER/KER extraction ii) Revenue (Sales of CPO/PK/Shell/Fibre + other income) iii) Production cost (general charges, production, maintenance, depreciation)	Complied

		iv) FFB purchase and forwarding v) General expenditure vi) Capital budget (CAPEX)																								
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	All the estates maintain record of replanting program from 2023 to 2028. The 5 years projection of replanting at the sampled estates is as follows: <table border="1" data-bbox="1137 582 1921 753"> <thead> <tr> <th rowspan="2">Estates</th> <th colspan="5">Year / Ha</th> </tr> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Sedenak</td> <td>233.33</td> <td>257.60</td> <td>336.1</td> <td>94.25</td> <td>0</td> </tr> <tr> <td>Kuala Kabong</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Estates	Year / Ha					2023	2024	2025	2026	2027	Sedenak	233.33	257.60	336.1	94.25	0	Kuala Kabong	0	0	0	0	0	Complied
Estates	Year / Ha																									
	2023	2024	2025	2026	2027																					
Sedenak	233.33	257.60	336.1	94.25	0																					
Kuala Kabong	0	0	0	0	0																					
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	The latest management review meetings were carried out on 10/7/2023.They were chaired by the respective operating unit's managers and attended by key personnel. Among the agenda discussed were: <ul style="list-style-type: none"> - Follow-up action from previous management review - Process conformance & product conformity - Customer feedback - Internal audit - External audit - Changes that could affect management system - Recommendation for improvement - Complaints and grievances Other matters	Complied																							
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.																										
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	Action plan for continuous improvement implemented by individual operating unit within the certification unit and annually reviewed. The plans were developed based on consideration of the social	Complied																							

	- Critical (Major) compliance -	impacts, which in general includes welfare of employees, and relationship between the relevant stakeholders. Based on interview, records review and site visit, the implementation of all the plans were observed to be on track within the set timeframe.	
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: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	RSPO metric template version 2.1 is used for the reporting of Sedenak POM certification unit's metrics (economic, social and environment). Data reporting period is January to December 2022 for (social and environment metrics) and economic metrics from Aug 2022 – Jul 2023 (counting back from audit month). Based on verification with input data, no discrepancies of data reported in the metrics for the period under review for all the operating units	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The Mill operations are guided by the following documents:</p> <ul style="list-style-type: none"> - Quality Manual (SDPOM/QM) document no SDPOM/QM.4.0 - Standards Operating Procedure (SDPOM/SOP) <p>Kulim (M) Berhad Agricultural Manual has been established which covers all the operation in the estate such as land preparation, planting/replanting, field maintenance, infrastructure development & maintenance, harvesting & evacuation, integrated pest management, and pest & diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management including composting site operation.</p>	Complied
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	Apart from daily routine supervision, the sampled management units have their mechanism to monitor the implementation of their procedures, among others through Internal Audit, Mill	Complied

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		Inspectorate visit, Estate Inspectorate visit, and workplace inspection by Safety Officer. Visit reports were made available for verification at all the sampled operating units.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Records of monitoring with regards to EHS and RSPO implementation are maintained and available for verification. Among monitoring records verified: – Sedenak POM Inspectorate Visit report, ref: MKI/SEDPOM2_2023 dated 23/07/2023 – PI Report 1/2023 – Kuala Kabong Estate, date of visit: 20/7/2023 – PI Report 1/2023 – Sedenak Estate, date of visit: 21/5/2023	Complied
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	There was no new planting or new operation reported in the estate. As for the current operations, the social impacts were updated annually and registered in the Evaluation of Impact Significant. It was last updated on 15/09/2023 and the evaluation was based on three criteria which are likelihood, consequences and frequency.	Complied
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -	For existing operation, the social impact management plans were developed and updated from time to time by the operating units. The updating of the management plan was based feedbacks and issues collected during various of meeting such as stakeholder meeting, OSH meeting, trade union meeting, and complaint records to name a few. However, it was found that Kuala Kabong Estate has been inviting food, clothing and raw material vendors inside their premise on twice a month basis to sell their goods to the workers. However, the management plan has yet to be established based on the potential risks such as legality and health requirements of the	Non-compliance

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		vendors, training needs related to company's policy, complaint/grievance procedure, safety hazards, and vaccination requirement for food preparation, to name a few. Thus, a non-conformity was assigned due to this lapse.	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -	Among the information available in the social impact management plans was social aspects, feedbacks/issues, proposal of improvement, and persons in-charge. The progress of the actions was monitored and regularly updated. Evidence of the implementation of the proposal for improvement was satisfactorily provided.	Complied
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	Johor Plantations Berhad (JPB) has established Recruitment of Local Workers for Operating Units, issue 1, rev. 0, dated 01/06/2021 and Recruitment of New Foreign Workers, issue 1, rev. 1, dated 01/01/2019 to describe the recruitment processes for both local and foreign workers. The process of promotion, retirement and termination is stated in the earlier-mentioned procedure and can be made available to the workers upon request. The recruitment of foreign workers will be carried out by JPB's Foreign Workers Unit and HR. There is also Ethical Recruitment Migrant Workers [JPB/PRO/OPERATIONS/PLANTATION/01, Issue 0, Rev. 0, dated 05/07/2023] which outlines the process of recruiting foreign workers without tolerating any forms of forced or bonded labour, slavery, human trafficking and sexual exploitation.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Recruitment of foreign workers is carried out by JPB's Foreign Workers Unit at HQ level while for the locals, it is managed by the respective operating units. At the operating units, application forms, medical check-up reports, copy of identification documents	Complied

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		and employment contract for all employees were made available for verification. These are among the pre-requisites spelt out in the recruitment procedure.	
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>HIRARC (Hazard Identification, Risk Assessment, and Risk Control) was a comprehensive process applied across all operations within the mill and estates to pinpoint potential hazards, evaluate them, and propose measures to mitigate risks. The following HIRARC assessments were conducted for various activities, including Harvesting of Fresh Fruit Bunches (FFB), Pest and Disease Control (P&D), Landfill Activities, Manuring, and Spraying Activities. The assessments aligned with legal requirements, and the resulting recommendations were implemented as outlined below.</p> <p><u>Sedenak POM:</u></p> <p>1. Chemical Health Risk Assessment (CHRA): In adherence to the USECHH Regulation 2000, a thorough Chemical Health Risk Assessment was carried out by QMSPRO Sdn Bhd from 17/04/2018 – 13/08/2018. The CHRA Report, bearing the reference number JKPP HQ/03/ASS/00/154-2018/059, is available for verification. The new CHRA has been conducted on 18/04/2023 however the report is yet to be available.</p> <p>2. Noise Risk Assessment (NRA): In accordance with the Occupational Safety and Health (Noise Exposure) Regulations 2019, a Noise Risk Assessment was conducted by Kulim Safety Training and Services Sdn Bhd on 30/08/2020. The NRA Report, identified as Report Number HQ/18/PEB/00/00018-2020/40, is accessible for verification.</p> <p><u>Kuala Kabong Estate</u></p>	Complied

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		<p>1. Chemical Health Risk Assessment (CHRA) was done in compliance with USECHH Regulation 2000. The assessment was conducted by QMSPRO Sdn Bhd on 15/04/2018 – 13/08/2018 The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2018/041) was available for verification. The CHRA has been conducted on 15/06/2023 but the report is yet to be available.</p> <p>2. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by NRA Assessor (JKKP Registration Number: HQ/18/PEB/00/00014) on 28/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/024) was available for verification.</p> <p><u>Sedenak Estate</u></p> <p>1. Chemical Health Risk Assessment was conducted to assess the use of hazardous chemicals in the estate. The CHRA Assessment was conducted on 17/04/2018 until 13/08/2018 by QMSPro Sdn Bhd. The CHRA Report (JKKP HQ/03/ASS/00/154-2018/042) was available for verification. Supplementary CHRA Report was conducted due to additional chemicals used in the estate. The assessment was done on 22/12/2020 – 31/01/2021 by QMSPRO Sdn Bhd. The CHRA Report (Report Number: JKKP HQ/03/ASS/00/154-2021/016) was available for verification.</p> <p>2. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Kulim Safety Training And Services Sdn Bhd on 28/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/023) was available for verification.</p>	
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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>Annual H&S plan established by each Operating Unit are mostly implemented through Annual Training Program 2023 to address the identified health and safety risks. The emphasis is on safe work by providing:</p> <ol style="list-style-type: none"> 1. Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. 2. Awareness and understanding of workplace hazards and how to identify, report, and control them. 3. Specialized training when their work involves unique hazards. <p>Besides formal classroom training other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ol style="list-style-type: none"> 1. Internal Audit conducted by the Johor Plantation Berhad Head Office Sustainability Palm Oil Department; 2. Workplace inspection by site OSH Committee; 3. Direct involvement of supervisor and rounds by Asst Manager; 4. Safety occurrence reporting; 5. Health / medical surveillance; 6. Chemical exposure monitoring. <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken. Related H&S compliance monitoring carried out at the respective estates as per the following:</p> <p><u>Sedenak POM:</u></p>	Non-compliance
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		<p>1. Medical Surveillance for 2023 was conducted on 01/08/2023, medical surveillance was conducted for 44 mill workers who were exposed to n-hexane, pesticides, and hazardous fumes. This assessment took place at JPG Terrasolutions Sdn Bhd by Dr Rosman Surie (OHD: HQ/15/DOC/00/437). The results confirmed that none of the workers exhibited any abnormal health conditions attributable to their occupational exposure.</p> <p>2. Audiometric Testing: JPG Terrasolutions Sdn Bhd conducted audiometric tests for 34 mill workers on 03/07/2023. The results revealed that 15 workers were diagnosed with NIHL and 9 workers were having hearing impairment and required retesting within 30 days. The management has sent the respective workers for retesting, however the report is yet to be available for review during the audit.</p> <p><u>Kuala Kabong Estate</u></p> <p>1. Medical Surveillance was conducted on 13/07/2022, medical surveillance was conducted for 17 workers mill workers who were exposed on Serum Cholinesterase. This assessment took place at Kulim Safety Training And Services Sdn Bhd by Dr Rosman Surie (OHD: HQ/15/DOC/00/437). The results confirmed that one of the workers was deemed unfit and require MRP. The management has changed the job position of the specific worker for bunch census work from 02/08/2022. Medical Surveillance for the year 2023 has been conducted on 12/09/2023, the report is yet to be available during the audit.</p> <p>2. Audiometric test was conducted by TSM Training And Consultancy Services for 10 estate workers on 20/09/2022 based on the requirements in the NRA. The results indicated 3 workers were diagnosed to have hearing loss and 4 workers were having hearing impairment (HI) with or without hearing loss.</p>	
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		<p><u>Sedenak Estate</u></p> <p>1. Medical Surveillance was conducted for 36 estate workers, deemed to be exposed to pesticides, fertilisers and mineral oils. The assessment was conducted on 01/08/2023 at Ladang Sedenak Clinic. The results indicated that all workers had no abnormal results that were occupationally cause.</p> <p>2. Audiometric test was conducted by TSM Training And Consultancy Services for 10 estate workers on 20/09/2022 based on the requirements in the NRA. The results indicated 3 workers were diagnosed to have hearing loss and 4 workers were having hearing impairment (HI) with or without hearing loss.</p> <p>Safety Improvement Plan 2023 for Sedenak POM has been established. Sample of improvement plan is as following: Reduce the chemical consumption and testing by using chemicals by using NIR machine for oil loss, FFA, and DOBI test.</p> <p>The workplace inspection checklist verified at Kuala Kabong Estate and Sedenak Estate identified stations, including Chemical Store, Schedule Waste Store, Fertilizer Store, Workshop, Linesite, Lubricant/Fuel Store, Clinic/Medical Waste, Chemical Mixing Area, and General Store. Notably, no inspection was conducted at the workplace of the production site in both estates. Additionally, the Medical Surveillance Programme for 2023 at Kuala Kabong and Sedenak Estate was not implemented as per the established Health and Safety plan for each respective estate. Thus Critical Non Conformance was raised.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable	The annual training program has been established and covered all aspects of the RSPO elements. There were also additional subjects including the estate operating procedures, parameters, vehicles	Complied

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	aspects of the RSPOP&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -	maintenance etc. The training program also specified the target group of employees to be trained under specific subjects. The program mainly covers both requirements of the estates and mill in the CU.	
3.7.2	Records of training are maintained. - Minor Compliance -	Generally, the subjects covered for the trainings are occupational safety & health, environment & HCV, company’s policies on labour welfare, discrimination, ethical conducts, human rights, sexual harassment, etc., and best practices. The trainings for stakeholders such as contractors, vendors, surrounding communities were also conducted. Records of training were maintained by the mill and estates and made available for verification. Example of training carried out in 2023: i) Manuring application – 12/5/23 ii) Harvesting operation – 10/3/23 iii) Spraying Operation – 10/7/23 iv) Scheduled waste training – 20/2/23 v) First Aid training – 27/7/23 vi) Integrated Pest Management – 6/2/23 vii) Zero Burning Policy – 6/3/2023 viii) Grievance/complain training – 6/8/2023	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 conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by HQ sustainability department personnel, attended by mill manager, assistant mill manager, lab supervisor, lab despatch operator, weighbridge clerk and auxiliary police. Latest training was conducted on 30/03/2023.	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)

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<p>3.8.1</p>	<p>Identity Preserved Module</p> <p>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.</p> <p>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.</p>	<p>Johor Plantations Berhad (JPB) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.</p> <p>As per SOP established, under section 4. Definition, Identity Preserved (IP) defined as FFB used by the mill sourced from plantations/ estates that are certified against the RSPO Principle and Criteria (RSPO P&C), and /or against the Group Certification scheme.</p> <p>Sedenak POM received FFB from both certified and uncertified source using Mass Balance Module. Thus, the criteria is not applicable.</p>	<p>Not Applicable</p>
<p>3.8.2</p>	<p>Mass Balance Module</p> <p>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.</p>	<p>Johor Plantations Berhad (JPB) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.</p> <p>As per SOP established, under section 4. Definition, Mass Balance (MB) – FFB used by the mill may be from uncertified growers, in addition to those from its own group of company and third-party certified supply base. Only the volume of oil palm products produced from processing of the certified FFB claimed as MB.</p> <p>Sedenak POM received FFB from both certified and uncertified source using Mass Balance Module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>	<p>Complied</p>
<p>3.8.3</p>	<p>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</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 10.</p>	<p>Complied</p>

	<p>produced shall then be recorded in each subsequent annual surveillance report.</p>										
<p>3.8.4</p>	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table border="1" data-bbox="1151 549 1937 805"> <tr> <td>Member name</td> <td>Johor Plantations Berhad-Sedenak Palm Oil Mill</td> </tr> <tr> <td>Palm Trace ID</td> <td>RSPO_PO1000000019</td> </tr> <tr> <td>Membership No</td> <td>1-0080-09-000-00</td> </tr> <tr> <td>Type of business</td> <td>Oil mill</td> </tr> </table>	Member name	Johor Plantations Berhad-Sedenak Palm Oil Mill	Palm Trace ID	RSPO_PO1000000019	Membership No	1-0080-09-000-00	Type of business	Oil mill	<p>Complied</p>
Member name	Johor Plantations Berhad-Sedenak Palm Oil Mill										
Palm Trace ID	RSPO_PO1000000019										
Membership No	1-0080-09-000-00										
Type of business	Oil mill										
<p>3.8.5</p>	<p>Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having 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>Johor Plantations Berhad (JPB) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.</p> <ul style="list-style-type: none"> a) As of the date of on-site assessment, the documented procedures for supply chain still based on existing as following: <ul style="list-style-type: none"> - Kulim Sustainable Management System Doc. Title: Traceability; Issue # 1; Doc. # SQD/SMS/2.1; Rev. # 06; Date: 17/2/2022 - Operational Procedure title: CSPO & CSPK Supply Chain; Rev. # 02; Procedure # MKTG 04; Date: January 2021 b) Sedenak POM maintained the records and reports on the implementation of supply chain model requirements as per procedure Doc. Title: Control of Record; Issue # 1; Doc. # SQD/SMS/3.4; Issue # 1; Rev. # 0; Date: 20/9/2019 stated that records shall be kept for five (5) years. Among records maintained in the supply chain implementation including the following: 	<p>Complied</p>								

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	<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 records - Internal audit report - Invoice and contracts - Weighbridge tickets - Daily production reports - Sustainable product monthly movements summary report (mass balance sheet) <p>c) There was a letter of Appointment as Person Responsible for Traceability System (PRTS); Letter Ref. # SID/SD/ADMIN/047/23; Date: 8/9/2023 to all Senior Manager/Manager/Person In-Charge of Respective Operating Units where for Sedenak POM the responsible identified is Mr. Mohd. Yusof Mat, Senior Manager. The Procedure # MKTG 04 CSPO & CSPK Supply Chain clause 3.0 Responsibility also specifies the that the mill manager responsible for the overall supply chain traceability activities at mill level.</p> <p>d) The documented procedure # SQD/SMS/2.1 Traceability clause 6.4 Procedure Reception of FFB specifies procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. However, Sedenak POM certified as MB.</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> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Johor Plantations Berhad (JPB) are in the midst of updating its documented information related to traceability and supply chain procedures to reflect its change of name.</p> <p>i) As of the date of on-site assessment, the documented procedures for supply chain still based Kulim Sustainable Management System Doc. Title: Internal Audit; Issue # 1; Doc. # SQD/SMS/3.2; Rev. # 0; Date: 1/8/2020.</p>	Complied

	<p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <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 be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>a. The procedure with aim to ensure the implementation of Sustainable Management System including RSPO SCCS in line with the defined policies, procedures and requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Sedenak POM implemented and maintained the standard requirements internal audit conducted once a year with latest done on 25/6/2023</p> <p>ii) Based on the records of latest internal audit conducted on 25/6/2023 documented as Internal Audit Report; Doc. # JPB/SID/SMS/3.2-F1; Issue # 0; Rev. # 0; Effective date: 2023; no non-conformity raised by the internal auditors. The internal audit report maintained together with records of internal audit plan, attendance list and internal audit checklists.</p>	
<p>3.8.7</p>	<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>Purchasing and Goods In documents maintained as per sample Certified FFB received verified as following:</p> <ul style="list-style-type: none"> - FFB Receive Ticket # 461850; Date: 24/9/2023; Supplier: Sedenak Estate; Field: 2000; DO # 81087; Nett weight: 9,590 kg; Cert. # RSPO 537873 - FFB Receive Ticket # 461843; Date: 24/9/2023; Supplier: Kuala Kabong Estate; Field: 1999, 2000, 2001, 2002; DO # 19607; Nett weight: 31,9180 kg; Cert. # RSPO 537873 <p>i) The mill weighbridge clerk verified all incoming documents prior to receiving and this has been approved by the assistant mill manager</p> <p>ii) Based on the production records, no overproduction of certified tonnage as to date.</p>	<p>Complied</p>

		<p>The mill has a mechanism in place for handling non-conforming FFB and/or documents as specified in the procedure Traceability; Doc. # SQD/SMS/2.1; Rev. # 06; Date: 17/2/2022.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>Sales and Goods Out documents maintained as per sample verified as following:</p> <p>Certified CPO:</p> <ul style="list-style-type: none"> - Buyer: PGEO Edible Oils Sdn. Bhd.; Lorong Pukal Dua, Kawasan Lembaga Pelabuhan Johor, 81700 Pasir Gudang, Johor - Seller: Johor Plantations Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor - Despatch Ticket # C35491; Date: 18/9/2023 - RSPO Cert. # RSPO 537873 - Product: CSPO MB - Nett weight: 44,860 kg - Vehicle # BMR 2955 <p>Certified PK:</p> <ul style="list-style-type: none"> - Buyer: PGEO Edible Oils Sdn. Bhd.; Lorong Pukal Dua, Kawasan Lembaga Pelabuhan Johor, 81700 Pasir Gudang, Johor - Seller: Johor Plantations Berhad, Sedenak Palm Oil Mill, KB 721, 80990 Johor Bahru, Johor - Despatch Ticket # K10141; Date: 14/9/2023 - RSPO Cert. # RSPO 537873 - Product: CSPK MB - Nett weight: 40,150 kg - Vehicle # JRF 3222 	<p>Complied</p>

<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>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</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <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>	<p>No processing outsource activity by Sedenak POM except for transportation as per Memorandum of Agreement (MOU) as following:</p> <ul style="list-style-type: none"> - Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Berhad Group Mills to Various Refineries; Contract # JPB/CTD/72/29/2023/1 (NFH); Renewal period: 1/6/2023 to 30/6/2024; Transporter: Mirzafiz Sdn. Bhd. - Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Berhad Group Mills to Various Refineries; Contract # JPB/CTD/76/29/2023/1 (NFH); Renewal period: 1/6/2023 to 30/6/2024; Transporter: Teo Tuan Kwee Sdn. Bhd. - Renewal of Contract: Transport of Crude Palm Oil (CPO) from Johor Plantations Berhad Group Mills to Various Refineries; Contract # JPB/CTD/77/29/2023/1 (NFH); Renewal period: 1/6/2023 to 30/6/2024; Transporter: Yewtan Enterprise Sdn. Bhd. <p>The agreement specified in clause 16.2, 16.4, 16.5, 16.8 & 21.6 the following:</p> <ul style="list-style-type: none"> - The mill has legal ownership of all CPO transported until it reaches customer. - The explicit procedure specified is Traceability; Doc. # SQD/SMS/2.1; Rev. # 06; Date: 17/2/2022. <p>Transporters agreed to provide relevant access for duly accredited CBs to their respective operations, systems, and all information with signing on the contract by both parties.</p>	<p>Complied</p>
<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>The list of outsourced contractors was sighted, "list of stakeholders" to include the transport contractor for CPO. The independent third parties involve in Mill operation is only transportation services for CPO and PK.</p>	<p>Complied</p>

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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 new contractor used for the processing or physical handling of RSPO certified oil palm products transportation.	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>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>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, records are to be maintained minimum of two years for sample records as per following:</p> <ul style="list-style-type: none"> - Mass Balancing Records (Sustainable Product Monthly Movements Summary Report) for Sedenak Palm Oil Mill - Daily Production Summary Report - Monthly Production Summary Report <p>Based on mass balance sheet latest dated end of August 2023, no negative stock recorded.</p>	Complied
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</p>	The oil extraction rate (OER) and the kernel extraction rate (KER) for Sedenak POM is determined and set their own extraction rates based upon past experience, documented and applied consistently.	Complied

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	PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.		
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Extraction rates are calculated daily through measurement in production and storage tanks for CPO and bunkers for PK. This daily extraction aggregated monthly and annually for monitoring and reporting. As of August, the 2023 year to-date OER: 19.95% and KER: 5.23%.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Not applicable for mass balance module.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	i) Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders within three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. Sighted sample of Shipping Announcement made as following: - Product name: CSPO; SC Model: MB; Volume: 504.46 MT; Transaction ID: TR-f8106260-d60f; Creation date: 7/9/2023; Confirmation date: 7/9/2023 - Product name: CSPK; SC Model: MB; Volume: 300 MT; Transaction ID: TR-9abc7434-d7de; Creation date: 15/9/2023; Confirmation date: 19/9/2023 ii) RSPO certified volumes sold under conventional removed in the RSPO IT platform	Complied
3.8.17	Claims	There is no claim on RSPO SCCS by Sedenak POM.	Complied

	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.		
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	The company's website (https://johorplantations.com/sustainability/) was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications.	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	The company's website (https://johorplantations.com/sustainability/) was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The website has displayed RSPO Trademark accompanied with license trademark number.	Complied
4.3	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 oil palm products.	The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	The company's website (https://johorplantations.com/sustainability/) was reviewed and confirm the communications are mainly on the efforts and commitments of Johor Plantations Berhad (JPB) towards production of sustainable palm oil. The website has published	Complied

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		reports, statements, policies, procedures and performances of such implementation. The website did not specifically publish its product as RSPO certified product.	
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Sedenak POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Mass Balance) was stamped on the tickets.	Complied
5.2	When confirming the sale of certified oil palm 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.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CPO – MB (Despatch Ticket # C35491; Date: 18/9/2023) with RSPO Cert. # RSPO 537873. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm 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 product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.	Not applicable since Sedenak POM is not under distributor or wholesaler category.	Not Applicable

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm content is 100% CPO and claim as RSPO-MB certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Oil palm content is 100% CPO and claim as RSPO-MB certified.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm 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'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). 	Sedenak POM is producing crude palm product and does not involve in any labelling of end product.	Complied

	<ul style="list-style-type: none"> In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. The volume of [oil palm 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. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Sedenak POM is producing crude palm product and does not involve in any labelling of end product.</p>	<p>Complied</p>
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<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>Johor Plantations Berhad (JPB) has established their Sustainability where the company pledges to respect, support and protect international human rights against violence, threats, and all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and people which include Environmental Human Rights</p>	<p>Complied</p>

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	- Critical (Major) compliance -	Defenders, whistleblowers, complainants, and community spokesperson. Apart from posting on the company’s website, the policy was also communicated to the stakeholders mainly through stakeholder meetings and workers’ routine musters.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Johor Plantations Berhad (JPB) prohibits any form of violence or harassment in their operation as per the above-mentioned policy. Based on interview with sampled workers and gender committee representatives, there has been no case reported with regards to violence and harassment. Should there be any such case, it can be addressed in accordance with the JPB’s appropriate platforms and procedures.	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	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Johor Plantations Berhad (JPB) has established their Sustainability Policy where the company pledges to respect, support and protect international human rights against violence, threats, and all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and people which include Environmental Human Rights Defenders, whistleblowers, complainants, and community spokesperson. Apart from posting on the company’s website, the policy was also communicated to the stakeholders mainly through stakeholder meetings and workers’ routine musters.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Briefings on grievance procedures are given to ensure that the system is understood by affected parties. To ensure understanding by illiterate parties, the briefings were given verbally, and when necessary, translators from among the workers (usually a worker representatives) are sought to translate documents including procedures for dealing with complaints and grievances. Interview with the workers confirmed that they understood the procedure.	Complied

4.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There has been no complaint received from external parties since the last assessment by any of the sampled operating units. As for the internal party, complaints were mostly of housing facility repair. Based on verification of the complaints book, and interview with the sampled complainants, the complains were satisfactorily handled by the management.</p>	Complied
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Addressed under Clause 5.5 of Grievance Mechanism Doc. # SQD/SMS/4.1; Issue #1; Date: 1/8/2020, where the option to engage independent legal, technical advice and third-party mediator is mentioned. Nonetheless, there was no case where a third-party mediator is needed since the last assessment.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>The certification unit obtained the information about any potential contribution mainly through stakeholders' consultation meetings or written request. Since the last assessment, the requests for contribution were mainly came from surrounding schools in term of monetary donation to fund various schools' activities. Evidence to show the contributions have been delivered was made available for verification.</p>	Complied
<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.</p>			
4.4.1	<p>(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> <p>- Critical (Major) compliance -</p>	<p>Sedenak POM is situated in the land of Sedenak Estate occupying around 7.71 Ha of Lot No. 136. A copy of the land title was kept in the mill office. Sedenak Estate has 10 land titles with a total area of 2,808 Ha while Kuala Kabong Estate has one land title with a total area of 1,718.32 Ha. All the copy of land titles were made available for verification.</p>	Complied

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Not applicable as there was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Not Applicable
4.4.2a	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. - Minor compliance -	Not applicable as there was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Not Applicable
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. - Minor compliance -	Not applicable as there was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Not Applicable
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 -	Not applicable as there was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	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 -	Not applicable as there was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Not applicable as there was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Not Applicable

	- Minor compliance -		
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Not applicable as there was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Not applicable as there was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	Not Applicable
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment. Thus, this indicator is not applicable.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment. Thus, this indicator is not applicable.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples.	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment. Thus, this indicator is not applicable.	Not Applicable

	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment. Thus, this indicator is not applicable.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment. Thus, this indicator is not applicable.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment. Thus, this indicator is not applicable.	Not Applicable
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 -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment. Thus, this indicator is not applicable.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment. Thus, this indicator is not applicable.	Not Applicable

<p>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.</p>			
4.6.1	<p>(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 -</p>	Johor Plantations Berhad (JPB) has established Negotiations Concerning Compensation Program dated 4/9/2007 was established by to identify legal and customary rights as well as people entitled to compensation.	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair 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. - Critical (Major) compliance -</p>	Johor Plantations Berhad (JPB) has established Negotiations Concerning Compensation Program dated 4/9/2007 was established by to identify legal and customary rights as well as people entitled to compensation.	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -</p>	Not applicable as there has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	Not Applicable
4.6.4	<p>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 -</p>	Not applicable as there has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Not Applicable
<p>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.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	Johor Plantations Berhad (JPB) has established a procedure entitled Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.	Complied

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4.7.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Johor Plantations Berhad (JPB) has established a procedure entitled Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.</p>	Complied
4.7.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Not applicable as there was no community that had lost access and rights to land as well as no expansion of plantation by the certification unit.</p>	Not Applicable
<p>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.</p>			
4.8.1	<p>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.</p> <p>- Minor compliance -</p>	<p>Not applicable as there has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.</p>	Not Applicable
4.8.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable as there has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.</p>	Not Applicable

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4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Not applicable as there has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	Not Applicable
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 as there has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	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 past FFB prices available in the mill as per MPOB guideline. The mill has displayed the FFB pricing from January to September 2023 at the weighbridge area. The pricing was according to MPOB set price. Grading guideline according to MPOB was publicly displayed at the weighbridge area.	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 -	FFB pricing to smallholders/dealers explained to individual smallholders during contract signing on annual basis. Other than that, they have been remained during stakeholders meeting. FFB price calculation was based on monthly average price of CPO and PK for peninsular Malaysia declared by MPOB. Processing charges was based on tonnage supplied and Extraction rates that based on OER extraction.	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 -	Pricing of FFB is based on MPOB latest price and it was publicly available at weighbridge. No bidding contract between mill and	Complied

		supplier and they are free to send their crop to other mill or collection centre.																					
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>	No binding contract between mill and FFB suppliers that includes finance, loans/credit and repayments through FFB price reductions for replanting and or other mechanisms at Sedenak POM. Thus, this indicator is not available.	Not Applicable																				
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	Verified agreement between Sedenak POM with Supplier from Estates and Dealer. Based on the review of the contract, all the terms contained therein are fair, legal, transparent and with an agreed timeframe.	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>	<p>As refer to the agreement, under Clause 3, "Monthly payments shall be made in three (3) instalments. The first instalment payment being made on or before 15th of the month in payment of FFB delivered in the first 10 days of the same month at a price per ton based on 80% of the previous month's price calculated in accordance with the agreement. Records of payment vouchers, payment memo and transaction record as below:</p> <table border="1"> <thead> <tr> <th>Supplier</th> <th>Validity</th> <th>Voucher no.</th> <th>Invoice date</th> <th>Date paid</th> </tr> </thead> <tbody> <tr> <td>Qi Hong</td> <td>26/7-31/12/23</td> <td>PV2303583</td> <td>31/8/23</td> <td>6/9/23</td> </tr> <tr> <td>Keng Ann Rubber</td> <td>1/1-31/12/23</td> <td>PV2303216</td> <td>31/7/23</td> <td>7/8/23</td> </tr> <tr> <td>Koperasi Penanaman Sawit Mampan</td> <td>1/1-31/12/23</td> <td>PV2303226</td> <td>7/8/23</td> <td>31/7/23</td> </tr> </tbody> </table>	Supplier	Validity	Voucher no.	Invoice date	Date paid	Qi Hong	26/7-31/12/23	PV2303583	31/8/23	6/9/23	Keng Ann Rubber	1/1-31/12/23	PV2303216	31/7/23	7/8/23	Koperasi Penanaman Sawit Mampan	1/1-31/12/23	PV2303226	7/8/23	31/7/23	Complied
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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>	<p>2 units of weighbridges were used for weighing the FFB receive from supplier. Annual calibration has been made from control mechanism the efficiency of the weightage. Records of weighing equipment stamping was maintained on annual basis at visited operating units even though there is no smallholder within Sedenak certification unit. Latest calibration of weighbridge tabulated in the table below:</p> <table border="1"> <thead> <tr> <th>Weighbridge No.</th> <th>Cert # & date</th> </tr> </thead> <tbody> <tr> <td>A000741</td> <td>CA 043395, 14/8/23</td> </tr> <tr> <td>B217745</td> <td>CA 043054, 17/2/23</td> </tr> </tbody> </table>	Weighbridge No.	Cert # & date	A000741	CA 043395, 14/8/23	B217745	CA 043054, 17/2/23	Complied				
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5.1.8	<p>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.</p> <p>- Minor compliance -</p>	<p>No independent smallholder at Sedenak Certification Unit. Thus, this indicator was not applicable.</p>	Not Applicable										
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Grievance mechanism has been developed to ensure the grievances raise were solve in timely manner. An agreed and documented system which deals with complaints and grievances are available and documented as follows:</p> <p>1) Grievance Policy dated 01/05/2018. This Policy commits to a transparent process ensuring stakeholder's grievances and complaints are dealt with fairly, consistently and promptly.</p>	Complied										

		2) Grievance Procedure Doc No. SQD/SMS/4.1 dated 01/08/2020. This SOP is applicable to all parties who deal with the Company who may have complaints and grievances. The grievance mechanism that has been established is applicable to all parties, including smallholders.	
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 -	The mill does not receive any crop from smallholders. Thus, this indicator is not applicable.	Not Applicable
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 -	The mill does not receive any crop from smallholders. Thus, this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	The mill does not receive any crop from smallholders. Thus, this indicator is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The mill does not receive any crop from smallholders. Thus, this indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The mill does not receive any crop from smallholders. Thus, this indicator is not applicable.	Not Applicable

Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Johor Plantations Berhad (JPB) has established their Core Labour Standard and Sustainability policies where the company pledges not to engage any form of discrimination which include race, ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. These policies available in the company's website and posted at the strategic location within company premise. Implementation of these Policies were evidenced from reviews of employment contracts of foreign and local workers, as well as interviews conducted with sampled workers. These workers confirmed the absence of any form of discrimination and that they were accorded equal opportunities.</p>	Complied
6.1.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interview with the workers from different gender and nationalities, it was confirmed that there was no discrimination reported. The management has treated all employees equally for example in term of providing accommodation, medical treatment, job opportunity, wages rate, etc. There was also no charging of recruitment fees incurred for foreign workers and this was further confirmed by foreign workers interviewed.</p>	Complied
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Verification of sampled employment records and consultation with workers confirmed that the certification unit has demonstrated that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available</p>	Complied

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6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Based on interview with female employees at the sampled operating units, it was confirmed that there is no requirement for pregnancy testing to be conducted prior the employment.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Each operating unit has established their own gender committee called Women Onwards (WOW). The committees organize a meeting every two months. The last meetings were conducted on 28/08/2023 (Sedenak POM), 13/09/2023 (Kuala Kabong) and 16/08/2023 (Sedenak). All minutes of meeting were made available for verification. The objectives of the committee are to promote gender equality and empower women’s knowledge and skills.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Based on the sampled payslips, which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 without any form of discrimination. This was also evident through interview with sampled workers.	Complied
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 -	Employment contract was established based on the collective agreement and available in all languages of which the workers are from. Samples of employment contracts were reviewed and found that the agreements were signed by the employees. Any new foreign workers will be inducted for the terms and conditions of employment contract and briefed on the company’s policies, upon arrival to the operating units. The implementation of this practice was evident through interview with the sampled workers.	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	Based on sampled employment contracts the contracts were signed in dual language which is English and their home country language such as Bahasa Indonesia, and Bangladeshi. The terms and	Complied

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	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. - Critical (Major) compliance -	conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the terms and condition according to the Collective agreement, Employment Act and Minimum Wage Order 2022.	
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. - Critical (Major) compliance -	33 samples for workers from various operations such as mill operators, harvester, field workers and general workers were verified. Overtime was found to be appropriate, and deduction was fairly made as per the agreement and approval from the Labour Department.	Complied
6.2.4	(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. - Critical (Major) compliance -	Workers are accommodated at the housing complex quarters of the operating units without any charges. Water and electric supplies were adequately subsidised, and free medical support were also given to all workers. Housing inspection was conducted weekly by the Medical Assistant.	Complied
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	There was no issue on accessibility to adequate and sufficient food supplies as sundry shops were available in most of the housing complex. Workers are also free to go to the nearby towns for more options of groceries. There has been no complaint received with regards to the price of supplies. Based on interview, the basic supplies were affordable.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE:	The certification unit has provided decent living wage for both local and foreign workers based on JPB's prevailing wages assessment. Among the items included in the in-kind benefits were housing, electricity & water, education, crèche facility, healthcare, and food,	Complied

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<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 the RSPO Guidance for Implementing a Decent Living Wage (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).</i></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 	<p>to name a few. Review of sampled pay slips and prevailing wage assessment report 2022, showed that the wages received complied with the Minimum Wage Order 2022.</p> <table border="1" data-bbox="1137 467 1915 798"> <thead> <tr> <th>OU</th> <th>Total cost of in-kind benefits</th> <th>Average monthly take home salary per worker</th> <th>Prevailing wages</th> </tr> </thead> <tbody> <tr> <td>POM</td> <td>814.54</td> <td>2,712.35</td> <td>3,526.90</td> </tr> <tr> <td>Kuala Kabong</td> <td>543.14</td> <td>2,196.27</td> <td>2,739.41</td> </tr> <tr> <td>Sedenak Estate</td> <td>271.12</td> <td>2,395.73</td> <td>2,666.85</td> </tr> </tbody> </table>	OU	Total cost of in-kind benefits	Average monthly take home salary per worker	Prevailing wages	POM	814.54	2,712.35	3,526.90	Kuala Kabong	543.14	2,196.27	2,739.41	Sedenak Estate	271.12	2,395.73	2,666.85	
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	<ul style="list-style-type: none"> • 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>All the core works are mostly performed by permanent and full-time employees. The estates had appointed contractors for replanting, FFB transporting and hiring heavy machinery. Nonetheless, it was found that Kuala Kabong Estate has engaged a contractor (Binatab Sdn Bhd) to provide workers to do harvesting task for the period from 01/06/2023 to 31/07/2023. Based on the contract agreement between Binatab and their workers dated 01/06/2023, the term of employment is classified as temporary since it was stated that under Clause 4 that the period of employment is "one year". Thus, a non-conformity report was assigned due to this lapse.</p>	Non-compliance
<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>Addressed in Core Labour Standard Policy where the company recognises and respects the right of employees to form and/or join trade union of their choice. Apart from that, it also stated in "Buku Panduan Anggota Pekerja Perladangan" which is distributed to workers upon joining the company. Communication of the policy has been done during morning muster call and have been verified base on the training records. Interview with worker confirmed their understanding on the policy which they have right to join any worker's union/association.</p>	Complied

6.3.2	<p>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.</p> <p>- Minor compliance -</p>	<p>Each operating unit has their own union committee (NUPW). The last meetings were conducted on 16/08/2023 (Sedenak POM), 21/09/2023 (Kuala Kabong Estate), and 23/08/2023 (Sedenak Estate) between the management and workers' representatives. Issues raised during the meeting were recorded in the minutes of meeting which was made available for verification.</p>	Complied
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Interview with the NUPW representatives and the workers confirmed that the election of the representatives were freely done by the workers without any influence or interference from the management.</p>	Complied
<p>Criterion 6.4: Children are not employed or exploited.</p>			
6.4.1	<p>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.</p> <p>- Minor compliance -</p>	<p>Johor Plantations Berhad (JPB) has established their Core Labor Standard policy where the company pledges not to engage in or support the use of child labour as defined by Malaysia law and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. Johor Plantations Berhad (JPB) shall also take appropriate action to prevent the use of such labour in connection with their activities. Children and/or young workers shall not be exposed to situations in or outside of the workplace that are hazardous, unsafe, or unhealthy.</p>	Complied
6.4.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Age screening for foreign workers is based on identification documents and/or passport and from the stated date of birth. As for the local employees, photocopies of identification cards were retained by the management for verification purpose. Verification of employee data base and sampled identification documents showed that workers were above 18 years old of age at the point of appointment.</p>	Complied

6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by any of the sampled operating units based on verification of the employee data base, sampled identification documents, and through interview with the workers.</p>	Complied
6.4.4	<p>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.</p> <p>- Minor compliance -</p>	<p>The management has communicated their Core Labour Policy and emphasized that the risk of child labour to the stakeholders mainly through stakeholders' consultation. Specific clause to restrict child labour is also stipulated in the contract agreement. This was also confirmed through interview with the contractors and FFB suppliers.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Johor Plantations Berhad (JPB) has their Sexual Harassment policy where the company pledges to eradicate all forms of sexual harassment in the workplace and wherever possible influence the behaviour of its employees in a wider social setting. The policy has been communicated to the workers through musters and display on notice boards.</p>	Complied
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.</p> <p>- Critical (Major) compliance -</p>	<p>Addressed in JPB's Core Labour Policy where the company recognizes and respects the rights and freedom of employees relating to reproduction and reproductive health which will include the right to make decisions concerning reproduction free of discrimination, coercion, and violence as long as it is not against the law, rules and regulations of the country. The policy has been communicated to the workers through musters and display on notice boards.</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.</p> <p>- Minor compliance -</p>	<p>Assessment for new mothers (with infants under 24 months) FY2023 were conducted by each operating unit's Gender Committee. Based on verification of the assessment report ("New Mother Census" form) and interviews, among the needs identified were antenatal/pregnancy check-up, vaccination programme,</p>	Complied

		needs before& after delivery, postpartum care, prenatal check-up, breastfeeding facilities, and childcare centre to name a few. Based on interview with the sampled new mothers, the management had granted all their identified needs.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	A grievance mechanism, which respects anonymity and protects complainants where requested, is spelt out in Sustainable Management System procedure, Issue # 1; Grievance; Doc. # SQD/SMS/4.1; Rev. # 0; Date: 1/8/2020. A Grievance/Complaint Form for Sexual Harassment was developed to record if there is any complaint. Interview with sampled workers confirmed that they are aware of the grievance mechanism. There has been no issue reported since the last assessment	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <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 - Critical (Major) compliance -	Interview with sampled workers and documents reviews (personal file, employment records etc) confirmed that the following are not being practiced by the management: <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 	Complied

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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>The certification unit is implementing the JPB's Core Labour Standard policy and can be accessed via https://johorplantations.com/corporate-governance/ where the company is committing the following:</p> <ul style="list-style-type: none"> • prohibits the employment of children and young persons, forced and bonded labour • provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties • workers' entitlement to housing and basic amenities which are at par with statutory requirements • free from discrimination, coercion, or violence • rights of employees to join trade unions • accessibility to grievance procedure • entitled to one day off per week. <p>Verification of various documents such as employment contract agreement, pay slips, complaint records, and trade union meeting minutes confirmed that all the above were adequately delivered by the operating units.</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 General Manager/ Senior Manager/ manager/ Deputy Manager/ Assistant In-Charge/ Acting manager of the respective Operating Units are appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter dated 15/09/2021 undersigned by the Chairman, ESG Committee.</p> <p>1. Sedenak POM – Mill Manager was appointed as Safety and Health Committee Chairman. OSHA safety meetings were conducted at an interval of 3 months at the mill to address all the OSH related issues. Sighted the meeting minutes dated</p>	Complied

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		<p>21/09/2023 (03/2023), 18/06/2023 (02/2023), 14/03/2023 (01/2023), and 21/12/2022 (04/2022)</p> <p>2. Kuala Kabong Estate - Estate Manager was appointed as Safety and Health Committee Chairman at Kuala Kabong Estate dated 15/09/2021. OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 15/06/2023 (02/2023), 20/03/2023 (01/2023), 29/11/2022 (04/2022) and 19/09/2022 (03/2022)</p> <p>3. Sedenak Estate - Estate Manager was appointed as Safety and Health Committee Chairman at Sedenak Estate dated 15/09/2021. OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 15/06/2023 (02/2023), 20/03/2023 (01/2023), 29/11/2022 (04/2022) and 19/09/2022 (03/2022)</p> <p>The safety and health meeting discussed all safety concern and welfare for all workers. Records of meeting were reviewed accordingly through the minutes of meeting.</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>Emergency Procedures and Safe Working Procedures were available at the office, workshops and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies.</p> <p>Procedure established for emergency is as the following:</p> <ol style="list-style-type: none"> 1. Emergency Response Procedure for Injuries/Fire and Boiler (Doc No: SDM/WI/15, Date: 10/02/2008) 2. Control Of CPO/POME/Diesel/ Chemical Spillage/ETP Bund 	Complied

		<p>Rupture (Doc No: SDM/WI/14, dated 01/07/2007)</p> <p>The management has conducted the training for emergency procedure and first aid. Sample of the details taken of the training is as the following:</p> <ol style="list-style-type: none"> 1. Sedenak POM <ul style="list-style-type: none"> - ERP Training – Diesel, lubricant, chemical schedule waste spillage training – 14/09/2023 - Fire Drill Training – 18/09/2023 - First Aid Training – 22/06/2023 2. Kuala Kabong Estate <ul style="list-style-type: none"> - Emergency Response Training (ERP) 2023 – 10/02/2023 - First Aid Training – 17/03/2023 - Chemical Handling Training – 09/04/2023 <p>First Aid Kit is available at designated station at Sedenak POM. First Aid Box distribution list mentioned the location of First Aid Kit</p> <p>First Aid Kits were available at all sampled work units Spraying Gang, Harvesting Gang, Workshop, Boiler Station and Chemical Store. The first aid kits were well equipped with first aid items as stated in the list. All items were seen to be replenished at monitored regularly as per the monitoring checklist. The First Aid Kit holders were aware on how to use the items in case of an emergency.</p> <p>Accident Records were maintained in the operating units and verified as follows.</p> <p><u>Sedenak POM</u></p>	
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		<p>Accident records for 2023 were maintained and updated on a monthly basis at the mill, as the day of audit, there is no occupational accident happened for the year 2023. The accident investigation have been conducted accordingly and the JKPP 6 forms have been submitted to DOSH and available for verification. The JKPP 8 form have been submitted for the year ending 2022 (Ref No: JKPP8/136546/2022). As for 2022 there were 3 accidents cases in the mill with LTI of 140 days. The JKPP 6 forms have been submitted to DOSH accordingly.</p> <p><u>Kuala Kabong Estate</u></p> <p>There were 16 accident cases reported for the year 2022 in the estate. The JKPP 8 Form has been submitted to DOSH and available for verification (Ref No: JKPP8/129115/2022 dated 15/01/2023). Accident investigation have been conducted accordingly and submitted using the JKPP 6 to DOSH. As of 2023, there is one accident occurred. The accident investigation was conducted on 16/04/2023.</p> <p><u>Sedenak Estate</u></p> <p>There were 8 accident cases reported for the year 2021 which includes 3 major cases exceeding 4 days LTA. The JKPP 6 Forms have been submitted to DOSH accordingly. The JKPP 8 Form (Reference Number: JKPP 8/116829/2022) for the year ending 2022 have been submitted to DOSH on 29/01/2023 and available for verification. There were 35 accidents reported for the year 2022 with 65 days of LTI. The JKPP 6 Forms have been submitted to DOSH and available for verification.</p>	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine	All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit for spraying activity and manuring	Complied

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	<p>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>activity and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the respective workers.</p> <p>Verification at Sedenak POM PPE issuance records verified that all workers were provided with appropriate PPE relative to the stations. Sample taken verified that the PPE were given on the day the workers started working.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>																													
<p>6.7.4</p>	<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>Medical care is provided to all the employees by the organization. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for July 2023 with the details as following:</p> <table border="1" data-bbox="1137 954 1912 1378"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Sedenak POM</td> <td>Jul 2023</td> <td>126</td> <td>RM 8, 346.10</td> </tr> <tr> <td>May 2023</td> <td>133</td> <td>RM 8,396.90</td> </tr> <tr> <td>Jan 2023</td> <td>135</td> <td>RM 8,708.20</td> </tr> <tr> <td rowspan="3">Sedenak Estate</td> <td>June 2023</td> <td>248</td> <td>RM 9,493.50</td> </tr> <tr> <td>Jan 2023</td> <td>243</td> <td>RM 8,259.60</td> </tr> <tr> <td>March 2023</td> <td>252</td> <td>RM 8,577.40</td> </tr> <tr> <td>Kuala Kabong Estate</td> <td>Feb 2023</td> <td>81</td> <td>RM 2,689.20</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Sedenak POM	Jul 2023	126	RM 8, 346.10	May 2023	133	RM 8,396.90	Jan 2023	135	RM 8,708.20	Sedenak Estate	June 2023	248	RM 9,493.50	Jan 2023	243	RM 8,259.60	March 2023	252	RM 8,577.40	Kuala Kabong Estate	Feb 2023	81	RM 2,689.20	<p>Complied</p>
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			April 2023	93	RM 2,982.00																										
			July 2023	110	RM 3,772.10																										
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Occupational Injuries were recorded using the Lost Time Accident metrics as below:	<table border="1"> <thead> <tr> <th rowspan="2">Operating Unit</th> <th colspan="2">2022</th> <th colspan="2">2023 (to date)</th> </tr> <tr> <th>Cases</th> <th>Days</th> <th>Cases</th> <th>Days</th> </tr> </thead> <tbody> <tr> <td>Sedenak POM</td> <td>3</td> <td>140</td> <td>0</td> <td>0</td> </tr> <tr> <td>Kuala Kabong Estate</td> <td>16</td> <td>58</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sedenak Estate</td> <td>35</td> <td>69</td> <td>0</td> <td>0</td> </tr> </tbody> </table>				Operating Unit	2022		2023 (to date)		Cases	Days	Cases	Days	Sedenak POM	3	140	0	0	Kuala Kabong Estate	16	58	0	0	Sedenak Estate	35	69	0	0	Complied
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* Death case is categorized as loss of 6000 days.																															
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 -	The estates has established Integrated Pest Management focusing on controlling the pest infestation such as rat and bagworm. Among the plan established as follows:	<ol style="list-style-type: none"> 1. Rat damage census 2. Rat baiting program 3. Barn owl census 				Complied																								

		<p>4. Maintenance of barn owl box</p> <p>5. Beneficial plant planting program</p> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The estate conducted bagworm census when necessary. Reviewed the boundary bagworm census conducted in February 2023, August 2023 2. Rat baiting was conducted at 2 campaign per year. Reviewed the latest campaign conducted in the month of May and June 2023 3. Barn Owl Box ratio in the Sedenak Estate recorded at 1:15 ha. Reviewed the latest barn owl census FY 2023 with occupancy recorded at 52%. 	
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>There were no species referenced in the Global invasive Species database and CABI.org sighted within the estate and POM premises.</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>No evidence of fire use to control pest in the estates sampled.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
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 written justification of all agrochemicals is available in the Kulim Malaysia Berhad Agricultural Manual; Justification of chemical use; Table H01-2 till Table H01-6. The table states the Weed Situation, Active Ingredient, Chemical Brand Name, Product Rate/Ha and CKS Dossage/18L.</p>	Complied

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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 Pesticide/Agrochemicals used in the estate were recorded and monitored on a monthly basis and available for verification. Data were sampled as below:</p> <table border="1" data-bbox="1137 475 1933 624"> <thead> <tr> <th>Estate</th> <th></th> <th>June 2023</th> <th>July 2023</th> <th>Aug 2023</th> </tr> </thead> <tbody> <tr> <td>Sedenak</td> <td>a.i / Ha</td> <td>0.0873</td> <td>0.0913</td> <td>0.0880</td> </tr> <tr> <td>Kuala Kabong</td> <td>a.i / Ha</td> <td>0.0758</td> <td>0.0477</td> <td>0.0755</td> </tr> </tbody> </table>	Estate		June 2023	July 2023	Aug 2023	Sedenak	a.i / Ha	0.0873	0.0913	0.0880	Kuala Kabong	a.i / Ha	0.0758	0.0477	0.0755	Complied
Estate		June 2023	July 2023	Aug 2023														
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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 estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</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 is no prophylactic use of pesticides in all estates visited.</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>The Chemical Registers for the mill and sampled estates are checked every year and whenever new chemicals are introduced. The registers show that only class III and IV pesticides are used at the mill and estates, and Paraquat and Monocrotophos are no longer used. Instead, safer options like Glyphosate and Acephate are used.</p> <p>At Sedenak Estate, Paraquat has been replaced with safer alternatives like Glyphosate. Monocrotophos was bought in 2018 to treat bagworm infestations through trunk injection. The</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>	<p>management plans to gradually stop using Monocrotophos until there is none left and shift to safer Class III chemicals (Altacor/Adonis). The last trunk injection was in February 2020. The management intends to get rid of the current stock of riskier Class 1B chemicals and switch to safer alternatives. They have also increased planting beneficial plants in areas prone to bagworm infestations.</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>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms.</p> <p>Sampled the training conducted for pesticide handlers as below:</p> <table border="1" data-bbox="1137 807 1910 1136"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Sedenak</td> <td>Chemical Handling Training</td> <td>10/07/2023</td> </tr> <tr> <td>Safety Work at Chemical Store</td> <td>14/07/2023</td> </tr> <tr> <td rowspan="2">Kuala Kabong</td> <td>Spraying – Buffer Zone Training</td> <td>26/07/2023</td> </tr> <tr> <td>Chemical Handling Training</td> <td>21/03/2023</td> </tr> </tbody> </table>	Estate	Training	Date	Sedenak	Chemical Handling Training	10/07/2023	Safety Work at Chemical Store	14/07/2023	Kuala Kabong	Spraying – Buffer Zone Training	26/07/2023	Chemical Handling Training	21/03/2023	Complied
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7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were stored in the mill and all estate Chemical Stores, following the rules of the Occupational Safety and Health Act 1994 (Act 514) and the Pesticides Act 1974 (Act 149) and their Regulations. These stores were always kept locked. When we visited, the person in charge unlocked the door for the auditor to check. There were signs at the entrance telling people to wear protective gear. The Chemical Store signs with Hazard Symbols</p>	Complied													

		were also there. The ventilation fan in the facility was working, giving enough fresh air. They had an updated list of chemicals, including their names and Safety Data Sheets.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	All pesticide containers are triple rinsed and punctured before being disposed to the authorised collector. Receipts of latest disposal were made available for verification with the following details: i) Kuala Kabong Estate – last disposal on 17/02/2023 to G-Planter Sdn Bhd Some of the 20 lt containers were used to contain pre-mixed herbicides for spraying operation in the field. There is no evidence of pesticide containers are used for other purpose.	Complied
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 -	No aerial spraying for pesticide were done in all the 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 CHRA (Chemical Health Risk Assessment) for each operating unit has suggested the need for yearly medical check-ups for pesticide applicators exposed to organophosphates. However, after auditing all the estates, it was confirmed that no organophosphate chemicals were used. This confirmation was obtained by checking the Chemical Register, inspecting the Chemical Store of each operating unit, and interviewing the pesticide applicators in each estate. Even though organophosphates were not used, the estates still conduct monthly health screenings at their clinics. These screenings are performed by the estate's own Medical Assistant, and the records are available for verification. Additionally, an annual	Complied

		medical surveillance is carried out for all workers that expose to pesticides/chemicals.									
7.2.11	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Internal Memo verified in the estates.</p> <p>For Johor Plantation Berhad, the SOP for Agrochemical Management under Sustainable Management System; Doc Number: SQD/SMS/6.1; Doc Date: 01.08.2020 (Issue 01) states "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."</p>	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>Wastes management plan is developed based on the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. The Waste Management Action Plans 2023 were established to mitigate and control the identified wastes and source of pollution. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill and recyclable wastes were sent to recycle centres as reported under indicator 7.2.8.</p>	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>- Minor compliance -</p>	<p>In Sedenak POM and the estates, procedure SPO/W1/06-10 – Scheduled Wastes (Hazardous Waste) Management has been established. The disposal of scheduled waste was available and disposed at Kualiti Alam Sdn Bhd.</p> <table border="1" data-bbox="1137 1225 1937 1351"> <thead> <tr> <th>Type SW</th> <th>Consignment note</th> <th>Dated</th> <th>Weight (mt)</th> </tr> </thead> <tbody> <tr> <td>SW110</td> <td>20230920130WZ4B Y</td> <td>20/9/2023</td> <td>0.3</td> </tr> </tbody> </table>	Type SW	Consignment note	Dated	Weight (mt)	SW110	20230920130WZ4B Y	20/9/2023	0.3	Complied
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		<table border="1"> <tr> <td>SW305</td> <td>202309201378FJ96</td> <td>20/9/2023</td> <td>3.2</td> </tr> <tr> <td>SW410</td> <td>2023092013ABP8R 7</td> <td>20/9/2023</td> <td>0.15</td> </tr> </table> <p>Latest disposal was on conducted on 30/06/2023 at Kuala Kabong sampled as per below:- SW 305 consignment note 2023063009KR9AF7 with total 0.1 mt of spent/used oil been disposed to Kualiti Alam Sdn Bhd. Another sample of disposal for SW 307 spent mineral oil-water emulsion disposal on 20/6/2023, consignment note 20230630093FZV74 with total 0.105 mt. This waste was disposed at Kualiti Alam Sdn Bhd. Domestic/organic waste disposed at designated landfill within estate premise.</p>	SW305	202309201378FJ96	20/9/2023	3.2	SW410	2023092013ABP8R 7	20/9/2023	0.15	
SW305	202309201378FJ96	20/9/2023	3.2								
SW410	2023092013ABP8R 7	20/9/2023	0.15								
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>Johor Plantation Berhad practices of “Zero open burning” is enforced and elaborated in the Sustainability Policy.</p> <ul style="list-style-type: none"> 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. All the estates had replanting program spanned over the forthcoming years as shown in 3.1.2. <p>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 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.											
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental impacts were	Complied								

		<p>documented in Kulim (Malaysia) Berhad – Agricultural Manual under section D: Manuring. The procedure includes:</p> <ul style="list-style-type: none"> D01 – General Information D02 – Methods of Applications D03 – Precision Manuring D04 – Quality Check and Storage D05 – EFB Utilization D06 – POME Utilization D07 – MIWAMAS Composting System D08 – Bio-compost Application D09 – Bio-compost : Quality Check 	
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>Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms.</p> <p>Sample of the soil sample and leaf analysis taken is as following:</p> <ol style="list-style-type: none"> 1. <u>Kuala Kabong Estate</u> Latest Soil Sampling was conducted in August 2019. Refer report no. SI/1908/0245-0248 dated 30/08/2019. Latest leaf sampling was conducted on January 2020. Refer report no. LI/2001/KK/0054-0063 dated 30/01/2020 2. <u>Sedenak Estate</u> Latest leaf and soil Sampling was conducted in 16/05/2023 – 28/05/2023. Report with Ref No: SI/2023/05/62 for the Soil sample and LI/2023/05/156 for foliar sample were verified. 	Complied

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>The estates implement several practices as part of their nutrient recycling strategy, fostering sustainable agricultural practices. These include:</p> <ol style="list-style-type: none"> 1. Application of Empty Fruit Bunches (EFB) in designated fields at specific dosages, guided by recommendations from Agronomists. 2. Stacking of cut fronds in between palm rows, allowing them to decompose naturally. 3. Utilization of Palm Oil Mill Effluent (POME) through a furrow system at the host estate of Sedenak POM. <p>For the fiscal year 2023, the estate has established an EFB application program, and site visits to both estates confirmed the application of EFB to the fields. Records of EFB and compost application reviewed through Compost Programme Monitoring for both estates.</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records was available at the estate visited for review. The estate reported the fertilised application to the Agronomy Advisory and Services Department on monthly basis. Reviewed the report for the month of June, July and August 2023</p>	Complied
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units have meticulously identified soil series in the estates and created corresponding soil series maps. In Sedenak Estate, various soil series have been recognized, with percentages as follows: Alma (0.11%), Batang Merbau (4.97%), Batu Lapan (5.24%), Binjai (0.38%), Bungor (10.24%), Gajah Mati (2.92%), Kampong Pasu (3.34%), Kaya (1.01%), Rengam (21.82%), Slime</p>	Complied

		<p>Tailings (4.63%), Tai Tak (27.27%), Tawar (3.91%), Tebok (6.52%), Terap (7.56%), and Kawasan Bandaran (0.08%).</p> <p>Meanwhile, in Kuala Kabong Estate, the identified soil series include Deep Peat (78.18%), Batang Merbau (4.2%), Gajah Mati (10.59%), Rengam (6.82%), and Unclassified (0.21%). This comprehensive identification of soil series reflects a thorough understanding of the soil composition in each estate. Such knowledge is crucial for effective land management and strategic planning in agricultural activities.</p>	
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>Addressed in the Agricultural Manual under chapter as follows:</p> <ol style="list-style-type: none"> 1. A07 – Terrace and Platform Construction 2. A07A – Palm Lining and Terrace 3. A08 – Harvester Path Construction 4. A17 – Protection of Natural Water Courses and 5. A18 – Water Management Plan in Peat Area. <p>No replanting was conducted on steep slopes more than 25 degree.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting conducted at all estates visited as verified and sighted during site visit.</p>	Complied
<p>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.</p>			
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>The sampled estates possess both soil series and topography maps, aiding in comprehensive land assessment. Notably, no fragile soil has been identified in the sampled estates. In the planning of the 2023 replanting, the estates have thoughtfully considered factors such as land terrain, drainage, and road systems. This holistic approach underscores the estate's commitment to informed and sustainable agricultural practices for the upcoming replanting cycle.</p>	Complied

7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Addressed in the Agricultural Manual under chapter as follows:</p> <ol style="list-style-type: none"> 1. A07 – Terrace and Platform Construction 2. A07A – Palm Lining and Terrace 3. A08 – Harvester Path Construction 4. A17 – Protection of Natural Water Courses and 5. A18 – Water Management Plan in Peat Area 	Complied																							
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>The Agronomy Advisory and Services Department conducted a meticulous assessment, providing detailed topography maps for Sedenak Estate and Kuala Kabong Estate. The slope distribution data, expressed as percentages in various categories, offers valuable insights into the terrain characteristics of each estate.</p> <table border="1" data-bbox="1137 791 1930 1222"> <thead> <tr> <th rowspan="2">Topography</th> <th colspan="2">Estate</th> </tr> <tr> <th>Sedenak Estate (%)</th> <th>Kuala Kabong (%)</th> </tr> </thead> <tbody> <tr> <td>0°-2°</td> <td>18.01%</td> <td>76.40%</td> </tr> <tr> <td>2°-6°</td> <td>57.51%</td> <td>16.89%</td> </tr> <tr> <td>6°-12°</td> <td>23.05%</td> <td>6.08%</td> </tr> <tr> <td>12°-20°</td> <td>1.31%</td> <td>0.63%</td> </tr> <tr> <td>20°-25°</td> <td>0.11%</td> <td>0.00%</td> </tr> <tr> <td>>25°</td> <td>0.01%</td> <td>0.00%</td> </tr> </tbody> </table> <p>This comprehensive data underscores the diverse slope profiles within each estate, providing a nuanced understanding of their respective landscapes.</p>	Topography	Estate		Sedenak Estate (%)	Kuala Kabong (%)	0°-2°	18.01%	76.40%	2°-6°	57.51%	16.89%	6°-12°	23.05%	6.08%	12°-20°	1.31%	0.63%	20°-25°	0.11%	0.00%	>25°	0.01%	0.00%	Complied
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Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.

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7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>Following the date of 15/11/2018, no new planting activities have been carried out on peat regardless of its depth.</p>	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>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).</p> <p>- Minor compliance -</p>	<p>Kuala Kabong Estate, within the Johor Plantation Berhad group, stands as the sole estate cultivating oil palm on peat soil, encompassing a significant 96.7% of the entire plantation area, equivalent to 1662.65 hectares. To ensure responsible and sustainable practices, the peat areas within the estate have been thoroughly inventoried, documented, and reported to the RSPO Secretariat in a document titled 'RSPO Peat Inventory, Drainability Assessment, and Revised BMP for Peat,' on 23/09/2022.</p> <p>The estate has further demonstrated its commitment to responsible management through the preparation of Peat Drainability Assessments for replanting in 2027. These reports, dated 14/11/2022 respectively, were meticulously compiled by the Agronomy Advisory Services Department at Johor Plantation Berhad.</p>	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>The estate implements a regular monitoring system for peat subsidence levels on a quarterly basis, while water levels are monitored monthly. At Kuala Kabong Estate, peat subsidence is monitored using 6 probes installed. The monitoring occurs quarterly with the latest reading taken on 05/09/2023, site visit at P01/02 and P00/08 found both area were equipped with the peat Probe.</p> <p>Water levels, on the other hand, are monitored using 11 piezometers installed at a ratio of, with the latest record reviewed dated 07/09/2023.</p>	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The water management practices in the peat areas of Kuala Kabong Estate adhere to established procedures, specifically outlined in Procedure A18. These practices are designed to establish an</p>	Complied

		<p>extensive and efficient drainage system within the peat soil. The primary objectives are to maintain optimal water levels during dry periods and to facilitate the drainage of excess water during wet periods.</p> <p>The implemented drainage network follows a typical pattern, with cross-sectional details evident. In areas with a high water table, field drains are strategically placed at every eighth row, fourth row, and then at every alternate row of oil palm, depending on the water table levels.</p>	
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>For the proposed replanting to be conducted in 2027 with the total of 172.41 ha for block P99/1, P99/2, and P99/3. Peat Drainability Assessment was conducted dated 14/11/2022 have been sighted and confirming the estates' adherence to the necessary protocols and guidelines for responsible replanting on peat areas.</p>	Complied
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>The management of all current plantations on peat follows the guidelines outlined in the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat,' version 2 (2019), along with the accompanying audit guidance.</p>	Complied
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";</p>	<p>The management of all current plantations on peat follows the guidelines outlined in the 'RSPO Manual on Best Management</p>	Complied

	<p>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>Practices (BMPs) for existing oil palm cultivation on peat,' version 2 (2019), along with the accompanying audit guidance.</p>	
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
<p>7.8.1</p>	<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>Water management and action plans at all the sampled estates and mill for year 2023 were made available. Among the objectives of the management plan are:</p> <p>i) Pollution prevention of surface and underground water sources</p> <p>ii) Maintain the availability of water source especially during draught season</p> <p>The mill collected water samples for the domestic water consumption collected by SPAN twice a year. All results were made available for verification. The analysis was conducted by an accredited laboratory (SMM No. 146). Based on the reports, the results were within the standard limits under the Drinking Water Quality Standard, MOH 2010.</p>	<p>Complied</p>
<p>7.8.2</p>	<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 2 Estates 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 SOP revised dated 01/11/2018.</p>	<p>Complied</p>

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		<p>Upstream and downstream river monitoring was done by Sedenak POM, latest record was 16/8/2023 (WI/2023/08/471) and result as per below:</p> <table border="1" data-bbox="1137 467 1930 1106"> <thead> <tr> <th>Parameter</th> <th>Unit</th> <th>WI-1413 (Upstream)</th> <th>WI-1414 (Downstream)</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>-</td> <td>7.1</td> <td>6.9</td> </tr> <tr> <td>Chemical Oxygen Demand</td> <td>mg O2/L</td> <td>75</td> <td>35</td> </tr> <tr> <td>Biological Oxygen Demand</td> <td>mg/L</td> <td><10</td> <td><10</td> </tr> <tr> <td>Ammoniacal Nitrogen</td> <td>mg NH3-N/L</td> <td>2.46</td> <td>2.6</td> </tr> <tr> <td>Nitrate Nitrogen</td> <td>mg NO3-N/L</td> <td>2.99</td> <td>2.86</td> </tr> <tr> <td>Dissolved Oxygen</td> <td>mg DO/L</td> <td>7.81</td> <td>7.95</td> </tr> </tbody> </table> <p>Same also for Kuala Kabong estate, the water sampling conducted after fertiliser application been conducted as per environmental management plan as per report WI/2023/06/333 dated 18/6/2023 showed that the result was comply with standard limit.</p>	Parameter	Unit	WI-1413 (Upstream)	WI-1414 (Downstream)	pH	-	7.1	6.9	Chemical Oxygen Demand	mg O2/L	75	35	Biological Oxygen Demand	mg/L	<10	<10	Ammoniacal Nitrogen	mg NH3-N/L	2.46	2.6	Nitrate Nitrogen	mg NO3-N/L	2.99	2.86	Dissolved Oxygen	mg DO/L	7.81	7.95	
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p>	<p>The mill applies the biological system with ponds in series for its treatment of effluent. The mill is disposing its effluent to land application and compost. The quality of discharged effluent was analysed every month an accredited laboratory (SAMM No. 307) and</p>	Complied																												

	- Minor compliance -	the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. The last 12 months results were verified where all the BOD results were within the regulated limit.	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>The mill processing water is obtained from a water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis. Based on the records, the water consumption of the mill is as follows:</p> <p>Year 2022: 1.54 2 m³/mt FFB 2023 todate: 1.57 m³/mt FFB</p> <p>There were variations of performance. Probable factors are linked to cleaning activities, significant boiler water rinsing/discharging for maintenance etc. The base rate is 1.2 m³/mt FFB processed.</p>	Complied
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 -	<p>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 2023. The document was reviewed/updated on September 2023.</p> <p>The estates 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 size / no of gen-sets, c) No. of vehicles / age of machine. d) Weather interference / crop production volume <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p>	Complied

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<p>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.</p>		
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>Sedenak Palm Oil 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> <p>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 adverse impact the environment.</p> <p>b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</p>
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>Palong Cocoa Palm Oil Mill and estates has calculated the GHG using RSPO Palm GHG calculator version 4. There was no new development within the certified area.</p>
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 estates 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.</p>
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>		

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7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	There is no land preparation by burning at Sedenak Complex Management Unit. Johor Plantation Berhad owned policy on sustainable crude oil palm has included zero open burning policy which signed by Managing Director on 1/10/2021. Management complying with the Malaysian environmental law – EQA and Regulations 1974.	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 -	Johor Plantation Berhad has subscribed to ASEANFireAlert for the whole group estate’s for aerial monitoring. FWI @ Fire Weather Index will be identified at each estate (i.e high risk area – peat soil) to monitor changes in FWI. ASEANFireAlert will trigger any changes in FWI and a notification will be sent to HQ personnel via mobile phone. Operating unit’s personnel will be informed and reported to fire department for further action.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Johor Plantation Berhad engaged smallholders on the fire prevention and control measures. This was mentioned in the stakeholder meeting of respective units under item no 4 elaborating the following; <i>a. Memelihara dan memulihara kepelbagaian biologi</i> <i>b. Pihak berkepentingan boleh melaporkan kepada KMB</i> <i>c. Jika berlaku kebakaran di persempadanan kawasan ladang/kilang</i> <i>d. Pihak ladang/kilang /pekebun kecil berhampiran juga boleh mendapatkan bantuan daripada KMB jika berlaku di kawasan mereka.</i> Engagement process was done via stakeholder meeting on 3/9/2023.	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.			

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<p>7.12.1</p>	<p>(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.</p> <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>	<p>Not applicable as no new development within Sedenak POM certification unit.</p>	<p>Complied</p>
<p>7.12.2</p>	<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>	<p>The Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report February 2013 (Compiled from unchanged draft of January 2008). HCV assessment for the Sedenak Complex was conducted by A.J.F.M Dekker (RSPO Assessor, HCV/Biodiversity) was available for verification. The report has identified the list of natural habitats that is possible present in the operating units. The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following:</p> <p>a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long-term effect</p> <p>Identification of HCV under Sedenak POM complex as per the following:</p>	<p>Complied</p>

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		Estate	Field	Type of RBA/HCV	Area (ha)		
		Sedenak Estate	P00/04	Unplantable (RBA 3)	0.28		
			P00/05	Unplantable (RBA 3)	0.76		
			P00/08	Unplantable (RBA 3)	1.15		
			P02/04	Vacant (RBA 2)	0.02		
				River and buffer zone	9.8		
		Total					12.01
		Kuala Kabong Estate		Pond (RBA 2)	25.58		
			P06/04	Drain and buffer zone (RBA 4)	0.81		
		Total					26.39
		7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable			
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once	Based on the Rapid Biodiversity Assessment report, there were some RTE species identified to be present within the estates. The estates have developed their management plan based on recommendation of HCV assessment report. Generally, the management plans consist as follows:				Complied	
		HCV plan	Progress	Person In Charge			

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	<p>every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Animal sighting</p>	<p>To record animal sighting and send to SPOD on monthly basis.</p>	<p>Estate team</p>	
		<p>Encroachment control</p>	<p>Briefing to workers on the importance of HCV</p> <p>Continuously monitor and report sign of encroachment</p>	<p>Sustainability and estate team</p>	
		<p>Buffer zone establishment</p>	<p>Mapped out area</p> <p>Buffer zone peg</p> <p>Twice a year maintenance programme</p>	<p>Sustainability and estate team</p>	
<p>7.12.5</p>	<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>No local communities have been identified in HCV areas within Sedenak POM complex.</p>			<p>Complied</p>
<p>7.12.6</p>	<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</p>	<p>Although there is no RTE species identified at Sedenak complex group estate, there is evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities. Sighting as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity.</p>			<p>Complied</p>

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	for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	The latest awareness training on environmental and biodiversity was carried out on 6/9/23 for internal stakeholders (workers) at Kuala Kabong Estate.										
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	<p>Management plan is incorporated with ongoing monitoring of the status of HCV and RTE species that are affected by plantation or mill operations and reported by the Kulim SQI Team from Head Office. Outcomes of monitoring are communicated with plantation management and with management plan. HCV monitoring/patrolling records available.</p> <p>Sample of latest sighting of animal and patrolling records as per below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Date of monitoring</th> <th style="width: 50%;">Visited area (hotspots/HCV)</th> <th style="width: 30%;">Estate</th> </tr> </thead> <tbody> <tr> <td>3/8/23, 24/8/23, 8/9/23, 20/9/23</td> <td>RBA 2, RBA 4 (P06/04)</td> <td>Sedenak Estate</td> </tr> <tr> <td>4/9/23,</td> <td>RBA 2 (P02/04), RBA 3(P00/4/5/8)</td> <td>Kuala Kabong Estate</td> </tr> </tbody> </table>	Date of monitoring	Visited area (hotspots/HCV)	Estate	3/8/23, 24/8/23, 8/9/23, 20/9/23	RBA 2, RBA 4 (P06/04)	Sedenak Estate	4/9/23,	RBA 2 (P02/04), RBA 3(P00/4/5/8)	Kuala Kabong Estate	Complied
Date of monitoring	Visited area (hotspots/HCV)	Estate										
3/8/23, 24/8/23, 8/9/23, 20/9/23	RBA 2, RBA 4 (P06/04)	Sedenak Estate										
4/9/23,	RBA 2 (P02/04), RBA 3(P00/4/5/8)	Kuala Kabong Estate										
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	No land clearing without prior HCV assessment since November 2005 occurred at visited estates.	Complied									

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Sedenak POM** 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 **Sedenak POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.15
PKO	0

Extraction	%
OER	19.44
KER	5.33

Production	t/yr
FFB Process	366,122.62
CPO Produced	71,179.13
PKO Produced	0

Land Use	Ha
OP Planted Area	23,935.07
OP Planted on peat	1,366.41
Conservation (forested)	7.47
Conservation (non-forested)	250.76
Total	25,559.71

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	39,377.10	0.71	10,918.51	0.46	34,321.40	0	84617.01	1.17
CO ₂ Emission from fertilizer	1,516.51	0.03	738.77	0.03	1,679.52	0	3934.80	0.06
NO ₂ Emission	11,108.3	0.2	646.15	0.03	1,175.12	0.05	12,929.57	0.28
Fuel Consumption	703.88	0.01	316.79	0.01	2,128.09	0	3,148.76	0.02
Peat Oxidation	69,877.75	1.26	0	0	0	0	69,877.75	1.26
Sink								
Crop Sequestration	-37,324.25	-0.67	-10,349.30	-0.44	-31,828.87	0	-79,502.42	-1.11
Conservation Sequestration	0	0	-1.70	0	0	0	-1.70	0
Total	85,259.29	1.54	2,269.22	0.01	48,121.39	0	135,649.90	1.55

*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	69,266.73	0.19
Fuel Consumption	1,337.07	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	-72.89	0
Sales of PKS	-11,190.04	-0.03
Sales of EFB	0	0
Total	59,340.87	0.16

Summary of Kernel Crusher Emission and Credit (if applicable)

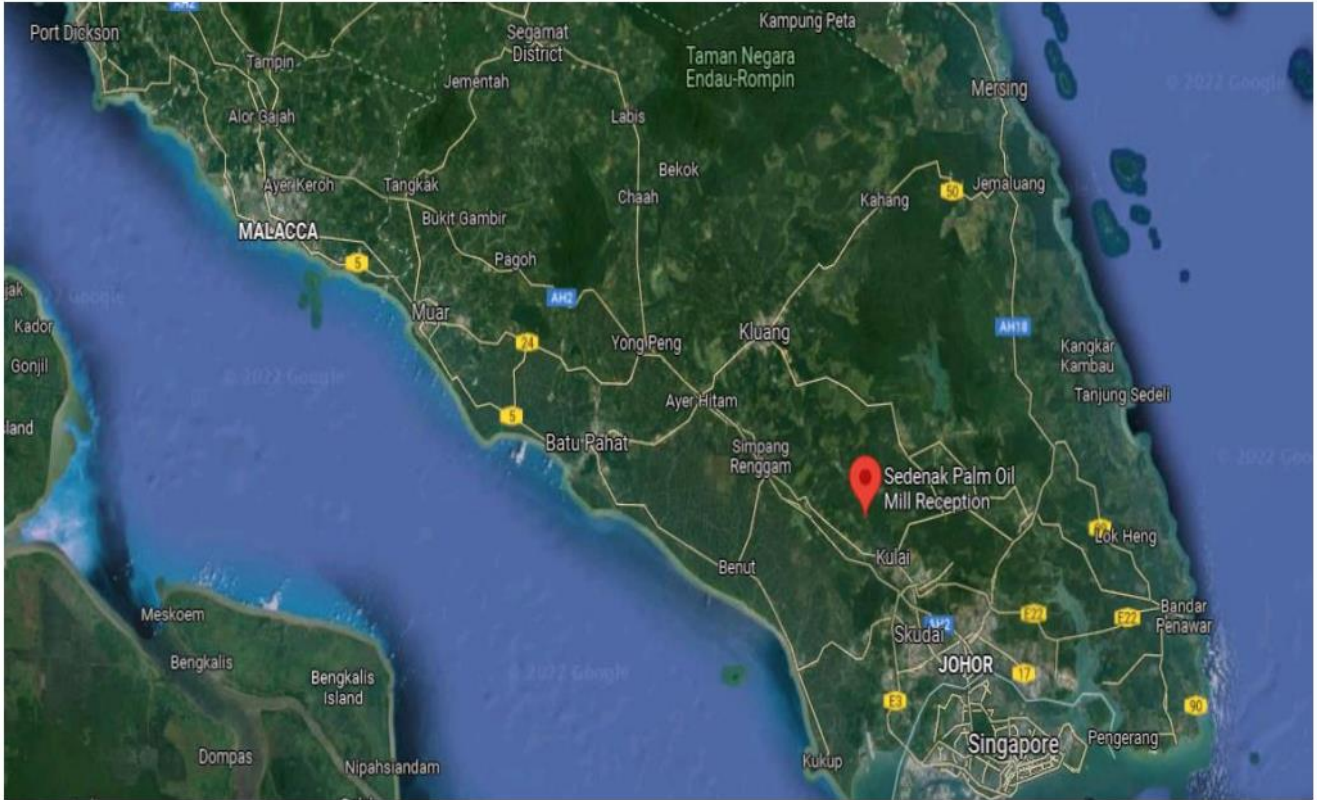
Emissions	tCO ₂ e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

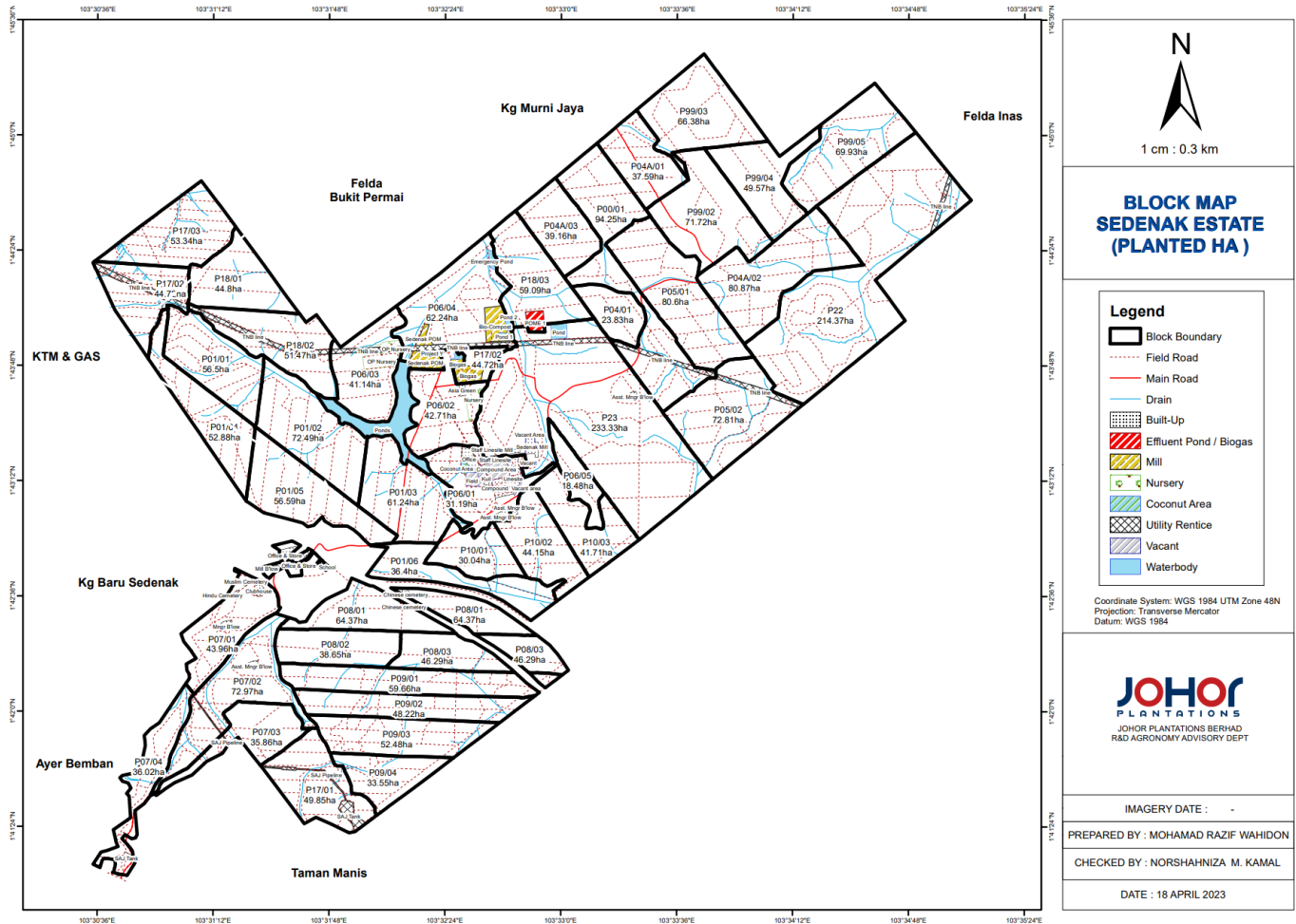
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	76
Divert to methane captured (flaring) (%)	24
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

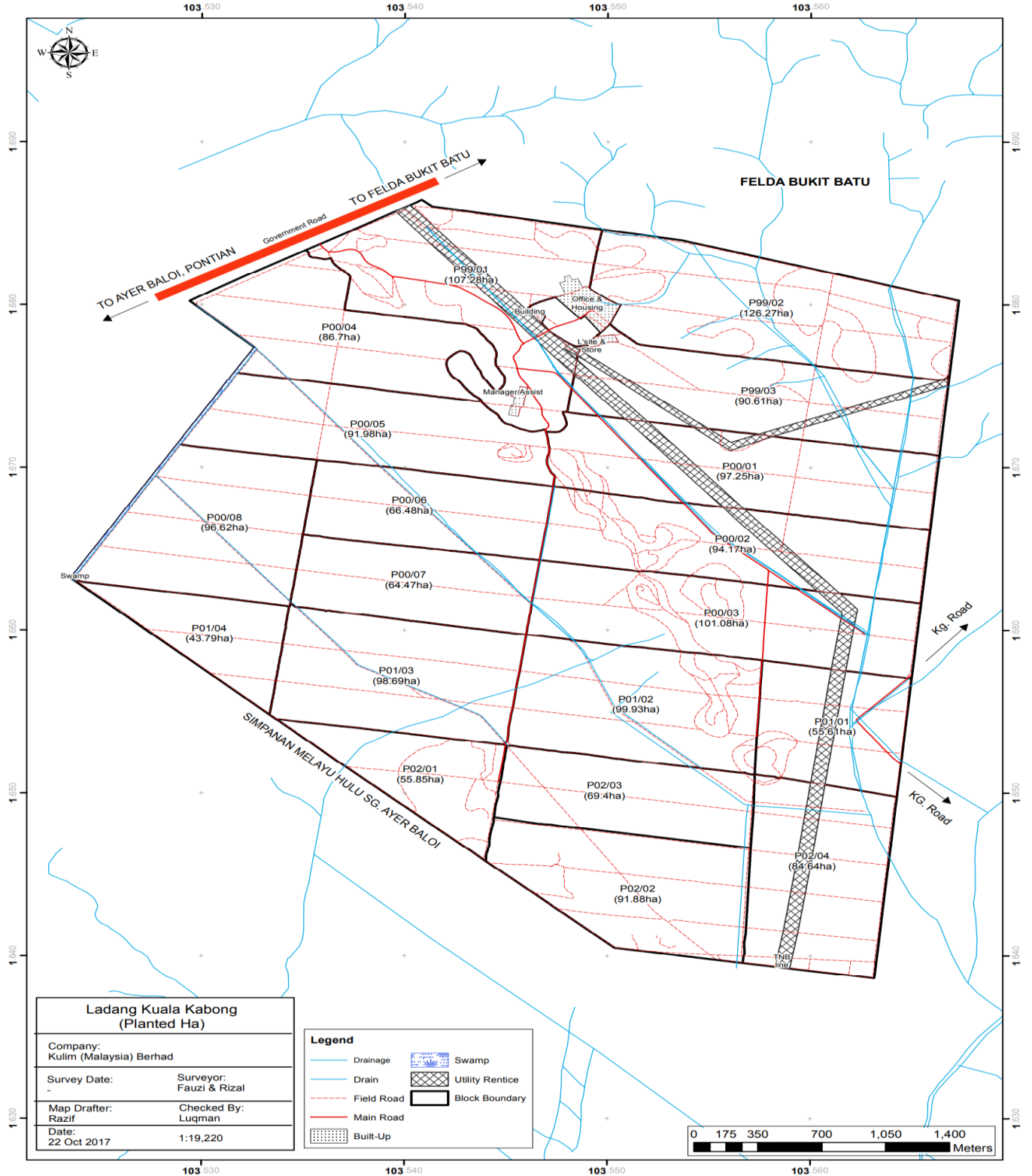


Appendix D: Estate Field Map

Sedenak Estate



Kuala Kabong Estate



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Appendix E: List of Smallholder Registered and/or sampled

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.									

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