

GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)

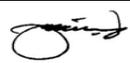
CERTIFICATION AUDIT REPORT

Part 4 : General Principles for Palm Oil Mills

TH Plantations Berhad
Sungai Tenegang Complex [Mill]

-Group Certification-

MAIN ASSESSMENT AUDIT 01st April 2019

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	24/05/19	Issued as Draft Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
A	07/06/19	Peer Review 1 Comments	Remi bin Rasidi	Peer Reviewer 1	
A	07/06/19	Peer Review 2 Comments	Mohd Zuhaili bin Mukri	Peer Reviewer 2	
B	08/06/19	Issued as Final Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	17/06/19	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	

Acknowledgment by TH Plantations Berhad					
Rev	Date	Description	Management Representative	Role	Signature
B	17/06/19	Acceptance of the contents	Mr. Ahmad Anuar bin Sairi	General Manager (CEO's Office)	

Declaration

The auditor(s) has (had) no personal, business or other ties to the client and the assessment is carried out objectively and independently.

WITH INTEGRITY WE SERVE



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Table of Contents

SECTION I : PUBLIC SUMMARY REPORT	3
1.1 Certification Scope	3
1.2 Company details and Contact information.....	3
1.3 Certification Unit.....	3
1.4 Map Showing Geographical Location	4
1.5 Production Area, Actual and Projected FFB Production (MT)	5
1.6 Certificate Details.....	6
1.7 Qualification of the Lead Assessor and Assessment Team.....	7
1.8 Audit Methodology	8
1.9 Audit Plan Information	8
1.10 Audit Result Summary Findings	8
1.11 Stakeholder Consultation.....	9
1.12 Recommendation	12
1.13 Date of Next Surveillance Audit.....	12
1.14 Confidentiality	12
1.15 Abbreviations Used	12
SECTION II : ASSESSMENT FINDINGS BY PRINCIPLES AND CRITERIA.....	14
2.1 Principle 1 : Management commitment and responsibility.....	14
2.2 Principle 2 : Transparency	17
2.3 Principle 3 : Compliance to legal requirements.....	20
2.4 Principle 4 : Social responsibility, health, safety and employment condition	26
2.5 Principle 5 : Environment, natural resources, biodiversity, and ecosystem services	36
2.6 Principle 6 : Best practices.....	44
2.7 Details of Audit Findings.....	46

Note: Section II of this report contain confidential information and been protected from public disclosure.

SECTION I : PUBLIC SUMMARY REPORT

1.1 Certification Scope

Global Gateway Certifications Sdn. Bhd. (GGC) has conducted the Certification Assessment of **TH Plantations Berhad, Sungai Tenegang Complex [Mill]**. During this **Main Assessment (Stage 2) Audit**, the audit team were briefed by sustainability member, of the supply base disposition. The source of FFB supplies to Sungai Tenegang POM are from their own estates [Sungai Tenegang Estate, Bukit Belian Estate, Sungai Koyah Estate & Bukit Gold Estate] and from out-grower and other smallholders.

This assessment was conducted onsite on **01st April 2019** to assess the compliance of the certification unit against the "**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills**". The scope of certification is "**Production Of Sustainable Crude Palm Oil And Palm Kernel**".

1.2 Company details and Contact information

Company Name	TH Plantations Berhad
Business Address	Menara TH Platinum, Level 31-35, No. 9 Persiaran KLCC, 50088 Kuala Lumpur.
Contact Person	Mr. Ahmad Anuar bin Sairi
Office Telephone	+603 2603 4800
E-Mail	anuar@thplantations.com

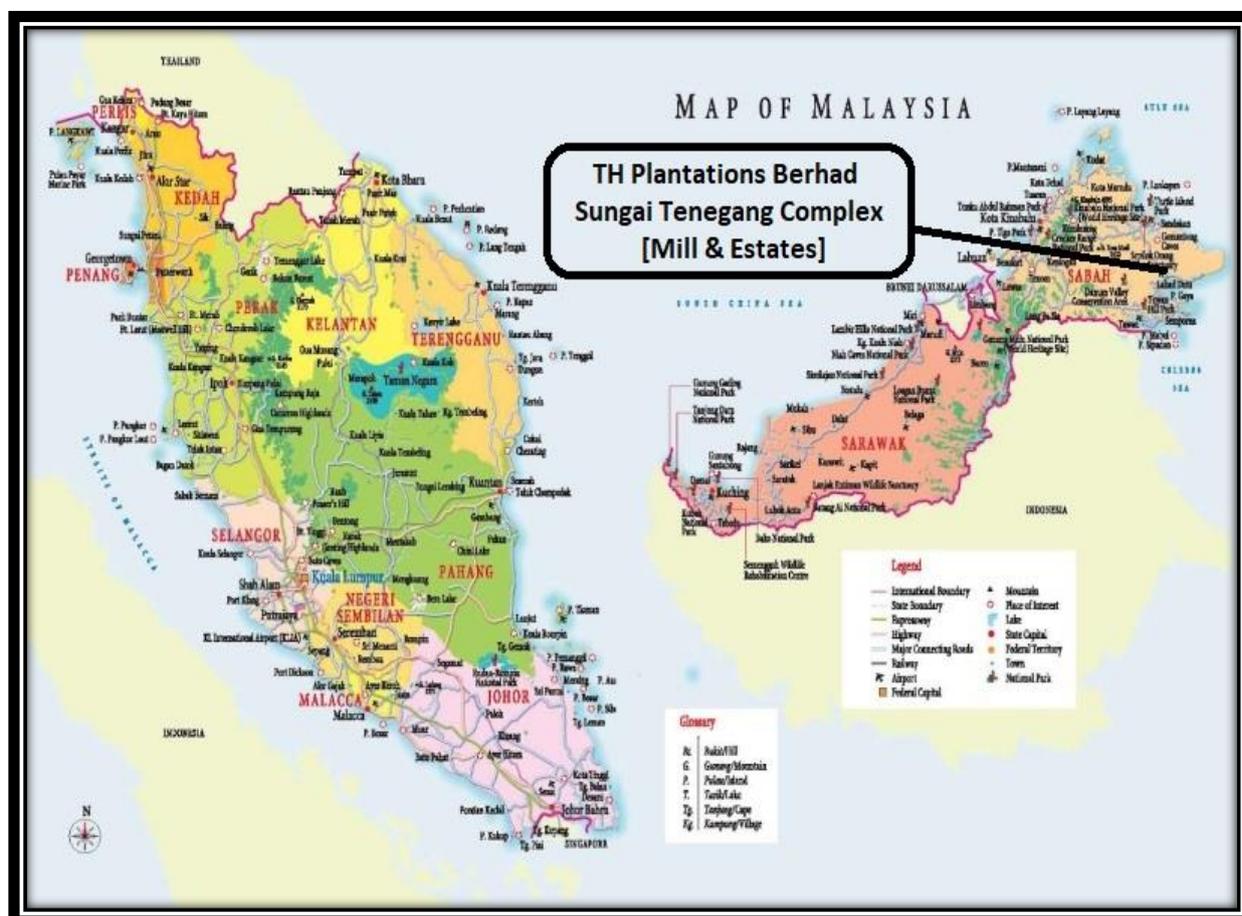
1.3 Certification Unit

Name of the Certification Unit	Kilang Sawit Sungai Tenegang	
Mill Capacity (MT/HR)	30	
Site Address	KM 41, Jalan Lahad Datu - Sandakan, Peti Surat 60626, 91115 Lahad Datu, Sabah.	
GPS Reference of the site office	Longitude	E 118°01'0"
	Latitude	N 5°12'59"

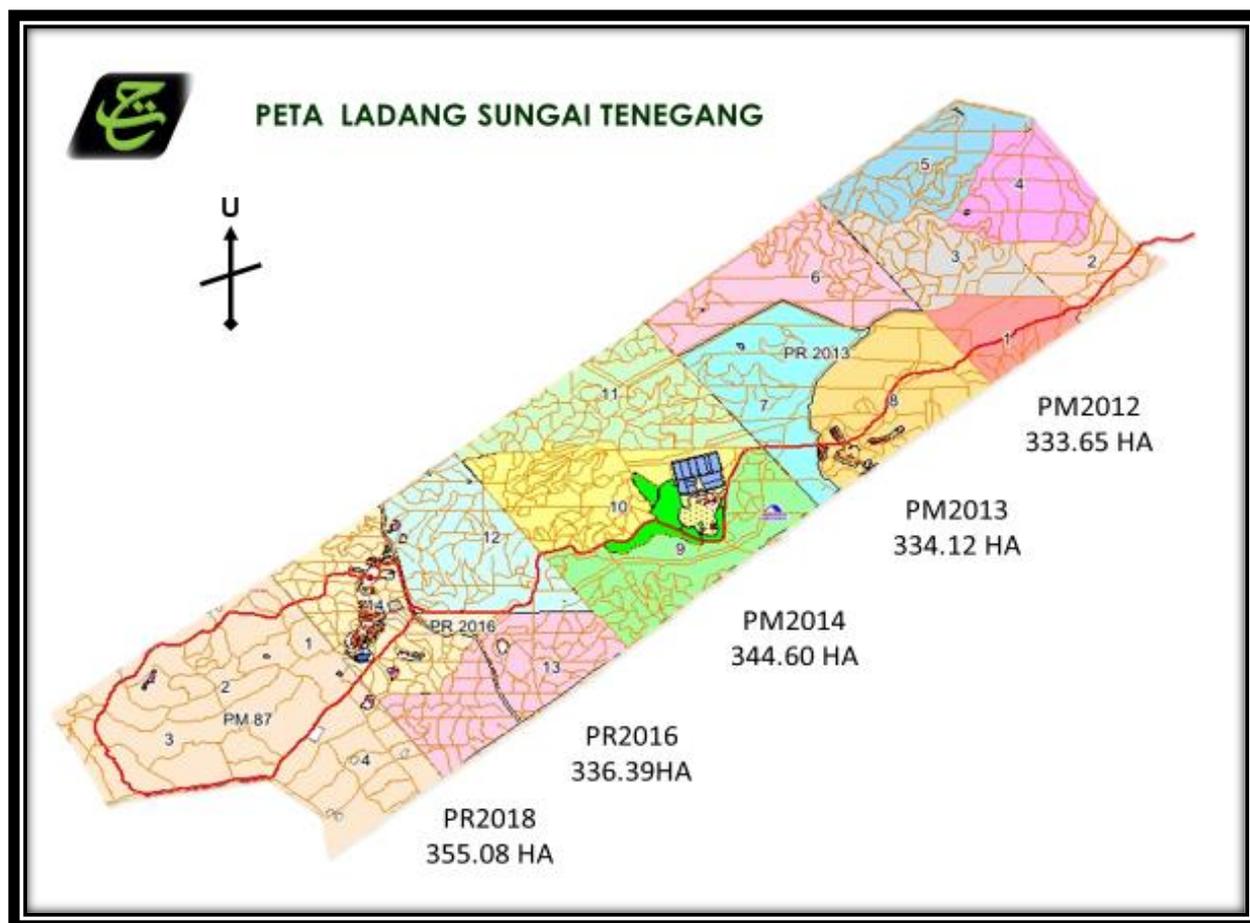
MPOB License Information	License No.	509162704000
	Scope of Activity	<ol style="list-style-type: none"> 1. Menjual dan Mengalih – PK, CPO, SPO 2. Membeli dan Mengalih – FFB, PK, CPO 3. Menyimpan – PK, CPO, SPO 4. Mengilang FFB
	Expiry Date	31 st August 2020
Others Sustainability Certification	NIL	

1.4 Map Showing Geographical Location

1) TH Plantations Berhad – Sungai Tenegang Complex [Mill & Estates]



2) Kilang Sawit Sungai Tenegang (Share with Sungai Tenegang Estate Land Title)



1.5 Production Area, Actual and Projected FFB Production (MT)

Production for Certified Unit

Kilang Sawit Sungai Tenegang	Projected from last audit	Actual Production for 12 Months [Mar 2018-Feb 2019]	Projected Production for next 12 Months [Mar 2019-Feb 2020]
FFB Summary (MT)	NIL	NIL	99,112
CPO Summary (MT)	NIL	NIL	20,070.18
PK Summary (MT)	NIL	NIL	4,707.82

FFB's Own Estate & Certified Estate

Production for Uncertified Unit

Kilang Sawit Sungai Tenegang	Projected from last audit	Actual Production for 12 Months [Mar 2018-Feb 2019]	Projected Production for next 12 Months [Mar 2019-Feb 2020]
FFB Summary (MT)	NIL	1,923.82	1,598.00
CPO Summary (MT)	NIL	398.76	323.60
PK Summary (MT)	NIL	90.79	75.91

1.6 Certificate Details

Certification body	Global Gateway Certifications Sdn. Bhd., No. 10 Jalan Rasmi 7, Taman Rasmi Jaya, 68000 Ampang, Selangor Darul Ehsan, Malaysia. Tel.: +603 4256 2689; Fax: +603 4256 2687 Website: www.ggc.my
Assessment standard	(MSPO) Part 4: General Principles for Palm Oil Mills
Certificate number	GGC-THPB007-MSPO-00-2019
Initial certificate issued date	17 th June 2019
Certificate expiry date	16 th June 2024
Stage 1 assessment date	15 th February 2019
Stage 2 / Main Assessment	01 st April 2019
Annual Surveillance 1 [ASA 1]	March 2020
Annual Surveillance 2 [ASA 2]	March 2021
Annual Surveillance 3 [ASA 3]	March 2022
Annual Surveillance 4 [ASA 4]	March 2023

1.7 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: **Muhammad Syafiq bin Abd Razak**

Graduate in plantation management with more than 7 years working experience in various plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Fully trained in similar agriculture certification programs such as RSPO, SCCS, MSPO and etc. Qualified as Lead Auditor/Auditor in several certification programme. Involved in RSPO and MSPO assessment since 2014. Involved in audits conducted in for many different companies in Malaysia, Indonesia, Australia, Pakistan, India, Arab Saudi and Ivory Coast. Completed and certified MSPO Auditor course in 2014 (3rd Batch) held by MPOB. Member of GGC MSPO audit team.

Experienced in handling mineral and peat soil oil palm estate. Knowledgeable in chemical in control of weeds and pest & disease in Oil Palm Plantation sector. Understanding in Industrial relation and labour law. Attended OSH Act 1994 & Regulations and Factories & Machinery Act 1967 & Regulations Training. Participated in Workshop for Oil Palm Growers on Peat at Bogor, Indonesia. Completed and attended Social Impact Assessment Training at Bogor, Indonesia organized by Remark Asia. Also, has attended training for RSPO GHG calculation on year 2015 in Kuala Lumpur.

During this assessment, he assessed on the aspect of Management Commitment & Responsibility, Transparency, Legal, Safety and Health, Social, Stakeholder's Consultation, Workers Welfare, Environment, Best Practices and etc. He is able to speak and understand Bahasa Malaysia and English.

Auditor

Name: **Ismadi bin Hj. Ismail**

He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang. 24 years of working experiences with various plantation companies and skills in Best Agriculture Practices (GAP) for plantation. Fully trained in CoP, MSPO and OSHAS. Qualified as Lead Auditor/Auditor for MSPO and CoP. Involved in MSPO assessment since 2017. Completed and certified MSPO Auditor course in 2017 held by SGS (M) Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of Transparency, Safety and Health, Employment Condition, Social and Community Engagements, Stakeholder's Consultation and Workers Welfare. Able to speak and understand Bahasa Malaysia and English.

Auditor

Name: **Hj. Ahmad bin Sukiman**

He holds MSc Plantation Management from Universiti Putra Malaysia (UPM). Above 30 years of working experiences with various plantation companies and skills in Best Agriculture Practices (GAP) for plantation. Fully trained in MSPO and qualified as Lead Auditor/Auditor for MSPO. Involved in MSPO assessment since 2015. Completed and certified MSPO Auditor course in 2015 held by DQS Certification (M) Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of Legal, Stakeholder's Consultation, Workers Welfare and Environment. Able to speak and understand Bahasa Malaysia and English.

1.8 Audit Methodology

The audit was conducted based on sampling following the method as specified in the MSPO requirements (MSPO-Questionnaire Self-Assessment – RA). The sampling was calculated and determined prior to the audit assessment. In the case of this certification unit, sampling calculation was not applied as there is only one palm oil mill, namely "**Kilang Sawit Sungai Tenegang**".

The assessment activities include of documents review and site inspection. The documents that had been reviewed among others were company policy, internal procedures, management system procedures, waste management procedures, legal documents etc. Significant issues that would impact to the environmental and social were also been verified.

The methodology for collection of objective evidence was established during physical site inspections, observation of tasks and processes, interviews of stakeholders, interview of officers, review of documents and data. Checklists and questionnaires were used to guide the collection of information and the comments made by external stakeholders were also been taken into consideration in this assessment.

Appendix A (Audit Plan) details the actual assessment plan. Stakeholders were consulted randomly during the assessment to obtain feedback on the management compliance and performance (Appendix C) of MSPO.

1.9 Audit Plan Information

Audit Date	01 st April 2019
Name of site(s) visited	Kilang Sawit Sungai Tenegang
Total number of man-days spent	3 man-days

1.10 Audit Result Summary Findings

Findings category		
Category	Numbers	Status (Closed/Open/Not Applicable/No Action Requires)
Major Nonconformities	2	Closed
Minor Nonconformities	0	No action requires
Area of Concern	1	No action requires
Noteworthy /Positive Comments	5	No action requires

1.11 Stakeholder Consultation

As per ACB-Malaysian Sustainable Palm Oil (MSPO); ACB-OPMC4; Issue 1, 01st August 2017; Stakeholder Consultation Requirements For Certification Bodies Operating Oil Palm Management Certification Under Malaysian Sustainable Palm Oil (MSPO) Certification Scheme. The consultation during the audit will be carried out during the stage 2 and recertification audit of the management unit. The CB shall carry out stakeholder consultation to ensure continued compliance with the requirements of the certification standards. However, stakeholders' consultation during surveillance audit may be limited to those stakeholders who have raised concerns, complaints or disputes prior to the audit.

GGC has published the public notification on 22nd February 2019 and as to accommodate a stakeholders' consultation meeting for mill and estates. Therefore, it was conducted on 28th March 2019 – 01st April 2019 in TH Plantations Berhad, Sungai Tenegang Complex [Mill & Estates] to gather information from the local communities in accordance to Certification Scheme and Stakeholder Consultation requirements.

During this Main Assessment (Stage 2) audit, the audit team has conducted stakeholder consultations involving both internal and external stakeholders as to understand the practices in relation to environmental, social performance and their performance with respect to the MSPO requirements. The meeting was conducted without the present of mill management.

At the start of meeting, the auditor explained the purpose of the audit followed by an evaluation of the relationship between the stakeholders before discussions continued. The auditor recorded comments made by stakeholders and verified with the mill management before incorporating into the assessment findings. There was no negative complaint or feedback received during the audit or during the field assessment when interviewing with the external and internal stakeholders. The details is as per table below:

No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken. [What we did]	Assessment team findings [Outcome]
1.	Stakeholders A (Government Agency)	<ul style="list-style-type: none"> Requested the entrance gate to be accessible 24 hours in consideration of occasional teacher requirement and emergency cases. Requested the management's representative to attend important school events. 	Management may continue to be supportive with the school requests.	Will review by next surveillance audit
2.	Stakeholders B (Government Agency)	<ul style="list-style-type: none"> Suggested the management to organize Fire & Safety Briefing twice a year. To provide one more unit of fire extinguisher on the 2nd floor of the guest house. To provide appropriate emergency light (exit point) as part of the Emergency Response Plan. 	Management may consider the suggestions in line with the Continuous Improvement Plan	Will review by next surveillance audit

3.	Stakeholders C (Government Agency)	<ul style="list-style-type: none"> With the existence of Auxiliary Police, its help a lot on controlling crime. 	Management to continue and strengthen the good relationship with local PDRM unit.	Positive findings
4.	Stakeholders D (Government Agency)	<ul style="list-style-type: none"> Suggested to have its own HUWANA for diseases control. Requested entrance gate to be operational 24 hours in case of emergency. Independent statistics is needed by the Department for its database. Requested Auxiliary Police to check and record any movements of unknown persons. 	Management may consider the suggestions in order to contain contagious diseases.	Will review by next surveillance audit
5.	Stakeholder E (NGO)	<ul style="list-style-type: none"> Suggested the management to have its own school building for non-resident children (HUMANA) in order to ensure children safety and welfare. NGO will provide the teacher and P & P The NGO requested to conduct census on the number of children eligible for schooling. 	Management may consider the suggestions for its Continuous Improvement Plan.	Will review by next surveillance audit
6.	Stakeholders F (Contractors)	<ul style="list-style-type: none"> They have good understanding about MSPO. He is clear that if he employs a worker, he has to officially inform estate management. He also knows the working hours, minimum salary, Socso & EPF (for local workers) that has to be paid as he has been briefed in the Stakeholders meeting. They informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work. They were aware that any complaints or suggestions could be forwarded to the mill/estate management. 	No action requires	Positive findings

		<ul style="list-style-type: none"> • He is very happy with the management and hopes to continue his contract for a long time. • The company has good relation with supplier and there is no issue with company's performance. 		
7.	Stakeholders G (Contractors)	<ul style="list-style-type: none"> • Most of the stakeholders attended the meeting are aware about the MSPO. • Most of them has little knowledge on the existence of method/ mechanism of complaints/ grievances. 	Management will continue briefing to all stakeholders on MSPO and complaint and grievance mechanism	Will review by next surveillance audit
8.	Stakeholder H (Mill workers)	<ul style="list-style-type: none"> • MSPO awareness, company policy and SOP are briefed among workers during muster call. • Personal Protective Equipment are distributed free of charged by management. • They have good understanding about complaint and grievance mechanism. • They are very happy with the management and hopes to continue their contract for a long time. • Company well managing the welfare, health and safety of their workers. • Housing facilities is provided with water and electrical supply. • They have been treated equally without any discrimination. Their salary was according to Minimum Wage Order 2018. 	No action requires	Positive findings
9.	Stakeholders I (Mill - Gender Committee Representatives)	<ul style="list-style-type: none"> • They have been treated equally without any discrimination. • No sexual harassment reported. 	No action requires	Positive findings

1.12 Recommendation

The company has established sustainability policy, objectives and procedures that define an effective system for the administration and control of sustainability management system throughout all operation activities of TH Plantations Berhad, Sungai Tenegang Complex [Mill]. Senior Mill Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual. All operating units also assist by TH Plantations Berhad, Sustainability and Investor Relations Department.

The management is committed to comply with MSPO system by giving awareness training to all personnel involved in this standard to make them understand the procedures and implementation of the standard. The employees are aware of the requirements of MSPO. There was no complaint or feedback received during this Main Assessment (Stage 2) Audit.

This report will be internally reviewed prior to certification decision by GGC and externally peer reviewed by independents panel reviewers (qualified and trained by MPOCC). During this Main Assessment (Stage 2) Audit [based on MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO)] Part 4: General Principles For Palm Oil Mills, there were 2 major non-conformities and 1 area of concern have been raised to the facility that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted of major non-conformity findings is closed. Therefore, the Lead Auditor recommends a certificate of compliance **"MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles For Palm Oil Mills"** is awarded to TH Plantations Berhad, Kilang Sawit Sungai Tenegang.

1.13 Date of Next Surveillance Audit

The first annual surveillance assessment visit will be scheduled after 12 months of the MSPO Certificate being issued.

1.14 Confidentiality

GGC auditors will not discuss or reveal any of the confidential information seen during the audit to any third party. Any public summary of the main assessment will be approved by the client prior to publication.

1.15 Abbreviations Used

BOD	Biological Oxygen Demand
CHRA	Chemical Health & Risk Assessment
CIP	Continuous Improvement Plan
COD	Chemical Oxygen Demand
CoP	Code of Practise
CSPO	Certified Sustainable Palm Oil
CPO	Crude Palm Oil
CSPK	Certified Sustainable Palm Kernel
DOE	Department of Environmental
DOSH	Department of Occupational Safety and Health Malaysia
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan

FFB	Fresh Fruit Bunch
FGS	Finished Good Stock
GAP	Good Agriculture Practise
GHG	Greenhouse Gas
GGC	Global Gateway Certifications Sdn Bhd
HIRARC	Hazard Identification, Risk Assessment and Risk Control
ISCC	International Sustainability & Carbon Certification
IPM	Integrated Pest Management
MPOB	Malaysian Palm Oil Board
MSPO	Malaysian Sustainable Palm Oil
NCR	Non-Conformance Report
NGO	Non-Government Organization
OHS	Occupational Health & Safety
OHSAS	Occupational Health and Safety Assessment Series
PK	Palm Kernel
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
SEIA	Social Environmental Impact Assessment
SOP	Standard Operating
SPO	Sludge Palm Oil



SECTION II : ASSESSMENT FINDINGS BY PRINCIPLES AND CRITERIA

2.1 Principle 1 : Management commitment and responsibility

Criterion 1 Malaysian Sustainable Palm Oil (MSPO) Policy

Indicator 1 Policy for the implementation of MSPO shall be established.

Summary TH Plantations Berhad has established Sustainability Policy. The policy has been proved by Mr. Muzmi bin Mohamed; Chief Executive Officer dated on 1st March 2019.

Stakeholder Meeting was conducted on 12th December 2018 by En. Ghazali bin Ab Talib, The Estate Senior Manager attended by 100 stakeholders. The meeting was collaborated between Sungai Tenegang, Sungai Koyah, Bukit Belian, Bukit Gold and Tenegang Palm Oil Mill.

MSPO Awareness for Internal Stakeholder was conducted on

1. 17th February 2019 by En. Muhamad Murshid Mukhtar (Mill Sr. Assistant Manager), attended by 57 participants.
2. 18th March 2019 by En. Muhamad Murshid Mukhtar (Mill Sr. Assistant Manager), attended by 19 participants.
3. 19th March 2019 by En. Muhamad Murshid Mukhtar (Mill Sr. Assistant Manager), attended by 23 participants.

In Compliance **Yes** No Not Applicable

Indicator 2 The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation.

Summary TH Plantations Berhad has established Sustainability Policy. The policy has been proved by Mr. Muzmi bin Mohamed; Chief Executive Officer dated on 1st March 2019.

Stated in the Sustainability Policy; Point no 2 – “To continuously improve our operations in line with social, environmental and economic requirements”.

In Compliance **Yes** No Not Applicable

Criterion 2 Internal audit

Indicator 1 Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.

Summary TH Plantations Berhad has established MSPO Procedure on the Internal Audit. MSPO-TH-01; Rev 0; Date 10/01/2018. The internal audit done annually by team appointed as Internal Auditors from TH Plantations Berhad, Head Quarters.

In Compliance **Yes** No Not Applicable

Indicator 2 The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.

Summary TH Plantations Berhad has established MSPO Procedure on the Internal Audit. MSPO-TH-01; Rev 0; Date 10/01/2018.

The purpose of this procedure is to describe the audit process conducted internally to determine TH Plantations Berhad's estate and mill operations are effectively implemented to comply with the Malaysian Sustainable Palm Oil (MSPO) standards.

The internal audit conducted by En. Mohd Uzair bin Rozali and En. Mohd Shahrul bin Usran on 19th November 2018. 5 major, 1 minor Non – conformities and 4 area of concern being raised during audit. The Non – conformities being closed on 06th December 2019.

In Compliance **Yes** No Not Applicable

Indicator 3 Reports shall be made available to the management for their review.

Summary Sighted the internal audit report done by Sustainability & Investor Relations Department. Conducted by En. Mohd Uzair bin Rozali and En. Mohd Shahrul bin Usran on 16th November 2018. 8 major and 1 minor Non – conformities being raised during audit. The report is available for Management to review and being responded in timely manner.

In Compliance **Yes** No Not Applicable

Criterion 3 Management review

Indicator 1 The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.

Summary TH Plantations Berhad has established the Management Review Procedure. MSPO-TH-02; Rev 0; Date 10/01/2018.

Sighted "Management Review Meeting 02/2019" on 30th November 2018. Prepared by En. Muhamad Murshid Mukhtar (Mill Sr. Assistant Manager) and approved by En. Kamar bin Jamain (Mill Sr. Manager).

As per stated in the procedure, the estate manager is responsible for arranging the meeting, preparing meeting agenda, determine scheduled date and meeting minutes. The agenda shall be as listed below:

1. Review action items from previous meetings.
2. Review the suitability of the policy.
3. Review process performance and product conformity including suitability and achievement of the quality objectives and other measures.



4. Review feedback from customers and other interested parties including data relating to customer perception of whether the organization has met customer requirements (include positive feedback as well complaints). Review customer delivery performance.
5. Review summary and status of non-conformities.
6. Review any changes or requirements that might affect the QMS, e.g. revisions to the MSPO standard, legal & regulatory issues or new processes.
7. Review resource issues such as:
 - Human – current adequacy and future needs, competency, training, organization chart and job descriptions (responsibility, authority and communication);
 - Facility – adequacy, suitability and maintenance of buildings, work environment and services (e.g. communications).
8. Any other business or quality planning. (e.g financial, social, environmental, statutory, regulatory, marketing, etc)

In Compliance **Yes** **No** **Not Applicable**

Criterion 4 Continual improvement

Indicator 1 The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.

Summary TH Plantations Berhad has established Sustainability Policy. The policy has been proved by Mr. Muzmi bin Mohamed; Chief Executive Officer dated on 1st March 2019. Stated in the Sustainability Policy; Point no 2 – “To continuously improve our operations in line with social, environmental and economic requirements”.

TH Plantations Berhad has established the Management Review Procedure. MSPO-TH-02; Rev 0; Date 10/01/2018, Appendix 2: Continuous Improvement Plan. As evidence, sighted continuous improvement plan for Sungai Tenegang POM. Sample taken:

1. 1 Unit BOD Analysis for POME
2. 1 Lot Effluent Mini Lab Equipment
3. 1 Unit Electrostatic Precipitator (ESP)
4. Block (1X4) Worker Quarters

In Compliance **Yes** **No** **Not Applicable**

Indicator 2 The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.

Summary There is no new application of new technology implemented during the certification period. The current practices continued and guide by Mill Advisor and Engineering Department.

In Compliance **Yes** **No** **Not Applicable**



2.2 Principle 2 : Transparency

Criterion 1 Transparency of information and documents relevant to MSPO requirements

Indicator 1 The management shall communicate adequate information to other stakeholders on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.

Summary TH Plantations Berhad has established the Stakeholder Communication & Consultation Procedure. MSPO-TH-03; Rev 2; Date 5/04/2018.

Sighted stakeholders' meeting with:

a) External Stakeholders

- Stakeholder Meeting was conducted on 12th December 2018 by En. Ghazali bin Ab Talib, The Estate Senior Manager attended by 100 stakeholders. The meeting was collaborated between Sungai Tenegang, Sungai Koyah, Bukit Belian, Bukit Gold and Tenegang Palm Oil Mill.

b) Internal Stakeholders

- Latest meeting with Internal Stakeholders was held on 17th February 2019, 18th March 2019 and 19th March 2019 attended by 155 internal stakeholders throughout the sessions. The meeting was conducted by Mill Manager. Sighted in the minutes of meeting the agenda on Complaints and Request Procedure, Environmental and Policies being briefed to all workforce.

In Compliance **Yes** No Not Applicable

Indicator 2 Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes

Summary Sighted Reference Document List guideline by Head, Sustainability and Investor Relations, last updated 10th April 2018 as stated below:-

No	Reference Document	Confidential	Non-Confidential
1	Policy		/
2	Standard Operating Procedure	/	
3	Management and Discussion Analysis		/
4	Corporate Information		/
5	Corporate Structure		/
6	Board Directors		/
7	Senior management Profiles		/
8	Corporate Responsibility		/



9	Statement of Corporate Governance		/
10	Statement on Risk Management & Internal Control		/
11	Audit Committee Report		/
12	Additional Compliance Information		/
13	Performance Statistic		/
14	Consolidated Financial Statements		/
15	www.thplantations.com.my		/

All these documents were sighted in the estate office. Requests for official documents through the estate office will have to go through the estate manager/assistant in charge, whom will make the decision as to whether the information can be shared to or viewed by the person requesting the information or document.

In Compliance **Yes** No Not Applicable

Criterion 2 Transparent method of communication and consultation

Indicator 1 Procedures shall be established for consultation and communication with the relevant stakeholders.

Summary TH Plantations Berhad has established the Stakeholder Communication & Consultation Procedure. MSPO-TH-03; Date 5th April 2018 (second release).

The Standard Operating Procedure has identified mechanism for consultation and communication with the relevant stakeholders.

In Compliance **Yes** No Not Applicable

Indicator 2 The management shall nominate management officials at the operating unit responsible for issues related to Indicator 1 (4.2.2.1).

Summary The person in charge for transparency agenda is Puan Norhasifah binti Andi Ngara and Lokman bin Abd Rahil, appointed on 14th November 2018 by the Mill Senior Manager, En. Kamar Jamian.

In Compliance **Yes** No Not Applicable

Indicator 3 A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.



Summary Sighted latest stakeholders list updated on 8th March 2019. The stakeholders list was updated by En. Khatrina Tyongkeng.

	No of stakeholders
Estate & Mill	14
Government	22
Supplier / Contractor	60
School	4
FFB Supplier	21
Total	119

In Compliance **Yes** No Not Applicable

Criterion 3 Traceability

Indicator 1 The management shall commit itself to implement and maintain the requirements for traceability and shall establish a standard operation procedure for traceability.

Summary The THP has established the MSPO Procedure: Title FFB Traceability. MSPO-TH-04; Rev 0; Date 1st November 2017.

Sighted all records done by Mill Management. Sighted the Security will check the followings before the vehicles are allow to enter the mill premises:-

- a) Date
- b) Vehicle Number
- c) Name of driver
- d) Name of Supplying Estate / Field No
- e) Time in / Out

Later, the loaded FFB to be weighed at the weighbridge:-

- a) Date of weighing
- b) Name of Supplier
- c) Gross/Tare/Net Weight
- d) Contact Number
- e) Weighbridge ticket number
- f) Description of contents
- g) Vehicle number
- h) Name of driver
- i) Time in / out

Then, the FFB being unload at ramp and the crop being graded by grading team. Result of grading being recorded in Grading Chit.

Upon completion, the vehicles need to weigh empty in order to obtain actual FFB weight, data synchronizing from the first weighing.



The lorry will left the mill with Received Ticket.

Base on interview with Puan Norhafisah bt Andi Ngara the weighbridge personnel, she well versed with the procedures.

In Compliance **Yes** No Not Applicable

Indicator 2 The management shall conduct regular inspections on compliance with the established traceability system.

Summary The Mill Management team holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Mill Advisor and Internal Audit Team. The effectiveness of the monitoring will evidence in the internal audit and visit report findings.

In Compliance **Yes** No Not Applicable

Indicator 3 The management shall identify and assign suitable employees to implement and maintain the traceability system.

Summary The person in charge for traceability agenda is Puan Norhasifah binti Andi Ngara and Lokman bin Abd Rahil, appointed on 14th November 2018 by the Mill Senior Manager, En. Kamar Jamian.

In Compliance **Yes** No Not Applicable

Indicator 4 Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.

Summary Purchases and sales will base on demand and has agreeable documentation with the supplier. Sighted the records of sales, delivery or transportation of FFB. This record being maintained and the documents are kept by the both site (estate and mill).

In Compliance **Yes** No Not Applicable

2.3 Principle 3 : Compliance to legal requirements

Criterion 1 Regulatory requirements

Indicator 1 All operations shall be in compliance with applicable local, national and ratified international laws and regulations.

Summary The company has established and updated list of applicable laws and regulations that are applicable for the Mill as per "Plantation Quality Management System (PQMS) – Summary Compliance. The legal register is prepared by SIR Department.

Sighted the Summary of Compliance updated on 07.02.2019. It includes the following:
 1) Occupational Safety and Health Act 1994



- 2) Factories and Machinery Act, 1967
- 3) Uniform Building By Law, 1986
- 4) Petroleum (Safety Measures) Act, 1984
- 5) Electricity Supply Act, 1990
- 6) Fire Service Act, 1984
- 7) Code of practice for safe working in a confined space, 2001
- 8) Environmental Quality Act 1974
- 9) Local Government Act, 1976
- 10) Workers' Minimum Standards of Housing and Amenities Act 1990
- 11) Akta Kerja 1955
- 12) Employee Provident Fund Act 1991
- 13) Employees Social Security Act 1969
- 14) Akta Kesatuan Sekerja, 1959
- 15) Minimum Retirement Age Act, 2012
- 16) National Wage Consultative Council Act 2011, Minimum Wages Order 2018
- 17) Weights and Measures Regulations 1981.
- 18) Sabah Labour Ordinance
- 19) Jadual Pematuhan, Department of Environment
- 20) Jadual Pematuhan, Department of Environment (for THP Sabaco Sdn Bhd No Lesen:001892, validity 01.07.2018 to 30.06.2019)
- 21) MPOB, 1998

The list covered the details requirements that related to MSPO compliance. These documents include information on title of laws, subject, reference number, etc, requirement, status of compliance and enforcing agency.

However, one major non conformity has been raised to Kilang Sawit Sungai Tenegang. Details as per below:

- 1) Evidence on overtime records for Mr. Samsul bin Mustafa, Employee's Code: TKI0316 for the works done from January 2019 till March 2019.

Month	No. of Days Work	No. of Days Exceeded (4hrs/Day)
January 2019	26	6
February 2019	24	7
March 2019	26	13

- 2) No evidence of Sungai Tenegang POM obtaining "Lesen Untuk Menggaji Pekerja Bukan Pemastautin" Seksyen 118, Ordinan Buruh (Sabah Bab 67) from Jabatan Tenaga Kerja.
- 3) No evidence of re-test on Standard Threshold Shift being conducted to En. Kadir bin Abung – AT 252246 since 2017. Part VI Audiometric Testing Programme, Regulation 23 - Retest.
 - If the registered medical practitioner, after reviewing the annual and baseline audiograms of the employee and after taking into consideration the effect of temporary threshold shift, is of an opinion that a standard threshold shift has occurred, he shall notify the

occupier and the occupier shall retest the employee within three months from the date of the last audiometric test.

One area of concern also has been raised due to Kilang Sawit Sg. Tenegang has utilized estate quota for obtaining the work permit for mill workers. Sample taken on Ayub Tabulu, a watchman, Passport No. AT253499, Nationality: Indonesia, employed as "plantation workers" with THP Sabaco Sdn Bhd.

In Compliance Yes **No** Not Applicable

Indicator 2 The management shall list all relevant laws related to their operations in a legal requirements register.

Summary Sighted list of permits/licenses being monitored and updated by Pn Sitti Raeffidah Binti Awang such as;

- a) MPOB License No. 509162704000 valid till 31.08.2019
- b) Perakuan Penentuan Timbang dan Sukat, No Siri Alat: 114732 (60mt) last inspected by Metrology Corporation Malaysia Sdn Bhd on 04.12.2018.
- c) Jadual Pematuhan, Department of Environment (for THP Sabaco Sdn Bhd No Lesen:001892, validity 01.07.2018 to 30.06.2019)
- d) Permit Barang Kawalan Berjadual No Siri P: Q00004(LDT) No Rujukan : KPDNHEP.LDT.900.3/1(06/2004)P for 20,000 liters Diesel expiry 21.01.2020).
- e) Sighted "Surat Sokongan Pelesenan" from Jabatan Bomba dan Penyelamat Malaysia, Zon Tawau Sabah dated 29.04.2016.
- f) Lesen Bagi Pemasangan Persendirian No Siri 33062, Akta Bekalan Elektrik 1990 (Peraturan 9) for a period of 30.12.2018 to 29.12.2019.
- g) Lesen Jabatan Alam Sekitar under Seksyen 18(1), Akta Kualiti Alam Sekeliling 1974 for "Menduduki atau menggunakan premis yang ditetapkan" expiry 30.06.2019.
- h) Perakuan Kelayakan Mesin Angkat, The Factories and Machineries Act, 1967 No. Perakuan: PMA-SB/18 11788 for 5,000kg expiry 10.07.2019.
- i) Perakuan Kelayakan Mesin Angkat, The Factories and Machineries Act, 1967 No. Perakuan: PMA-SB/18 11787 for 6,300kg expiry 10.07.2019.
- j) Perakuan Kelayakan Dandang, The Factories and Machineries Act, 1967 No. Perakuan: PMD-SB/18 13319 for Boiler, 2,500 kilo pascal expiry 10.07.2019.
- k) Perakuan Kelayakan Pengandung Tekanan Tak Berapi, The Factories and Machineries Act, 1967 No. Perakuan: PMT-SB/18 11785 for Bekas Udara expiry 10.07.2019.
- l) Perakuan Kelayakan Pengandung Tekanan Tak Berapi, The Factories and Machineries Act, 1967 No. Perakuan: PMT-SB/18 11786 for Sterilizer expiry 10.07.2019.
- m) Perakuan Kelayakan Pengandung Tekanan Tak Berapi, The Factories and Machineries Act, 1967 No. for Steam Receiver expiry 10.07.2019.
- n) Perakuan Kelayakan Pengandung Tekanan Tak Berapi, The Factories and Machineries Act, 1967 No. Perakuan: PMT-SB/18 14462 for Sterilizer expiry 13.08.2019
- o) Lesen (Peraturan 5) Peraturan-peraturan cukai jualan negeri 1999, No. Lesen: KEW/MKS/12/99 effective 10.06.2010.

- p) Certificate of Registration, windfall profit levy Act 1998, Reg No.:S13-199900000005 as a producer of CPO effective 27.01.1999
- q) Perakuan Kebolehan, Peraturan 5(2), No Perakuan 068/98 for Mr Kamar Bin Jamian (Jurutera Stim Gred Dua) effective 22.12.1998.
- r) Perakuan Kebolehan, Peraturan 5(2), No Perakuan H/ED/42/91 for Abdul Rahman Bin Hj Ibrahim, I.C. No. H8024751 (Drebar Enjin Gred Dua) effective 06.02.1991.
- s) Perakuan Kebolehan, Peraturan 5(2), No Perakuan SB/12/EIS/01/4 for Mr Isnin Bin Hajarun, I.C No. 710312-12-5483 (Dandang Stim dan Enjin-Enjin Stim Gred Satu) effective 17.01.2011.
- t) Perakuan Kekompetenan sebagai Penjaga Jentera, Akta Bekalan Elektrik, 1990 No. Perakuan PJ-T-4-B-0008-2006 for Mr Ali Bin Enchuda@Udah, I.C. No. 661002-12-5615 effective 13.02.2006
- u) Perakuan Kekompetenan sebagai Pendawai, Akta Bekalan Elektrik, 1990 No. Perakuan PW-T-2-B-0793-2014 for Mr Mohd Warhamdi Bin Rahman, I.C. No. 930103-12-5537 effective 05.05.2014
- v) Sighted "Senarai Alat Pemadam Api" – 23 unit for the Mill premise, 8 unit for staff housing and 26 unit for workers housing areas expiry 01.10.2019, 02.10.2019, 16.11.2019.

Permit Sekatan Kerja Lebih Masa (had maksima 120 jam dan pekerja tidak boleh dibenarkan bekerja lebih 12 jam sehari) for a period of 22.02.2018 to 22.02.2020.

Sighted Permit Potongan Daripada Gaji Pekerja Seksyen 113 (4), Ordinan Buruh (Sabah Bab 67) which was expired by 01.11.2018 for the following purposes;

- a) Bayaran Pemprosesan Dokumen Perjalanan (tidak termasuk bayaran levi, jaminan bank, insuran pampasan am pekerja dan pemeriksaan kesihatan (GROWARISAN)
- b) Pembelian kerbau untuk tujuan mengangkut buah kelapa sawit.
- c) Pembelian barangan runcit/kantin
- d) Barangan stor (minyak diesel, petrol, air bateri dan helmet.
- e) Pembelian sabit kelapa sawit yang dirosakkan atau dihilangkan
- f) Tabung haji
- g) Tabung pekerja
- h) Bayaran potongan perubatan
- i) Potongan bayaran zakat
- j) Bayaran passport (tanggungan pekerja)

However, sighted letter of extension JTK.H.KBN.600-14/1/16 dated 17.12.2018 addressed to Pengarah Tenaga Kerja, Sabah with regards to "Memohon pembaharuan permit potongan gaji pekerja di bawah Seksyen 113 (4) Ordinan Buruh (Sabah Bab 67) THP Sabaco Sdn Bhd".

Sighted "Senarai Kakitangan dan Keluarga - KSST". Weekly workers quarters site inspection visited by Hospital Assistant, Mr Abd Rahman Bin Sabran on 17.03.2019.

In Compliance **Yes** No Not Applicable

Indicator 3 The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.

Summary Based on interview conducted, Pn Salmah Binti Salior (Kerani Am) did mentioned that any new amendments to any regulations through the following manner:

- HQ Department
- Communication with law/enforcement officers
- Enquiring the laws books publisher
- Website

In Compliance **Yes** No Not Applicable

Indicator 4 The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.

Summary Sighted letter of appointment for the responsible person, Pn Sitti Raeffidah Binti Awang and Cik Suriyanti Binti Ahmat signed by Mr Kamar Bin Jamian (Senior Manager) dated 14.11.2018.

In Compliance **Yes** No Not Applicable

Criterion 2 Land use rights

Indicator 1 The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.

Summary The Mill is situated in the Land Title of CL095314122 valid till 31.12.2083 with the approximate area of 21.41ha. The copy of land title is kept in the mill office and was sighted during the audit. Evidence of annual payment of land cess paid by Sungai Tenegang Estate to Majlis Daerah Kota Kinabatangan. Sighted also quit rent paid by Sungai Tenegang Estate to Jabatan Tanah dan Ukur Kota Kinabatangan.

In Compliance **Yes** No Not Applicable

Indicator 2 The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.

Summary Sighted Land ownership of the company in the Land Title of CL095314122 belongs to Syarikat Sabaco Sdn Bhd. Observed estate has made effort to transfer the land ownership to THP Sabaco Sdn Bhd as per the following chronology:

- 1) On 07.03.2019 – wrote a letter to Jabatan Tanah dan Ukur, Kota Kinabatangan but was directed to bring the case to be referred to Jabatan Tanah dan Ukur, Kota Kinabalu.
- 2) On 14.03.2019 – Submitted the application to change of name of owner (Code LSF1871) at Jabatan Tanah dan Ukur, Kota Kinabalu. Sighted evidence of presentation slip No. PC19030906344 with Ref No. PRSLIP0320191394873592 represented by Mr Zainul Ariff Bin Mhamod.

Mill was built within the Sungai Tenegang Estate's area.

In Compliance **Yes** No Not Applicable



Indicator 3 Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground, where practicable.

Summary As the mill was built within the Sungai Tenegang Estate's area, the permanent fence had been constructed to demarcate the vicinity of the mill area. Mill is situated within the estate land title No. CL095314122.

In Compliance **Yes** No Not Applicable

Indicator 4 Where there are, or have been disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).

Summary As the mill is built within Sungai Tenegang Estate, no disputes have been recorded in mill area. There is no evidence of conflict present in this mill. There is no violence in instigated violence in maintaining peace because company has a clear procedure for land conflict.

In Compliance **Yes** No Not Applicable

Criterion 3 Customary land rights

Indicator 1 Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.

Summary As the mill is built within Sungai Tenegang Estate, no disputes have been recorded in mill area. There is no evidence of conflict present in this mill.

In Compliance **Yes** No Not Applicable

Indicator 2 Maps of an appropriate scale showing extent of recognized customary rights shall be made available.

Summary As the Mill is built within Sungai Tenegang Estate, thus no issue of land encumbered by customary rights.

In Compliance **Yes** No Not Applicable

Indicator 3 Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.

Summary There is no land conflict or disputes recorded by the mill. The Mill land title and ownership are legally identified and documented.

In Compliance **Yes** No Not Applicable



2.4 Principle 4 : Social responsibility, health, safety and employment condition

Criterion 1 Social impact assessment (SIA)

Indicator 1 Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.

Summary Sighted, the latest Social Impact Assessment was conducted on 22nd January 2019. The purpose of Social Impact Assessment is to measure and assessing on "Kenderaan berat melalui jalan utama dan masuk Ke Kilang, perlepasan asap hitam daripada operasi dandang kilang dan bau busuk daripada operasi kolam effluent kilang".

20 respondents were involved in the assessment. Seen in the review report, the mitigation plan on the negative's response. Post assessment was conducted on 5th March 2019.

In Compliance **Yes** No Not Applicable

Criterion 2 Complaints and grievances

Indicator 1 A system for dealing with complaints and grievances shall be established and documented.

Summary Sighted MSPO Procedure, Stakeholder Communication and Consultation Procedures, Ref No: MSPO – TH -03, Rev: 0, Dated 1st November 2017 and Second Release on 5th April 2018 has been established and documented. Sample of Grievance Form as per Appendix 3.

The procedure and flowchart outlined the mechanism to handle issues highlighted by all the stakeholders and resolved effectively, timely and appropriate manner that is accepted by all parties.

In Compliance **Yes** No Not Applicable

Indicator 2 The system shall be able to resolves disputes in an effective, timely and appropriate manner, which is accepted by all parties.

Summary Merely, one complaint being recorded in 2018 and zero in 2019 to date. Complaints forms seen and being responded by the Management. Seen samples of complaints dated 2/2/19 by Mr. Sabri Soton on "Jalan masuk kawasan perumahan pekerja dan workshop rosak teruk". Work was completed on 5th February 2019 by sending the machinery to repair the road.

In Compliance **Yes** No Not Applicable

Indicator 3 A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.

Summary Complaint Form seen for External and Internal Stakeholders. Complaint form is available at the office and the complaint being place in the Drop Box outside the office.

In Compliance **Yes** No Not Applicable

Indicator 4 Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.

Summary Stakeholder Meeting was conducted on 12th December 2018 by En. Ghazali bin Ab Talib, The Estate Senior Manager attended by 100 stakeholders. The meeting was collaborated between Sungai Tenegang, Sungai Koyah, Bukit Belian, Bukit Gold and Tenegang Palm Oil Mill.

Latest meeting with Internal Stakeholders was held on 17th February 2019, 18th March 2019 and 19th March 2019 attended by 155 internal stakeholders throughout the 3 sessions. The meeting was conducted by Mill Manager. Sighted in the minutes of meeting the agenda on Complaints and Request Procedure, Environmental and Policies being briefed to all workforce.

In Compliance **Yes** No Not Applicable

Indicator 5 Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.

Summary Merely, one complaint being recorded thus far. Issues is attended and has been resolved in timely manner.

In Compliance **Yes** No Not Applicable

Criterion 3 Commitment to contribute to local sustainable development

Indicator 1 Palm oil millers should contribute to local development in consultation with the local communities. Where the mill is an integral part of a plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.

Summary Mill is committed and have contributed to local development. The contribution made to the internal and external stakeholders. As evidence, the management has organized activities as follows:-

- Sighted, a Corporate Social Responsibility contribution on Pertandingan Badminton Wanita 2018 for Mill Sungai Tenegang Staffs and Workers dated 20th October 2018 – 31st October 2018.

In Compliance **Yes** No Not Applicable

Criterion 4 Employees safety and health

Indicator 1 An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act139) shall be documented, effectively communicated and implemented.

Summary Sighted the Occupational Safety & Health Policy. Established on 1st March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language. The policy being displayed at the Notice Board



and awareness programme to all the Stakeholders. 2019 OSH Plan sighted with an objective "Kearah Kemalangan Sifar".

In Compliance **Yes** No Not Applicable

Indicator 2 The occupational safety and health plan shall cover the following:

- a) A safety and health policy, which is communicated and implemented.
- b) The risks of all operations shall be assessed and documented.
- c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:
 - i) all employees involved are adequately trained on safe working practices; and
 - ii) all precautions attached to products should be properly observed and applied.
- d) The management shall provide the appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).
- e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.
- f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.
- g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meetings shall be kept and the concerns of the employees and any remedial actions taken shall be recorded.
- h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.
- i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.
- j) Records shall be kept of all accidents and be reviewed periodically a t quarterly intervals.

Summary Sighted the Occupational Safety & Health Policy. Established on 1st March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.

Adequate HIRARC being assessed and documented. Risk assessment was conducted through HIRARC based on the severity and the likelihood. HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive). HIRAC review date: 20st October 2018.

The Mill has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training 2019 file.



NO	TOPIC	MONTH PROGRAMME
1	1st Aid Training	Apr / Oct 19
2	Fire drill	Apr / Oct 19
3	PPE Training	Apr / Oct 19
4	ERP	Apr / Oct 19
5	Confined Space	April 19

Training records for PPE Training was sighted on 19th February 2019 conducted by Mill Executives attended by 62 participants.

Mill has provided appropriate PPE for all workers in their operations. Person in-charge of in issuing PPE is En Abdul Jumaat Md Daud, the Storekeeper. PPE Issuance and replacement record sighted for:-

- 1) Staff/AP
- 2) General Workers

The type of PPE is included in the HIRARC assessment chart for all type of job activities.

Company has established Standard Operating Procedure for transporting, receiving, handling, storage and disposal of chemicals, MNL/OSH/2009/1 - 1.14 dated 1st March 2009.

The last CHRA was conducted on 3rd March 2016 to 15th March 2016 by Hajah Noormahani Harun, JKKP HIE 217/171-2 (154) & Aisyah Borhan, JKKP HQ/12/ASS/00/309.

The person in charge for OSH is En. Kamar Jamian the Senior Manager of the Mill dated 17th January 2019. OSH Committee Chart 2019 sighted. Seen, Letter of appointment for committee members dated 14th March 2019. The committee meeting has been conducted as follows :-

- 1) 27th March 2019
- 2) 4th December 2018
- 3) 4th September 2018

To discuss all issues regarding worker's safety and health.

Emergency Response Procedure Standard Operating Procedure, MNL/OSH/2009/1-1.21 dated 1st March 2009 sighted. The ERP has clearly justified procedures when dealing with chemical spillage, accident and others.

Emergency response plan include the emergency contact number, Emergency Respond Plan Procedure and exit routes in file and notice board. ERP Chart 2019 indicates En. Abdul Rahman bin Sabran as First Aider for Sungai Tenegang Mill.

Sighted, JKKP 8 (I & II)/(IV) being submitted on annually basis to the DOSH. LTA calculation based on local interpretation from DOSH.

However, one major non-conformity has been raised to Kilang Sawit Sungai Tenegang due to no evidence Medical surveillance being conducted to Storekeeper, En Abdul Jummat Md Daud as recommended in Chemical Health Risk assessment and Part IX - Health Surveillance Regulation 27. Health surveillance programme.

- If an employee is exposed or likely to be exposed to chemicals hazardous to health listed in Schedule II, the health surveillance required under sub regulation (1) shall include medical surveillance conducted at intervals of not more than twelve months or at such shorter intervals as determined by the occupational health doctor or an occupational safety and health officer who is also a medical practitioner.

In Compliance Yes **No** Not Applicable

Criterion 5 Employment conditions

Indicator 1 The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.

Summary Sighted in the Social Policy on Respect and protection of basic Human Rights of all Employees (including temporary, contract and/or foreign workers) Established on 1st March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language

This policy covers:-

- "Mematuhi perundangan dan peraturan – peraturan yang ditetapkan termasuk untuk undang –undang buruh, undang –undang hakmilik tanah serta perumahan pekerja".
- "Memastikan polisi persaraan minima dipatuhi".
- "Menyediakan latihan dan pembangunan yang berkaitan dengan peranan dan tanggungjawab pekerja dan kakitangan tersebut".
- "Melarang pengambilan tenaga kerja tidak sah secara paksaan dan pekerja di bawah umur".
- "Membayar gaji kepada pekerja dan kakitangan berdasarkan perintah gaji minima".
- "Menghormati dan melindungi hak asasi manusia dan pekerja (termasuk pekerja sementara, kontrak dan atau pekerja asing".
- "Tidak mengamalkan sikap diskriminasi dan prejudis terhadap jantina, bangsa, agama, kewarnegaraan dan pandangan politik".
- "Menyediakan persekitaran kerja yang harmoni kepada pekerja ,pelanggan dan orang yang berkepentingan".
- "Memastikan Suasana kerja bebas daripada gangguan seksual samada secara langsung atau tidak langsung kepada semua pekerja, masyarakat dan pihak berkepentingan keseluruhannya".

The Mill is displayed at notice boards outside the office. Communication of all the policies to workforce is through training and during muster call.

In Compliance **Yes** No Not Applicable



Indicator 2 The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.

Summary Sighted in the Social Policy on Free from discriminatory practices against sex, race, religion, nationality and political opinions. Established on 1st March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer).

No evidence of discrimination based on race, skin color, religion, gender, national origin, ancestry, disability, marital status, and sexual orientation was found in the estate.

All workers enjoy the same scale of pay. This was confirmed through interview with workers/staff from the mill. Also, through verification of contracts of service and pay slips of workers.

In Compliance **Yes** No Not Applicable

Indicator 3 Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.

Summary Pay and conditions are documented in the workers' Contract Agreement and wage payment records / pay slip.

The salary is according to 'Guidelines on the Implementation on the Minimum Wages'. National Wages Consultative Council Act 2018 (Act 732) Malaysian minimum salary is RM1,100.00 as stated in the guidelines.

Interview with both Mill staff and workers and with both male and female confirmed that they understand the terms and conditions of their employment. Sample taken on the following worker:-

1) Appa bin Bula – AT 253243 - January 2019

- Basic Salary = RM 1,100.06
- Holiday pay = RM 42.31
- Overtime = RM 302.46
- Elaun Khas = RM 65.00

- Deduction
- Khairat Kematian = RM 2.00

- Net salary = RM 1,507.85

In Compliance **Yes** No Not Applicable

Indicator 4 Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.

Summary No contractor in the mill.



In Compliance **Yes** No Not Applicable

Indicator 5 The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.

Summary Sighted, Employment Contract between THP Sabaco Kilang Sawit Sungai Tenegang and the workers. The Agreement stated all the term and conditions according to Malaysian Law. The contract is in Bahasa Malaysia.

This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local and Indonesian. The registration card stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc.

Sample taken on:

- 1) En Yusrin bin Abdul Hamid – 950709-12-6209
- 2) En Aliuddin bin Balakim – 620421-12-5379
- 3) En Zulkifli bin Sampa AT 679890

In Compliance **Yes** No Not Applicable

Indicator 6 All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.

Summary Sighted, Employment Contract between Kilang Sawit Sg. Tenegang and the workers. The Agreement stated all the term and conditions according to Malaysian Law. The contract is in Bahasa Malaysia.

This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local and Indonesian. Sample taken on Puan Masriah Bt Dudukok 940207-12-6154, En. Adin bin Befing 900118-12-6519 and En Sahim bin Jayan 700402-12-6421.

In Compliance **Yes** No Not Applicable

Indicator 7 The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.

Summary Working hours is 8 hours. From Saturday to Thursday. The overtime maximum is 104 hours according to Malaysian Law. Daily attendance recorded during muster call. Mill has used punch card as a working time recording system.

In Compliance **Yes** No Not Applicable

Indicator 8 The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirement applicable.



Summary The working hour and break time have been clearly stated in the Employment Contract. Sighted in the Contract Agreement the rate of overtime which agreed by both parties. There is no complaint received regarding payment or are forced to work overtime during site interview.

In Compliance **Yes** No Not Applicable

Indicator 9 Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.

Summary Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.

Documented payslip was distributed to individual workers on the day of payment. Payment being made through bank.

In Compliance **Yes** No Not Applicable

Indicator 10 Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings

Summary All workers have been provided with medical and accident insurance. With regards to local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations.

In Compliance **Yes** No Not Applicable

Indicator 11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.

Summary All workers are provided with housing facilities at workers linesite, football field, shop and mosque. Water and electricity are subsidized free.

In Compliance **Yes** No Not Applicable

Indicator 12 The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.

Summary Sighted in the Social Policy. Established on 1st March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.

The policy to prevent all forms of sexual harassment and violence at the workplace has stated under the following number:

- h) "Menyediakan persekitaran kerja yang harmoni kepada pekerja, pelanggan dan orang yang berkepentingan."
- i) "Memastikan Suasana kerja bebas daripada gangguan seksual samada secara langsung atau tidak langsung kepada semua pekerja, masyarakat dan pihak berkepentingan keseluruhannya"

In Compliance **Yes** No Not Applicable

Indicator 13 The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.

Summary Sighted in the Social Policy. Established on 1st March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.

The policy on respect the right of all employees to form or join trade union has been stated under the following number:

- f) "Menghormati dan melindungi hak asasi manusia dan pekerja (termasuk pekerja sementara, kontrak dan atau pekerja asing).

In Compliance **Yes** No Not Applicable

Indicator 14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.

Summary Child and young person policy is incorporated in the Social Policy. The policy was established on 1st March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.

The policy on Children and young persons shall not be employed or exploited. has been stated under the following number:

- d) Melarang pengambilan tenaga kerja tidak sah secara paksaan dan pekerja di bawah umur.

There are no children below ages of 18 working in the Estate and this was proven through checking the list of employees. The workers were clear that no one below 18 years old should be employed.

In Compliance **Yes** No Not Applicable

Criterion 6 Training and competency



Indicator 1 All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.

Summary Training and Development policy is incorporated in the Social Policy which established on 1st March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.

The statement under the following number:

- b) Menyediakan latihan dan pembangunan yang berkaitan dengan peranan dan tanggungjawab pekerja dan kakitangan tersebut.

The Mill has a comprehensive annual training plan. The training plan for 2019.

NO	TOPIC	MONTH PROGRAMME
Occupational Safety and Health		
1	1st Aid Training	Apr / Oct 19
2	Fire drill	Apr / Oct 19
3	PPE Training	Apr / Oct 19
4	ERP	Apr / Oct 19
5	Confined Space	April 19
Environmental		
1	Waste Handling	Apr / Oct 19
2	Schedule waste	Apr / Oct 19
3	Recycle Awareness	Feb 2019

Training records for "Taklimat Pelan Tindakan Kecemasan serta Pelan Pengurusan Sisa Domestik dan Bahan Buangan Terjadual" was sighted on 9th March 2019 conducted by Mill Executives attended by 42 participants.

In Compliance **Yes** No Not Applicable

Indicator 2 Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.

Summary Yearly training plan is created based on Training Needs Analysis for workers involved in the operations. Sighted the Training Need Analysis of all workers, staffs and Management which are based on their competencies and job description.

In Compliance **Yes** No Not Applicable

Indicator 3 A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.



Summary The Mill has a comprehensive annual training plan for its staffs and workers and this was sighted in the training records file for each staffs and workers.

In Compliance **Yes** No Not Applicable

2.5 Principle 5 : Environment, natural resources, biodiversity, and ecosystem services

Criterion 1 Environmental management plan

Indicator 1 An environmental policy and management plan which shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.

Summary TH Plantations Berhad has established Environmental Policy signed by En. Muzmi Bin Mohamed; Chief Executive Officer dated 01.03.2019.

Based on the Environmental Policy, TH Plantations Berhad is committed towards implementing the following practices:

- To execute estates and mill operations in line with relevant legislations and the Environment Quality Act
- To practice a "Zero Burning" policy on new land development and replanting activities
- To ensure that estates and mill activities follow the guidelines of current industry practices; and
- To promote and provide the awareness on environmental protection to all employees and stakeholders

Interview with the mill workers and staffs confirmed they have been trained under Environmental Policy and Management Plan. Records of the training in the form of the attendance list, pictorial evidence as well as the training handouts is made available to the audit team during the audit.

In Compliance **Yes** No Not Applicable

Indicator 2 The environmental management plan shall cover the following:
a) An environmental policy and objectives;
b) The aspects and impacts analysis of all operations.

Summary TH Plantations Berhad has established the MSPO Procedure with a title: Environmental Management Plan (EMP) Ref No. MSPO-TH-06 Rev: 00 Date: 01.11.2017 initially released by SIR Department on 01.11.2018. The purpose of the procedure is to provide the relevant guidelines in the preparation and implementation of the Environmental Management Plan (EMP).

The Mill has conducted environmental aspect and impact assessment for all its' activities. The environmental assessment findings are recorded in document titled "Environmental Risk Assessment Form" and last reviewed and updated by Mr

Muhammad Mursyid Bin Mukhtar (Assistant Manager) and approved by the Senior Manager, Mr Kamar Bin Jamain on 01.12.2018.

The environmental aspect impact assessment (annually reviewed) has covered 8 main operations that related to environmental aspects such as;

1. Office/lab
2. Receptions
3. FFB, CPO & PK Processing
4. Generation of Steam & Electricity
5. Water & Effluent Treatment
6. Workshop
7. Store
8. Product Storage

In Compliance **Yes** No Not Applicable

Indicator 3 An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.

Summary Mill has established the Environmental Management Plan – Environmental Impact Assessment on Mitigation and Monitoring Records Doc No. MSPO-KSST-P4.5.1.1; prepared by Mr Muhammad Mursyid Bin Mukhtar (Assistant Manager) and approved by the Senior Manager, Mr Kamar Bin Jamain on 24.02.2019.

. It consist column of the following;

1. No.
2. Environment Aspect
3. Environmental Impact/Effect of the Impacts,
4. Impact Analysis i.e. (a)Frequency/Likelihood, (b)Consequences, (axb)Impact Level
5. Mitigation Measure
6. Monitoring Program.

The Mill activities on environmental aspects such as;

1. Toilet
2. Sampling test for quality monitoring
3. Receiving & loading of FFB
4. Despatch of CPO & PK
5. EFB disposal & others
6. Sterilization
7. Threshing
8. Pressing
9. Nut/kernel plant
10. Oil clarification
11. Boiler & genset operation
12. Treatment of water
13. POME discharge
14. Electrical maintenance
15. Mechanical repairing & maintenance
16. Diesel storage



17. Lubricant/hydraulic using for maintenance
18. Spent oil storage
19. Chemical preparation for water treatment
20. Storage of CPO & PK
21. Despatch of CPO & PK

In Compliance **Yes** No Not Applicable

Indicator 4 A programme to promote the positive impacts should be included in the continual improvement plan.

Summary Sighted the Appendix 4 of Environmental Management Plan – Continuous Improvement Plan prepared by Mr Muhammad Mursyid Bin Mukhtar (Assistant Manager) and approved by the Senior Manager, Mr Kamar Bin Jamain on 23.02.2019 stated the following;

- 1) "Pemasangan system ESP (electrostatic precipitator) bagi memastikan kadar pelepasan partikal tidak melebihi 150mg/m³ berdasarkan arahan oleh pihak Jabatan Alam Sekitar".
- 2) "Menjalankan kerja-kerja Desludging system kolam rawatan untuk Effluent Treatment Plant bagi memastikan kolam rawatan tersebut berada dalam keadaan operasi yang baik dan tidak melimpah".
- 3) "Pemasangan system LEV (Fume Cupboard) yang mengikut standard yang ditetapkan bagi memastikan kerja-kerja analisa kehilangan minyak dilakukan dengan selamat dan tidak menjejaskan kesihatan pekerja".
- 4) "Pemasangan Methane Trapping Cloth dan Sistem Flaring bagi kolam Anaerobic di Effluent Treatment Plant bagi menyelesaikan masalah bau busuk yang berunca daripada proses penguraian POME".
- 5) "Menghantar Penolong Pengurus untuk menghadiri kursus Competent Person for Schedule Waste Management bagi mematuhi peraturan yang ditetapkan oleh Jabatan Alam Sekitar".

In Compliance **Yes** No Not Applicable

Indicator 5 An awareness and training programme shall be established and implemented to ensure that all employees understand the policy, objectives and management plans and are working towards achieving the objectives.

Summary Sighted the Mill training program 2019 for all executives, staffs and workers on the following aspects;

- 1) OSH programme
- 2) Environment programme
- 3) Operation/Management programme

Sighted also the Mill Training Program 2019 related on Environment Aspects such as;

- 1) Environmental Committee Meeting
- 2) Waste Handling Training
- 3) Scheduled waste handling
- 4) Recycle Awareness program

In Compliance **Yes** No Not Applicable

Indicator 6 Management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.

Summary Sighted "Minit Mesyuarat Jawatankuasa Alam Sekitar kali 01/2019 held on 09.01.2019 attended by 7 executives/staff.

Sighted training report of the following;

- 1) "Taklimat Polisi Syarikat, Prosedur Aduan dan penjagaan Alam Sekitar" held on 17.02.2019 attended by 1 executive & 14 workers (Shift A).
- 2) "Taklimat Polisi Syarikat, Prosedur Aduan dan penjagaan Alam Sekitar" held on 17.02.2019 attended by 1 executive & 16 workers (Shift B).
- 3) "Gotong-Royong Perumahan KSST" held on 01.03.2019 attended by 3 executives, 16 staff & 74 workers.
- 4) "Taklimat Pelan Tindakan Kecemasan serta Pelan Pengurusan Sisa Domestik & Bahan Buangan Terjadual" held on 09.03.2019 attended by 1 executive, 5 staff & 36 workers

In Compliance **Yes** No Not Applicable

Criterion 2 Efficiency of energy use and use of renewable energy

Indicator 1 Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.

Summary Mill has maintained record of diesel monitoring for a period of 2016-2018 with an average baseline value of 2.24 liters/ton FFB processed.

Observed also record of Diesel Consumption per MT FFB for year 2019. As at February 2019, the Mill has used 36,466 liters diesel against the FFB processed of 16,277.62ton or equivalent to 2.24liters diesel/ton FFB versus the baseline of 2.24 litres/ ton FFB.

The Mill has established TH Plantations Data Collection Template – for amount of mill's operational energy generated from non-renewable energy. For 2018, the mill has generated 21,670kWh from the diesel consumption.

In Compliance **Yes** No Not Applicable

Indicator 2 Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.

Summary Sighted Diesel Estimate per MT FFB for 2019 with a total of 201,836litres versus FFB to be processed of 96,000mt or 2.10 litres/ton FFB. The vehicles involved in the use of diesel as follow;



- 1) Shovel (3 units)
- 2) Tractor
- 3) Genset (3 unit)
- 4) School Van (2 unit)
- 5) 4-WD Pick-up (2 unit)

In Compliance **Yes** No Not Applicable

Indicator 3 The use of renewable energy should be applied where possible.

Summary Sighted TH Plantations Data Collection Template – sustainability reporting 31.12.2018 for the production of fiber and shell as a source of renewable energy for their operations for a period of 2015 to 2018. For 2018, the mill has generated 16,150kWh from the re-utilisation of biomass residue produced.

Biomass production by the Mill;

Desc.	2018 production (mt)	Utilization (mt)	Location
Shell	6,102.79	6,102.79	Boiler
Fiber	12,205.59	12,205.59	Boiler
EFB	7,791.73	10,281.00	Estate mulching programme

In Compliance **Yes** No Not Applicable

Criterion 3 Waste management and disposal

Indicator 1 All waste products and sources of pollution shall be identified and documented.

Summary TH Plantations Berhad has established the MSPO Procedure; Title: Waste Management. MSPO-TH-05; Rev 0; dated 01.11.2017, initially released by SIR Department on 10.01.2018.

The MSPO Procedure describes the following implementation on;

- 1) Waste management
- 2) Scheduled waste disposal
- 3) Domestic waste disposal

Mill has identified and monitored all waste products and polluting activities resulting from its activities based on the following types;

- 1) Scheduled waste
- 2) Domestic waste
- 3) Milling by-product



4) Recyclable container.

In Compliance **Yes** No Not Applicable

Indicator 2 A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measures for:
a) Identifying and monitoring sources of waste and pollution.
b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.

Summary The Mill has identified and documented all types of waste that generated from its operation as stated in the "Rekod Buangan Terjadual" and Inventory of Scheduled Waste (e-swis)

Sighted consignment note for scheduled waste and permit of licensed contractor, Wawasan Oil Recycle Sdn Bhd for the following disposal (dated 29.03.2019);

- 1) SW305 (spent oil) – 1.000mt
- 2) SW409 (empty metal drum) – 0.400mt
- 3) SW410 (oil filter) – 0.012mt
- 4) SW410 (used rags) – 0.04mt

In Compliance **Yes** No Not Applicable

Indicator 3 The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Wastes) Regulations, 2005.

Summary TH Plantations Berhad - Standard Operating Procedure Manual (OSH); Ref. No: MNL/OSH/2009/1-1.14; Safe Operating Procedure (Transporting, Receiving, Handling, Storage and Disposal of Chemicals); dated 01.03.2009.

Sighted Chemical Registration listed 39 names of chemical substances. The list was last updated by Mr Abdul Sajidin Bin Abdul Rahman (Assistant Manager) and approved by the Senior Manager, Mr Kamar Bin Jamian on 15.02.2019.

In Compliance **Yes** No Not Applicable

Indicator 4 Domestic waste should be disposed as such to minimise the risk of contamination of the environment and watercourse.

Summary Mill disposes domestic waste to minimize the risk of contamination of the environment and watercourse. Domestic waste for linesite area are disposed at landfill located within the Mill's vicinity, 1km from the office.

In Compliance **Yes** No Not Applicable

Criterion 4 Reduction of pollution and emission including greenhouse gas

Indicator 1 An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.

Summary Mill identifies and monitor all waste products and polluting activities resulting from its activities.

Mill has established the Environmental Management Plan – Mitigation and Monitoring Records; prepared by Mr Muhammad Mursyid Bin Mukhtar (Assistant Manager) and approved by the Senior Manager, Mr Kamar Bin Jamain on 24.02.2019. It consist column of the following example;

- 1) Mill Activity: POME discharge
- 2) Environment Aspect: Spillage of POME due to overflow ponding system.
- 3) Environmental Impact: Land and water pollution
- 4) Mitigation Measure: Maintain POME free board for ponds over 0.5m; Maintain pump and piping regularly
- 5) Monitoring Program: Mill SOP; ETP log book

Sighted Greenhouse Gas Calculation for 2018;

- 1) FFB produced: 101,713.24mt
- 2) POME produced : 45,543mt
- 3) Methane emitted : 340.11mt
- 4) Diesel usage : 195,093liters
- 5) Mill CO₂ emission : 8,176.24mt

In Compliance **Yes** No Not Applicable

Indicator 2 An action plan to reduce identified significant pollutants and emissions shall be established and implemented.

Summary Sighted environmental improvement plan on environment to overcome the following;

- 1) Black genset operation
- 2) Dust particle e.g. light fibre & shell generated from mill processing
- 3) Spillage of POME due to leakage/ overflow ponding, piping system.

In Compliance **Yes** No Not Applicable

Indicator 3 Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations

Summary The POM is treating POME in accordance to the DOE Limits for final discharge into the land irrigation.



Sighted effluent analysis report, analysed by Dynakey Laboratories Sdn Bhd on 27.02.2019 for final discharge recorded 4.0mg/L BOD.

In Compliance **Yes** No Not Applicable

Criterion 5 Natural water resources

Indicator 1 The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water).
The water management plan may include:
a) Assessment of water usage and sources.
b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.
c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc).

Summary TH Plantations Berhad has established the MSPO Procedure; Title: Water Management Plan, MSPO-TH-08; Rev 0 dated 01.11.2017 revised on 10.01.2018.

Sighted raw water analysis report (carried out on monthly basis), analysed by Dynakey Laboratories Sdn Bhd on 21.02.2019 for upstream and downstream of Sungai Koyah. The parameters analysis as follow;

1) Upstream

No	Parameter	Results
1	pH value	8.1 @25°C
2	BOD (3days@30°C),mg/L	ND (<2)
3	COD, mg/L	20
4	Amm-N (NH ₃ -N),mg/L	ND (<1)
5	Total N, mg/L	ND(<1)
6	Oil & Grease, mg/L	ND (<2)
7	Suspended solids, mg/L	3
8	Total solids, mg/L	321

2) Downstream

No	Parameter	Results
1	pH value	7.1 @25°C
2	BOD (3days@30°C), mg/L	2.4
3	COD, mg/L	67
4	Amm-N (NH ₃ -N), mg/L	5
5	Total N, mg/L	7.6
6	Oil & Grease, mg/L	ND (<2)
7	Suspended solids, mg/L	7
8	Total solids, mg/L	563

In Compliance **Yes** No Not Applicable



Indicator 2 Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.

Summary The POME is discharged to Sungai Tenegang Estate for land irrigation (furrow system). The BOD is below approved limit of 20mg/L by DOE for land irrigation. The "Penyata Sukutahunan" is reported to DOE on quarterly basis using OER (online environmental reporting).

Sighted DOE approval for land irrigation stated as per "Syarat-syarat Pengurusan Efluen" in the Jadual Pematuhan Ref No. ASSH(B)31/152/000/046.

Effluent disposal location has been determined based on "Topographical Survey of Land Irrigation at Kilang Sawit Sg Tenegang" dated 05.07.2007.

In Compliance **Yes** No Not Applicable

2.6 Principle 6 : Best practices

Criterion 1 Mill management

Indicator 1 Standard operating procedures shall be appropriately documented and consistently implemented and monitored.

Summary Mill capacity 25 MT/Hr – Sterilization is by horizontal sterilizer. The mill has implemented Good Milling Practice (GMP) as seen from visit to the mill and seen from the document and also interviewing the workers.

Palm Oil Mill has 6 types of Manuals:

- 1) Standard Operating Procedure (SOP) Manual – Milling Operation
- 2) Standard Operating Procedure (SOP) manual – Occupational Safety & Health
- 3) Standard Operating Procedure (SOP) manual – Technical Mill Operation Procedure
- 4) Standard Operating Procedure (SOP) Manual – Office Administration
- 5) Standard Operating Procedure (SOP) manual – Finance
- 6) TH Plantations Berhad - MSPO Procedure

In Compliance **Yes** No Not Applicable

Indicator 2 All palm oil mills shall implement best practices.

Summary The mill is not certified by MPOB Codes of Milling Practice (CoP). However, mill has implemented Good Milling Practice (GMP) as per their own SOP's.

The mill is operating in accordance to Jadual Pematuhan – Syarat-Syarat Lesen Premis Minyak Kelapa Sawit Mentah, Jabatan Alam Sekitar Negeri Sabah JPKKS/12/001892; License No: 001892 valid until 30.06.2019 and all the Standard Operating Procedures.

In Compliance **Yes** No Not Applicable

Criterion 2 Economic and financial viability plan

Indicator 1 A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.

Summary Mill had an annual budget for the financial year 2019. The budget includes the projected FFB production, general charges, upkeep & cultivation, Collection and Immature areas.

Sighted the 14 years business plan for the Mill.

FY	2019	2020	2021
Own crop	94,711	97,816	92,129
Outside	1,290	1,200	1,200
Total	96,000	99,016	93,329
Estimate OER %	20.25	20.25	20.25
KER	4.75	4.75	4.75

In Compliance **Yes** No Not Applicable

Criterion 3 Transparent and fair price dealing,

Indicator 1 Pricing mechanisms for the products and other services shall be documented and effectively implemented.

Summary The pricing of FFB is based on MPOB pricing every month and for CPO and PK is based on the tender price by Procurement Department at HQ. As evidence, the price for March 2019 is RM 2,100.00 (Malaysia Average).

The company will make an announcement for tender for other services like annual mill inspection, boiler overhaul, service decanter and etc.

In Compliance **Yes** No Not Applicable

Indicator 2 All contracts shall be fair, legal and transparent and agreed payments shall be made in a timely manner.

Summary Currently mill don't have any contractors and outsource the work.

In Compliance **Yes** No Not Applicable

Criterion 4 Contractor

Indicator 1 In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.



Summary As per interviewed with Sr Mill Manager, once the contractor appoints by the mill, all the contractors will be informed by mill management to follow the MSPO standard requirement.

In Compliance **Yes** No Not Applicable

Indicator 2 The management shall provide evidence of agreed contracts with the contractor.

Summary Currently mill don't have any contractors and outsource the work.

In Compliance **Yes** No Not Applicable

Indicator 3 The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.

Summary The mill was audited by Global Gateway Certifications Sdn Bhd MSPO auditor on 1st April 2019. Sighted audit plan dated 22nd February 2019 which have been accepted address to Miss Aisyatul Aizzura Salha Abdul Rahim (Head Sustainability and Investor Relations). All the auditors are qualified MSPO auditor. As per agreed, the company accept the GGC MSPO Auditors to verify through a physical inspection if required for audit purposed.

In Compliance **Yes** No Not Applicable

2.7 Details of Audit Findings

Details Non-Conformity

- See Appendix B -

Details of Area of Concern

- See Appendix B -

Details of Noteworthy / Positive Findings

- 1) The mill management has demonstrated fully commitment during the entire audit process.
- 2) Signages throughout office, chemical area and in the field sites, effectively maintained and appropriate to the needs of the process.
- 3) Top management continuously establishes directions for the middle and upper management to execute in ways to comply with the MSPO management system in future.
- 4) Good relationship being maintained with surrounding smallholders and villages.
- 5) Good positive feedback received from internal and external stakeholders.

Appendix A: Audit Plan

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
27 th March 2019	TBA	➤ Travelling from Mamahat Complex – Lahad Datu, Sabah.	MS	IBI/AS
28 th March 2019	08:00 – 09:00	➤ Centralize Opening Meeting at Sungai Tenegang Estate: <ul style="list-style-type: none"> • Presentation by the manager/coordinator • Presentation by Lead Auditor. ➤ Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable).	MS	IBI/AS
	09:00 – 13:00	Sungai Tenegang Estate <ul style="list-style-type: none"> ➤ Document Audit: <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	IBI/AS
	10:30 – 12:30	Centralize Stakeholder Consultation		IBI/AS
	13:00 – 14:00	➤ Lunch	MS	IBI/AS
	14:00 – 16:00	➤ Continue document review <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc 	MS	IBI/AS
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 1.	MS	IBI/AS

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
29 th March 2019	08:00 – 13:00	Bukit Belian Estate <ul style="list-style-type: none"> ➤ Document Audit: <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	IBI/AS



	10:30 – 12:30	<ul style="list-style-type: none"> ➤ Estate inspection: • Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MS	IBI/AS
	13:00 – 14:00	<ul style="list-style-type: none"> ➤ Lunch 	MS	IBI/AS
	14:00 – 16:00	<ul style="list-style-type: none"> ➤ Continue document review • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	IBI/AS
	16:00 – 17:00	<ul style="list-style-type: none"> ➤ Verify any outstanding issues, auditor discussion and end of audit for day 2. 	MS	IBI/AS

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
30 th March 2019	08:00 – 13:00	Bukit Gold Estate <ul style="list-style-type: none"> ➤ Document Audit: • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	IBI/AS
	10:30 – 12:30	<ul style="list-style-type: none"> ➤ Estate inspection: • Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MS	IBI/AS
	13:00 – 14:00	<ul style="list-style-type: none"> ➤ Lunch 	MS	IBI/AS
	14:00 – 16:00	<ul style="list-style-type: none"> ➤ Continue document review • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	IBI/AS
	16:00 – 17:00	<ul style="list-style-type: none"> ➤ Verify any outstanding issues, auditor discussion and end of audit for day 3. 	MS	IBI/AS



AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
31 st March 2019	08:00 – 13:00	Sungai Koyah Estate <ul style="list-style-type: none"> ➢ Document Audit: <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	IBI/AS
	10:30 – 12:30	<ul style="list-style-type: none"> ➢ Estate inspection: <ul style="list-style-type: none"> • Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MS	IBI/AS
	13:00 – 14:00	<ul style="list-style-type: none"> ➢ Lunch 	MS	IBI/AS
	14:00 – 16:00	<ul style="list-style-type: none"> ➢ Continue document review <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	IBI/AS
	16:00 – 17:00	<ul style="list-style-type: none"> ➢ Verify any outstanding issues, auditor discussion and end of audit for day 4. 	MS	IBI/AS

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
01 st April 2019	08:00 – 13:00	Sungai Tenegang POM <ul style="list-style-type: none"> ➢ Document Audit: <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	IBI/AS
	10:30 – 12:30	<ul style="list-style-type: none"> ➢ Mill inspection: <ul style="list-style-type: none"> • Workshop, Laboratory, Environment, OHS, Chemical Stores, Workers Welfare and Interview, Clinic, Landfill, Mill Housing, Schedule Waste, POME and etc. 	MS	IBI/AS
	13:00 – 14:00	<ul style="list-style-type: none"> ➢ Lunch 	MS	IBI/AS

	14:00 – 15:30	<ul style="list-style-type: none"> ➤ Continue document review • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	IBI/AS
	15:30 – 16:00	<ul style="list-style-type: none"> ➤ Verify any outstanding issues and auditor discussion 	MS	IBI/AS
	16:00 – 17:00	<ul style="list-style-type: none"> ➤ Centralize Closing Meeting at Sungai Tenegang POM: ➤ Chaired by the audit Lead Auditor • Welcome and introduction by the Lead Auditor • Presentation of findings by the audit team • Questions & answers and Final summary by Lead Auditor ➤ End of assessment 	MS	IBI/AS
02 nd April 2019	TBA	<ul style="list-style-type: none"> ➤ Travelling from Lahad Datu, Sabah to Kuala Lumpur. 	MS	IBI/AS

Appendix B : Non-Conformity details

Non-Conformities Identified During This Audit

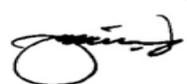
Major Nonconformities:	The following NC's were raised for this audit.
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Company Name	TH Plantations Berhad															
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>												
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>												
Audited Standard	Part 4: General Principles for Palm Oil Mills															
Client Number	GGC-D5-MSPO-2019															
NC No. / Ref.	D5/MSPO/MAJOR/01	Date Detected	01 st April 2019													
Site(s) concern	Kilang Sawit Sungai Tenegang	Target Completion	90 Days													
Normative Reference and Requirement	4.3.1.1 Major All operations shall be in compliance with applicable local, national and ratified international laws and regulations.															
NC Type	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Area of Concern															
Description of Non-Conformity	1) Incompliance to Section 104 (1)'(c) of Labour Ordinance (Sabah Cap.67). 2) Incompliance to Section 118 (1) of Labour Ordinance (Sabah Cap.67). 3) Incompliance to FMA 1967; Regulations 1989.															
NC Objective Evidence:																
1) Evidence on overtime records for Mr. Samsul bin Mustafa, Employee's Code: TKI0316 for the works done from January 2019 till March 2019.																
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Month</th> <th style="width: 25%;">No. of Days Work</th> <th style="width: 25%;">No. of Days Exceeded (4hrs/Day)</th> </tr> </thead> <tbody> <tr> <td>January 2019</td> <td style="text-align: center;">26</td> <td style="text-align: center;">6</td> </tr> <tr> <td>February 2019</td> <td style="text-align: center;">24</td> <td style="text-align: center;">7</td> </tr> <tr> <td>March 2019</td> <td style="text-align: center;">26</td> <td style="text-align: center;">13</td> </tr> </tbody> </table>					Month	No. of Days Work	No. of Days Exceeded (4hrs/Day)	January 2019	26	6	February 2019	24	7	March 2019	26	13
Month	No. of Days Work	No. of Days Exceeded (4hrs/Day)														
January 2019	26	6														
February 2019	24	7														
March 2019	26	13														
2) No evidence of Sungai Tenegang POM obtaining "Lesen Untuk Menggaji Pekerja Bukan Pemastautin "Seksyen 118, Ordinan Buruh (Sabah Bab 67) from Jabatan Tenaga Kerja.																



<p>3) No evidence of re-test on Standard Threshold Shift being conducted to En. Kadir bin Abung – AT 252246 since 2017. Part VI Audiometric Testing Programme, Regulation 23 - Retest.</p> <ul style="list-style-type: none"> If the registered medical practitioner, after reviewing the annual and baseline audiograms of the employee and after taking into consideration the effect of temporary threshold shift, is of an opinion that a standard threshold shift has occurred, he shall notify the occupier and the occupier shall retest the employee within three months from the date of the last audiometric test. 	
<p>Lead Auditor Signature:</p> 	<p>Client Signature:</p> 
<p>Root cause Analysis (to be filled by client):</p> <ol style="list-style-type: none"> Maintenance for heavy machineries consumes more time to complete the task. Lack of understanding on legal requirement of Section 104 (1)(c) of Labour Ordinance (Sabah Cap.67). Lack of understanding on legal requirement of Part VI Audiometric Testing Program, Regulation 23-Retest (FMA 1967; Regulations 1989). 	
<p>Corrective action planned (to be filled by client):</p> <ol style="list-style-type: none"> Mill has applied for exemption on 12 hours per day work limit according to Section 104 (5)(d) An employee may be required to work by his employer to exceed the limit of hours in subsection (1) and to work on rest day in the case of urgent work to be done to machinery or plant and Section 104(5)(e) An employee may be required to work by his employer to exceed the limit of hours in subsection (1) and to work on rest day in the case of any interruption of work which was impossible to for see. Mill management also already arranged operation and maintenance work to be done as per Section 104 (1)(c) of Labour Ordinance (Sabah Cap.67). Mill has applied for "Lesen Penggajian Pekerja Bukan Pemastautin" from Jabatan Tenaga Kerja as required by Section 118 (1) of Labour Ordinance (Sabah Cap.67). Mill has sent Mr. Kadir Abung to undergo Audiometric retest on Standard Threshold Shift on 15th of April 2019 together with 12 other mill workers as recommended in Audiometric Test Report dated 8th of March 2019. 	
<p>Preventive Action (to be filled by client):</p> <ol style="list-style-type: none"> The mill will ensure the operation and maintenance works arrangement to comply with Section 104 (1)(c) of Labour Ordinance (Sabah Cap.67). The mill management will ensure the operation to comply with all regulations stated in Legal Requirement. The mill will ensure the operation to comply with Factory & Machinery Act (FMA) 1967; Regulations 1989. 	
<p>Review of corrective/preventive action (to be filled by Lead Auditor)</p> <p>All the evidence submitted were found adequate and therefore this major non-compliance is closed.</p>	

NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input type="checkbox"/> No
Date Verified: 22 nd May 2019	Lead Auditor Signature: 

Company Name	TH Plantations Berhad			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 4: General Principles for Palm Oil Mills			
Client Number	GGC-D5-MSPO-2019			
NC No. / Ref.	D5/MSPO/MAJOR/02	Date Detected	01 st April 2019	
Site(s) concern	Kilang Sawit Sungai Tenegang	Target Completion	90 Days	
Normative Reference and Requirement	4.4.4.2 Major The occupational safety and health plan should cover the following: e. The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.			
NC Type	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	No evidence sighted during the audit			
NC Objective Evidence:				
No evidence Medical surveillance being conducted to Storekeeper, En Abdul Jummat Md Daud as recommended in Chemical Health Risk assessment and Part IX - Health Surveillance Regulation 27. Health surveillance programme.				
<ul style="list-style-type: none"> If an employee is exposed or likely to be exposed to chemicals hazardous to health listed in Schedule II, the health surveillance required under sub regulation (1) shall include medical surveillance conducted at intervals of not more than twelve months or at such shorter intervals as determined by the occupational health doctor or an occupational safety and health officer who is also a medical practitioner. 				
Lead Auditor Signature: 		Client Signature: 		



Root cause Analysis (to be filled by client):	
Lack of understanding on legal requirement of Chemical Health Risk assessment and Part IX - Health Surveillance Regulation 27. Health Surveillance Programme.	
Corrective action planned (to be filled by client):	
The mill has sent En. Abd Jummat Md Daud to undergo medical surveillance on 15 th of April 2019.	
Preventive Action (to be filled by client):	
The mill will arrange all workers who are exposed to any types of chemical contents to undergo medical surveillance (retest) on November 2019 (as per scheduled in KSST Mill OSH Programme).	
Review of corrective/preventive action (to be filled by Lead Auditor)	
All the evidence submitted were found adequate and therefore this major non-compliance is closed.	
NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 22 nd May 2019	Lead Auditor Signature: 

Minor Nonconformities:	Non-were raised during this audit.
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Area of Concern:	The following AOC's was raised for this audit.
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Company Name	TH Plantations Berhad			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 4: General Principles for Palm Oil Mills			
Client Number	GGC-D5-MSPO-2019			
NC No. / Ref.	D5/MSPO/AOC/01	Date Detected	01 st April 2019	
Site(s) concern	Kilang Sawit Sungai Tenegang	Target Completion	-	
Normative Reference and Requirement	4.3.1.1 Area of Concern All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.			



NC Type	<input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Area of Concern	
Description of Non-Conformity	Sighted the work permit of mill foreign worker is under different employer.	
NC Objective Evidence:		
<p>Evidence during audit, Sungai Tenegang POM has utilized estate quota for obtaining the work permit for mill workers. Sample taken on Ayub Tabulu, a watchman, Passport No. AT253499, Nationality: Indonesia, employed as "plantation workers" with THP Sabaco Sdn Bhd.</p>		
Lead Auditor Signature:	Client Signature:	
		



Appendix C: List of Stakeholders Contacted

Attendance List

Internal Stakeholders

- 1) Kilang Sawit Sungai Tenegang management team and staff
- 2) Gender Committee Representatives
- 3) Male and Female workers
- 4) Workers Representatives
- 5) Foreign Workers Representatives

External Stakeholders

- 1) Pn. Dayang Norihsan binti Jainal – Humana
- 2) En. Mohd Supri bin Bacho – Koordinator Humana
- 3) En. Mohd Razik bin Abd Hudik – Pontian
- 4) En. Muhamad Kamdul – Kretam
- 5) Mr. Robin Kong Soo Chion – Welpros Zat
- 6) En. Mastarip bin M. Moktar – Bode (KHB)
- 7) En. Syed Mahmud bin Wafi – Manager
- 8) En. Mhammad bin Rasyid – Pekebun Kecil
- 9) En. Hasbi – LH
- 10) En. Azmi – TT Ent
- 11) Megah Maju
- 12) En. Salim bin Ali – Pen KPB
- 13) En. Salman bin Jubideh – BP KTGN
- 14) En. Izzat bin Rusdee – Salesman
- 15) Mr. Steven Tai – Manager
- 16) En. Faizal Darius – Ketua Bengkel
- 17) En. Mohamad Ali – Salesman
- 18) Mr. Kbid – Tamaco 2
- 19) Mr. Darren Lam – Sr. Assistant Manager
- 20) Mr. Au Ching Lu – AP TKA S/B
- 21) Mr. Harby – Apex
- 22) Pn. Sarianah Mataring – Kontraktor
- 23) En Zamri bin Galahad – Kontraktor
- 24) En Azlan bin Abdul Latip – Yu Climbing
- 25) Mr. Yeh Yee Seng – Kenso
- 26) En. Sultan Aswad bin A. Sakka – Kontraktor
- 27) En. Mohd Nizar bin Khir Azman – Behn Mayer
- 28) En Hussam bin Lahuseng – Kejuruteraan Elektrik
- 29) En. Sharif bin Rahman – Arinahletro
- 30) En. Kalil Tumpang – G-Planter
- 31) Mr. Chong Yen Dan – Manager
- 32) En Umran – Mekanik
- 33) En. Fauzi – Mekanik
- 34) En Arbin – Sawipol
- 35) En. Azwin – Mega Focusjaya
- 36) En. Suding Barawang – L/Maju



- 37) Mr. Charles Ng – Ever Gold
- 38) Mr. Marhin Maing – Salesman
- 39) En. Ramlan bin Dahlan – Salesman
- 40) Mr. Kuang Lip Sing – Branch Manager
- 41) Mr. Asmal Masana – Kontraktor
- 42) Pn. Nurwina Nurung – Mat Ent
- 43) Pn. Norhaidah binti Naming – SK Paris 3
- 44) Pn. Norasmah binti Chawa – SK Paris 3
- 45) En. Amir Abas – Harapan Baru Hang Soon
- 46) En. Jeffrin Perkin – Gen Man
- 47) Pn. Faridah binti Zainuddin – Pekebun Kecil
- 48) En. Jasman bin Zulkifli – Pekebun Kecil
- 49) En. Jupri bin Samsudin – Pekebun Kecil
- 50) En. Ammis Asbudi – Pekebun Kecil
- 51) En. Abdullah Selamat – Pekebun Kecil
- 52) Pn. Noraidah Sebnah – Humana
- 53) Pn. Rubylisa Rosalinda – Humana
- 54) En. Mohd Hamdan Husin – Ldg Sutera
- 55) En. Shahrin bin Perkin – AB JSM SB
- 56) En. Baharudin bin Banita – SD
- 57) En. Mazlan Perkins – Sri Ledang
- 58) En. Muhamad Hasram Idris – Sutera
- 59) En. Muhammad Hanif bin Shukor – Sutera
- 60) Pn. Amira Shafinaz Askani – Humana
- 61) En. Mohd Nizam bin Awang – PPAT SDK
- 62) En. Ahmad Muradi – E Badang
- 63) En Rendy bin Bacho – E Badang
- 64) En. Kasman Bahar – Adrit Advance Agro
- 65) En. Ramlan Kasiran – Hung Sing Tyres
- 66) Mr. Tommy Tap – San SDK
- 67) En. Hanafi – Kontraktor
- 68) En. Mohd Bakri – Intan
- 69) Mr. William Suates – Salesman
- 70) Tn. Hj Simon Lakiman – Usaha Jaya
- 71) En. Abu Bakar Turji – Bomba Lahad Datu
- 72) En. Masrah bin Tata – Kesihatan
- 73) En. Firman bin Ahmad – Kedai Runcit
- 74) Mr. Joseph Sudungking – Gerola
- 75) Pn. Norsri Kurdiati - Gerola
- 76) En. Muhammad Haimin bin Razmi – Pengurus
- 77) Pn. Sumina binti Sederi – Pekebun Kecil