

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (4)**
- Recertification Assessment** (Choose an item.)
- 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 (JPG) – Bukit Layang Estate
Location of Certification Unit: Jalan Sungai Tiram, Mukim Sungai Tiram, 81800 Johor Bahru, Johor, Malaysia
Date of Final Report: 22/02/2024

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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 (JPG) – Bukit Layang Estate		
Location / Address	Jalan Sungai Tiram, Mukim Sungai Tiram, 81800, Johor Bahru, Johor, Malaysia		
Website	www.johorplantations.com		
Management Representative	Wan Adlin Wan Mahmood	E-mail	wanadlin@johorplantations.com
Telephone	+607-8611611	Facsimile	+607-8631084

2. Certification Information			
Certificate Number	RSPO 720133	Certificate Start Date	07/04/2020
Date of First Certification	07/04/2020	Certificate Expiry Date	06/04/2025
Scope of Certification	Production of Sustainable Fresh Fruit Bunches		
Visit Objectives	The objective of the assessment was to conduct annual surveillance assessment to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organization’s management system and to confirm the forward strategic plan.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	N/A
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input 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)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 697948	MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (M) Sdn. Bhd	29/03/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Layang Estate	Jalan Sungai Tiram, Mukim Sungai Tiram, 81800, Johor Bahru, Johor, Malaysia	1°34'56.70"N	103°57'46.93"E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Layang Estate	371.10	12.89	13.77	397.76	93.29
Total	371.10	12.89	13.77	397.76	93.29

Note:

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bukit Layang Estate	0	75.54	295.56	0	371.1	0
Total (ha)	0	75.54	295.56	0	371.1	0

Note:
The data has been incorrectly key in during the previous audit report which has been verified based on the area statement, crop production records and budget for year 2024.

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Apr'23 – Mar'23)	Actual (Jan'23- Dec'23)		Forecast (April'24- Mar'25)
		Previous license period (Jan'23 – Mar'23)	Current license period (Apr'23- Dec'23)	
Bukit Layang Estate	13,500	2,100.60	6,930.70	9,212
Total	13,500	9,031.30		9,212

Note: Volume extension of 5000mt has been done on 06/02/2024 to increase estimate last year FFB volume

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Apr'23 – Mar'23)	Actual (Jan'23- Dec'23)		Forecast (April'24- Mar'25)
		Previous license period (Jan'23 – Mar'23)	Current license period (Apr'23- Dec'23)	
N/A		N/A	N/A	
N/A		N/A	N/A	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Apr'23 – Mar'23)	Actual (Jan'23- Dec'23)		Forecast (April'24- Mar'25)
		Previous license period (Jan'23 – Mar'23)	Current license period (Apr'23- Dec'23)	
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

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	January 2023	676.77	0	676.77
2	February 2023	735.92	0	735.92
3	March 2023	687.91	0	687.91

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4	April 2023	531.29	0	531.29
5	May 2023	845.03	0	845.03
6	June 2023	704.48	0	704.48
7	July 2023	744.83	0	744.83
8	August 2023	799.32	0	799.32
9	September 2023	795.07	0	795.07
10	October 2023	879.43	0	879.43
11	November 2023	804.35	0	804.35
12	December 2023	826.90	0	826.90
TOTAL		9,031.30	0	9,031.30

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Apr'23 – Mar'23)	Actual (Jan'23- Dec'23)		Forecast (April'24- Mar'25)
	Previous license period (Jan'23 – Mar'23)	Current license period (Apr'23- Dec'23)	
FFB	FFB		FFB
13,500 mt	2,100.60 mt	6,930.70 mt	9,212 mt
	TOTAL	9,031.30 mt	
CPO (OER:20.50%)	CPO (OER:19.13%)		CPO (OER:22.61%)
1,742.50 mt	398.46 mt	1,329.33 mt	2,083 mt
	TOTAL	1,727.79 mt	
PK (KER:5.00%)	PK (KER:5.00 %)		PK (KER: 6.79 %)
425.00 mt	105.04 mt	346.53 mt	626 mt
	TOTAL	451.57 mt	

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	January 2023	131.97	33.84
2	February 2023	136.48	36.80
3	March 2023	130.01	34.40
4	April 2023	102.01	26.56
5	May 2023	164.78	42.25
6	June 2023	136.67	35.22

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7	July 2023	140.03	37.24
8	August 2023	152.67	39.97
9	September 2023	151.86	39.75
10	October 2023	170.17	43.97
11	November 2023	154.03	40.22
12	December 2023	157.11	41.35
TOTAL		1,727.79	451.57

Note

The CPO and PK has been calculated base on the total FFB that has been delivered to Sedenak POM and the oil extraction rate (OER) and Kernel Extraction Rate. Verification has been done by the auditor through the FFB production records, OER and KER awarded to the estate.

11. Summary of Actual Volume sold

Current License period (Apr'23- Dec'23)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	0	0	0	0
PK (MT)	0	0	0	0	0
Credits	0	0	0	0	0

Previous License period (Jan'23 – Mar'23)

CPO (MT)	0	0	0	0	0
PK (MT)	0	0	0	0	0
Credits	0	0	0	0	0

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)

No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
N/A	N/A	N/A	N/A	N/A
TOTAL				

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)
N/A	N/A	N/A	N/A	N/A
TOTAL				

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
N/A	N/A	N/A	N/A
TOTAL			

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
N/A	N/A	N/A	N/A
TOTAL			

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Apr'23 – Mar'23)			Actual (Jan'23- Dec'23)			Forecast (April'24- Mar'25)		
	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									
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)
N/A	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 (Apr'23- Dec'23)							
Credits				N/A	N/A	N/A	N/A

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Physical	N/A	N/A	N/A				
Previous License period (Jan'23 – Mar'23)							
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)
TOTAL							
Note:							

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639
Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **22-23/01/2024**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the group of estates 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 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 Johor Plantations Berhad- Bukit Layang Estate 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 estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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.

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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 (Certification)	Year 2 (ASA1)	Year 3 (ASA2)	Year 4 (ASA3)	Year 5 (ASA4)
Bukit Layang Estate	√	√	√	√	√

Tentative Date of Next Visit: January 22, 2025 – January 23, 2025

Total Number of Mandays: 4.5 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohd Razaleigh Mohamad (MRM)	Team Leader	<p>Education: Holds bachelor’s degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p>Work Experience: He has 5 years’ experience in Oil Palm Estate management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p>Training attended: He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course and RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Amir Bahari (AB)	Team Member	<p>Education:</p> <p>He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996.</p> <p>Work Experience:</p> <p>He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment, he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry.</p> <p>Training attended:</p>

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		<p>He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course</p> <p>Language proficiency: He is fluent in both verbal/written in Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
<p>Ahmad Rufi Bin Abu Talib Khan (ARK)</p>	<p>Team Member</p>	<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>Language proficiency: Fluent in English and Bahasa Malaysia</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

Accompanying Persons:

Name	Role
Zulkifli bin Kamarol Zaman	(Observer)

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the

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Date	Time	Subjects	MRM	AB	ARA
Sunday, 21/01/2024		Audit Team travels to Johor Bahru and hotel check-in	√	√	√
Monday, 22/01/2024	0900-0930	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) 	√	√	√
	0930-1300	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, wastes management, workers housing, clinic, etc.	√	√	√
		Lunch break			
	1300-1400	Document review P1 – P7: Legal, risk assessments, 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, management plans and implementation etc.	√	√	√
Tuesday 23/01/2024	0900-1200	Document review (Continued)	√	√	√
	1000-1130	Stakeholder consultation Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers,NGO, contractors, suppliers, surrounding communities (e.g., neighboring estates, smallholders, villages, etc.), etc.	√		
	1130-1200	Audit team discussion & preparation for closing meeting	√	√	√
	1200-1300	Closing meeting	√	√	√

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. However the Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer https://kulim.com.my/media-release/announcement/disposal-of-kulims-oil-palm-plantation-business-in-indonesia/	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 not been any deviations from the maximum periods requires approval by the RSPO Secretariat. Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer https://kulim.com.my/media-release/announcement/disposal-of-kulims-oil-palm-plantation-business-in-indonesia/	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No. There 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	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer	Complied

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with RSPO P&C criterion 7.12.	https://kulim.com.my/media-release/announcement/disposal-of-kulims-oil-palm-plantation-business-in-indonesia/ Therefore this indicator was not applicable.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer Agreement between both parties dated 06/07/2023. Therefore, this requirement was not applicable.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer Agreement between both parties dated 06/07/2023. Therefore, this requirement was not applicable.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Complied
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.	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Complied
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?	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

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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.		
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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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	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	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Pasir Logok Estate	2097.7	Certified	Nil	2009	20-Apr-22	Yes	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	Yes	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 *Zero (0)* Critical; *Zero (0)* Minor nonconformities and *Zero (0)* Opportunity For Improvement raised. The *Bukit Layang Estate* 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 #	NIL	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvements	
OFI #	Description
OFI 1	NIL

Positive Findings	
PF #	Description
PF 1	Good commitment from the management teams on the documentation and preparation of the audit
PF 2	Good housekeeping at the housing area
PF 3	Positive feedbacks from external stakeholders

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	N/A	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			
Effectiveness Closure (for previous audit closed Critical NC):			

Previous Audit Minor Non-conformity			
NCR Ref #		Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: NIL Verification / Follow-up actions:

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1843576-201910-M1	Critical	4.7.2	30/10/2019	Closed on 24/03/2020
1843576-201910-M2	Critical	5.2.1	30/10/2019	Closed on 24/03/2020
1843576-201910-M3	Critical	5.6.2	30/10/2019	Closed on 24/03/2020
1843576-201910-N1	Minor	4.1.2	30/10/2019	Closed on 09/02/2021
1843576-201910-N2	Minor	2.1.3	30/10/2019	Closed on 09/02/2021
1843576-201910-N3	Minor	5.1.2	30/10/2019	Closed on 09/02/2021
1843576-201910-N4	Minor	5.3.3	30/10/2019	Closed on 09/02/2021

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- Bukit Layang Estate* Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Workers Union	NUPW representative	Face to Face
Local communities	Head village Kampung Sungai Tiram	Face to Face

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Local communities	Head village Kampung Air Putih	Face to Face
Contractor	Sungai Rezeki Enteprise	Face to Face

Stakeholders comment	
1	<p>Feedbacks: Sungai Rezeki Enteprise</p> <p>The FFB transporter contractor has established a positive rapport with Bukit Layang Estate, and their services primarily revolve around transporting Fresh Fruit Bunches (FFB) from the estate to the Sedenak Palm Oil Mill. She mentioned that there is tendering process which has been announced by procurement department and they has been selected base on quotation that has been provided. In term of payment, there is no issues which payment has followed the payment term as per stated in the invoices..</p> <p>Audit Team verification and response: No further verification required.</p>
2	<p>Feedbacks: Head village Kampung Sungai Tiram and Kampung Air Putih</p> <p>Having good relationship with company management. No disturbance or negative impact caused by the mill and estate operation. In fact, positive impact mainly job opportunity within Kulim’s mill and estate that benefits the villagers. No issue of land dispute between villagers and estate</p> <p>Audit Team verification and response: No further verification required.</p>
3	<p>Feedbacks: Mr Azamuddin Kassin, Pejabat Perhutanan Johor Bharu</p> <p>Mr Azamuddin is the head of Pejabat Perhutanan Johor Bharu and has been served since past 5 years. He said that good relationships have been maintained by both parties. Consultation and communication of fire prevention has been discussed during the stakeholder meetings. He also mentioned that there is no illegal hunting/ logging that has been done by staff/workers from both operating units. The management of both operating units supported Pejabat Perhutanan in order to preserve to reserve forest.</p> <p>Audit Team verification and response: No further verification required.</p>
4	<p>Feedbacks: NUPW representative</p> <p>He mentioned that the selection of NUPW representative has been done through the election of the NUPW in the Bukit Layang Estate. It has been confirmed any issues raised will be escalated to the Johore region NUPW for consultation. There is no issues has been arising in Bukit Layang Estate. All workers has been treated equally and has freedom to be member to any union.</p> <p>Audit Team verification and response: No further verification required.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A

Johor Plantations Berhad- Bukit Layang Estate 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.

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- Bukit Layang Estate Certification Unit 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- Bukit Layang Estate Certification Unit is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohd Razaleigh bin Mohamad	Name: Wan Adlin Wan Mahmood
Company Name: BSI Services (M) Sdn Bhd	Company Name: JOHOR PLANTATIONS GROUP BERHAD
Title: Client Manager	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: 23/01/2024	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>There was no changes compare to last year where Bukit Layang Estate provides adequate information to relevant stakeholders. Documents specified in the RSPO P&C were made available to the public at the estate premises, and available in website. The documents available are:</p> <ul style="list-style-type: none"> a. Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts b. HCV documentation - Pollution prevention and reduction plans c. Details of complaints and grievances d. Continuous improvement plans e. Public summary of certification assessment report - Group Sustainability Policy f. Record of contributions to community development <p>The publicly available document has been briefed to all stakeholders during the stakeholders meetings that has been conducted at The Legends Golf and country resorts on 03/09/2023.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>There is no information request has been received by the management of Bukit Layang Estate only assistance request. Latest</p>	Complied

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		<p>assistance request received on from the nearest Kindergarten to purchase teaching and learning material.</p> <p>All the document has been established in both Bahasa Malaysia and English. As mentioned, if there any clarification needed, the manager of the estate responsible to clarify the any information request by the stakeholders.</p>	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Logbook established for enquiry recording purposes in the "Enquiry register". There is no information request has been received by the management for year 2023 and 2024.</p>	Complied
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>Consultation and communication procedures is documented in the document title Company's Communication and Consultation Management System Issue No. 1 Doc. No. SQD/SMS/1.1 dated 1/08/2020 which there is no new revision has been done.</p> <p>This procedure applies to all communications and consultations between the Company and its stakeholders. The SOP was disclosed and explained during stakeholders meetings that has been conducted at The Legends Golf and country resorts on 03/09/2023</p> <p>There is evidence that the procedure has been implemented and has been verified through interview with sample stakeholders where they can demonstrate their understanding on the procedure and agreed that they has been explained on the procedure by the management.</p> <p>Base on the records maintained in the enquiry books, there is also evidence that management responded for any request by stakeholders.</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>Bukit Layang Estate has a current list of stakeholders. The details include the stakeholders' address, telephone number and their nominated representatives. These stakeholders include suppliers, contractors, service providers, nearby clinics, transporters.</p>	Complied

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		3 contractors has been listed which are Sungai Rezeki Sdn Bhd and Soko SK Enterprise (FFB transport) and J&N Indah for construction.	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Policy code of ethical conduct has been established in the document "Business policy" that has been signed by Managing Director, Mr Mohd Faris Adli Shukery on 07/12/2021 mentioned the commitment of the company to fulfill the needs and requirement of the customer and to comply with legal requirements in which the company operated. Stated also in the policy that the policy covers in terms of workers recruitment and contract tendering.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	As mentioned, the implementation of the policy has been done through the RSPO internal audit that has been conducted by sustainability team lead by Mr. Muhammad Hazim Sukandar on 18/06/2023 and through the finance internal audit by Internal audit department that has been conducted on 02/07/2023. The management also has established whistle blowing policy which any misconduct or incompliance of the policy can be reported directly whistle blowing email, whistle blowing@kulim.com.my , e-form; http://kulim.com.my/whistleblowing or to write report directly to chairman, board of Kulim (Malaysia) Berhad.	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 -	Bukit Layang Estate continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and Sustainability & Innovation Department personnel. The estate had obtained and renewed	Complied

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license and permits as required by the law. Among others the licenses/permit viewed were;

	Permit/license	Validity
1	MPOB license no 613-1100-2000	Expired 30/09/2024
2	JTK - Penggajian Pekerja Asing ref 2022/08662	Effective 12/10/2022
3	JTK - Wages Deduction – Insurance ref 34/1481	Effective 15/04/2014
4	KPDNHEP Permit diesel 5460L ref 1-00085	Expired 08/01/2024
5	SPAN - Ref LK/3/23/01207	Expired 02/01/2026
6	Jabatan Alam Sekitar Ref 3319/3854/3876/3291	Effective 30/04/2024
7	BAKAJ - Ref 07/A/KT/026	31/12/2023
8	Lesen Perpasangan Persendirian 2023/02838	29/09/2024

The estate had made application to BAKAJ via letter dated 26/11/2023. Letter was received by BAKAJ on 27/11/2023 and awaiting approval. Similarly, an application was made to KPDNHEP dated 27/12/2023 and BOMBA through letter dated 17/01/2023 for the support application. There was a reply from BOMBA dated 17/01/2024 for the delay to visit the site. All documents were in relation to the renewal application were sighted and verified.

		<p>The estate was equipped with 2 units of gen-sets of capacity each at 21KVA and 30 KVA. This installation was notified to DOE with reply received on 16/07/2014. However, the installation was not bonded by Peraturan 5, Peraturan-Peraturan Kualiti Alam Sekitar Sekeliling (Udara Bersih) 2014 as the fuel utilization is below 15kg/hour.</p>	
<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>The Estate continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them.</p> <p>a) The Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the Estate Manager.</p> <p>b) The SID Department is responsible to track changes and the information was disseminated to all its plantations and Mill department. Among the applicable legal and included in the legal register are;</p> <ul style="list-style-type: none"> - Pesticides Act 1974 and Regulations, - Environmental Quality Act 1974 and Regulations, - Factories and Machinery Act 1967 and Regulations, - Occupational Safety and Health Act 1994, - Employment Act 1955, - Labour Act 1955, - Children & Young Person (Employment) Act 2010, - Industrial Relations Act 1967, 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Children and Young Persons (Employment) Act 1966 - MPOB Regulations (Licensing) 2005, - Min retirement age Act 2012, - Passport Act 1996 - Uniform Building By-Laws 1984 <p>The latest revision on the LORR was made dated 01/09/2023 on the following changes to date for the year.</p> <ul style="list-style-type: none"> a) 01/01/2023 - Employment Act 2022 b) 01/06/2023 - KWSP Amendment of 3rd Schedule Order 2023 c) 01/10/2023 - Peraturan Kawalan Penyakit - Perlanjutan Kuat Kuasa 2023 																
2.1.3	<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>The estate has map showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the estate, during the field inspection confirmed that they were clearly marked and maintained.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Field</th> <th>Boundary</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>P00/Bk 2</td> <td>Sg Layang Estate</td> </tr> <tr> <td>2</td> <td>P14/Blk 2</td> <td>SAJ Layang Reservoir</td> </tr> <tr> <td>3</td> <td>P03/Blk 2</td> <td>Kek Seng Estate</td> </tr> <tr> <td>4</td> <td>P03/Blk 2</td> <td>Sg Layang</td> </tr> </tbody> </table>		Field	Boundary	1	P00/Bk 2	Sg Layang Estate	2	P14/Blk 2	SAJ Layang Reservoir	3	P03/Blk 2	Kek Seng Estate	4	P03/Blk 2	Sg Layang	Complied
	Field	Boundary																
1	P00/Bk 2	Sg Layang Estate																
2	P14/Blk 2	SAJ Layang Reservoir																
3	P03/Blk 2	Kek Seng Estate																
4	P03/Blk 2	Sg Layang																
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																		
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The list of Contractors has been established by and updated on 15/01/2024 as described below. The estates continued to maintain</p>	Complied															

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		<p>the relevant information (address, contact number, nominated representatives)</p> <table border="1"> <thead> <tr> <th></th> <th>Contractors Name</th> <th>Work</th> <th>Commence</th> <th>Expiry</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Soko SK Enterprise</td> <td>FFB Loading & Transportation P00/P03</td> <td>01/06/2023</td> <td>30/06/2024</td> </tr> <tr> <td>2</td> <td>Soko SK Enterprise</td> <td>FFB Loading & Transportation P14</td> <td>15/06/2023</td> <td>30/06/2024</td> </tr> <tr> <td>3</td> <td>Soko SK Enterprise</td> <td>Hiring of JCB</td> <td>15/03/2023</td> <td>14/03/2024</td> </tr> <tr> <td>4</td> <td>Sungai Rezeki Sdn Bhd</td> <td>External FFB transportation to mill</td> <td>01/09/2023</td> <td>30/06/2024</td> </tr> </tbody> </table>		Contractors Name	Work	Commence	Expiry	1	Soko SK Enterprise	FFB Loading & Transportation P00/P03	01/06/2023	30/06/2024	2	Soko SK Enterprise	FFB Loading & Transportation P14	15/06/2023	30/06/2024	3	Soko SK Enterprise	Hiring of JCB	15/03/2023	14/03/2024	4	Sungai Rezeki Sdn Bhd	External FFB transportation to mill	01/09/2023	30/06/2024	
	Contractors Name	Work	Commence	Expiry																								
1	Soko SK Enterprise	FFB Loading & Transportation P00/P03	01/06/2023	30/06/2024																								
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3	Soko SK Enterprise	Hiring of JCB	15/03/2023	14/03/2024																								
4	Sungai Rezeki Sdn Bhd	External FFB transportation to mill	01/09/2023	30/06/2024																								
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>The agreements have included clauses in relation to requirement to meeting legal requirement and the agreement is governed among others by the following;</p> <p>a) Clause 17.0 Laws –</p> <ul style="list-style-type: none"> i. Compliance with applicable laws and guidelines ii. To comply with all applicable laws, by-laws, rules, regulations iii. Not limited to laws in relation to employment, environment, OSH, anti-bribery, anti-slavery, human trafficking laws iv. All costs for compliance of Malaysian laws shall be borne by Vendor 	Complied																									

		<p>b) Clause 18.0 Privacy Laws</p> <p>i. Vendor consent JPB to store vendors data</p> <p>ii. Disclose vendors data to relevant where required by law of legal purposes.</p> <p>c) Clause 18.0 No bribery</p> <p>Governed by anti-bribery law MACC Act 2010.</p>	
2.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>All Contracts/Agreement have clauses in relation to disallowing child, forced and trafficked labour. Details as follows;</p> <p>a) Clause 16.4</p> <p>The vendor shall comply with relevant business policies and all certification program standard requirement related to the Contract execution failure of which may result in termination of contract.</p> <p>b) Clause 16.8</p> <p>The vendor shall comply with applicable labour and employment laws regarding and prohibit any form of child labour, forced and trafficked labour. Any eligible young labour will be employed only in accordance with children and young person (Employment) Act 1966.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	N/A	Not Applicable

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 -	N/A	Not Applicable																																																
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	<p>(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 -</p>	<p>The Estate continued to commit to long term economic and financial viability. The annual budgets for 2024 to 2028 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m/ton, per/ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estate adopted the following format for the annual budget.</p> <table border="1" data-bbox="1176 906 1906 1310"> <thead> <tr> <th></th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>371.10</td> <td>223.06</td> <td>223.06</td> <td>371.10</td> <td>371.10</td> </tr> <tr> <td>Immature Ha</td> <td>0.00</td> <td>148.04</td> <td>148.04</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Total Ha</td> <td>371.10</td> <td>371.10</td> <td>371.10</td> <td>371.10</td> <td>371.10</td> </tr> <tr> <td>FFB Tons</td> <td>6,991</td> <td>5,511</td> <td>5,364</td> <td>6,400</td> <td>5,527</td> </tr> <tr> <td>Yield /Ha</td> <td>19.00</td> <td>25.00</td> <td>24.00</td> <td>17.00</td> <td>15.00</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table>		2024	2025	2026	2027	2028	Mature Ha	371.10	223.06	223.06	371.10	371.10	Immature Ha	0.00	148.04	148.04	0.00	0.00	Total Ha	371.10	371.10	371.10	371.10	371.10	FFB Tons	6,991	5,511	5,364	6,400	5,527	Yield /Ha	19.00	25.00	24.00	17.00	15.00	RM/mt FFB	x	x	x	x	x	RM/ha	x	x	x	x	x	Complied
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<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -</p>	<p>The long-range replanting programs (LRRP) until 2028 were sighted and verified. The program is reviewed annually and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows:</p> <table border="1" data-bbox="1211 531 1856 632"> <tr> <td>Year</td> <td>2024</td> <td>2025</td> <td>2026</td> <td>2027</td> <td>2028</td> </tr> <tr> <td>Hectare</td> <td>0.00</td> <td>148.04</td> <td>147.52</td> <td>0.00</td> <td>0.00</td> </tr> </table>	Year	2024	2025	2026	2027	2028	Hectare	0.00	148.04	147.52	0.00	0.00	<p>Complied</p>
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -</p>	<p>The management of Johor Plantations Berhad has established internal procedure for management review and has been documented in the document number SID/SMS/3.1 dated 01/08/2020 titled "Management Review". The procedure therein among others mentioned that management review is to be held minimum once annually.</p> <table border="1" data-bbox="1184 906 1848 975"> <thead> <tr> <th></th> <th>Date</th> <th>Attendee</th> <th>Date</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>16/07/2023</td> <td>7</td> <td>23/08/2022</td> <td>7</td> </tr> </tbody> </table> <p>Members discussed issues relating to the RSPO preparation among others.</p> <ul style="list-style-type: none"> a) Internal audit findings b) Process Performance c) Customer Feedback d) Audits Results e) Changes That Could Affect Management System f) Complaints and grievance g) Continual Improvement Plan 		Date	Attendee	Date	Attendee	1	16/07/2023	7	23/08/2022	7	<p>Complied</p>		
	Date	Attendee	Date	Attendee											
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Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.

<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The estate had established continual improvement plan revised dated 15/01/2024 upon consideration of the social, operations and environmental impacts. Among other efforts are;</p> <table border="1" data-bbox="1160 497 1915 1303"> <thead> <tr> <th></th> <th>Program</th> <th>Action /Initiatives</th> </tr> </thead> <tbody> <tr> <td rowspan="5">1</td> <td rowspan="5">Chemical Reduction</td> <td>Manual grass cutting</td> </tr> <tr> <td>Only circle and strip spraying in fields</td> </tr> <tr> <td>Apply low volume spraying equipment</td> </tr> <tr> <td>Follow manufacturer dosage</td> </tr> <tr> <td>Cattle integration - grassing in field.</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Waste reduction</td> <td>Awareness among employees</td> </tr> <tr> <td>Enhancement of waste segregation.</td> </tr> <tr> <td rowspan="3">3</td> <td rowspan="3">Employment condition</td> <td>Enhancement of workers quarters</td> </tr> <tr> <td>Schedule repair and painting</td> </tr> <tr> <td>Conducive environment</td> </tr> <tr> <td rowspan="2">4</td> <td rowspan="2">Labour ratio</td> <td>Expansion of in-field FFB collection – grabber</td> </tr> <tr> <td>Expand mechanization in manuring</td> </tr> <tr> <td>5</td> <td>Environmental</td> <td>Desilting field drain for maintenance</td> </tr> </tbody> </table>		Program	Action /Initiatives	1	Chemical Reduction	Manual grass cutting	Only circle and strip spraying in fields	Apply low volume spraying equipment	Follow manufacturer dosage	Cattle integration - grassing in field.	2	Waste reduction	Awareness among employees	Enhancement of waste segregation.	3	Employment condition	Enhancement of workers quarters	Schedule repair and painting	Conducive environment	4	Labour ratio	Expansion of in-field FFB collection – grabber	Expand mechanization in manuring	5	Environmental	Desilting field drain for maintenance	<p>Complied</p>
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		<p>Details of expenditure are provided in the estate under both CAPEX/OPEX. Inclusive are projects for improvement as described below among others;</p> <table border="1" data-bbox="1160 491 1921 742"> <thead> <tr> <th></th> <th>Sections</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Facilities</td> <td>Upgrade solar system for guard post RM5K</td> </tr> <tr> <td>2</td> <td>Operation</td> <td>Additional Barn Owl Boxes – 13 units</td> </tr> <tr> <td>3</td> <td>Operation</td> <td>Beneficial Plant planting to meet standard ratio</td> </tr> <tr> <td>4</td> <td>Facilities</td> <td>SAJ water supply Installation – 2024 - RM250K</td> </tr> </tbody> </table>		Sections	Description	1	Facilities	Upgrade solar system for guard post RM5K	2	Operation	Additional Barn Owl Boxes – 13 units	3	Operation	Beneficial Plant planting to meet standard ratio	4	Facilities	SAJ water supply Installation – 2024 - RM250K	
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<p>3.2.2</p>	<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. - Minor Compliance -</p>	<p>As per verification on data as per record of workers, total workers, demographic, OSH data and HCV data. The data in RSPO Metric template 2.1 was accurate as per verification.</p>	<p>Complied</p>															
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>																		
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p>	<p>Bukit Layang Estate has set up and put into action Standard Operating Procedures (SOP) for various processes. These SOPs are documented in manuals like the Kulim Malaysia Berhad Agriculture Manual 07/2013, Sustainability Management System SOP, Working Instruction, Safety Standard Operating Procedures (SSOP) dated</p>	<p>Complied</p>															

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		<p>25/02/2015, Pictorial Safety Standards and Security Guidelines (PSS), and Security Guidelines.</p> <p>These manuals are stored in the main office for employees, especially supervisory staff, to refer to. They cover all estate operations, including topics like replanting, road and drainage maintenance, construction of estate buildings, manuring, harvesting, pruning, ablation, soil conservation, justification of chemical use, weed management, integrated pest management, and plant disease.</p> <p>After conducting site inspections and interviews with workers, it was confirmed that the SOPs have been implemented, and the workers understand the SOP requirements.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Kulim Bukit Layang Estate has a system to make sure that the procedures are consistently followed in the day-to-day operations. This involves internal audits, visits from a task force from Kulim (HQ), monthly and weekly performance meetings, daily and monthly production and financial reports, and inspections of workstations by the Safety and Health Committee.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Kulim Bukit Layang Estate keeps records of monitoring and makes them available for verification. The Plantation Advisor (PA) is responsible for ensuring that the estate follows the SOP, stays within the budget, and maintains productivity. The latest visit was documented in the Plantation Inspectorate Report -Ladang Bukit Layang dated 31/05/2023. The estate uses various checklists for operations, health and safety monitoring, worker welfare, and environmental issues. Sample taken on Internal Audit Report dated 18/06/2023, verified that one Major Non Conformance were raised and closed effectively on 06/07/2023</p>	Complied

<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>		
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>The Estate had established Environmental Impact Assessment (EIA) procedure and has been documented as Environmental Aspect and Impact Identification - EIA KULIM – LBL - 2023. All significant impacts have been determined and mitigation plan was developed thereafter as per document The Environmental Improvement Plan/Pollution Prevention Plan reviewed annually. The EIA was reviewed on 29/08/2023 with no major changes recorded in the operations /activities. The EIA covers the following operations/activities among others;</p> <ul style="list-style-type: none"> a) Construction / building maintenance b) power station / workshop activity c) Harvesting / Chemical Application d) Fertilizer / Compost application e) Water Treatment Plant / Diesel Engine f) Use of Machine and Tractor. g) Replanting <p>The Estate had established Environmental Management Plan 2024 with identification to the mitigation plan for negative impacts, time plan and the PIC stated therein. All sites and the reports were visited and sighted respectively by the auditors in presence of the Sustainability & Innovation Department, estates and mill personnel. There are no new plantings or operations within Northern Zone estates. However, there were plans and impact assessments relating to</p> <ul style="list-style-type: none"> a) Environmental impacts based on Environmental Aspect Identification Evaluation Procedure, Register File no KMB/5.2.EAI.

		<p>b) Environmental Impact Evaluation Procedure, Register File no EAI/203/1-04.</p> <p>There is no change of current practices required to mitigate negative effects based on identified impacts for the estate. However, the estate conducted periodical review on the aspects and impacts identified and evaluated as registered.</p> <p>The estate had continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and Assistant Managers were identified as the PIC. The programs relating to operations, environmental and social enhancement were planned by the management as summarized 3.2.1 above.</p> <p>Evidence was available that the management and monitoring plans which was updated on 29/08/2023, was made in a participatory manner with affected stakeholders. These included feedbacks and inputs obtained during Women Onwards or WOW, Union and stakeholder meetings 03/09/2023, as well as social meeting held with internal and external stakeholders where their inputs were obtained when updating the EIA/SIA management and monitoring plans. Bukit Layang Estate has developed Environmental Management Plan (LBL-EMP 01) Rev.02/2023. Objective is to minimize environmental impact (pollution and emission) from all estate operations. Targeted to be achieved by end of Dec 2024.</p> <p>There is no new planting or new operations has been identified in Bukit Layang Estate and has been verified through interview and site visit to the site.</p> <p>Social impact assessment conducted internally by the sustainability department for Bukit Layang Estate and the method is through the interview the stakeholders, site visit, and output for any meeting and consultation that has been done separately. There is 2 issues</p>	
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		<p>that has been highlighted base on the assessment which are related to passport for foreign workers has been kept by the management and also inaccurate contribution for SOCSO.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -</p>	<p>The development of both Social and Environmental Management Plan 2024 activities involved discussion with the following parties among others.</p> <ol style="list-style-type: none"> 1. JCC Meeting held respectively held combined with Basir Ismail Estate 23/10/2023. 2. Workers and staff as the internal stakeholders. 3. WOW (Women Onward) Meeting dated 12/07/2023. 4. External stakeholders' consultation meeting dated 03/09/2023. 5. Monthly Management meetings identifying issues in relation to social and environmental 6. Observation on sites and surrounding, 7. The assessment in aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. <p>Management plan has been established for both issues that has been highlighted in the social impact assessment and has been remarks as continuous and applicable for all existing and new workers.</p> <p>Stated in the management plan, for passport retention issues starting from 03/08/2022, all workers need to sign declaration which to confirm that all the workers received and kept the passport by their self. The signed declaration form need to be kept in each individual file.</p>	<p>Complied</p>

		<p>While for the SOCSO contribution issues, the management will monitor the contribution and final calculation will be monitored and approved by the management.</p>	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The Social and Environmental Management Plan 2024 available for each unit were available having information i.e. issues, management plan, PIC and time frame. The input is gathered from the meeting minutes similar to the session as described in 3.4.2 above.</p> <p>The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas.</p> <p>The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. Feedback was also obtained through questionnaire with stakeholders.</p> <p>Implementation of the management plan has been verified by the auditor base on sample of 6 workers. There is evidence base on interview that they already signed the declaration and passport has been kept by them. During site visit, all workers can provide the auditor original copies of their passport.</p> <p>While for contribution, sample has been taken for month March'23, June'23 and November' 23 and there is evidence that contribution has been made according to the SOCSO regulations.</p>	<p>Complied</p>
<p>Criterion 3.5: A system for managing human resources is in place.</p>			

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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 -	Recruitment, selection and hiring process has been documented in the procedure "Recruitment of new foreign workers" issuance No.01 dated 01/01/2019. While for recruitment, selection, hiring, promotion and termination of local workers it has been documented in the document title Recruitment of local workers for operating unit issuance number 001 latest updated on 01/10/2020	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Latest recruitment has been done in year 2022 for both local and foreign workers. There is no new recruitment, terminations and promotion in year 2023.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	HIRARC was available for all operations within the mill and estates to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Harvesting of FFB, P&D Control, Landfill Activities, manuring and Spraying Activities. Risks were also assessed in accordance to legal requirements and its recommendations were implemented as below. <u>Bukit Layang Estate</u> 1. Chemical Health Risk Assessment (CHRA) was done in compliance with USECHH Regulation 2000. The assessment was conducted by TSM Training And Consultancy Services Sdn Bhd on 03/07/2023. The CHRA Report (Report Number: JKPP HQ/16/ASS/00/35-2023/41) was available for verification. 2. Medical Surveillance has been conducted for 4 sprayers, and 13 workers exposed to chemicals, all of them were found fit to work. Medical Surveillance were conducted on 07/08/2023 3. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations	Complied

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		<p>2019. The assessment was conducted by NRA Assessor (JKKP Registration Number: HQ/18/PEB/00/00014) on 06/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/033) was available for verification.</p> <p>4. Audiometric test was conducted for 3 estate workers on 22/10/2023 based on the requirements in the NRA. Result from audiometric testing found that all of the workers having normal audiometric.</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Annual H&S plan established by each Operating Unit are mostly implemented through Annual Training Program 2023/2024 to address the identified health and safety risks. The emphasis is on safe work by providing;</p> <ul style="list-style-type: none"> ▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. ▪ Awareness and understanding of workplace hazards and how to identify, report, and control them. ▪ 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> <ul style="list-style-type: none"> • Internal Audit conducted by the Johor Plantation Berhad office Sustainability Palm Oil Department; • Workplace inspection by site OSH Committee; • Direct involvement of supervisor and rounds by Asst Manager; 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Safety occurrence reporting. • Health / medical surveillance. • Chemical exposure monitoring. <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The Annual Training Program 2023 and 2024 was established that covers mainly Health and Safety but extends to include all aspects of RSPO P&C.</p> <p>Means implemented by Johor Plantations Group – Bukit Layang Estate to assess understanding of participants include:</p> <ul style="list-style-type: none"> • Participants completing post-training evaluation/feedback form and give suggestions; • Learners engagement such as interactive quizzes; • Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, etc.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records are maintained by each Operating Unit. Sample some records at each Operating as follows:</p>	Complied

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		<table border="1"> <tr> <td colspan="2">Bukit Layang Estate</td> </tr> <tr> <td>Training</td> <td>Date</td> </tr> <tr> <td>Spraying, Spraying Calibration and HCV Buffer Zone Area Training</td> <td>20/12/2023</td> </tr> <tr> <td>Schedule Waste</td> <td>16/02/2023</td> </tr> <tr> <td>Fertilizer Handling Training</td> <td>14/04/2023</td> </tr> <tr> <td>Harvesting Training</td> <td>08/08/2023</td> </tr> <tr> <td>Waste Cleaning and landfill</td> <td>13/07/2023</td> </tr> <tr> <td>Emergency Response Plan and CPR</td> <td>04/12/2023</td> </tr> <tr> <td>Fire Drill Training</td> <td>04/12/2023</td> </tr> </table>	Bukit Layang Estate		Training	Date	Spraying, Spraying Calibration and HCV Buffer Zone Area Training	20/12/2023	Schedule Waste	16/02/2023	Fertilizer Handling Training	14/04/2023	Harvesting Training	08/08/2023	Waste Cleaning and landfill	13/07/2023	Emergency Response Plan and CPR	04/12/2023	Fire Drill Training	04/12/2023	
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Schedule Waste	16/02/2023																				
Fertilizer Handling Training	14/04/2023																				
Harvesting Training	08/08/2023																				
Waste Cleaning and landfill	13/07/2023																				
Emergency Response Plan and CPR	04/12/2023																				
Fire Drill Training	04/12/2023																				
3.7.3	<p>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.</p> <p>- Minor Compliance -</p>	N/A	Not Applicable																		
<p>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)</p>																					
3.8.1	<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</p>	Not applicable for Bukit Layang Estate	Not Applicable																		

	<p>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>		
3.8.2	<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>	Not applicable for Bukit Layang Estate	Not Applicable
3.8.3	<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 produced shall then be recorded in each subsequent annual surveillance report.</p>	Not applicable for Bukit Layang Estate	Not Applicable
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	Not applicable for Bukit Layang Estate	Not Applicable
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p>	Not applicable for Bukit Layang Estate	Not Applicable

	<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. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 		
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. 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. 	Not applicable for Bukit Layang Estate	Not Applicable
3.8.7	Purchasing and Goods In	Not applicable for Bukit Layang Estate	Not Applicable

	<ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 		
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	Not applicable for Bukit Layang Estate	Not Applicable
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors 	Not applicable for Bukit Layang Estate	Not Applicable

	<p>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>		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Not applicable for Bukit Layang Estate	Not Applicable
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.	Not applicable for Bukit Layang Estate	Not Applicable
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>	Not applicable for Bukit Layang Estate	Not Applicable

	<ul style="list-style-type: none"> 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. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Not applicable for Bukit Layang Estate	Not Applicable
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	Not applicable for Bukit Layang Estate	Not Applicable
3.8.15	<p>Processing</p>	Not applicable for Bukit Layang Estate	Not Applicable

	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.		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	Not applicable for Bukit Layang Estate	Not Applicable
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Not applicable for Bukit Layang Estate	Not Applicable
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	Not applicable for Bukit Layang Estate	Not Applicable
4.2	<p>In corporate communications, a member is allowed to:</p> <p>A. display its RSPO membership status</p> <p>B. display the RSPO web address (www.rspo.org)</p> <p>C. state that the member supports the work of RSPO</p> <p>D. state the member's history with regard to RSPO</p>	Not applicable for Bukit Layang Estate	Not Applicable

	E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership		
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Not applicable for Bukit Layang Estate	Not Applicable
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Not applicable for Bukit Layang Estate	Not Applicable
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • “We have been sourcing RSPO certified palm oil since (YEAR).” • “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” • “We have been RSPO certified since (YEAR).” • “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.” • “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.” • “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” • “We are RSPO certified. Ask us for our RSPO certified products.” 	Not applicable for Bukit Layang Estate	Not Applicable
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).”</p>	Not applicable for Bukit Layang Estate	Not Applicable

	<p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>		
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Not applicable for Bukit Layang Estate	Not Applicable
5.1.2	Product-specific communications are voluntary.	Not applicable for Bukit Layang Estate	Not Applicable
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	Not applicable for Bukit Layang Estate	Not Applicable
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	Not applicable for Bukit Layang Estate	Not Applicable
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO	Not applicable for Bukit Layang Estate	Not Applicable

	<p>Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	<p>Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain</p>	Not applicable for Bukit Layang Estate	Not Applicable
5.2 Off pack claims			
5.2.1	<p>Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.</p>	Not applicable for Bukit Layang Estate	Not Applicable
5.2.2	<p>When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the</p>	Not applicable for Bukit Layang Estate	Not Applicable

	supply chain model and certificate number under which the claim is being made.		
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	Not applicable for Bukit Layang Estate	Not Applicable
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	Not applicable for Bukit Layang Estate	Not Applicable
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* 	Not applicable for Bukit Layang Estate	Not Applicable

	<ul style="list-style-type: none"> • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable for Bukit Layang Estate	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable for Bukit Layang Estate	Not Applicable
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable for Bukit Layang Estate	Not Applicable
5.3.3	On pack claims shall not include information about the claimant’s RSPO membership status.	Not applicable for Bukit Layang Estate	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers’ RSPO membership status.	Not applicable for Bukit Layang Estate	Not Applicable
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	Not applicable for Bukit Layang Estate	Not Applicable
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	Not applicable for Bukit Layang Estate	Not Applicable

MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	Not applicable for Bukit Layang Estate	Not Applicable
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Not applicable for Bukit Layang Estate	Not Applicable
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 	Not applicable for Bukit Layang Estate	Not Applicable
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO Trademark that includes the tag "CERTIFIED"; or • RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	Not applicable for Bukit Layang Estate	Not Applicable

MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	Not applicable for Bukit Layang Estate	Not Applicable
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Not applicable for Bukit Layang Estate	Not Applicable
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	Not applicable for Bukit Layang Estate	Not Applicable
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	Not applicable for Bukit Layang Estate	Not Applicable
Principle 4: Respect community and human rights and deliver benefits			

Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>There is no changes compare to last year where the management adopt the same policy for respect human rights is available title Sustainability Policy signed by the Managing Director dated 01/10/2021. Among others, the Policy states that the Company will respect, support and protect international human rights against violence, threats and other forms of retaliation against individuals and peoples which include human rights defenders, whistle-blowers, complainants and community spokespersons.</p> <p>The policy has been communicated during stakeholders meetings that has been conducted at The Legends Golf and country resorts on 03/09/2023 that has been attended by various stakeholders.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>There is evidence that Bukit Layang Estate did not instigate violence or using any harassment in the operations. It has been verified though interview with sample workers and stakeholders.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>There is no changes compare to last year where the management of Bukit Layang estate adopt the same procedure document in the Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020 is a procedure available that is agreeable to all sides and accepted by all stakeholders to deal with complaints and grievances. Clause 5.8 states that complainants' anonymity would be respected and protected if requested. In addition, the Company's Sustainability Policy also states that it respects, supports and protects international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistle-blowers, complainants and community spokespersons.</p>	Complied

4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The procedure are in place which can be understood by all affected parties including illiterate parties. It has been confirmed through interview with workers and stakeholders that they can demonstrate their understanding on the procedure. There is no illiterate parties has been identified as per sample workers.</p> <p>Communication of the procedure.</p>	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>Verification has been done by auditor and there is evidence that any grievance has been responded and resolved in the timely manner as per stated in the procedure. Sample of grievance received on 05/10/2023 regards to wild dogs at the housing compound and has been settle on the same days.</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>Stated in the procedure under in Clause 5.5 of Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 August 2020. This mechanism provides an option for parties to engage independent legal, technical advice and third-party mediator.</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 management has made contribution to local communities such as Kampung FELDA Tiram where they has been provided machineries for road repairs and supported during any event. Latest has been during the Maulidur Rasul. Interview with local communities confirm confirmed that they are aware that they has been consulted for any contribution.</p> <p>The management also provided chicken to the workers during the Eid Fitri celebrations and meat for Eid- Adha celebrations.</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>There is no changes of land area where Bukit Layang Estate consist of 397.76 Ha total area. There is 12 land title available under the ownerships of Kulim (M) Berhad with total area 397.76Ha</p> <p>Details of land title</p> <ol style="list-style-type: none"> 1. Title No.: 100184; Total Area: 1.3582 ha; Lot No.: 283 2. Title No.: 105393; Total Area: 34.5753 ha; Lot No.: 712, Kulim (M) Berhad 3. Title No.: 84652; Total Area: 15.2389 ha; Lot No.: 720, Kulim (M) Berhad 4. Title No.: 105390, Total hectare: 120.672 ha, lot no. 713, Kulim (M) Berhad 5. Title No.: 105391; Total Area: 117.5737 ha, lot no. 745, Kulim (M) Berhad 6. Title No.: 105389; Total Area: 6.1664 ha, lot no. 718, Kulim (M) Berhad 	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the smallholder as the company acquired and replanted for more than 2nd cycle. Trenches and gate were available to demarcate the boundary of land.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the smallholder as the company acquired and replanted for more than 2nd cycle.. Trenches and gate were available to demarcate the boundary of land.</p>	Complied

4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the smallholder as the company acquired and replanted for more than 2nd cycle. Trenches and gate were available to demarcate the boundary of land.	Complied
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 -	There is no land dispute in Bukit Layang Estate since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this. In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is not applicable.	Complied
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 -	There is no land dispute in Bukit Layang Estate since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4.	Complied
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 -	There is no land dispute in Bukit Layang Estate since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. #	Complied

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	- Minor compliance -	PROP/MP/5; Date: 9/6/2020; Rev. # 4. Based on the map and stakeholders consultation, there is no evidence of any local community land involved. Therefore, this indicator is 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	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting at Bukit Layang Estate. There is 12 land title available under the ownerships of Kulim (M) Berhad with total area 397.76Ha</p> <p>Details of land title</p> <ol style="list-style-type: none"> 1. Title No.: 100184; Total Area: 1.3582 ha; Lot No.: 283 2. Title No.: 105393; Total Area: 34.5753 ha; Lot No.: 712, Kulim (M) Berhad 3. Title No.: 84652; Total Area: 15.2389 ha; Lot No.: 720, Kulim (M) Berhad 4. Title No.: 105390, Total hectare: 120.672 ha, lot no. 713, Kulim (M) Berhad 5. Title No.: 105391; Total Area: 117.5737 ha, lot no. 745, Kulim (M) Berhad 6. Title No.: 105389; Total Area: 6.1664 ha, lot no. 718, Kulim (M) Berhad 	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>No new planting and issues of customary land occurred in all operating units under Bukit Layang Estate a that requires FPIC process since the last audit.</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new</p>	Complied

	- Critical (Major) compliance -	development in all operating units under Bukit Layang Estate in the past recent years. The estate’s land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year’s land statements and MPOB License	
4.5.3	Evidence is available that affected local peoples understand they have the right to say ‘no’ to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	No new planting and issues of customary land occurred in all operating units under Bukit Layang Estate a that requires FPIC process since the last audit.	Complied
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 -	It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images and interview with local communities and neighbouring estate, that there was no new development in all operating units under Bukit Layang Estate in the past recent years.	Complied
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 -	The estate’s land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year’s land statements and MPOB License	Complied
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.	No new planting and issues of customary land occurred in all operating units under Bukit Layang Estate a that requires FPIC process since the last audit.	Complied

	- Minor compliance -		
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 -	It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development in all operating units under Bukit Layang Estate in the past recent years.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	The estate’s land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year’s land statements, MPOB License and interview with local communities and neighbouring estate.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4/9/2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.6.2	(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 -	An SOP known as Negotiations Concerning Compensation Program dated 4/9/2007 was established by Kulim (Malaysia) Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4/9/2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	Bukit Layang Estate does not have scheme smallholders within its certification unit. Thus, this indicator is not applicable.	Complied

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4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There was no dispute that involved compensation in Bukit Layang Estate Hence, this indicator is not applicable	Not Applicable
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Kulim (M) Berhad has developed the procedure for 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
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The same procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4 will be used for calculating and distributing fair and gender-equal compensation.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	There are no customary right lands both operating units under Bukit Layang Estate. It has been confirmed through interview with local communities and neighbouring estate	Not Applicable
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition	There are no customary right lands both operating units under Bukit Layang Estate. It has been confirmed through interview with local communities and neighbouring estate	Complied

	is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -		
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There are no customary right lands both operating units under Bukit Layang Estate. It has been confirmed through interview with local communities and neighbouring estate	Complied
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 -	There are no customary right lands both operating units under Bukit Layang Estate. It has been confirmed through interview with local communities and neighbouring estate	Complied
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 -	There are no customary right lands both operating units under Bukit Layang Estate. It has been confirmed through interview with local communities and neighbouring estate	Complied
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 -	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable

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 -	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable
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 -	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable

	system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -		
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable
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 -	Bukit Layang Estate is under single estate certification, and therefore, 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 -	Bukit Layang Estate is under single estate certification, and therefore, 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 -	Bukit Layang Estate is under single estate certification, and therefore, 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 -	Bukit Layang Estate is under single estate certification, and therefore, 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.	Bukit Layang Estate is under single estate certification, and therefore, this Indicator is not applicable.	Not Applicable

	- Minor compliance -		
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>Policy for discrimination has been established in the document "Core labor standard policy" signed by Managing Director, Mohd Faris Adli Shukery dated 01/10/2021. Mentioned in the policy, that the management committed to not engage in nor support discrimination in any form.</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>Latest recruitment for migrant workers has been done in 17/03/2023 and for female workers on 15/10/2023. As per interview, it has been confirmed that there is no recruitment fees has charged during the recruitment process.</p> <p>It also has been further verified that there is no discrimination has been practices for any difference in the estate regardless of gender, races, origin countries. All workers has been treated equally and fairly.</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>Latest recruitment has been done in year 2022 for both local and foreign workers. There is no new recruitment, terminations and promotion in year 2023.</p> <p>While for training, all the workers has been trained according to the job specification and general training. Training records has been verified based on sample workers has been detail up in the indicator 6.7</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>There is no pregnancy test has been conducted for all female workers. It has been confirmed through interview with hospital assistant, and sample of female worker. It has been verified that</p>	Complied

		there is no female workers works related to chemical hence there is significant risk has been identified.	
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	Gender committee has been established a known as Women Onwards (WOW) combined with Basir Ismail Estate and has been led by Puan Affidah Katamin. As per interview with the sample female workers, the objective of WOW is to communicate the company policy and procedure, to raise awareness on women and mechanism to raise any complaint/grievance related to gender. Latest meeting has been conducted on 12/07/2023. There is no negative issues arise and discussed during the meeting.	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	There is evidence that all workers has been paid equally base on types of workers. For daily rates, the workers has been paid at RM57.69/day. It has been verified that all workers complied with Minimum Wages Order 2022..	Complied
<p>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).</p>			
6.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad is a member of the Malaysian Agricultural Producers Association (MAPA) and is therefore subjected to the agreement between MAPA and the National Union of Plantation Workers (NUPW). The MAPA/NUPW agreement dated 2/04/2019 had expired on 31/12/2021. Based on the interview conducted with the NUPW officer, the terms and conditions of the previous MAPA/NUPW agreement remains binding. Pending on the signing of the new agreement still in the court process.</p> <p>The employment contracts signed with all workers contain applicable labour laws related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc are stipulated in the employment contracts. Clause 9 of all the employment contract states that unless otherwise stated, all terms and conditions of</p>	Complied

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		<p>contract are subjected to the Employment Act 1955 and SOCSO Act 1969, and the current MAPA/NUPW agreement. These contracts were prepared in Bahasa Malaysia for Malaysian and Indonesian workers. For Bangladeshi workers, the contracts were also prepared in Bengali.</p> <p>In addition, the Company had also printed and distributed to all workers a booklet entitled Buku Panduan Anggota Pekerja Perladangan which contain applicable labour laws and contents of NUPW/MAPA agreement.</p> <p>Workers interviewed confirmed that the contents of their contracts were explained to them prior to signing and that they had understood the contents.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of employment contract has been taken and details up all the payment and condition of employment.</p> <ol style="list-style-type: none"> 1. Regular working hours: 0630-1430 with 30 minutes rest 2. Rest day : every Saturday 3. Public holiday: 14 days with 5 total compulsory days 4. Sick leave: 14 days (less than 2 years), 18 days (between 2 to 5 years) and 22 days (more than 22 days) 5. Hospitalization : 60 days 6. Maternity leave: 98 days 7. Paternity leave: 7 days 	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Based on review of workers' sampled punch cards, employment contracts and payslips, evidence was available that Bukit Layang Estate were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. sports and recreation club, surau funds, electricity bills, union</p>	Complied

		membership, etc) in accordance with the relevant laws and Labour Office permits.	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	Adequate housing has been provided to all the workers including the sanitations facilities where 1 house with 2 rooms has been occupied by 3-4 workers. Water has been provided through the water treatment plant and electricity through genset. For medical, the is one hospital assistant has been appointed and base at Basir Ismail Estate and will visit the estate 2 times per weeks or any emergency cases. There is surau has been provided and also sport facilities. As per site visit, there is evidence that facilities has been maintained in good condition and line site inspection has been done weekly basis.	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	The nearest town which is Ulu Tiram and Pasir Gudang located 15km from the Bukit Layang Estate. The management has provided transport for all the workers on weekly basis to buy groceries for free. As per interview, there is no plan to established sundry shops in the estate since there is only 33 workers reside in the estate compound. The management commitment is to continue to provide free transportation to workers.	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: 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</p>	<p>Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,500 per month, or more.</p> <p>Bukit Layang Estate have calculated their own prevailing wages and in-kind benefits. The calculation took into account housing, electricity and water, education, creche facilities, healthcare, sports and recreation activities, transport, clothing and food.</p>	Complied

	<p>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 • 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. 		
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	- Minor compliance -		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>There 33 workers has been recruited by the management of Bukit Layang Estate and all has been recruited as permanent workers and has been verified base on the employment contract for sample workers and interview conducted.</p> <p>There are few contractor has been assigned for pruning and harvesting workers (Farah Damia Entepriise and Lim Chee An). As per verification, all workers has been recruited permanently. It has been confirm though stakeholders consultations.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Policy to freedom of association and right to collective bargaining has been established in the document "Core labor standard policy" signed by Managing Director, Mohd Faris Adli Shukery dated 01/10/2021. Mentioned in the policy that the management will recognizes the rights of the employees to form and/or joins trades unions of their choices which are given due to recognition by the management. The policy has been established in Bahasa Malaysia and English.</p> <p>The implementation of the policy has been demonstrated and confirmed base on verification by auditor through memberships documentation and fees payment for 21 workers as National Union Plantation Workers. It also has been confirmed through interview that there is no restriction by the management to be member of trade unions.</p> <p>There is evidence that the policy has been communicated during the morning muster call on 01/03/2023. It has been further verified through interview with sample workers.</p>	Complied

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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>Minutes meeting available between the management of Bukit Layang Estate and workers representative that has been conducted on 09/03/2023 with attendance of management representative, NUPW representative and workers representative. The minutes meeting has been documented in Bahasa Malaysia. It has been verified that all representative that attended has been freely elected through election document and interview</p> <p>There is no issues has been raised during the meeting. The management has taken opportunities to communicate the company policy and procedure during the meeting.</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>Based on audit interview held with NUPW representatives, review of minutes of meetings between NUPW representatives and management evidence was available that management does not interfere with the formation or operation of the NUPW. Workers' representatives were chosen from among the workers as confirmed by the NUPW representatives.</p> <p>The meetings were attended by Malaysian workers as well as foreign workers from Indonesia and Bangladesh.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
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>Policy to protect children and prohibition of child labour and remediation has been established in the document "Core labor standard policy" signed by Managing Director, Mohd Faris Adli Shukery dated 01/10/2021. Mentioned in the policy that the management shall not engage in or support the use of child labour as defined in Malaysia Law and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. Mentioned in the policy that the management will take appropriate action to prevent the use of such labour in connection with the company activities.</p>	Complied

		This requirement is also included in all agreements with its contractors via Addendum to the Agreement.	
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>	It has been verified that the minimum age requirement has been met which is all workers in the operations is above that 18 years old. This has been confirmed by auditor through verification that has been done through interview, document review such as master list, personal document (Identity card/ Passport) and interview.	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>	It has been verified through list of workers, site visit and interview that there is no young workers has been recruited for all operations in the estate. All workers recruited is above than 18 years old.	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>	The policy of no child labour has been communicated to all stakeholders during the stakeholders meetings that has been conducted at The Legends Golf and country resorts on 03/09/2023 While for workers, it has been communicated during the morning muster call on 13/11/2023. It has been further verified through interview with sample workers.	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>	A policy to prevent sexual and all other forms of harassment and violence established in the document "Core labor standard policy" signed by Managing Director, Mohd Faris Adli Shukery dated 01/10/2021. Mentioned in the policy, the management commitment does not support and will not engage in the use of corporate punishment, mental or physical coercion and verbal abuse.	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>	Policy to protect reproductive rights has been established in the document "Core labor standard policy" signed by Managing Director, Mohd Faris Adli Shukery dated 01/10/2021. Mentioned in the policy that the management recognizes and respects the rights and freedoms of employees relating to reproduction and	Complied

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		<p>reproductive health that will include the right to make decision concerning reproduction.</p> <p>Evidence of the implementation of policy has been verified through interview with sample workers where there is no restriction for local workers to reproduce.</p> <p>Communication of the policy has been done to all workers on 13/11/2023</p> <p>It has been further verified through interview with sample workers.</p>	
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>There are only 3 female workers in Bukit Layang Estate, and there is no new mothers has been identified. It has been confirmed through with sample of female workers.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The Company's grievance mechanism is available and documented in Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 Aug 2020. The scope covers all those who deal with Kulim (Malaysia) Berhad and may have complaints or grievances. The aim of this mechanism is to have a documented system for dealing with complaints and grievances that is agreeable and accepted by all stakeholders. Clause 5.8 states that anonymity of complainants will be respected and protected if requested. This mechanism was briefed during muster</p> <p>The Company has established a complaint flowchart for WOW (Carta Alir Aduan WOW). This flowchart shows the different stages involved when WOW receives and handles grievances. The efficiency of handling the grievances can be further improved by incorporating specific timeframes for each stage.</p>	Complied
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			

<p>6.6.1</p>	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>As per verification, there is no forms or trafficked labour has been used for Bukit Layang Estate. It has been verified base on the interview and records.</p> <ol style="list-style-type: none"> a. Retention of passports/ identity document- As per interview at the workers quarters, there is evidence that workers kept passport by their self at the housing which able to show after requested by the auditor. The workers also mentioned that workers need to submit passport 3 months before passport renewal. b. Charging of recruitment fees- Latest recruitment has been done in year 2022 for both local and foreign workers. There is no new recruitment, terminations and promotion in year 2023. c. Contract substitution- As per interview, there is no contract substitution has been practised where workers clearly mentioned that they has been explain on scope of jobs and locations of the workplace. d. Penalty for termination of employment- There is no termination has happen in Bukit Layang Estate e. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview that confirmed that there is no loan/borrowing money given by the management to the workers. There is also no recruitment fee charged to the workers, hence confirmed that there is no debt bondage implemented. As per interview, there is no cost borned by the workers during the recruitment process. From the workers respond, they only used money which is for their own goods. Other cost has been paid by the management. 	<p>Complied</p>
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		Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by the management bank account and can be withdrawn at the nearest ATM and sighted evidence of payment that has been signed by the workers. There is evidence that there were no workers' wages being withheld by the management. It has been further confirmed through interview with the workers	
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>Special labour policy and procedures have been established under the Kulim (Malaysia) Berhad Core Labour Standard signed by Executive Director dated 1/10/2021. This Policy:</p> <ol style="list-style-type: none"> 1) prohibits the employment of children and young persons, forced and bonded labour 2) provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties. 3) workers' entitlement to housing and basic amenities which are at par with statutory requirements. 4) free of discrimination, coercion, or violence 5) rights of employees to join trade unions. 6) accessibility to grievance procedure 7) entitled to one day off per week. <p>Based on pay slips, employment contracts, punch cards reviewed, and interviews conducted with workers, were able to demonstrate the implementation of this Policy</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</p>	Complied

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		<p>30/10/2023 undersigned by the Chairman, Sustainability Sub-Committee – Social Johor Plantations Berhad</p> <p><u>Bukit Layang Estate</u></p> <p>The management has appointed Mr Abu Bakar Mohamed for Chairman of Safety and Health Committee . 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 05/12/2023 (04/2023), 03/09/2023 (03/2023), 31/05/2023 (02/2023) and 27/02/2023 (01/2023)</p>	
<p>6.7.2</p>	<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>1. <u>Bukit Layang Estate</u></p> <ul style="list-style-type: none"> - Emergency Respond Plan (ERP), CPR Training dated 04/12/2023 - Fire Drill Training and Use of Fire Extinguisher dated 04/12/2023 <p>First Aid Kits were available at all sampled work units Spraying Gang, Harvesting Gang, Workshop, 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> <ul style="list-style-type: none"> - First Aid Training was conducted for on 25-26/06/2023 at Sungai Papan Estate. 	<p>Complied</p>

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		<p>The management sent two workers to be a competent first aider. Both certificates of attendance were verified with Serial Number: FA(A)0432/23/10428 and FA(A)0432/23/10434</p> <p><u>Bukit Layang Estate</u></p> <p>There were 0 accident cases reported for the year 2023 in the estate. The JKKP 8 Form has been submitted to DOSH (Ref No: JKKP8/163394/2023, dated 14/01/2024) and available for verification. As for 2024, there were no accident reported in the estate as of to date.</p>									
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</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 aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>	Complied								
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>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 the month of as below:</p> <table border="1" data-bbox="1137 1225 1921 1359"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td></td> <td>Aug 2023</td> <td>41</td> <td>RM 2,127.50</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount		Aug 2023	41	RM 2,127.50	Complied
Operating Unit	Month	Total Workers	Amount								
	Aug 2023	41	RM 2,127.50								

		Bukit Layang Estate	Oct 2023	41	RM 1,727.10															
			Dec 2023	40	RM 2,568.50															
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:				Complied														
		<table border="1"> <thead> <tr> <th rowspan="2">Operating Unit</th> <th colspan="2">2023</th> <th colspan="2">2024 (to date)</th> </tr> <tr> <th>Cases</th> <th>Days</th> <th>Cases</th> <th>Days</th> </tr> </thead> <tbody> <tr> <td>Bukit Layang Estate</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>				Operating Unit	2023		2024 (to date)		Cases	Days	Cases	Days	Bukit Layang Estate	0	0	0	0	
Operating Unit	2023		2024 (to date)																	
	Cases	Days	Cases	Days																
Bukit Layang Estate	0	0	0	0																
* Death case is categorized as loss of 6,000 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 -	<p>The Estate continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <ul style="list-style-type: none"> a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOP ref A O8 dated July 2019. b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as Turnera subulata, Cassia cobanensis, Antigonon leptopus, along the roadsides and designated points in the fields and also within the nursery perimeter. To develop beneficial plant nursery comprised of the beneficial plant. c) The plan also advocated single layer EFB mulching in order 				Complied														

		<p>to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff.</p> <p>d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PC /Agronomist. Baiting is continued until bait acceptance threshold level</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estate. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in the Estate by burning ever since Johor Plantations Berhad practiced zero burning as per the policy in:</p> <p>a) KMB Agricultural Manual SOP Section A04 dated 01/07/2013 - Under felling/clearing & land preparation b) Environmental Policy - dated 01/10/2021 c) Sustainability Policy - 01/10/2021</p> <p>Johor Plantations Berhad has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			

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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 Plantation 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										
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 655 1928 786"> <thead> <tr> <th>Estate</th> <th></th> <th>Sept 2023</th> <th>Oct 2023</th> <th>Nov 2023</th> </tr> </thead> <tbody> <tr> <td>Bukit Layang Estate</td> <td>a.i / Ha</td> <td>0.00159</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>	Estate		Sept 2023	Oct 2023	Nov 2023	Bukit Layang Estate	a.i / Ha	0.00159	0.00	0.00	Complied
Estate		Sept 2023	Oct 2023	Nov 2023									
Bukit Layang Estate	a.i / Ha	0.00159	0.00	0.00									
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> <p>The management has plan on using the roto slasher for possible filed which are suitable for using the slasher on the flat areas.</p> <p>The chemical usage of estate is as per the recommendation from agronomist. Agronomist reports were sighted dated 27/11/2023.</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										

<p>7.2.5</p>	<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> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>The Chemical Registers for Bukit Layang were available for verification and reviewed yearly, dated 01/01/2024 and as and when there are introductions of new chemicals in the operations.</p> <p>The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was purchased in 2018 for the use of trunk injection to combat bagworm infestations. The management have stated in the continuous improvement plan to <i>"continuously use the chemical until balance is zero. To implement use of chemical Class III (Altacor/Adonis) onwards.</i> The last trunk injection was conducted in February 2020. The management intends to dispose the current stock of Class 1B chemicals and substituting to less hazardous chemicals. The management have also increased the planting of beneficial plants at the bagworm prone areas.</p>	<p>Complied</p>						
<p>7.2.6</p>	<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 1187 1921 1345"> <thead> <tr> <th><u>Estate</u></th> <th><u>Training</u></th> <th><u>Date</u></th> </tr> </thead> <tbody> <tr> <td>Bukit Layang Estate</td> <td>Spraying, Spraying Calibration, Spraying – Buffer Zone</td> <td>20/12/2023</td> </tr> </tbody> </table>	<u>Estate</u>	<u>Training</u>	<u>Date</u>	Bukit Layang Estate	Spraying, Spraying Calibration, Spraying – Buffer Zone	20/12/2023	<p>Complied</p>
<u>Estate</u>	<u>Training</u>	<u>Date</u>							
Bukit Layang Estate	Spraying, Spraying Calibration, Spraying – Buffer Zone	20/12/2023							

			Fertilizer Handling	14/04/2023	
			Chemical Handling	20/12/2023	
			Triple Rinsing	27/04/2023	
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 found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store keeper was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</p>			Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste contractors.</p> <p>Verified the disposal records for the sampled estates as below.</p> <ol style="list-style-type: none"> 1. Bukit Layang has disposed the Empty Chemical Container to Licensed 3rd party Contractor, Kualiti Alam Sdn Bhd. Consignment Note (C.N Number: 2023112708DIMJQW) dated 27/11/2023 was available for verification. A total of 0.0445 mt of Empty Chemical Containers was disposed under code SW409. 			Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This</p>	<p>No aerial spraying for pesticide were done in all the estates</p>			Complied

	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 -		
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 have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. There were no use of organophosphate chemicals in all the estates audited. This was verified via the Chemical Register, visit to the Chemical Store of each operating units as well as interview with the respective estate’s pesticide applicators. Nevertheless, the estates conduct monthly health screening at the estate clinics by their own Medical Assistant and records were available for verification. Health surveillances are also done for the workers to identify general health conditions regularly. Records and details of medical surveillance is as per indicator 3.6.2	Complied
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	Bukit Layang Estate have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Internal Memo verified in the estates. 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 <i>"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."</i> Site visit verification found that there are no female workers working in the field, and no female workers working in chemical related environment.	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			

<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>The estate had identified all wastes and sources of pollution. The Waste Management Action Plan 2024 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estate operations among others as summarized below;</p> <ul style="list-style-type: none"> a) Air - Sources from vehicle & generator (smoke and gases), b) Water - Cleaning water/run-off/process station waters c) Land - Scheduled waste, domestic waste and industrial/process waste. <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2024 reviewed annually. The waste generated from the estate operations as shown below:</p> <ul style="list-style-type: none"> a) Scheduled waste -, filter, lubricants, hydraulic oil, grease, used batteries b) Domestic waste - rubbish from the estate complex and employees' quarters c) Industrial waste - scrap iron d) Sewage - Sewage from housing/office complex <p>The pollution identified from the estate activities:</p> <ul style="list-style-type: none"> a) Black smoke - Emission from vehicles/engines b) Leakage of lubricant - Storage & vehicle maintenance 	<p>Complied</p>
<p>7.3.2</p>	<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>The estate adopted a procedure SPO/W1/06-10 Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> a) Management and disposal of waste water 2024 has been established compiled by Assistant Engineer/Assistants/Staff. 	<p>Complied</p>

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- b) Waste Management Plan 2024 has been established prepared by SID and verified by the Assistant Engineer/Assistants/Manager.
- c) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.
- d) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal.
- e) Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled waste is disposed to Kualiti Alam Sdn Bhd registration no 003291 dated 30/04/2024 registered with DOE. Recent records of disposal as shown. SW produced are low quantity due to the small ha of the estate. Records are also checked against the date of generation. Sighted records and confirmed the storage are within the 180 days stipulated period.

		SW	SW	SW	SW	SW	SW
		409	307	305	408	410	109
1	27/11/2023	0.0445	0.0120	0.0950	0.0120	0.0015	0.0012
2	06/03/2023	0.0065	-	0.0400	0.0600	0.0104	0.0006

Domestic waste for the estate is made internally at field no - P03 / Block 1. Collections are made 2/3x week. The landfill site was visited and verified for compliance.

There are procedures and guidelines in the disposal of wastes and pollutants guided by SID Head Office level to minimize pollution on

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		<p>the routine operation. The employees were briefed and trained in subject related to environment among others as shown below;</p> <table border="1" data-bbox="1182 443 1886 885"> <thead> <tr> <th></th> <th>Subject</th> <th>Date</th> </tr> </thead> <tbody> <tr><td>1</td><td>CPR/ERP procedure</td><td>04/12/2023</td></tr> <tr><td>2</td><td>Compound hygiene & disease</td><td>13/07/2023</td></tr> <tr><td>3</td><td>Company Policies</td><td>17/12/2023</td></tr> <tr><td>4</td><td>Recycling Environment - Fire</td><td>27/04/2023</td></tr> <tr><td>5</td><td>RSPO / MSPO awareness</td><td>22/09/2023</td></tr> <tr><td>6</td><td>Buffer Region maintenance</td><td>20/12/2023</td></tr> <tr><td>7</td><td>Oil trap- maintenance</td><td>06/02/2023</td></tr> <tr><td>8</td><td>Scheduled waste inventory /disposal</td><td>16/02/2023</td></tr> <tr><td>9</td><td>Fire - ERP - Zero Burning</td><td>21/02/2023</td></tr> <tr><td>10</td><td>RTE /HCV /Buffer Region</td><td>07/08/2023</td></tr> <tr><td>11</td><td>Landfill Management / SOP</td><td>13/07/2023</td></tr> <tr><td>12</td><td>WTP / Chemical Management</td><td>20/12/2023</td></tr> </tbody> </table>		Subject	Date	1	CPR/ERP procedure	04/12/2023	2	Compound hygiene & disease	13/07/2023	3	Company Policies	17/12/2023	4	Recycling Environment - Fire	27/04/2023	5	RSPO / MSPO awareness	22/09/2023	6	Buffer Region maintenance	20/12/2023	7	Oil trap- maintenance	06/02/2023	8	Scheduled waste inventory /disposal	16/02/2023	9	Fire - ERP - Zero Burning	21/02/2023	10	RTE /HCV /Buffer Region	07/08/2023	11	Landfill Management / SOP	13/07/2023	12	WTP / Chemical Management	20/12/2023	
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7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>Johor Plantations Berhad practices of “Zero open burning” is enforced and elaborated in the Sustainability Policy.</p> <p>a) The operating units adhered to the policy of “Zero open burning” for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. The estate had replanting program spanned over the forthcoming years as shown in 3.1.2.</p> <p>b) 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																																							
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>																																										
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p>	<p>The estate continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate</p>	Complied																																							

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	<p>- Minor compliance -</p>	<p>locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <ul style="list-style-type: none"> a) Kulim Agricultural Manual established in 2011 b) Guidelines On Natural Water Course SOP no A17 01/07/2013 c) Pictorial Safety Standards and Security Guidelines (PSS). d) Laboratory Process Control Manual e) Security Guidelines SOP No E07 dated 01/07/2013 f) Manuring SOP no D01 - D04 dated 01/07/2013 <p>The estate operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the Estate to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. The agronomic assessment and fertilizer recommendation was conducted by AAD (Agronomy and Advisory Dept of Head Office to formulate the FY2024 manuring programme and to suggest relevant agronomic practices for oil palm yield and</p>	Complied

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		<p>growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been carried out in the estate. The latest being:</p> <table border="1" data-bbox="1155 467 1912 568"> <thead> <tr> <th></th> <th colspan="2">Soil Analysis</th> <th colspan="2">Foliar Analysis</th> </tr> <tr> <th></th> <th>Report Date</th> <th>Report No</th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>S1/2023/5/56</td> <td>17/05/23</td> <td>L1/2023/5/130</td> <td>16/04/23</td> </tr> </tbody> </table> <p>Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on a 5-year cycle basis. All foliar and soil sampling & analysis was conducted by Central Analytical Laboratory. of Johor Plantation Bhd. Reports were sighted and verified.</p>		Soil Analysis		Foliar Analysis			Report Date	Report No	Report Date	Report No	1	S1/2023/5/56	17/05/23	L1/2023/5/130	16/04/23	
	Soil Analysis		Foliar Analysis															
	Report Date	Report No	Report Date	Report No														
1	S1/2023/5/56	17/05/23	L1/2023/5/130	16/04/23														
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>All the estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field. There is no other method practiced in relation to EFB mulching/ application of compost due to the distance from the mill and economical factor. There were no replanting activities during the audit visit.</p>	Complied															
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2022/23 was in line with the program. The following fertilizers were applied in the estate upon the recommendation by the Agronomist.</p> <table border="1" data-bbox="1220 1235 1899 1382"> <thead> <tr> <th></th> <th>Fertilizer</th> <th>Kg/palm</th> <th>Application Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MOP</td> <td>1.50</td> <td>Jan / March</td> </tr> <tr> <td>2</td> <td>A Sulphate</td> <td>1.75 – 2.00</td> <td>October</td> </tr> </tbody> </table>		Fertilizer	Kg/palm	Application Month	1	MOP	1.50	Jan / March	2	A Sulphate	1.75 – 2.00	October	Complied			
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.																							
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was available. The soil series in the estate was classified as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Type</th> <th>%</th> <th>Type</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harimau</td> <td>14.80</td> <td>Rengam</td> <td>52.02</td> </tr> <tr> <td>2</td> <td>KerANJI</td> <td>1.99</td> <td>Tebok</td> <td>8.71</td> </tr> <tr> <td>3</td> <td>Tai Tak</td> <td>22.48</td> <td>Total</td> <td>100.00</td> </tr> </tbody> </table> <p>There were no other problem soils (e.g. podzols and acid sulphate soils) in the estate.</p>		Type	%	Type	%	1	Harimau	14.80	Rengam	52.02	2	KerANJI	1.99	Tebok	8.71	3	Tai Tak	22.48	Total	100.00	Complied
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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>Like all Johor Plantations Berhad Estates, the estate continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> a) Slope & River Protection Policy in Section A17 Johor Plantations Berhad Manual b) Buffer Region & 25-degree slope in Section A07 Johor Plantations Berhad Manual c) Land Preparation for Terracing in Section A08 Johor Plantations Berhad Manual. <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction</p>	Complied																				

		<p>terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop <i>mucuna bracteata</i> had been planted along crucial slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the AASD (Agronomy Advisory Service Dept) with details as follows:</p> <table border="1" data-bbox="1191 624 1877 810"> <thead> <tr> <th></th> <th>Topography</th> <th>%</th> <th></th> <th>Topography</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>6.85</td> <td>4</td> <td>12-20</td> <td>7.46</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>42.20</td> <td>5</td> <td>20-25</td> <td>0.11</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>43.36</td> <td>6</td> <td>>25</td> <td>0.02</td> </tr> <tr> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>Total</td> <td>100.00</td> </tr> </tbody> </table>		Topography	%		Topography	%	1	0-2	6.85	4	12-20	7.46	2	2-6	42.20	5	20-25	0.11	3	6-12	43.36	6	>25	0.02	-	-	-	-	Total	100.00	
	Topography	%		Topography	%																												
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-	-	-	-	Total	100.00																												
7.5.3	<p>There is no new planting of oil palm on steep terrain. - Minor compliance -</p>	<p>This compliance being addressed in the Sustainable Policy - "Slope and River Protection" signed by the Managing Director dated 01/10/2021 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly". Similar commitments are also described in the Environmental Policy - dated 01/10/2021</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>Soil surveys are made and available in a soil map for the estate. Topographic contour map is also available which are both used to manage the drainage and road works in the estate. The estate in</p>	Complied																														

	- Critical (Major) compliance -	had no new planting for the current year and also for the forthcoming 5 years operations.	
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Johor Plantations Berhad Group had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are made and available in a soil map at the estate. Topographic contour map is also available which are both used to manage the drainage and road works in the estate. Details as per 7.5.1 and 7.5.2.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in the estate. There was also no new planting in the estate.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil in the estate. There was also no new planting in the estate.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in the estate. There was also no new planting in the estate	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	The water and ground cover management programme are documented in the KMB Agricultural Manual (Water Management in Inland, Costal and Peat lands) issued on 01.07.2011. Details are described in 7.8.1. individual estates and mill had their respective	Complied

		<p>water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> a) Monitor the quality of main water inlet/outlet for pollutants from estate’s operations. b) Good drainage system to ensure adequate water supply for the palm trees via growth monitoring. c) Construction of roadside pits for a good road drainage. d) Contingency during water shortage. e) Monitoring of water level at low lying fields during the monsoon months for flood mitigation. 	
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in the estate. There was also no new planting in the estate.</p>	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in the estate. There was also no new planting in the estate.</p>	Not Applicable

7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in the estate. There was also no new planting in the estate.</p>	Not Applicable								
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>											
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The Water Management Plan 2024 has been established with the recent review made on date 04/01/2024. Among others the plan therein has emphasized;</p> <ul style="list-style-type: none"> a) rainwater harvesting for cleaning purposes, b) water from the reservoir/catchment for the mill operations c) continual training for workers on water efficiency consumption, d) Workers have adequate to clean water. The same water source supplied to the estate are from the same source of supply, own catchment with WTP facilities. e) desilting of water reservoir to retain the reservoir optimal capacity. f) The action plan in event of draught/water pollution. <p>Among others the Water Management Plan 2024 contains the following initiatives.</p> <table border="1" data-bbox="1160 1246 1912 1294"> <thead> <tr> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Source	Activity	Threat	Action Plan					Complied
Source	Activity	Threat	Action Plan								

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			Chemical mixing	Pollution Draught Wastage	Enforcement of buffer Region as non-spraying activities.
			General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.
		Reservoir / pond/ Rain	Line site	Pollution Draught Wastage	Every house is supplied with roof tanks. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.
			Drain upkeep	Interruption water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)
				Water pollution	Prohibit workers from activities at water source Drinking water analysis.

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		<table border="1" data-bbox="1160 363 1910 560"> <tr> <td data-bbox="1160 363 1288 560"></td> <td data-bbox="1288 363 1408 560"></td> <td data-bbox="1408 363 1615 560"></td> <td data-bbox="1615 363 1910 560"> Monitor condition of septic tank Adhere to SW management procedure. </td> </tr> </table> <p data-bbox="1137 563 1933 719">The estate collected water samples for the domestic water consumption twice a year. Analysis made in Decagon Lab & Analytical Testing, Shah Alam Selangor. All parameters are within the limits under Raw Water Quality Standard MOH 2010. Results of analysis dated 23/05/2023.</p> <table border="1" data-bbox="1144 735 1921 1150"> <thead> <tr> <th></th> <th>Parameter</th> <th>Unit</th> <th>Result</th> <th>Regn raw water</th> <th>Std drinking water</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>4.5</td> <td>5.5-9.0</td> <td>6.5-9.0</td> <td>7.1</td> </tr> <tr> <td>2</td> <td>Turbidity</td> <td>-</td> <td>3.64</td> <td>1,000</td> <td>5</td> <td>0.93</td> </tr> <tr> <td>3</td> <td>Aluminium</td> <td>NTU</td> <td>0.32</td> <td>-</td> <td>0.2</td> <td>ND</td> </tr> <tr> <td>4</td> <td>Chlorine</td> <td>mg/L</td> <td>-</td> <td>-</td> <td>0.2-5</td> <td>1.4</td> </tr> <tr> <td>5</td> <td>Coli form</td> <td>mg/L</td> <td>ND</td> <td>5,000</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>6</td> <td>E coli</td> <td>MPN/</td> <td>ND</td> <td>5,000</td> <td>Nil</td> <td>Nil</td> </tr> </tbody> </table>				Monitor condition of septic tank Adhere to SW management procedure.		Parameter	Unit	Result	Regn raw water	Std drinking water	Result	1	PH	-	4.5	5.5-9.0	6.5-9.0	7.1	2	Turbidity	-	3.64	1,000	5	0.93	3	Aluminium	NTU	0.32	-	0.2	ND	4	Chlorine	mg/L	-	-	0.2-5	1.4	5	Coli form	mg/L	ND	5,000	Nil	Nil	6	E coli	MPN/	ND	5,000	Nil	Nil	
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6	E coli	MPN/	ND	5,000	Nil	Nil																																																		
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer Regions has been verified at the Estate water catchment. Riparian buffer regions 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 river banks.</p>	Complied																																																					

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provided there is no evidence of environmental deterioration having occurred during the previous cycle.
- Critical (Major) compliance -

Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the SOP in KMB Agricultural Manual SOP no A17 revised dated 01/07/2013. The buffer regions established are as follows:

	River width	Buffer Region
1	>40 meters	50 meters
2	20 - 40 meters	40 meters
3	10 - 20 meters	20 meters
4	5 - 10 meters	10 meters
5	< 5 meters	5 meters

Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses at 3 points inlet/outlet of Sg Layang and outlet of Sg Johor. Analysis report details as shown below;

		24/12/2023				
	Parameter	Unit	Pt 1	Pt 2	Pt 3	Limit
1	N Nitrogen	mg NO3N/L	1.06	0.67	<0.05	7
2	Phosphate	mg PO4/L	<0.05	<0.05	<0.05	0.2

		05/10/2023				
	Parameter	unit	Pt 1	Pt 2	Pt 3	Limit
1	N Nitrogen	mg NO3N/L	<0.05	<0.05	<0.05	7
2	Phosphate	mg PO4/L	<0.05	<0.05	<0.05	0.2

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		The limit for phosphate and nitrate is 0.2 ppm and 7 ppm respectively. Prevention is made especially during the manuring activities.													
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	There is no POM in the CU of Ladang Bukit Layang.	Not Applicable												
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	There is no POM in the CU of Ladang Bukit Layang.	Not Applicable												
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 2024. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 25%;">Target</th> <th style="width: 30%;">Objective</th> <th style="width: 40%;">Action plan</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Backhoe, tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel.</td> </tr> </tbody> </table>		Target	Objective	Action plan	1	Backhoe, tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles	To record vehicle activity in order to eliminate waste activity which consume fuel.	Complied
	Target	Objective	Action plan												
1	Backhoe, tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel												
2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles	To record vehicle activity in order to eliminate waste activity which consume fuel.												

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	and fuel using mobile equipment	To turn off vehicle engine during idle time. Scheduled servicing for optimal performance
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The diesel utilization for the estate is provided in the below table.
Units in diesel L/FFB mt for 2023

Month	Ratio	Month	Ratio	Month	Ratio
Jan	5.55	May	4.42	Sept	5.09
Feb	6.72	June	5.11	Oct	5.21
Mac	6.91	July	7.98	Nov	5.15
April	7.15	Aug	5.27	Dec	5.99
Total/L	-	-	-	-	52,476
B/line	-	-	-	-	6.00

The estate records and monitors the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e.

- a) Infrastructure of estates
- b) Community size
- c) No. of vehicles / age of machine.
- d) Weather interference / crop production volume

There is no opportunity for the estates to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.

Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The Estate had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none"> a) The management had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report. c) Monitoring of the GHG quantity was done through RSPO Palm GHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO Palm GHG Calculator was correct. 	Complied
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>The Estate had calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1.</p> <p>As verified and checked with management of Kulim Bukit Layang Estate, there was no development within the estate since 2014.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The estate has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EIA) in form doc no KULIM-LBL-2024 which covers estate activities / operation. Pollution Identification Environmental Improvement Management</p>	Complied

		<p>Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</p> <p>The objectives are to minimize environmental impact (pollution and emission) from all estates and mill operations activities among others;</p> <ul style="list-style-type: none"> a) Monitoring of buffer region near water course b) Inlet/outlet water monitoring for nitrate and phosphate c) Cleaning and monitoring on PCD d) Maintenance and inspection of vehicles e) Erosion control program - cover crop and Guatemala grass f) Monitoring of SW disposal/transfer g) Triple rinsing empty chemicals <p>Among others the significant environmental receptors for the estate operations are;</p> <ul style="list-style-type: none"> a) Air - Sources from vehicle & generator (smoke and gases) b) Water - Cleaning water/run-off/process station waters c) Land - Scheduled waste, domestic waste and industrial/process waste <p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions. The Waste & Pollution Management Plan 2024 is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <ul style="list-style-type: none"> a) Scheduled wastes – disposed to Kualiti Alam Sdn Bhd. Details as shown in 7.3.2 above. 	
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		<ul style="list-style-type: none"> b) Domestic waste is disposed at respective internal landfill. c) Full compliance to zero burning practices. 					
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area							
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in the Estate by burning ever since Johor Plantations Berhad practiced zero burning as per the content in:</p> <ul style="list-style-type: none"> a) Under KMB SOP A04-A07 Replanting felling/clearing & land preparation b) Environmental Policy signed by the Managing Director dated 01/10/2021 <p>Johor Plantations Berhad has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estate, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estates. No fire was used for waste disposal.</p>	Complied				
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>This is established in the ERP procedure. Therein containing</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>The procedure was formalized by Sustainability & Innovation Department for use in all operating units in Northern Region Estates and Mills. Training related to fire drill /prevention were held respectively the estate among others as shown below;</p> <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <td style="width: 70%;"></td> <td style="width: 30%;"></td> </tr> <tr> <td>Subject</td> <td>Date</td> </tr> </table>			Subject	Date	Complied
Subject	Date						

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		<table border="1"> <tr> <td>1</td> <td>CPR/ERP procedure</td> <td>04/12/2023</td> </tr> <tr> <td>2</td> <td>Company Policies</td> <td>17/12/2023</td> </tr> <tr> <td>3</td> <td>Recycling Environment - Fire</td> <td>27/04/2023</td> </tr> <tr> <td>4</td> <td>RSPO / MSPO awareness</td> <td>22/09/2023</td> </tr> <tr> <td>5</td> <td>Fire - ERP - Zero Burning</td> <td>21/02/2023</td> </tr> </table>	1	CPR/ERP procedure	04/12/2023	2	Company Policies	17/12/2023	3	Recycling Environment - Fire	27/04/2023	4	RSPO / MSPO awareness	22/09/2023	5	Fire - ERP - Zero Burning	21/02/2023	
1	CPR/ERP procedure	04/12/2023																
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3	Recycling Environment - Fire	27/04/2023																
4	RSPO / MSPO awareness	22/09/2023																
5	Fire - ERP - Zero Burning	21/02/2023																
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The entire Northern Region Estates and Mill including Bukit Layang Estate held a combined meeting (Stakeholders Meeting) on 03/09/2023 with 63 participants present. Information in slides form in relation to ERP procedure - Program Pencegahan Kebakaran and Fire Prevention and Control Measure were presented. Therein containing;</p> <ul style="list-style-type: none"> a) Objective b) Activity and Fire Prevention. <ul style="list-style-type: none"> i. Avoidance of land clearing using fire ii. No fire to be used in peat soil fields iii. In event of fire occurrence to contact the estate/mill management or Fire Department iv. In event of any fire occurrence in the neighbouring properties the estate/mill management to at best level provide assistance with available resources. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>The meeting also recorded to date there were no report or incidence relating to fire within the complex and surrounding communities.</p>	Complied															
<p>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.</p>																		

<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>The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</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 HCV assessment was made reviewed internally by SID Department and an Assistant Manager titled "Laporan Biodiversiti Ladang Bukit Layang" dated 14/03/2019. Both Assessors attended courses / program among others related to:</p> <ul style="list-style-type: none"> a) Internal HCV Assessor by Wild Asia 12/12/2018 b) Tiger Project with Government Agencies /NGO c) RTE/HCV courses by PERHILITAN d) Conflict management human-elephant e) Survey Birds & Bats with Wildlife Conservation Society (WCS) <p>The assessments were made in relation to the Rapid Biodiversity Assessment the reports have 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 estate and address the RSPO P&C relevant to biodiversity conservation and HCV. Therein providing details relating to the following;</p> <ul style="list-style-type: none"> 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 	<p>Complied</p>

h) Immediate and long-term effect.

The HCV assessment methodologies are through site observation, interviews, stakeholders' consultation and desktop review on available secondary data. The assessment among others covers the following areas;

- a) Overview of HCV assessment.
- b) Description of assessment areas.
- c) Finding and discussion
 - landscape context
 - HCV criteria and application to agriculture
- d) HCV monitoring and management

In summary the HCV present within the estate landholdings as summarized below.

	Field	Description	HCV
1	P00/3	Mangrove / Belukar (Bushes/Shrub)	3, 4
2	P00/3	Mangrove Reserve / Low Tides Areas	3, 4
3	P03/1	Mangrove Reserve / Low Tides Areas	3, 4
4	P14/1	Water Catchment / Mangrove Reserve	3, 4
5	P03/2	Water Catchment Pond Bukit Layang	4
6	P14/2	Sg Layang Boundary Reserve	4
7	P03/2	Sg Layang Boundary Reserve	4
8	P14/B2	Indian & Muslim Cemetery	6

		The audit findings have confirmed that there is no new planting clearing after 15 November 2018 affecting present HCV and primary forest.	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in the estate.</p> <p>The HCV assessment methodologies are through site observation, interviews, stakeholders' consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none"> e) Overview of HCV assessment. f) Description of assessment areas. g) Finding and discussion <ul style="list-style-type: none"> i. landscape context ii. HCV criteria and application to agriculture iii. HCV monitoring and management <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PI/RC and also personnel from the SID Department. Sighting of RTE is made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</p> <p>The entire Region estates and mill held a combined meeting on 03/09/2023 with 63 participants present. Information in slides form in relation to RTE / HCV / Biodiversity management in the organization were presented. Therein containing the integrated</p>	Complied

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		<p>management plan comprises among others covering the following scope.</p> <ul style="list-style-type: none"> a) Biological Diversity b) Management of High Conservation Value Area. <ul style="list-style-type: none"> i. There are 6 categories of HCV in the estates and mill ii. The HCV management using the concept of Access, plan, action and monitoring c) Rare Threatened and Endangered Species <ul style="list-style-type: none"> i. Definition and protection under law ii. Disciplinary action / Punishment / Legality Consequences iii. Continuous monitoring of RTE / HCV iv. Flow chart of RTE Conflict management d) Emergency Evacuation Plan / Drill 	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There were no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation operations. There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2024.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in the estate.</p>	Complied

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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in the estates. Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PI/RC and also personnel from the SID Department. Sighting of RTE is made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new land clearing affecting areas of HCVs, HCS forests peatland and other conservation areas.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **[2023]** for **[Bukit Layang Estate]** and supply base was calculated using the PalmGHG Calculator version 3.0.1. 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 **[2023]** for **[Bukit Layang Estate]** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	NA
PKO	NA

Extraction	%
OER	NA
KER	NA

Production	t/yr
FFB Process	NA
CPO Produced	NA
PKO Produced	NA

Land Use	Ha
OP Planted Area	371.10
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	12.89
Total	383.99

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	3,665.22	0.59	0.00	0.00	0.00	0.00	3,665.22	0.59
CO ₂ Emission from fertilizer	196.45	0.03	0.00	0.00	0.00	0.00	196.45	0.03
NO ₂ Emission	229.78	0.04	0.00	0.00	0.00	0.00	229.78	0.04
Fuel Consumption	141.38	0.02	0.00	0.00	0.00	0.00	141.38	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-3,474.14	-0.56	0.00	0.00	0.00	0.00	-3,474.14	-0.56
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	758.68	0.12	0.00	0.00	0.00	0.00	758.68	0.12

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	0.00	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	0.00	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

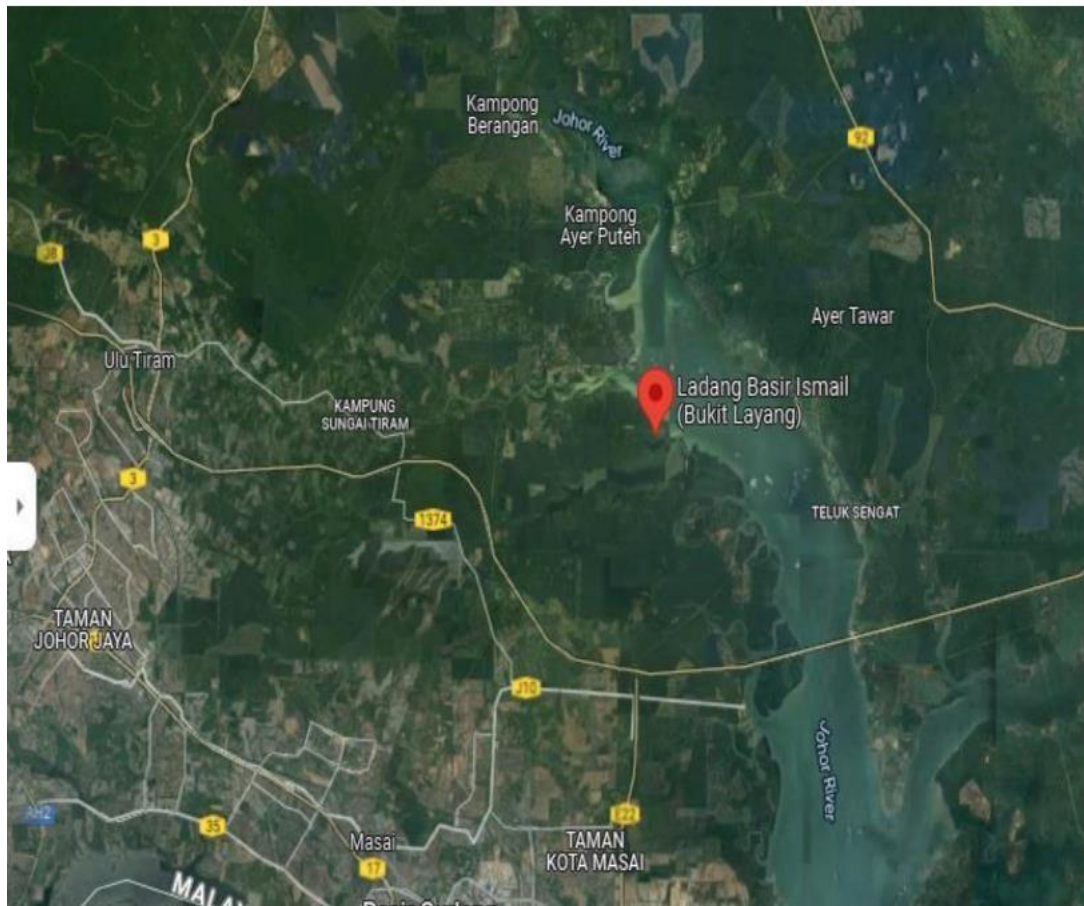
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

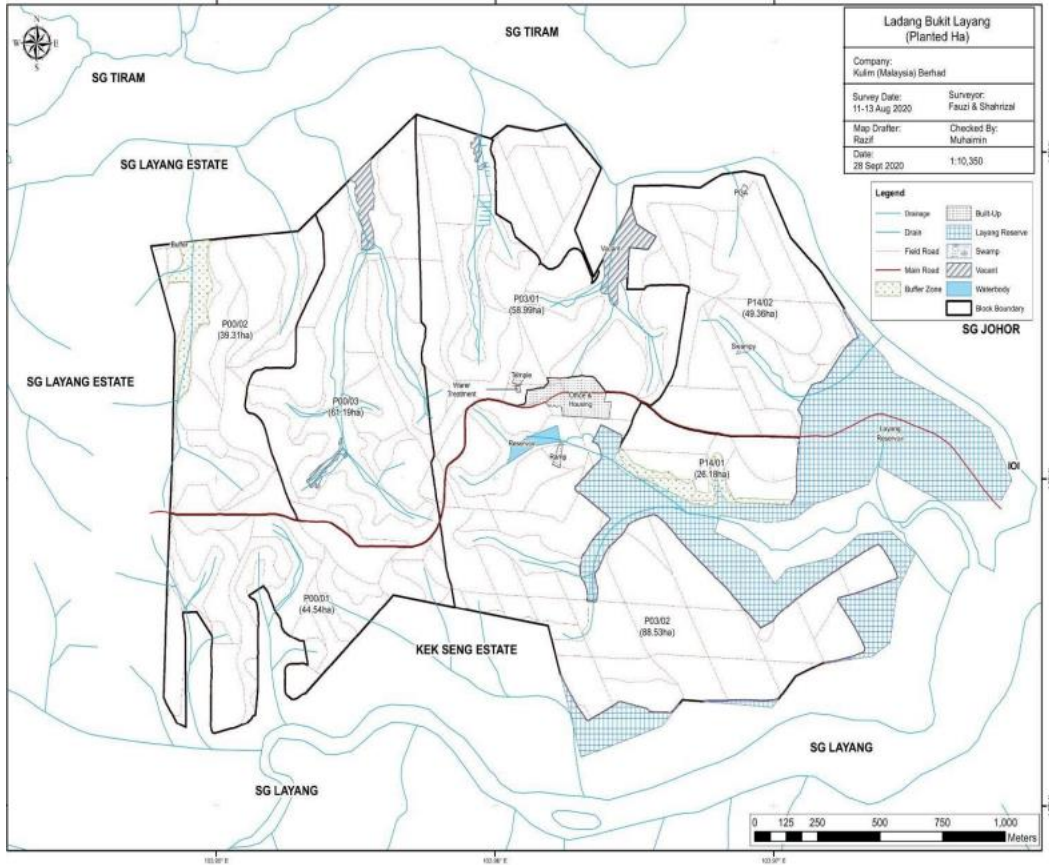
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	0

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

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

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
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