

GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)

CERTIFICATION AUDIT REPORT

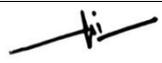
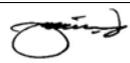
Part 4 : General Principles for Palm Oil Mills

Raub Oil Mill Sdn Bhd

-Group Certification-

MAIN ASSESSMENT AUDIT

19th March 2019

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	17/04/19	Issued as Draft Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
A	23/04/19	Peer Review 1 Comments	Remi bin Rasidi	Peer Reviewer 1	
A	23/04/19	Peer Review 2 Comments	Mohd Zuhaili bin Mukri	Peer Reviewer 2	
B	24/04/19	Issued as Final Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	29/04/19	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	

Acknowledgment by Raub Oil Mill Sdn Bhd					
Rev	Date	Description	Management Representative	Role	Signature
B	29/04/19	Acceptance of the contents	Uma Shankar A/L Balakrishnan	Mill Manager	

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	11
1.13 Date of Next Surveillance Audit.....	11
1.14 Confidentiality	12
1.15 Abbreviations Used	12
SECTION II : ASSESSMENT FINDINGS BY PRINCIPLES AND CRITERIA.....	13
2.1 Principle 1 : Management commitment and responsibility.....	13
2.2 Principle 2 : Transparency	15
2.3 Principle 3 : Compliance to legal requirements.....	17
2.4 Principle 4 : Social responsibility, health, safety and employment condition	20
2.5 Principle 5 : Environment, natural resources, biodiversity, and ecosystem services	31
2.6 Principle 6 : Best practices.....	37
2.7 Details of Audit Findings.....	40

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 **Raub Oil Mill Sdn Bhd.** During this **Main Assessment Audit (Stage 2)**, the audit team were briefed by Mill Manager, of the supply base disposition. The source of FFB supplies to Raub Oil Mill Sdn Bhd are only from their own estate [Raub Mining & Development Co. Sdn Bhd] from out-grower and other smallholders.

This assessment was conducted onsite on **19th March 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	Raub Oil Mill Sdn Bhd
Business Address	Bukit Koman, 27600 Raub, Pahang
Contact Person	Mr. Uma Shankar A/L Balakrishnan
Office Telephone	+603 355 1200/+603 355 2200
E-Mail	romsb_raub@yahoo.com

1.3 Certification Unit

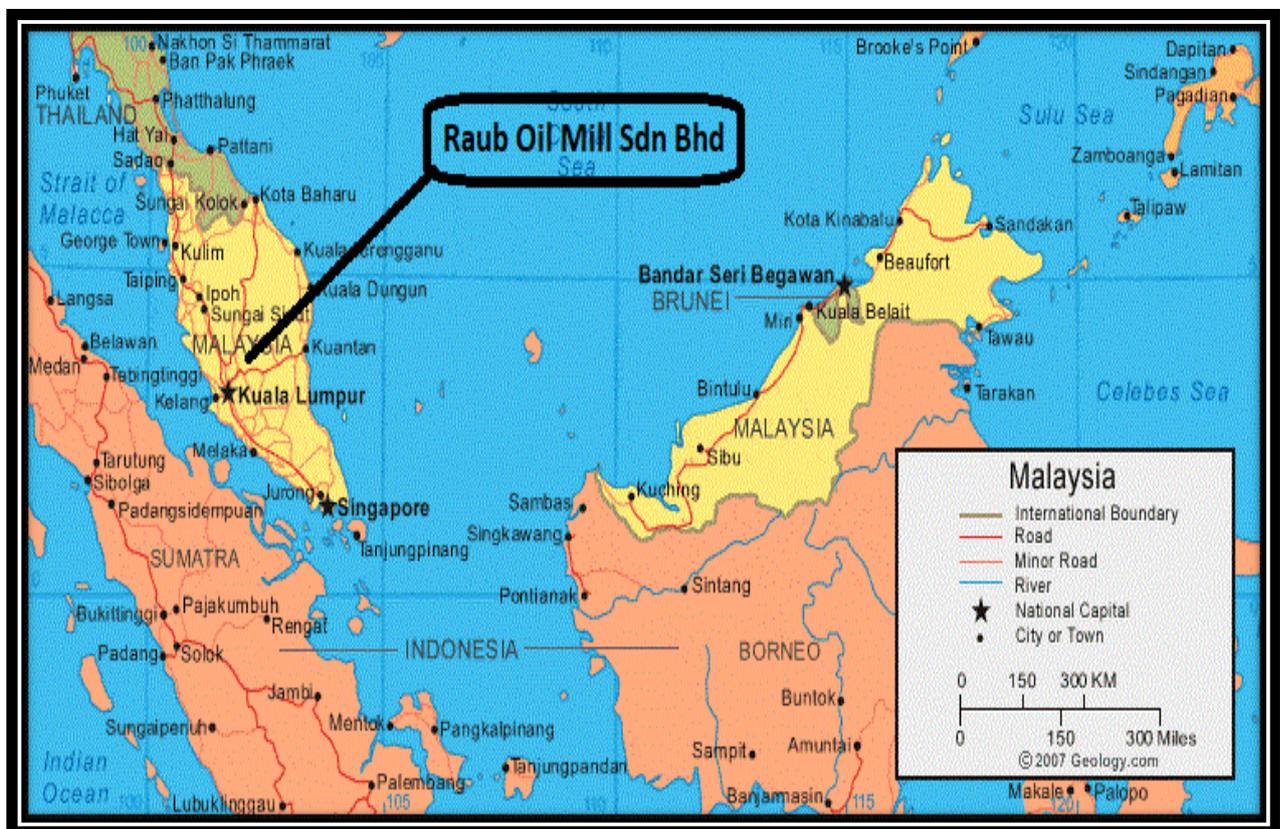
Name of the Certification Unit	Raub Oil Mill Sdn Bhd	
Mill Capacity (MT/HR)	60	
Site Address	Bukit Koman, 27600 Raub, Pahang	
GPS Reference of the site office	Longitude	E 101° 51' 15.78"
	Latitude	N 3° 50' 37.20"



MPOB License Information	License No.	522682004000
	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 March 2020
Others Sustainability Certification	NIL	

1.4 Map Showing Geographical Location

1) Raub Oil Mill Sdn Bhd



FFB Summary (MT)	NIL	213,866.28	187,559.00
CPO Summary (MT)	NIL	44,087.72	38,449.60
PK Summary (MT)	NIL	11,903.87	10,315.75

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-ROM001-MSPO-00-2019
Initial certificate issued date	29 th April 2019
Certificate expiry date	28 th April 2024
Stage 1 assessment date	18 th January 2019
Stage 2 / Main Assessment	19 th March 2019
Annual Surveillance 1 [ASA 1]	January 2020
Annual Surveillance 2 [ASA 2]	January 2021
Annual Surveillance 3 [ASA 3]	January 2022
Annual Surveillance 4 [ASA 4]	January 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 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: **Surenthiran Panneerselvam**

He is graduated from University of Abertay Dundee, Scotland, UK majoring in PgDip/ MSc Oil and Gas Accounting and also graduated from Universiti Tenaga Nasional, Malaysia with a Bachelor's Degree in Accounting. Prior to joining Shell Business Operation as a Senior Cash Management Executive, he worked with Crowe Horwath as Senior Associate Auditor. He is equipped with experience in audit field, lecturing and accounting. Fully trained in Malaysian Sustainable Palm Oil (MSPO2530), Roundtable Sustainable Palm Oil (RSPO), ISO9001:2015 and ISO37001:2016. Completed and certified MSPO auditor course in year 2018 held by SGS Academy and ISO9001:2015 auditor course in year 2017 by TOMC.

During this assessment, he assessed on the aspect of Legal, 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: **Mohamad Fitri bin Mustafa**

Graduate in degree of agribusiness with more than 8 years working experience in various plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Involved in ISCC and MSPO auditing since September 2017. Qualified as Lead Auditor/Auditor for MSPO, RSPO and ISO 9001. Completed and certified MSPO Auditor course in 2018 held by SGS (M) Sdn Bhd. Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of Transparency, Best Practise, Stakeholder's Consultation and Workers Welfare. 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 “**Raub Oil Mill Sdn Bhd**”.

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	19 th March 2019
Name of site(s) visited	Raub Oil Mill Sdn Bhd
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	0	No action requires
Minor Nonconformities	1	Open (Next Surveillance Audit)
Area of Concern	1	No action requires
Noteworthy /Positive Comments	7	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 15th February 2019 and as to accommodate a stakeholders' consultation meeting for mill and estate. Therefore, it was conducted on 18/03/2019-19/03/2019 in Raub Mining & Development Co. Sdn Bhd and Raub Oil Mill Sdn Bhd 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.	All stakeholders	<ul style="list-style-type: none"> • They aware and have good understanding about MSPO. • They have good relationship with the management. 	No action requires	Positive findings
2.	Stakeholders A (Government Agency)	<ul style="list-style-type: none"> • They are always invited by company to participate in stakeholder meeting annually. • They have good understanding about MSPO. • They have good understanding about complaint and grievance mechanism. 	No action requires	Positive findings
3.	Stakeholders B (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 	No action requires	Positive findings

		<p>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.</p> <ul style="list-style-type: none"> • 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. • 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. 		
4.	Stakeholder C (Neighbouring Estate)	<ul style="list-style-type: none"> • They have good relationship with the management. • There is no conflict ever happened with mill & estate. 	No action requires	Positive findings
5.	Stakeholder D (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. 	No action requires	Positive findings

		<ul style="list-style-type: none"> 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. 		
6.	Stakeholders E (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 Raub Oil Mill Sdn Bhd. Mill Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual.

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 was 1 minor non-conformity 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 was no major non-conformity findings. 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 Raub Oil Mill Sdn Bhd.

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 Company has established MSPO Policy signed and approved by Mr. Tai Swe Chong (General Manager) date on 1st August 2018.

As evidence, sighted the policy training on 01st October 2018. Conducted by Mr. Uma Shankar A/L Balakrishnan (Mill Manager) and attended by 99 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 Company has established MSPO Policy signed and approved by Mr. Tai Swe Chong (General Manager) date on 1st August 2018.

Stated on the MSPO Policy; the Raub Oil Mill Sdn Bhd will pursue continues improvement by engaging in regular review processes and taking active steps to continually develop the skills and competencies of our employees, strengthen our procedures and leverage technological advances.

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 Internal audit will be conducted once in a year as per stated on SOP Internal Audit [Doc No. MSPO-01 Rev: 0, dated 1st July 2018] at File 7 [C2/P1]. Internal audit procedure was made available Flowchart of internal audit were available [pg. 3 of 4].

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 SOP Internal Audit [Doc No. MSPO-01 Rev: 0, dated 1st July 2018] at File 7 [C2/P1]. Internal audit procedure was made available Flowchart of internal audit were available [pg. 3 of 4].



Internal audit conducted once in a year, latest internal audit conducted on 3rd – 7th January 2019, and internal report prepared by Mr. Naavin, Asst Mill Manager and approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager [Ref: 1/2019]

10 Minor NC were identified, all root cause was available and documented, sighted in audit internal audit procedures [Appendix 4].

In Compliance **Yes** No Not Applicable

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

Summary The internal audit report was documented and made available for management review. As evidence, all findings of the internal audit have been covered in management review. The status of the correction and preventive actions are being discuss and reviewed.

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 Management review meeting was conducted on 11th January 2019. Management review meeting (MRM) report were made available [File 6, C3/P1] prepared by Mr. Naavin, Asst Mill Manager and approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager.

Conducted at Raub Oil Mill Meeting Room. Sighted attendance record and photographs, and attended by 8 respective staffs.

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 As evidence in mill, sighted Continual Improvement Plan [Appendix 5] dated 1st October 2018 was prepared by Mr. Naavin, Asst Mill Manager and approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager.

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 Mr. Tai Swe Chong (General Manager)



Management proposed to install new Air Pollution Control System [To be scheduled in future plan].

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 Company has established the Stakeholder Communication & Consultation Procedure. Ref No: MSPO-03; Rev 1.0; Date 01/08/2018.

The purpose of this procedure is to outline the arrangements for consultation and communication by Raub Oil Mill Sdn Bhd with its relevant stakeholders and how their concerns and views are addressed.

Sighted stakeholders' meeting with:

- Dated on 13.11.2018. Briefing to CPO, PK, FFB transportation and FBB supplier. Attended by 18 participants.
- Dated on 29.11.2018. Briefing to Government Agency and Suppliers. Attended by 16 participants.

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 As per interviewed with Mr. Uma Shankar A/L Balakrishnan (Mill Manager), some of the documents publicly available and some of the documents need to get permission from HQ level.

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 Company has established the Stakeholder Communication & Consultation Procedure. Ref No: MSPO-03; Rev 1.0; Date 01/12/2018.

The purpose of this procedure is to outline the arrangements for consultation and communication by Raub Oil Mill Sdn Bhd with its relevant stakeholders and how their concerns and views are addressed.

Sighted stakeholders meeting was conducted on 13.11.2018, attended by 18 participants. All discussion with the stakeholders stated in the minute of the meeting. Prepared by Ms. Chiew Yan Fern (Admin Asst) and verified by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

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 Sighted an appointment letter of Mr. Naavin A/L Muthu Krishnan (Mill Engineer) as person in charge for stakeholder matters. The letter dated 01st August 2018, signed by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

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 list of stakeholders on 1st November 2018. Prepared by Ms. Chiew Yan Fern (Admin Asstn), Reviewed by Mr. Uma Shankar A/L Punir Selvam (Mill Engineer) and Approved by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

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 Company has established the Sustainability Procedure. Title: Traceability (Mill); No: SP-ROM-06; Rev 1.0; Date 01/10/2018. Prepared by Mr. Naavin A/L Muthu Krishnan (Mill Engineer) and Approved by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

- 1) FFB Receive:
From: Bentong Estate (Bentong Estate Sdn Bhd)
Date: 16.03.2019
Lorry No: CCS 8879
Weight: 22,290 kg.
- 2) Grading Chit:
Bunch Size: > 10kg – 90, > 6-7 kg – 11.
Underripe: 25 units

In Compliance **Yes** No Not Applicable

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

Summary Mill conduct the inspection on traceability system in daily basis. Sighted in Daily In & Out Lorries. All documents will be verified by Mr. Hoong Pee Teck (Assistant Mill).

Sighted the weighbridge ticket for CPO dispatch from the mill premise to the Felda Iffco Sdn Bhd, dated on 16.03.2019, amounted 36,320 kg.

In Compliance **Yes** No Not Applicable

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

Summary Mill management has assigned 1 personnel as person in charge to maintain and implement traceability system, Ms Shiew Yan Fern (Account & Admin Assistant). Sighted the appointment letter for her dated on 01st August 2018 which was signed by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

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.

Contract agreement of CPO transportation (KSBL/02/CPO/2017 between the mill, Raub Oil Mill Sdn Bhd and Pritam Singh Agency Sdn Bhd was sighted.

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 Seen File 62 [C1/P3] Legal Requirement Register (LRR). The company has established and updated list of applicable laws and regulations. The legal register is prepared by Ms. Chiew Yan Fern.

Updated list of applicable laws and regulations that are applicable for Raub Oil Mill. Summary of list of amendments

Legal Register Sighted – Acts updated are as follows:

- Minimum Wage Order (Amendment) 2018
- EPF Act 1991, Sec 43(1A) Min Statutory Rate for employees above 60 yrs old



- Employees Social Security Act 1969 - EIS

Sighted lists of permits/licenses which has been monitored and updated periodically includes:

1. MPOB licenses No. 500007904000 expiry 31.03.2020
2. Permit Barang Kawalan Berjadual - "Diesel – Bekalan daripada pemborong berlesen" – 20,000 Liters. Permit No C015414. KPDNKK REF: KPDNKK.PHG.RUB.600-5/4/150.
3. Boiler "Perakuan Kelayakan Dandang No Pendaftaran PMD4738 - Expiring 8/4/2019
4. Boiler - "Perakuan Kelayakan Dandang No Pendaftaran PMD15171 - Expiring 2/7/2019
5. Compressor – "Pengandung Tekanan Tak Berapi" Sterilizer PMT75701 - Expiring 2/7/2019

However, one minor non-conformity has been raised to the mill. As per site visit, no signage was displayed on the diesel tank as per "Panduan Permohonan Permit Untuk Membeli Barang-Barang Kawalan Berjadual Di Bawah Peraturan-Peraturan Kawalan Bekalan 1974".

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 The list is fully covered the requirements that related to MSPO compliance. These documents include information on laws, enforcement bodies, main requirement, environmental aspect, standard, fine, person in charge, and compliance status.

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 As per interviewed with Ms Chiew Yan Fern, she will update any new amendments or any regulations once received through the communication with internal department, legal register, communication with law/enforcement officers.

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 Seen appointment letter of Ms. Chiew Yan Fern, MSPO Person In charge for legal compliance matter, dated 1st August 2018 approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager.

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 Land title for mill is available and maintained by Raub Estate. This mill was demarcated and located in a plot of 1850.8812 Ha of Raub Mining & Development Co. Sdn Bhd land title. No. H.S.(D). 10803, [1850.8812 Ha] – PT23120. Owned by Raub Mining and Development Co. Sdn Bhd [No. Syarikat 4708-A].

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 Land title for mill is available and maintained by Raub Estate. This mill was demarcated and located in a plot of 1850.8812 Ha of Raub Mining & Development Co. Sdn Bhd land title. No. H.S.(D). 10803, [1850.8812 Ha]. Owned by Raub Mining and Development Co. Sdn Bhd [No. Syarikat 4708-A].

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 Raub Mining & Development Co. Sdn Bhd area, the permanent fence had been constructed to demarcate the vicinity of the mill milling area.

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 was built within the Raub Mining & Development Co. Sdn Bhd (the same Company's land), thus no disputes been recorded by the mill. There is no evidence of land conflict present in the mill. There is no violence on instigated violence in maintaining peace because company has a clear procedure on handling the 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 was built within the Raub Mining & Development Co. Sdn Bhd, thus no customary rights will affect the mill. There are also no land disputes or claims involving the mill. The company has proper legal land title with regards to land ownership.

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 was built within the Raub Mining & Development Co. Sdn Bhd, thus no disputes been recorded by the mill. There is no evidence of land conflict present in the mill. There is no violence on instigated violence in maintaining peace because company has a clear procedure on handling the land conflict.

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 Social Impact Assessment and Management Plan for Raub Oil Mill Sdn Bhd. Seen MSPO Procedure: Social Impact Assessment (SIA), Rev.: 0 dated 1st August 2018.

SIA report dated 15th October 2018, prepared by Mill management & Estate Management. Social Impact Assessment (SIA) have been identified and Stakeholders Meeting 02/2018 conducted dated 13th & 29th November 2018 at Bilik Mesyuarat Raub Oil Mill. Seen attendance record and photograph as evidenced. Attended by 16 participants on 29th November 2018.

Social Impact Assessment (SIA) & Management Plan for Raub Oil Mill Sdn Bhd is made available, dated 1st – 10th October 2018, prepared by Mill & Estate Management dated 15th October 2018.

Group involved:

- Local workers
- Foreign workers (Bangladeshi, Nepalese & Indonesian)
- Contractors & Suppliers
- Nearby village

- Government officers

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 Seen complaint procedure, SOP "Prosedur Aduan dan Rungutan" in File 14 [C2/P4]. Separate form for housing repair were prepared by the estate management.

Employees Consultancy Committee (ECC) was established as a mechanism to complaint/ grievances by the staff/workers. Sighted appointment letter of Mr. Uma Shankar A/L Balakrishnan as ECC committee member, approved by Mr. Tai Swee Chong, Managing Director, Raub Oil Mill. Representative of workers based on nationality (act as translator):

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 Complaint Form and Complaint Book is made available during the audit. Most complaints refer to housing repairs which action will be taken by estate management.

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 Book seen for External and Internal Stakeholders. As per interview with Mr. Uma Shankar A/L Balakrishnan, Mill Manager, compliant and grievances book are available at 'Sudut Aduan' located at RDMC 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 Sighted minute of meeting for external mill stakeholders and also training for the workers.

One area of concern has been raised to the mill. During stakeholders meeting (combine with Raub Mining & Development Co. Sdn Bhd) on 18th March 2019 conducted by Global Gateway Certifications Sdn Bhd, it was observed the stakeholders were not aware that any complaints or suggestions could be forwarded to the mill management.

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 Complaints form and “buku aduan” is made available. 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 Sighted Corporate Social Responsibilities File-38 [C5/P4] – Welfare, Incentives etc. and record for Internal and External stakeholders, [CSR Records].

1. Gotong-royong at RMDC Quarters, dated 10th March 2019, seen photographs as evidence.
2. Anak-anak istimewa PDK – Sambutan Deepavali Bersama Yogenthiran & Anak-anak istimewa PDK 2018. – Donated RM50.00 (cash), dated 30th October 2018.
3. Majlis Doa Selamat, donated RM450.00 dated on 6th February 2019. Sighted payment voucher No. P162/19.

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 Seen OSH Policy “Occupational Health and Safety Policy” approved by the General Manager, Mr. Tai Swe Chong dated 1st August 2018. Seen in File 2 [C1/P1]. OSH Plan sighted with specific objective for the Financial Year.

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

Seen OSH Policy "Occupational Health and Safety Policy" approved by the General Manager, Mr. Tai Swe Chong dated 1st August 2018. In File 2 [C1/P1]. Communicated to all internal and external stakeholders during stakeholder meeting on 13th November 2018 at ROM Main Office. The policy is displayed in office entrance for public viewing.

HIRARC file seen File - 48 [C4/P4], Rev.: 0. To verify the risks of all operations in Stage 2 Audit. HIRARC dated 1st October 2018 prepared by Mr. Uma Shankar P, Asst Mill Manager and approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager.

Mill has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the File 59 [C4/P4] training 2019.

Training	Date	Remarks (Evidence)
Basic Occupational First Aid, CPR & AED Training	8/1/19 & 9/1/19	Photographs and Attendance list Sighted
Workshop Training - SOP	17/1/19	Photographs and Attendance list Sighted

PPE issuance and replacement record seen. Listed PPE in HIRARC were provided to staffs/workers accordingly. During site visit, all employees was equipped with proper PPE and they aware of the importance of usage of PPE.

SOP Chemical Handling is available [SSOP for Chemical Handlers] Issue No. 22 Rev.: 0 dated 1st August 2018, prepared by Asst. Mill Manager and verified by Mill Manager. Chemical Handling Training conducted on 7th January 2019, sighted photographs, evaluation form and participated by 4 participants (consists of store keeper, Asst. Mill manager).

CHRA were made available during audit dated 24th March 2015 and next CHRA will be on 25th March 2020 by OCCUMED Consultancy & Services Sdn Bhd, Dr. Yazriza Bin Yahaya MD. Pg Doh [JKKP IH 127/171-2(08)].

Audiometric Test done by Dr. Halim Bin Ishak MD [JKKP HQ/DOC/00/387]. Baseline & Annual Audiometric Test Report [Date tested: 19th September 2018 & 2nd October 2018 by Specialist Mobile Safety Supplies Sdn Bhd. [Standard Threshold Shift – every 3 months (6 employees listed).

Safety officer (Appointment letter). The person in charge Mr. Uma Shankar P., Asst Mill Manager of OSH Committee approved by Mr. Uma Shankar B, Mill Manager. Letter of appointment dated 1st August 2018.

ERP (Emergency response plan) in File 56 [C4/P4] include the emergency contact number, Emergency Respond Plan Procedure and exit routes in file and notice board. Seen appointment letter of PIC Mr. Uma Shankar A/L Balakrishnan, Mill Manager as Chairman and approved by Mr. Tai Swe Chong, General Manager dated 1st October 2018. Emergency plan is displayed in mill notice board and places with high movement of people.

First aid kit (Training) were sighted in annual training programme year 2018. First Aid, CPR & AED Training dated 8th & 9th January 2019 by CERT ACADEMY. Sighted attendance record, attended by 22 participants.

JKKP 8: dated 10th January 2019 submitted by hand. Seen acknowledgement letter [Akuan Terima] from Marziah Binti Mohd Yusoff, Setiausaha Pejabat, Jabatan Keselamatan Dan Kesihatan Pekerjaan, Negeri Pahang, dated 29th January 2019.

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 Seen policy "Polisi Kemasyarakatan dan Hak Asasi Manusia" dated 1st August 2018 approved by Mr. Tai Swe Chong.

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 The documented social policy as specified above outlined the company's commitment to provide fair treatment to the workers without any discrimination in term of race, gender, nationality and position.



All workers enjoy the same scale of pay and provided with equal housing and work facilities. 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 appointment letter of the staff and workers. Interview with both Estate staff and workers and with both male and female confirmed that they understand the terms and conditions of their employment. No confinement history and no illegal or forced deduction as per this audit period.

The salary is according to 'Guidelines on the Implementation on the Minimum Wages Order (Amendment) 2018 Act 732'. National Wages Consultative Council Act 2011. Malaysian minimum salary is RM1,100 as stated in the guidelines.

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 The salary of the contractor workers is according to 'Guidelines on the Implementation on the Minimum Wages Order (Amendment) 2018 Act 732'. National Wages Consultative Council Act 2011. Malaysian minimum salary is RM1,100 as stated in the guidelines.

Several payslips (latest) has been verified and confirmed that the worker's salary are above the minimum threshold limit set by the Malaysian laws and regulations (RM1,100.00/month). As evidence, sampled taken:

FFB transporter:

- Min Onn Lorry Transport Sdn Bhd
- SF Rubber Trading
- Syarikat Forex Rubber
- Pritam Singh Agency Sdn Bhd

Seen contract employment of workers and payslip. Raub Oil Mill management issued letter dated 16th January 2019 confirming with contractor on achieving the minimum wages requirement. Seen acknowledgement by employees, signed by Ms. Gurshan Kaur and acknowledged by Mr. Uma Shankar A/L Balakrishnan, Mill Manager.

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 Personal file of employees was sighted. Registration Card of each workers sighted, consist of details of employee particulars.

Contract agreement sighted and made available during audit. All details (name, gender, date of birth, date of entry, job description, wage and period of employment information available as evidence of individual existence.

Sighted contract agreement as below:

1. Suresh Kumar Mandal [Passport No.: 09352648]
 - Period of employment: 3 years
 - Job: Factory Worker in Manufacturing
 - Date joined: 4th October 2017.
2. Rachmat Hidayat [Passport No.: AT051823],
 - Period of employment: 3 years
 - Factory Worker in Manufacturing
 - Date joined: 1st February 2004
3. Raj Kumar Thing [Passport No.: 07216246],
 - Period of employment: 3 years
 - Factory Worker in Manufacturing
 - Date joined: 4th September 2014

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 All workers enjoy the same scale of pay and provided with equal housing and work facilities. Seen contract of employment, signed by the employee and employer.

Each employee is provided with the copy of contract agreement, and as per interview with Ms. Chew all staff/workers required to sign acknowledgment form.

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 Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law. TMS Fingerprint System installed as time recording system. Workers are paid based on the hours worked. All data are recorded in payslips of each staffs/worker.

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.

Working hours is 8 hours (7.00 am – 3.00 pm). From Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law. Sighted gazette public holidays 2019 displayed on notice board. Working hours is stated in workers contract agreement:

- 7.00am – 3.00pm: 1st syif
- 3.00pm – 11.00pm: 2nd syif

Seen working hours sign board displayed in Main Office entrance.

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. Salary slips was made available, shows the deduction of workers as per the contract agreement signed by employee and employers. All deduction was made based on the agreed terms with the rate and hours worked. Sighted salary slips of:

- Mohammad Robiul Hossen, [BK0497917], February 2019.
- Hareram Sada [07570900], February 2019.

Interviewed staffs/ workers, they were provided with salary slips, verified on site.

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. Workers provided with accommodation with basic amenities.

Workers provided with medical and accident insurance:

- Foreign Workers Compensation Scheme (FWCS) under the Workmen's Compensation Act 1852.
- Foreign Workers Hospitalization and Surgical Scheme (SKHPPA).



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. Estate management handles the housing inspection.

Seen File No. 55 (Housing) [C5:P4], housing inspection report by Mr. N. Siritaran R. Narayanan, Asst Medical Office, dated 20th February 2019. Seen Quarter A and Staff Quarters Plans and activities for Year 2019, prepared by Mr. Naavin, Social Liasson Officer and approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager dated 13th March 2019.

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 Seen Social and Human Rights Policy, approved by Mr. Tai Swe Chong, General Manager dated 1st August 2018. Sighted "Prosedur Aduan Gangguan Seksual". Sighted appointment letter of AJK Gender Committee (Women), Ms. Chiew Yan Fern, dated 20th September 2018 approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager.

As interviewed staff (Ms. Nabilah – Lab attendant) attends meeting 6 months once and discussed issue more on sexual harassment, issues in workplace area and working condition. Seen organizational chart of gender committee, last date review: 1st September 2019, approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager.

Meeting minutes is made available, (Last meeting conducted on 19th September 2018 at Conference Room (attended by 12 staff/worker), photographs sighted in File No.33 [Sexual Harassment]. Procedure "Aduan Gangguan Seksual" is available and approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager.

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 As per "Social and Human Rights Policy", no children below ages of 18 working in the Mill. The workers were clear that no one below 18 years old should be employed.



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 As per "Social and Human Rights Policy", no children below ages of 18 working in the Mill and this was proven through checking the list of employees. The workers were clear that no one below 18 years old should be employed. As per interview with Mr. B. Uma Shankar, Mill Manager, the management ensure no children and young person are 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 As per SOP "Training & Competency Procedure, Doc. No: MSPO-10, Rev. No: 0, dated 1st August 2018. Training programme for the year 2018 & 2019 was sighted in File 59 [C4/P4].

Seen annual training programme for the year 2019 was sighted.

No.	Training	Date	Remarks
1.	Shovel & Pusher Training	28 th January 2019	Seen photographs, evaluation form [10 participants]
2.	Grading Training	17 th January 2019	Seen photographs, evaluation form [6 participants]
3.	Diesel Tank Training	7 th January 2019	Seen photographs, evaluation form [4 participants]
4.	Chemical Handling Training	7 th January 2019	Seen photographs, evaluation form [4 participants]
5.	Shovel Training	28 th January 2019	Seen photographs, attendance record. [9 participants]
6.	SOP Laboratory Training	21 st November 2018	Conducted by TETRACHEM
7.	SOP – Sterilizer Training	6 th December 2018	Seen photographs, attendance record. Conducted at Sterilizer station. [Involved by loading ramp workers – 9 workers].

8.	SOP – Loading RAMP Station	6 th December 2018	Seen photographs, attendance record. Conducted at RAMP station. [Involved by loading ramp workers – 9 workers].
9.	SOP – Threshing Station Training	6 th December 2018	Seen photographs, attendance record. Conducted at thresher station. [Involved by general workers – 11 workers].
10.	SOP – Press & Digester Station Training	7 th December 2018	Conducted by Asst. Engineer. Seen photographs, attendance record. Conducted at press & digester station. [Involved by press operator – 5 workers].
11.	SOP – Oil Room Operation Training	10 th December 2018	Conducted by Asst. Engineer. Seen photographs, attendance record. Conducted at oil room station. [Involved by oil room operator – 5 workers].
12.	SOP – Kernel Plant Operation	10 th December 2018	Seen photographs, attendance record. Conducted at kernel plant station. [Involved by kernel plant operator – 5 workers].

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 Training needs and training plan for the staff and workers. The Mill has a comprehensive annual training plan for the Staffs and Workers and this was sighted in File 59 [C4/P4] OSH Training. Seen training need analysis (TNA) for the year 2019, prepared by Mr B Uma Shankar, Asst Manager dated for all staff/workers in Raub Oil Mill Sdn Bhd.

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 Comprehensive annual training plan for the year 2019 were made available. Best practices training/ meeting schedule 2019 was made available, prepared by Mr. B Uma Shankar, Asst Manager and approved by Mr. Uma Shankar A/L Balakrishnan, Mill Manager.

No.	Training	Remarks
1.	Laboratory Training	Jan, May, Sep'19
2.	Grading Training	Jan, Apr, Jul, Oct'19
3.	Diesel Tank Training	Jan, Apr, Jul'19
4.	Store handling	Jan, Apr, Jul'19
5.	Loading Ramp Station	Jan, Apr, Jul'19
6.	Sterilizer Station Training	Feb, Jun, Sep'19
7.	SOP – Threshing Station Training	Feb, Jun, Sep'19
8.	SOP – Press & Digester Station Training	Feb, Jun, Oct'19
9.	SOP – Kernel Plant Operation	Jan, May, Aug'19
10.	Clarification Station Training	Mar, Nov'19
11.	Water treatment plant training	Mar, Nov'19
12.	Boiler station training	Mar, Nov'19
13.	Engine room training	Mar, Nov'19
14.	Shovel training	Jan, Nov'19
15.	Electrical workshop training	Jan, Nov'19
16.	FFB Grading course	As required
17.	Raw water and boiler water treatment	As required
18.	5S Training	Monthly briefing
19.	Zero burning policy training	Monthly briefing
20.	MSPO Policy Training	Monthly briefing

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 Sighted the "Environmental Policy". Established on 1st August 2018 which was approved by Mr Tai Swe Chong (General Manager). The policy is written in Bahasa and English language. The policy has been communicated to all workers.

The mill environmental impact assessment and management plan year 2018 has covered processes such as effluent pond, ffb process, scrap iron, scheduled waste, chemical store and etc.

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 Sighted the "Environmental Policy". Established on 1st August 2018 which was approved by Mr Tai Swe Chong (General Manager). The policy is written in Bahasa and English language.

Sighted the Environmental Impact Assessment, Management Action Plans & Continuous Improvement Plans Management Plan for mill. Dated on 1st October 2018. Prepared by Mr Naavin A/L Muthu Krishnan (Mill Engineer) and approved by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

As example:

Activity area: Effluent Pond

Type of Waste Generated: POME

Main Activity: Discharge of POME

Type of aspects:

1. Increase in BOD and affects aquatic lives and beneficial activities by humans in downstream
2. Insufficient BOD in effluent due to high sedimentation of solid in pond
3. Possibilities of underground contamination via leaching through subsoil
4. Sedimentation of solids in the trenches for land application effects overflow of effluents into surrounding waterways
5. Emissions of greenhouse gas especially methane

Type of impacts:

1. Water pollution
2. Global Warming

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 Sighted the Environmental Impact Assessment, Management Action Plans & Continuous Improvement Plans Management Plan for mill. Dated on 1st October 2018. Prepared by Mr Naavin A/L Muthu Krishnan (Mill Engineer) and approved by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

As evidence:

Activity area: Effluent Pond

Type of Waste Generated: POME



Main Activity: Discharge of POME

Type of aspects:

1. Increase in BOD and affects aquatic lives and beneficial activities by humans in downstream
2. Insufficient BOD in effluent due to high sedimentation of solid in pond
3. Possibilities of underground contamination via leaching through subsoil
4. Sedimentation of solids in the trenches for land application effects overflow of effluents into surrounding waterways
5. Emissions of greenhouse gas especially methane

Type of impacts:

1. Water pollution
2. Global Warming

In Compliance **Yes** No Not Applicable

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

Summary The mill has a program to identify all activities /aspects of the mill that have impact to the environment. The document was prepared by Mr Naavin A/L Muthu Krishnan (Mill Engineer) and approved by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

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 training program and records for all workers on MSPO requirement prepared Mr Naavin A/L Muthu Krishnan (Mill Engineer) and approved by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

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 The mill has conducted monthly meeting with their staffs and workers to discuss issues related to environment.

Sighted the latest meeting was conducted on 19th December 2018. Attended by 9 participants.

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 A monthly record on energy consumption for both renewable and non-renewable sources were also maintained documented. It is monitored to optimise use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel.

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 The projection consumption of diesel for mill has been documented on annual basis based on the financial year with the latest available is for year 2018.

In Compliance **Yes** No Not Applicable

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

Summary Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement.

Apart from use of diesel for electricity, palm fibre and nut shells were also used to generate electricity through steam turbine and boiler. The mill use by product of FFB production as renewable energy source where 80% of fibre and 20% shell are extracted from FFB production. Biogas plant expected to run in 2019.

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 Company has established the MSPO Procedure: Waste Management; Ref. No: MSPO-05; Rev: 0; Date 12th December 2018. Prepared by Mr Naavin A/L Muthu Krishnan (Mill Engineer) and approved by Mr. Uma Shankar A/L Balakrishnan (Mill Manager). Sighted list of waste identified by mill management on 1st November 2018 by mill management.

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 Sighted Environmental Management Plan 2018 by prepared by Mr Naavin A/L Muthu Krishnan (Mill Engineer) and Mr. Uma Shankar A/L Balakrishnan (Mill Manager). Approved by Mr Tai Swe Chong (General Manager).

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 Sighted Environmental Management Plan 2018 by prepared by Mr Naavin A/L Muthu Krishnan (Mill Engineer) and Mr. Uma Shankar A/L Balakrishnan (Mill Manager). Approved by Mr Tai Swe Chong (General Manager).

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 Domestic waste for housing area is managed by the contractor (Mido Recycle) that linked to Alam Flora. As per interviewed, the contractor will be disposed at "Tapak Pelupusan Padang Sertik". Collected twice a month.

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 The polluting activities are identified and documented in the environmental impact assessment and management plan. From the EIA, it will be evaluated for the impact and any impact will be included in the management plan.

Sighted the GHG Calculation for mill year 2018 using GHG Emissions Calculation Methods, ISCC 11-01-14, v1.16.

In Compliance **Yes** No Not Applicable

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

Summary Action plan to reduce significant pollutants and emissions has been established as evident in environmental impact assessment and management plan for year 2018.

Example of the action plan included as part of reducing polluting activities is by conducting frequent maintenance of all vehicles. Sighted latest maintenance records of mill vehicles.

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 watercourse. The POME is discharge to the drain and finally to Sg. Gali

Sighted the DOE approval letter for watercourse.

1. License No: 004132
2. Date: 01/07/2018 – 30/06/2019
3. JP/KKS/2018/2019/004132

POME is treated by ponding system (11 Ponds). Retention time (minimum) is 157 days.

Site inspection confirms that the effluent treatment plant meets the requirements set by DOE (Jadual Pematuhan). Verification from the documents confirms that effluent discharges are sampled on a monthly basis and founds meeting requirements set by DOE. As evidence, latest done on 07/01/2019; Certificate No: 32/2019E; Batch No: 0022/2019E; analyzed by Felda Agricultural Services Sdn Bhd.

Mill will send the First Schedule [Regulation 10 (2)] – Quarterly Return Form report quarterly to DOE. As evidence sighted Second Quarter (01/10/2018-31/12/2018). Ref No: AS:C31/152/000/026.

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 Company has established the Water Management Plan Procedure. Ref No: MSPO-08; Rev 1.0; Date 01/11/2018. Prepared by Mr. Naavin A/L Muthu Krishnan (Mill Engineer) and Approved by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).



Identification on water usage have been document in the water management plan. This includes consumption for domestic, boiler and processing. Summary of water consumption on POM have been reviewed.

Abstract from Sungai Gali;
Lesen Penggunaan Sumber Air:
License No: SWUL/LPSA/115/2018
Date: 01/01/2018-31/12/2018
Already Renew: Evidence payment on 21/11/2018. Waiting the New License send by the Jabatan Sumber Air Negeri Pahang

Mill has been monitored the outgoing water/POME. As evidence, sighted the water analysis results conducted by Felda Agricultural Services Sdn Bhd.

In the water management plan, water consumption activity, efficiency monitoring for domestic water use including installing of flow meter at the point where water is extracted, and water quality test have been in place.

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 effluents are discharged through land application as approved by DOE in Jadual Pematuhan. Site inspection confirms that the effluent treatment plant meets the requirements set by DOE (Jadual Pematuhan). Verification from the documents confirms that effluent discharges are sampled on a monthly basis and founds meeting requirements set by DOE.

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 The mill processed its own estates (10%) and external suppliers (90%).

The Mill Capacity is 60 Mt/Hr - Conventional/ Horizontal Sterilizer system has been commissioned in 1977. The mill has one weighbridge which was last calibrated on 28.09.2018 by Department of Meteorology.

The mill has Standard and Safe Operating Procedure includes the following;

1. Safety & Health Policy
2. Environmental Policy
3. Guidelines of Environmental Care



4. Organization Chart
5. Process Flow

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 Code of Good Milling Practice for Palm Oil Mills – MPOB as guidance.

As evidence, the mill is operating in accordance:

- Jadual Pematuhan – Syarat-Syarat Lesen Premis Minyak Kelapa Sawit Mentah, Jabatan Alam Sekitar Negeri Pahang, License No: 004132, Ref No. RAUB/ACC/06/01 valid until 30.06.2019.
- The mill is complying with the BOD limit stipulated under 3.0 Pengurusan Efluen - "Kepekatan Oksigen Biokimia Yang hendak dilupuskan (BOD, 3 hari, 30°C) bagi efluen daripada "Pond No. 11" hendaklah tidak melebihi 100mg/l". The effluent final discharge analysis was conducted on weekly basis for Pond No. 11. The latest sampling was carried out on 17.01.2019 and the analysis result for BOD is 14mg/l.
- As per required in Jadual Pematuhan - Syarat-Syarat Lesen Premis Minyak Kelapa Sawit Mentah, the mill only can release the effluent to the waterway not exceed 1320 m3/day. Sighted the "Liquid Waste Monitoring Record (Influent, Effluent & Incoming Raw Water Reading) for March 2019 (to date), the final discharge is complied with the requirement in jadual Pematuhan - Syarat-Syarat Lesen Premis Minyak Kelapa Sawit Mentah.

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 Sighted the Raub Oil Mill 5 years Business Plan for year 2019 – 2024.

Item	19/20	20/21	21/22	22/23	23/24
FFB	213,559	216,363	217,493	218,250	221,900
OER (20.5%)	43,779.59	44,354.41	44,586.06	44,741.25	45,489.50
KER (5.50)	11,745.74	11,899.96	11,962.11	12,003.75	12204.50
Profit	4,6982,97.99	4,7599,86.00	4784846.00	4801500.00	4881800.00

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 mechanism is well documented and implemented by both sides, the mill management and the contractor.

Sighted item no. 2 in the contract agreement, "Pricing and Schedule", where both parties agree that the rate for the transport services shall be as stated in Schedule A.

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 Stated in the item no. 3, 'Invoicing and Payment', the Supplier will pay the Contractor for all amounts twice a month once for invoices up to the middle of the month and the other for invoices up to the end of the month and will be paid within one week thereof".

Sighted the invoice made by the contractors, dated on 28.02.2019, amounted RM 93.881.31, and the payment was made by the management on 06.03.2019.

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 Stakeholder engagement meeting was done on 13.11.2018 where the management gave briefing on the items as below:

- a) Who are the stakeholders?
- b) What is the MSPO Certification?
- c) Briefing on company's policies.
- d) Briefing on complains and grievances procedures.
- e) ETC

Sighted an assessment form post-briefing which was sign by the contractor's representative, Mr. Nordin. The contractor also aware that mill will be certified under MSPO. Therefore, the contractor has been instructed by mill management to follow the MSPO standard requirement when carrying out their work in the mill premise.

In Compliance **Yes** No Not Applicable

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



Summary All the contractors aware that mill will be certified under MSPO. Therefore, the contractor has been instructed by mill management to follow the MSPO standard requirement when carrying out their work in the mill premise. All the contract agreement are kept in contractors file. Sighted the contract that sign by contractors with the company.

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 18th March 2019. Sighted audit plan dated 15th March 2019 which have been accepted by management. All the auditors are qualified MSPO auditor. As per agreed, the Raub Oil Mill Sdn Bhd 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) Interview with sampled workers revealed, the mill management impose strict control measure on safety compliances.
- 2) The storage facilities for schedule waste, chemical and POL well-constructed, proper signage clearly displayed, and emergency preparedness well implemented.
- 3) The mill management has demonstrated fully commitment during the entire audit process.
- 4) Signages throughout office, chemical area and in the field sites, effectively maintained and appropriate to the needs of the process.
- 5) Top management continuously establishes directions for the middle and upper management to execute in ways to comply with the MSPO management system in future.
- 6) Good relationship being maintained with surrounding smallholders and villages.
- 7) Good positive feedback received from internal and external stakeholders.

Appendix A: Audit Plan



AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
17 th March 2019	TBA	➤ Travelling from Ampang, Selangor – Raub, Pahang.	MS	SP/MF
18 th March 2019	08:00 – 09:00	➤ Centralize Opening Meeting at Raub Oil Mill Sdn Bhd: <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	SP/MF
	09:00 – 13:00	Raub Oil Mill Sdn Bhd [Mill] <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	SP/MF
	10:30 – 12:30	➤ Centralize Stakeholder Consultation	MS	SP/MF
	13:00 – 14:00	➤ Lunch	MS	SP/MF
	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. ➤ 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	SP/MF
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 1.	MS	SP/MF

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
19 th March 2019	08:00 – 13:00	Raub Mining & Development Co. Sdn. Bhd [Estate] <ul style="list-style-type: none"> ➤ Document Audit: 	MS	SP/MF

		<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. 		
	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	SP/MF
	13:00 – 14:00	➤ Lunch	MS	SP/MF
	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	SP/MF
	15:30 – 16:30	➤ Verify any outstanding issues, auditor discussion and end of audit for day 2.	MS	SP/MF
	16:30 – 17:30	<ul style="list-style-type: none"> ➤ Centralize Closing Meeting at Raub Mining & Development Co. Sdn. Bhd [Estate]: ➤ 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	SP/MF
20 th March 2019	TBA	➤ Travelling back from Raub, Pahang to Ampang, Selangor.	MS	SP/MF

Appendix B : Non-Conformity details

Non-Conformities Identified During This Audit

Major Nonconformities:	Non-were raised during this audit.
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Minor Nonconformities:	The following NC's was raised for this audit.
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Company Name	Raub Oil Mill Sdn Bhd			
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-K1-MSPO-2018			
NC No. / Ref.	K1/MSPO/MINOR/01	Date Detected	19 th March 2019	
Site(s) concern	Raub Oil Mill Sdn Bhd	Target Completion	Next Surveillance Audit	
Normative Reference and Requirement	4.3.1.1 Minor All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	No signage displayed during site visit			
NC Objective Evidence:				
As per site visit, no signage was displayed on the diesel tank as per "Panduan Permohonan Permit Untuk Membeli Barang-Barang Kawalan Berjadual Di Bawah Peraturan-Peraturan Kawalan Bekalan 1974".				
Lead Auditor Signature:		Client Signature:		
				
Root cause Analysis (to be filled by client):				
Corrective action planned (to be filled by client):				
Preventive Action (to be filled by client):				



Review of corrective/preventive action (to be filled by Lead Auditor)	
NC Closed: <input type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input type="checkbox"/> No
Date Verified:	Lead Auditor Signature:

Area of Concern:	The following AOC was raised for this audit.
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Company Name	Raub Oil Mill Sdn Bhd			
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-K1-MSPO-2018			
NC No. / Ref.	K1/MSPO/AOC/01	Date Detected	19 th March 2019	
Site(s) concern	Raub Oil Mill Sdn Bhd	Target Completion		
Normative Reference and Requirement	4.4.2.4 Area of Concern Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.			
NC Type	<input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Area of Concern			
Description of Non-Conformity	Stakeholders and workers still not aware of complaints or suggestion procedure			
NC Objective Evidence:				
Sighted minute of meeting for external mill stakeholders and also training for the workers. However, during stakeholders meeting (combine with Raub Mining & Development Co. Sdn Bhd) on 18 th March 2019 conducted by Global Gateway Certifications Sdn Bhd, it was observed the stakeholders were not aware that any complaints or suggestions could be forwarded to the mill management.				
Lead Auditor Signature:		Client Signature:		
				

Appendix C: List of Stakeholders Contacted

Attendance List

Internal Stakeholders

- 1) Raub Oil Mill Sdn Bhd management team and staff
- 2) Gender Committee Representatives
- 3) Male and Female workers
- 4) Workers Representatives
- 5) Foreign Workers Representatives
- 6) NUPW

External Stakeholders

- 1) Mr. Chang Tong Chuan - Min Onn Lorry Transport
- 2) Mr. Bendik Luntak – PDRM
- 3) En Andi Awang Mohamad – Perkeso
- 4) En. Muhammad Syuwari Khalid – Perkeso
- 5) En. Ab. Majid bin Abdul Manaf – Security
- 6) En. Muhamad Asyraf bin Azmi – MPOB
- 7) En. Mohamad bin Othman – MIDO
- 8) Mr. K Sugumaran – Contractor
- 9) Mr. Ashok Dewai – Contractor
- 10) En. Mohiuddin Sumon – Contractor
- 11) Mr. Lee Kian Aik – Contractor
- 12) Mr. Teoh Chiou Long – Contractor