

GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)



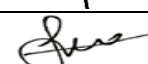
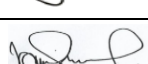
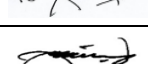
CERTIFICATION AUDIT REPORT


Part 3: General Principles for Oil Palm Plantations and Organized Smallholders

Sinaron Sinua Plantation Sdn Bhd

-Single Site Certification-

MAIN ASSESSMENT AUDIT
13th June 2019

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	22/07/2019	Issued as Draft Report	Ismadi bin Ismail	Lead Auditor	
A	05/08/2019	Peer Review 1 Comments	Muhammad Sufyan bin Azmi	Peer Reviewer 1	
A	05/08/2019	Peer Review 2 Comments	Mohamad Fitri bin Mustafa	Peer Reviewer 2	
B	06/08/2019	Issued as Final Report	Ismadi bin Ismail	Lead Auditor	
B	08/08/2019	Final Report Approved	Muhammad Syafiq bin Abd Razak	Certifier	

Acknowledgment by Sinaron Sinua Plantation Sdn Bhd					
Rev	Date	Description	Management Representative	Role	Signature
B	08/08/2019	Acceptance of the contents	Winnie Osingang	Sustainability 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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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 Sinaron Sinua Plantation Sdn Bhd [Estate]. During this Main Assessment (Stage 2) Audit, the audit team were briefed by Estate Management of the supply base disposition. The Estate is on Single Site Certification.

This assessment was conducted onsite on 13th June 2019 to assess the compliance of the certification unit against the "MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholder". The scope of certification is "Management of Sustainable Oil Palm Plantations from Cultivation, Planting and Production of Fresh Fruit Bunches".

1.2 Company details and Contact information

Company Name	Sinaron Sinua Plantation Sdn Bhd
Business Address	2-3, Lot 33, Block E, Lintas Square, Jalan Lintas, 88300 Kota Kinabalu, Sabah, Malaysia.
Contact Person	Mr. Roger Ling Wei Lee
Office Telephone	088-251711
E-Mail	roger.ling91@gmail.com

1.3 Certification Unit**Name of the Certification Unit**

No	Name of the Certification Unit	Site Address	GPS Reference of the site office	
			Longitude	Latitude
1.	Sinaron Sinua Plantation Sdn Bhd	Kg. Sinua, Sook, Sabah, Malaysia	E 116° 37' 49"	N 5° 30' 35"

MPOB License Information

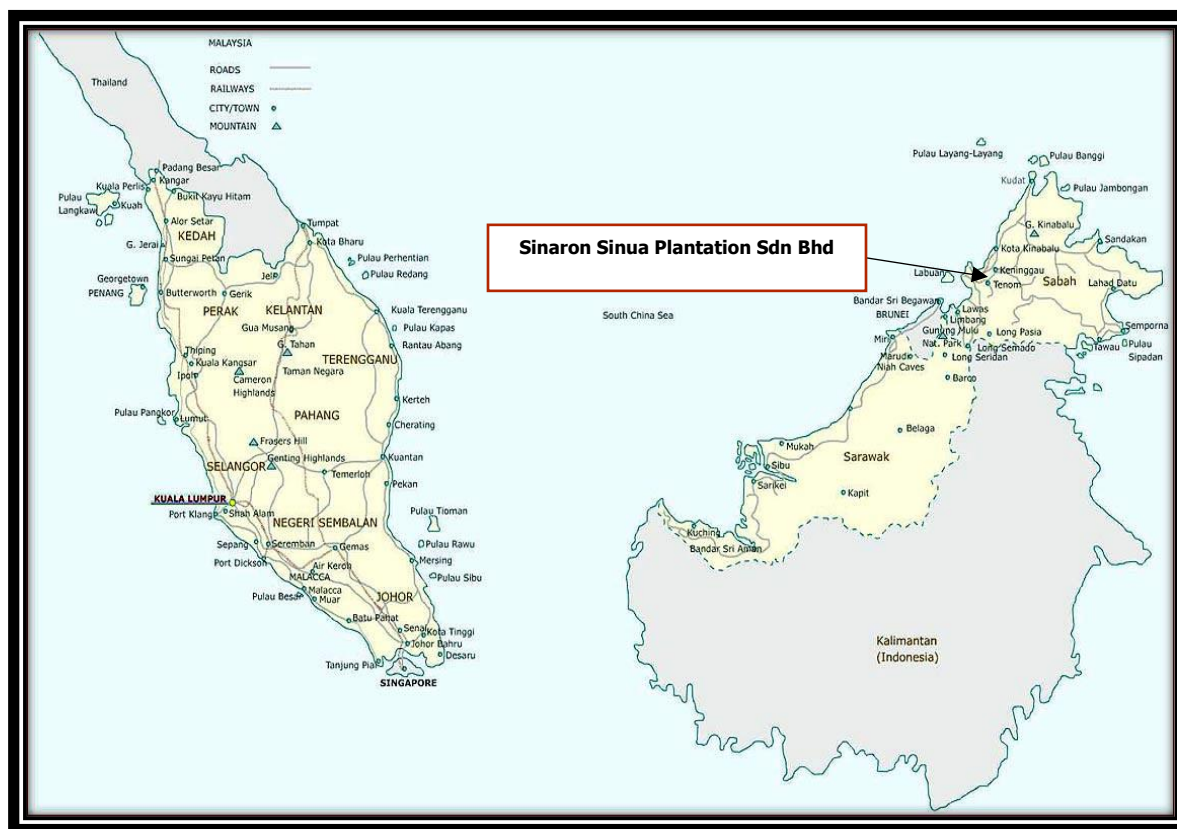
No	Name Of The Site	Licence Number	Expiry Date	Scope Activity
1.	Sinaron Sinua Plantation Sdn Bhd	616838002000	30.09.2019	Menjual dan mengalih FFB

Others Sustainability Certification

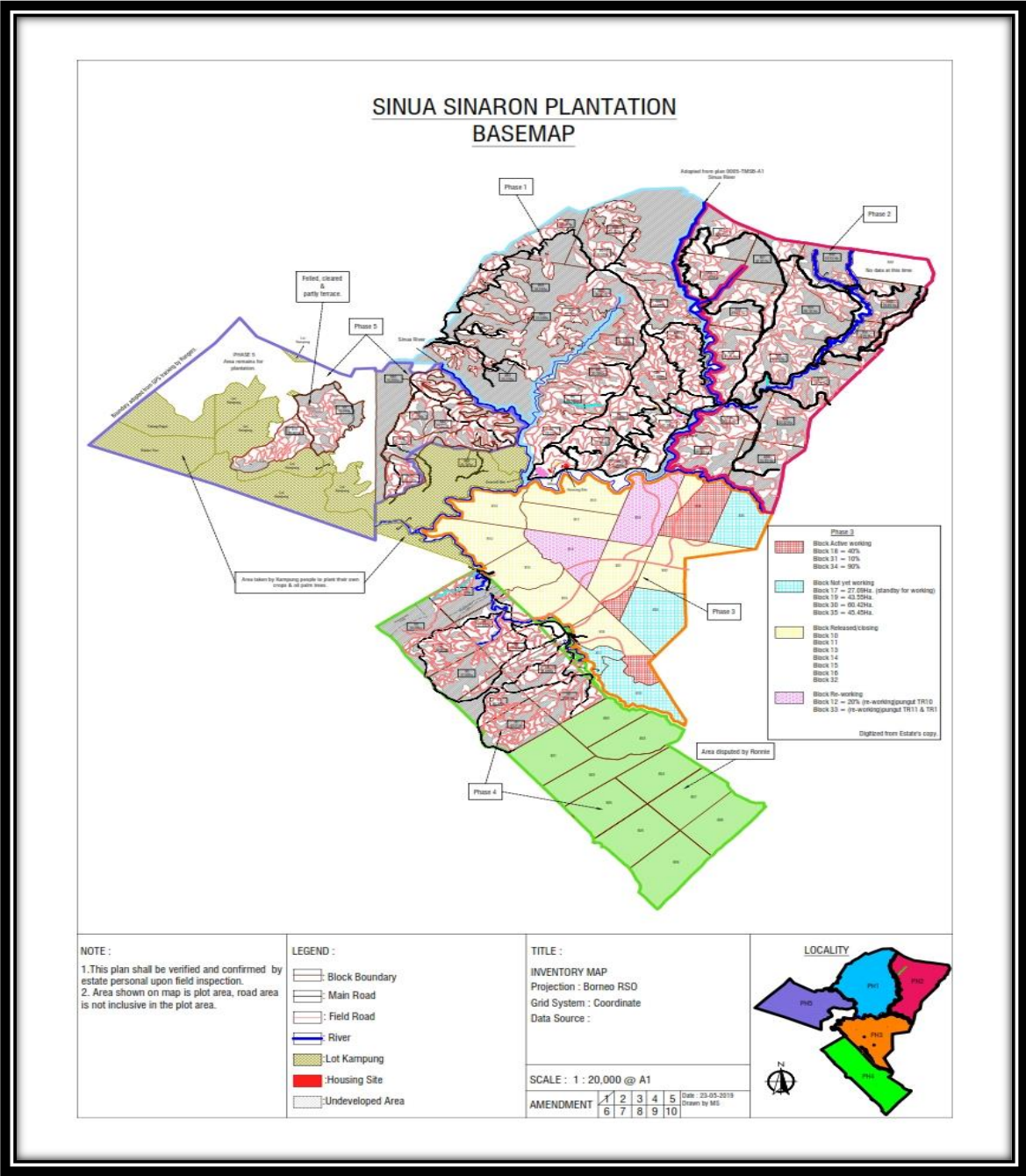
No	Name of the Site	Others Sustainability Certification
1.	Sinaron Sinua Plantation Sdn Bhd	Nil

1.4 Map Showing Geographical Location

a) Sinaron Sinua Plantation Sdn Bhd



b) **Sinaron Sinua Plantation Sdn Bhd**



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

Name of the Certification Unit	Area Summary (HA)		
	Certified Area (per Land Title)	Planted	Mature
Sinaron Sinua Plantation Sdn Bhd	3,080.81	1,137.66	132.32
Total	3,080.81	1,137.66	132.32

Name Of The Supply Base	Area Summary (HA)		
	Conservation Area	HCV	Others
Sinaron Sinua Plantation Sdn Bhd			1,320.44
Total			1,320.44

Name of the Certification Unit	FFB Summary (MT)		
	Projected from last audit	Actual Production for 12 Months [June 2018- May 2019]	Projected Production for next 12 Months [June 2019-May 2020]
Sinaron Sinua Plantation Sdn Bhd	NIL	776.00	635.00
Total		776.00	635.00

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 3: General Principles for Oil Palm Plantations and Organized Smallholders
Certificate number	GGC-SSP001-MSPO-00-2019
Initial certificate issued date	08 th August 2019
Certificate expiry date	07 th August 2024
Stage 1 assessment date	19 th April 2019
Stage 2 / Main Assessment	13 th June 2019
Annual Surveillance 1 [ASA 1]	May 2020
Annual Surveillance 2 [ASA 2]	May 2021
Annual Surveillance 3 [ASA 3]	May 2022
Annual Surveillance 4 [ASA 4]	May 2023

1.7 Qualification of the Lead Assessor and Assessment Team

Lead 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: Sesumaran Subramniam

Sesumaran's Academic Experience are BSc (Hons) Computer Studies, University of Sunderland (UK) Year 2006) and obtain Bachelors in Total Quality Management Year-2011. He has gained his vast experience in quality management and auditing while working in various certification bodies as a Quality Manager and auditor since 2013. Fully trained in similar agriculture certification programs such as RSPO, SCCS, MSPO and etc. Qualified as Auditor in several certification programme. Member of GGC MSPO audit team. Able to speak and understand Bahasa Malaysia and English.

Auditor

Name: Wan Mohd Azlan bin Wan Ngah

He is graduated from Open University Malaysia with a Bachelor's Degree in Business Administration with more than 30 years working experience in various plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Involved in MSPO assessment since 2018. Completed and certified MSPO Auditor course in 2017 held by SIRIM STS Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. Member of GGC MSPO audit team. 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). In the case of this certification unit, sampling calculation was not applied as it is on Single Certification.

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	13 th June 2019
Name of site(s) visited	Sinaron Sinua Plantation Sdn Bhd
Total number of man-days spent	3 man-days

1.10 Audit Result Summary Findings

Category	Numbers	Status (Closed/Open/Not Applicable/No Action Requires)
Major Nonconformities	5	Closed
Minor Nonconformities	2	Open
Area of Concern	0	No action requires
Noteworthy /Positive Comments	4	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, the stakeholder consultation shall be carried out in stage 2 and recertification audit cycle 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 3rd June 2019 at <https://www.ggc.my/index.php?task=public> as to accommodate a stakeholders' consultation meeting for estate. Therefore, it was conducted on 13/06/2019 at Sinaron Sinua Plantations 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 Estate.

The aim of stakeholder consultation is to ensure that the MSPO requirements are continuously implemented and adhere to, as well as others aspects that they considered could be improved. However, in surveillance audit, the consultation may be limited to those stakeholders who have raised concerns, complaints or disputes prior to the audit. The auditor begin consultation with brief explained on the purpose of the audit, interviewed and record comments made by the stakeholders. The comments were verified with the mill management before incorporating into the assessment findings. The participants were represented of internal and external stakeholder namely from local communities, government agencies, workers and etc.

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.	General Worker	<ul style="list-style-type: none"> They are aware on the importance of safe work practices to be implemented at the workplace and PPE will be given free of charge by the Estate. They have confirmed that no sexual harassment and violence case had happened in the workplace. The Estate has treated its worker's right equally with no 	<ul style="list-style-type: none"> No action requires No action requires No action requires 	<ul style="list-style-type: none"> Positive findings Positive findings Positive findings

		<p>discrimination based on gender.</p> <ul style="list-style-type: none"> • They were satisfied with the condition of their living quarters. The Estate provides the basic amenities such as free water and electricity. • They have confirmed that workers' wages per month are being paid more than the Minimum Wage Order 2018 of RM1, 100.00 	<ul style="list-style-type: none"> • No action requires • No action requires 	<ul style="list-style-type: none"> • Positive findings • Positive findings
2.	Harvesters	<ul style="list-style-type: none"> • They are aware on the importance of safe work practices to be implemented at the workplace and PPE will be given free of charge by the Estate. • They have confirmed that no sexual harassment and violence case had happened in the workplace. • The Estate has treated its worker's right equally with no discrimination based on gender. • They were satisfied with the condition of their living quarters. The Estate provides the basic amenities such as free water and electricity. They have confirmed that workers' wages per month are being paid more than the Minimum Wage Order 2018 of RM1, 100.00 	<ul style="list-style-type: none"> • No action requires • No action requires • No action requires • No action requires • No action requires 	<ul style="list-style-type: none"> • Positive findings • Positive findings • Positive findings • Positive findings • Positive findings
3.	Stakeholders A (Kampung Sinaron Representatives)	<ul style="list-style-type: none"> • He have good understanding about MSPO. • His aware on the existence of complaints and grievances mechanism. • Request from Management to provide a surau at Estate for the workers. 	<ul style="list-style-type: none"> • No action requires • No action requires • Estate Management has proposed to Senior Management to construct 'Surau' in the estate. The proposal is 	<ul style="list-style-type: none"> • Positive findings • Positive findings • To verify in next surveillance audit.

			included in the estate's infrastructure continuous improvement.	
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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 Sinaron Sinua Plantation Sdn Bhd. Estate Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual. MSPO Compliance also being assist by Sustainability 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 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 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO)] Part 3: General Principles for Oil Palm Plantations and Organized Smallholders), 5 major non-conformities and 2 minor non-conformities have been raised to the facilities that being audited. All the evidence submitted were found adequate and therefore all major non-conformities are closed. (Refer to Appendix B, non-conformity table for details).

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted of major non-conformity findings is closed. Hereby, the lead auditor recommends to award the certificate of compliance "MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders" to Sinaron Sinua Plantation 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

CHRA	Chemical Health & Risk Assessment
CoP	Code of Practise
CPO	Crude Palm Oil
DOE	Department of Environmental
DOSH	Department of Occupational Safety and Health Malaysia
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
FFB	Fresh Fruit Bunch
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
MPOCC	Malaysian Palm Oil Certification Council
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 Procedure

2.1 Principle 1 : Management commitment and responsibility

Criterion 1 Malaysian Sustainable Palm Oil (MSPO) Policy

Indicator 1 A policy for the implementation of MSPO shall be established.

Summary

Sinaron Sinua Plantation Sdn Bhd has established a Sustainability Policy which stating their commitment to implanting the following sustainable practices:

- To operate sustainability management based on the principles and criteria contained in MS2530:2013 standard.
- To continuously improve our operation in line with social, environmental and economic aspects.
- Ensure protection and conservation for High Conservation Value and High Carbon Stock areas.
- Ensure protection and preservation of rare, threatened or endangered species and high biodiversity values.
- To ensure this sustainability policy is distributed and understood by all the employees and stakeholders.

The policy was signed by Director of Operation (Mr. Roger Ling Wei Lee), Sinaron Sinua Plantation Sdn Bhd dated 01 June 2018.

External Stakeholder Meeting was conducted on 29th March 2019 at Dewan Serbaguna Kg Sinua attended by 26 participants. The meeting conducted by Miss Winnie Osiangang, the MSPO Coordinator.

Internal Stakeholder meeting was conducted on 1st May 2019 at Estate Muster Ground to 90 foreigners and 48 local workers by Estate Manager and Sustainability Team.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 2 The policy shall also emphasize commitment to continual improvement.

Summary

Sinaron Sinua Plantation Sdn Bhd has established a Sustainability Policy which stating their commitment to implanting the following sustainable practices. The policy was signed by Director of Operation (Mr. Roger Ling Wei Lee) dated 01 June 2018.

The company is committed to continuously improve their operation in line with social, environmental and economic aspects based on the principles and criteria contained in MS2530: 2013 standards.

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

Sinaron Sinua Plantation Sdn Bhd has established MSPO Procedure Title: Internal Audit, Doc No: MSPO-01, Rev 0, Date 1st July 2018.



Internal audit has been planned for the year 2019 as documented in "Annual Internal Audit Plan" prepared by Winne Osinggang and approved by the Director. Seen, the Internal audit at Sinaron Sinua Plantation Sdn Bhd being planned in Feb, June and October 2019.

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 The company has established MSPO Procedure Title: Internal Audit, Doc No: MSPO-01, Rev 0, Date 1st July 2018.

The purpose of this procedure is to describe the audit process conducted internally to determine Sinaron Sinua Plantation Sdn Bhd operations are effectively implemented to comply with the Malaysian Sustainable Palm Oil (MSPO) standards.

The internal audit conducted by Miss Winnie Osinggang on 20th March 2019. 8 major, 5 minor and 10 Opportunity for Improvement being raised during audit.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

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

Summary Seen, all the Non-Conformities being closed before the Management Review Meeting conducted on 5th April 2019.

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 Sinaron Sinua Plantation Sdn Bhd has established the Management Review Procedure. MSPO-02; Rev 0; Date 1/07/2018.

Sighted the MSPO Management Review Meeting dated 5th April 2019 chaired by Mr. Ling Ding Dieng, the Managing Director. The meeting attended by 10 participants. 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
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Indicator 1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.
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Summary

Sinaron Sinua Plantation Sdn Bhd has established Sustainability Policy. The policy has been approved by Director of Operation, Mr Roger Ling Wei Lee dated on 1st June 2018. Stated in the Sustainability Policy; Point no 2 – “To continuously improve our operations in line with social, environmental and economic requirements”.

Sinaron Sinua Plantation Sdn Bhd has established the Management Review Procedure. MSPO-02; Rev 0; Date 1/07/2018, Appendix 2: Continuous Improvement Plan. The Continual Improvement Plan as stated below:-

	2019	2020
Manager / Asst House	2	8
Bathrooms	25	28
Chemical Store	1	
Fertiliser Store	1	
Schedule waste	1	
PPE Store	1	
Surau		1
Lubricant Store	1	
Workshop	1	
General Store	1	
Office		1
Diesel Skid Tank		1
Gen-set House		1

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Indicator 2 The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology, where applicable, that are available and feasible for adoption

Summary The Company has installed Solar Panel to 72 workers quarters from the total of 160 in order to reduce the usage of Gen-set power supply.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Indicator 3 An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.

Summary The management will adapt any new technology suitable for its operations from time to time.

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 the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.

Summary The Company has established the Stakeholder Communication & Consultation Procedure under No.MSPO-03 Rev:0 Dated 1 July 2018, Sinaran Sinua Plantation Sdn Bhd. Communication and consultation process is also communicated through stakeholder meeting.

External Stakeholder Meeting was conducted on 29th March 2019 at Dewan Serbaguna Kg Sinua attended by 26 participants. The meeting conducted by Miss Winnie Osingang, the MSPO Coordinator.

Internal Stakeholder meeting was conducted on 1st May 2019 at Estate Muster Ground to 90 foreigners and 48 local workers by Estate Manager and Sustainability Team.

No record on request and response matter being addressed by stakeholders.

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 as stated below:-

No	Reference Document	Confidential	Non Confidential
1	Workers Safety and Health		/
2	Trade Supplier	/	
3	Operations(Prosedures) and Quality		/
4	Administration and human Resources		/
5	Environmental Related Matters		/
6	FFB Supplier	/	
7	Financial Statement & Business Data	/	
8	Corporate Responsibility	/	
9	Statement of Corporate Governance	/	
10	Operational Manual	/	
11	Internal process,method & system	/	
12	Marketing Strategy,Projection or plan	/	
13	Business Strategy projection or plan	/	
14	Salary structure and bonus structure	/	
15	Contract Agreements	/	

All these documents were sighted in the estate office.

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 The Company has established the Stakeholder Communication & Consultation Procedure under No.MSPO-03 Rev:0 Dated 1 July 2018, Sinaran Sinua Plantation Sdn Bhd. The Standard Operating Procedure has identified mechanism for consultation and communication with the relevant stakeholders.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 2 A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.

Summary The person in charge for transparency agenda is Mr Hazriano Robert, appointed on 1st March 2019 by the Sustainable Manager, Mr Lawrence Lau.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary Sighted latest stakeholders list updated in April 2019 as below:-

	No of stakeholders
Government	30
Supplier / Contractor	18
Local Community	18
Neighbouring Estate / Mill	4

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Criterion 3 Traceability

Indicator 1 The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).

Summary The company has established Sinaron Sinua Plantation Sdn Bhd MSPO Procedure : FFB Traceability Ref No: MSPO – 04 Rev: O; Date: 1st July 2018

Non-Conformity - Major

The actual FFB process flow is contradict with the Company's MSPO Procedure on Traceability.

In Compliance ☐ **Yes** ☒ **No** ☐ **Not Applicable**

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

Summary The Management team on harvesting holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through GM's and Director's visit.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

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

Summary The person in charge for transparency agenda is Mr Zaidye Zainuddin, appointed on 1st March 2019 by the Sustainable Manager, Mr Lawrence Lau.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Indicator 4 Records of sales, delivery or transportation of FFB shall be maintained.

Summary FFB being sell to Wonder Choice Sdn Bhd, collecting centre and being monitored by Head Office.

Sighted the records of sales, delivery or transportation of FFB. This record being maintained and the documents are kept by estate.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

2.3 Principle 3 : Compliance to legal requirements

Criterion 1 Regulatory requirements

Indicator 1 All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.

Summary The list of law sighted in document Legal Register Sinaron Sinua Plantation Sdn Bhd. The details as listed herein:-

1. Occupational Safety and Health
2. Factories and Machinery
3. Uniform Building By Law
4. Pesticide
5. Electrical Supply
6. Petroleum (Safety Measurement)
7. Fire Services
8. Code of Practice for Safe Working in A Confined Space
9. Environmental Quality
10. Local Government
11. Housing and Amenities
12. Labour
13. EPF
14. SOCSO
15. Union
16. Minimum Retirement Age Act 2012
17. National Wage Consultative Council Act 2011, Minimum Wages Order 2018
18. Weights and Measures Regulations 1981
19. MPOB

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 2 The management shall list all laws applicable to their operations in a legal requirement register.

Summary The list is fully covered the details requirements that related to MSPO compliance. Sighted at the Estate, permit & license being monitored and updated by the Person-In-Charge. Sighted some of the Licenses as below:

- MPOB License 616838002000, Expiry: 30/09/2019
- Trade license, no 536082

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 The company keep the legal requirements updated by appointing Mrs.Ruzaini Paduli as a PIC when any new amendments or any new regulatory coming into force.

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 The company keep the legal requirements updated by appointing Mrs.Ruzaini Paduli as a PIC when any new amendments or any new regulatory coming into force. The appointment was made on 9.3.2019 as per appointment letter sighted.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Criterion 2 Land use rights

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

Summary Sighted A joint venture agreement was made between Sabah Land Development Board and Tajuk maju Sdn Bhd (Mother company of Sinaron Sinua).

The Agreement between both parties made based on confidence and friendly cooperation to carry out the business of cultivating land up to 3080.81 plantable Hectares more or less with Palm Oil trees and plant , harvest, process and sell the procedure derived there from the project. Both parties agreed to carry out the Joint Venture Project through a joint company known Sinaron Sinua Plantation Sdn Bhd (Co.No 1101112-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 use of the land.

Summary Sighted the Joint Development Agreement – for the development of the Land measuring 3,080.81 plantable hectares more or less and situated in Sungai Sinarun in the District of Tongod, Keningau, Sabah between Sabah Land Development Board and Tajuk Maju Sdn Bhd.(Company No: 754031-P) dated 24th February 2014. The Agreement was prepared by J.T Kulai & Co, Advocates and Solicitors.

The JV Project will be developed through a joint venture company known as Sinaron Sinua Plantation Sdn Bhd as stated under Clause 2 , Whereas. The estates' land reconciliation statement as follow;

Description	
Planted	1,137.66
Unplantable	1,943.15
Total Area	3,080.81

Evidence in the Continual Improvement Plan the estate to conduct perimeter survey in August 2019 until December 2020 to determine the actual size developed since signing the Agreement.

Non- Conformity - Minor

No evidence, declaration of infrastructure areas in the Area Statement Report and legal Agreement between Sinaron Sinua Plantations Sdn Bhd and Sentosa Serimas Sdn Bhd, whom operating the sawmill in the Estate 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 Sighted boundary stone at phase 1 /block 9 and Phase 2/Block 59 legal perimeter boundary markers clearly demarcated and visibly maintained on the ground.

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 No customary right demonstrates in this vicinity.

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 No customary right demonstrates in this vicinity.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary No customary right demonstrates in this vicinity..

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary No customary right demonstrates in this vicinity.

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 are implemented to mitigate the negative impacts and promote the positive ones.

Summary SIA as per documented procedure MSPO Procedure: Social Impact Assessment (SIA) [Doc No: MSPO-09, Rev 00] dated 1st July 2018.

Sighted, SIA for Internal stakeholders conducted on 1st March 2019. The purpose of Social Impact Assessment is assessing on Access and Use Rights, Economic livelihoods and working condition, cultural and religion issues, health and education facilities and subsistence activities. 18 internal stakeholders being assessed and responded.

Non- Conformity- Minor

SIA was conducted on 1st March 2019. However, no management plan on the mitigation of the negative impacts and promote the positive ones was available.

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 "Prosedur Pengendalian Aduan atau Cadangan", dated 1st July 2018. Organization chart is available for Complaint and Grievances.

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 resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.

Summary Non-Conformity- Major

Evidence, all the complaints raised by the stakeholders dated 21st September 2018, 21st December 2018, 22nd January 2019 and 24th January 2019 are some without name and being resolve in an effective, timely and appropriate manner.

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 a complaint.

Summary Complaint Form seen for External and Internal Stakeholders.

All internal employee and external stakeholders' can deliver their complaints and grievances directly to the management through filling the complaints form and place into the Drop Box outside the Office.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 4 Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.

Summary Seen, communication of all the policies being conducted through-

- a. External Stakeholder Meeting was conducted on 29th March 2019 at Dewan Serbaguna Kg Sinua attended by 26 participants. The meeting conducted by Miss Winnie Osingang, the MSPO Coordinator.
- b. Internal Stakeholder meeting was conducted on 1st May 2019 at Estate Muster Ground to 90 foreigners and 48 local workers by Estate Manager and Sustainability Team.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 5 Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.

Summary Sighted 2 complaints being recorded in year 2018 and 2019 respectively.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Criterion 3 Commitment to contribute to local sustainable development

Indicator 1 Growers should contribute to local development in consultation with the local communities.

Summary Sighted Corporate Social Responsibility Record File for internal and external stakeholder.

Sumbangan kewangan untuk membiayai sambutan Hari Natal (Krismas) di Gereja Tonomon Sepulut. Sighted letter dated 6th November 2018, and donation amounted RM500.00 attached with bank payment slips made available.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Criterion 4 Employees safety and health

Indicator 1 An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.

Summary OSH policy sighted signed by Managing Director Mr. Roger Ling Wei Lee, dated 1st June 2018. OSH Plan has been established as per Occupational Safety and Health Program 2019

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 pesticides:
 - i) all employees involved shall be adequately trained on safe working practices; and
 - ii) all precautions attached to products shall 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 must 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 affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meetings are kept and the concerns of the employees and any remedial actions taken are recorded.
- h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.
- i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.
- j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.

Summary

OSH policy sighted signed by Managing Director Mr. Roger Ling Wei Lee, dated 1st June 2018.

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).HIRARC sighted for the followings work operation :-

1. Tingkahlaku Semasa bekerja
2. Menanam Anak Pokok Kelapa Sawit
3. Memotong buah tandan segar
4. Penyemburan racun
5. Menabur Baja
6. Menabur Racun Tikus
7. Pemandu
8. Penyimpanan dan Pengurusan bahan di stor

Non – Conformity - Major

Inadequate Hazard Identification, Risk Assessment and Risk Control (HIRARC) covering all activities and operations be assessed and documented for the followings:-

- a. All the activities under Agricultural Technical Policy except Harvesting
- b. Labour lines, Gate House, Chemical Store, Pre-mixing Store, Schedule Waste Room, Repeater House and Watching tower.

The Estate has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training records file for each staffs and workers. Training Plan includes:-

	Topic	Month Programme	Status Done
1	Chemizal Hazard	Dec '19	
2	PPE	Dec '19	
3	1 st Aid Box	Oct '19	29/3/19
4	CPR Techniques	Oct '19	
5	Workshop	Nov '19	
5	Signage	Dec '19	
6	Tingkahlaku Semasa Kerja	Jan '19	
7	Planting of Oil Palm	Feb '19	
8	Harvesting	March '19	
9	Spraying	April '19	18/1/19
10	Manuring	May '19	18/1/19
11	Rat Baiting	June '19	

12	Driving	July '19	
13	Penyimpanan dan Pengurusan Bahan Kimia di Store	August '19	
14	Pengangkutan Pekerja	Sept '19	

Samples training conducted was Training to Sprayers by Mr Hazriano Robert dated 18th January 2019 to 6 workers.

Estate has provided appropriate PPE for all workers in their operations. PPE Issuance and replacement record sighted for:-

1. Staff/AP
2. Harvesters
3. Field Workers
4. General Workers

All workers involved in the operations have been adequately trained in safe working practice.

CHRA has been conducted on 12th April 2019 reported by Mrs. Suzanna J Rice Oxley (HQ/11/ASS/00/290). Seen, a total of 19 workers will undergo medical surveillance at DAB OH Sdn Bhd. They will be tested on Physical examination, Blood, Urine, Cholinesterase and Chest X-ray. The workers are from the categories of sprayers, manure, workshop and store.

Seen the Chemical Register Hazardous to Health which registered 12 hazardous chemicals dated 11st April 2019.

OSH Committee Chart 2019 sighted. Seen, letter of appointment dated 16th January 2019 for committee members in the file. Person incharge of OSH is Mr. Michael Philip, The Estate Manager. He will assist by Sustainability Department.

The committee meeting has been conducted as schedule and the latest on 16th March 2019. The meeting to discuss all issues regarding worker's safety and health. The meeting attended by 13 people. Zero accidents occurred in 2018 and 2019 to date.

Sighted the emergency procedure for the Estate under Sinaron Sinua Plantation Sdn Bhd – Manual Keselamatan dan Kesihatan Pekerjaan, No Dokumen, SHM-SSPSB-04, No rujukan -0, Tarikh Berkuatkuasa-1/1/2019. Emergency response plan available in local language (Malay and English). The ERP has been explained to all workers and staffs during training which has been conducted.

Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board. The certified first aider for the Estate are:-

1. En Wilder Joseph – 950602-12-6217
2. En Zerafiani bt John – 920308-12-6374
3. En. Zendifirwan John – 940317-12-7019

They have attended the training on 27th April 2018. The certificate valid till April 2021 under Sijil Pengenalan Pertolongan Cemas Industri.

Estate has registered with DOSH the No . Daftar Tempat Kerja : SB/19/04/139663.

In Compliance ☐ Yes ☒ **No** ☐ Not Applicable

Criterion 5 Employment conditions

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

Summary Sighted the Social Policy., established on 1st June 2018 signed by Operation Director, Mr Roger Ling Wei Lee. Communication of the policy to workforce is through muster – call and the policies being displayed at the office notice boards. This policy covers :-

- a. Compliance with established laws and regulations including labour laws, land title laws and workers' housing
- b. Ensure minimum retirement age policy is complying
- c. Provide the relevant training and development associated with their roles and responsibility
- d. Prohibit employing worker by coercion or under age
- e. Paying salaries to employees and staff on a minimum a wage order
- f. Respect and protect Human Rights and workers Rights (including temporary workers, contracts or foreign workers)
- g. Freely of discrimination and prejudice against gender, race, religion, nationality and political views
- h. Provide a harmonious work environment to employees, customers and stakeholders
- i. Provide workplace free of sexual harassment whether directly or indirectly against all workers, societies and stakeholders.
- j. Allow workers to join or form trade unions of their own choosing that enable them to exercise their rights, Company shall give them freedom to have their own representative to organize themselves for collective bargaining.

The Policy being displayed at notice boards outside the office. The Social Policy has been communicated to all External and Internal Stakeholders during the meeting at respective Estates.

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 June 2018 signed by Operation Director, Mr Roger Ling Wei Lee.

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.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary Sighted in the Social Policy on Payment of the minimum salary as gazette by law, established on 1st June 2018 signed by Operation Director, Mr Roger Ling Wei Lee.

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 RM1100.00 as stated in the guidelines.

Interview with both Estate staff and workers and with both male and female confirmed that they understand the terms and conditions of their employment. Sample taken as below:-

➤ Nonis bin Mahadi – 930905-12-7323 – May 2019

Basic Salary	=	RM 1,403.70
Deduction		
EPF	=	RM 157.00
SOCSSO	=	RM 7.25
SIP	=	RM 2.90
Nett Pay	=	RM 1,236.55

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 being engaged in the Estate.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 5 The management shall establish records that provide an accurate account 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, the Registration Card of the workers which stated the offered position, employee number, date joined, wages implied, working hours, OT, allowances, rest day, working on holiday etc. Sample taken on Roslan bin Sumaila, Employee Number - 00286 and NRIC number -891205-12-6689.

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 is available for each and every employee indicated in the employment records.

Summary Sighted, Employment Contract between Sinaron Sinua Sdn Bhd and the workers. The Agreement stated all the terms 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 Afdil bin Andaun, NRIC number -001128-12-1173.

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 employees and employer.

Summary The Management has established Time Recording System based on Attendance Record Book for staff and Pocket Check-roll to workers.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 8 The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.

Summary The working hour and break time has 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 forced to work on 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 Pay Slip and Employment Contracts of each workers sighted. 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.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

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.

For Indonesian workers, will be covered under SOCSO upon expiring the Foreign Workers Compensation Scheme.

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 in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.

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

Periodically, linesite Inspection was conducted by the Staff In Charge of Linesite, Mr Hazriano Robert.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary Procedure for handling sexual harassment has been established as per Prosedur Pengurusan dan Pengendalian Gangguan Seksual di Tempat Kerja, approved by Mr. Roger Ling Wei Lee dated 1st June 2018. The policy to prevent all forms of sexual harassment and violence at the workplace.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 13 The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to 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 Freedom of Association Policy approved by Mr. Roger Ling Wei Lee dated 1st June 2018. In addition, the Social Policy did stated on respect the right of all employees to form or join trade union has been stated under clause:

'f. Respect and protect Human Rights and workers Rights (including temporary workers, contracts or foreign workers).

In Compliance**Yes**

No



ot Applicable

Indicator 14

Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions.

Summary

Child and young person policy is incorporated in the Social Policy. The policy was approved by Mr. Roger Ling Wei Lee dated 1st June 2018.

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

d'. Prohibit employing worker by coercion or under age

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



ot Applicable

Criterion 6 Training and competency**Indicator 1**

All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.

Summary

Training and Development policy is incorporated in the Social Policy established on 1st June 2018 signed by Operation Director, Mr Roger Ling Wei Lee. The statement is under the following number:

c' Provide the relevant training and development associated with their roles and responsibility

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

,	Topic	Month Programme	Status Done
1	Chemizal Hazard	Dec '19	
2	PPE	Dec '19	



3	1 st Aid Box	Oct '19	29/3/19
4	CPR Techniques	Oct '19	
5	Workshop	Nov '19	
5	Signage	Dec '19	
6	Tingkahtaku Semasa Kerja	Jan '19	
7	Planting of Oil Palm	Feb '19	
8	Harvesting	March '19	
9	Spraying	April '19	18/1/19
10	Manuring	May '19	18/1/19
11	Rat Baiting	June '19	
12	Driving	July '19	
13	Penyimpanan dan Pengurusan Bahan Kimia di Store	August '19	
14	Pengangkutan Pekerja	Sept '19	

Training records for 1st Aid Training was sighted on 29th March 2019 conducted by En. Wilder J attended by 8 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 should 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 All workers involved in the operations have been adequately trained in safe working practice. The estate 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. The training plan for 2019 was sighted. Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training.

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 Environmental policy signed by Managing Director, Mr. Roger Ling Wei Lee dated 01.06.2018 and seen Document No: MSPO-06 Pelan Pengurusan Alam Sekitar dated 01.07.2018. The objective is To plan, Implementing, monitoring and measuring predetermined activities to mitigate environmental impacts and greenhouse effect.

Sighted Training on Sustainable, Environmental, Safety & Health and Social Policy has been conducted to Internal stakeholders.

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 The estate has conducted Environmental Aspect Impact as per document Environmental Aspect Impact Assessment Guidance for Estate dated 1.07.2018 covering all estate operations which give major impacts on the environment.

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 Sinaron Sinua Plantation Sdn Bhd have established a mitigation plan documented in document Environmental Aspect Impact Assessment Guidance for Estate dated 1/7/2018-reference number: -MSPO -06.

Record of mitigation plan to change the herbicide spraying to machine cutting has been sighted in MSPO -06 -lampiran1.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary Program to promote positive impacts to the environment has been established. Estate established planning to upgrade / build Schedule waste store, Lubricant store, workshop and general store with time bound plan.

Sighted Improvement Plan available with the time bound plan of implementation. Verified record ref.no:CIP01/2019-Continual improvement plan.

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 of the environmental management and improvement management plans and are working towards achieving the objectives.

Summary Internal Stakeholder meeting was conducted on 1st May 2019 at Estate Muster Ground to 90 foreigners and 48 local workers by Estate Manager and Sustainability Team. The meeting has stress on compliance to the Environmental Aspects.

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 Internal Stakeholder meeting was conducted on 1st May 2019 at Estate Muster Ground to 90 foreigners and 48 local workers by Estate Manager and Sustainability Team. The meeting has stress on compliance to the Environmental Aspects.

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 Record for diesel consumption monitoring sighted during the audit. Consumption of Diesel monitored by establishing baseline values and trends. Solar Panel were installed to reduce diesel consumption.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 2 The oil palm premises shall estimate the direct usage of nonrenewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.

Summary Sighted annual estimate of non-renewable energy being established for the year 2019.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary Evidence, 109 solar panels being installed particularly the workers quarters.

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	All waste products and sources of pollution identified and documented under Schedule Waste Management Procedure namely Prosedur MSPO – Pengurusan Bahan Buangan. List of schedule waste clearly stated in Annex 1.
In Compliance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	Identifying and monitoring sources of waste and sources of pollution identified and documented under Schedule Waste Management Procedure, Pengurusan Bahan Buangan. List of schedule waste clearly stated in Annex 1 for instance improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products available
In Compliance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Indicator 3	The 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.
Summary	Estates Chemical Handling procedure not in line with Environment Quality Act 1974; Environment Quality (Scheduled Wastes) Regulations.
Non-Conformity - Major	
Sighted in the Sinaron Sinua Plantation Sdn Bhd's Chemical Handling procedure: "Cara pengendalian bekas dan bungkusan racun" stated:- v) Bungkusan atau bekas yang telah dirosakkan mesti dibungkus dengan beg plastic yang lebih besar bagi mengurangkan risiko pencemaran semasa pengendalian. vi) Bungkusan serpihan tersebut mestilah ditanam sekurang kurangnya satu meter dari paras tanah di tapak penimbunan/pelupusan yang telah dikhaskan dan mempunyai papan tanda amaran) Stating that chemical containers has to be buried 1 meter deep inside the land fill.	
In Compliance	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable
Indicator 4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used

HDPE pesticide containers..

Summary Schedule waste record was verified from schedule waste file. Proper recording of Schedule waste was maintained. The empty chemical container being recycle for water supply during spraying

Also verified estate's "Prosedur Pelan Pengurusan Alaam Sekitar-Lampiran 1-Panduan Penilaian Kesan Aspek Alam Sekitar untuk Ladang,number 8", Empty chemical containers were recycled by rinsing it with clean water at least minimum 3 times.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 5 Domestic waste should be disposed as such to minimise the risk of contamination of the environment and watercourse.

Summary Domestic waste for linesite area is managed by the Estate.

Domestic waste disposal area is more than a Kilometer away from the housing and water course. Not sighted any contamination agent or schedule wastes inside the landfill.

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 **Non – Conformity - Major**

Assessment of polluting activities in the estate sighted in document "MSPO-06 Lampiran 1: Panduan Penilaian Kesan Aspek Alam Sekitar Untuk Ladang". However, assessment for greenhouse gas emissions not available during audit.

In Compliance ☐ Yes ☒ **No** ☐ Not Applicable

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

Summary Sinaron Sinua Estate have established a mitigation plan documented in document Environmental Aspect Impact Assessment Guidance for Estate dated 1/7/2018-reference number: -MSPO -06. Record of mitigation plan to change the herbicide spraying to machine cutting has been sighted in MSPO -06 –lampiran 1.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Criterion 5 Natural water resources

Indicator 1 The management shall establish a water management plan 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 of supply.

- b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.
- c) Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).
- d) Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.
- e) Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.
- f) Where bore well is being used for water supply, the level of the ground water table should be measured at least annually.

Summary

Plan documented in Document Reference: Agricultural Technical Policy No.15, Water Management-ATP 15), Revision 1. Sources of water used for the estate have been identified in document "Identification of Water Source". Analysis of drinking water has been conducted. Sampling results on drinking water sighted during the audit.

In Compliance☒ **Yes**☐ No☐ Not Applicable**Indicator 2**

No construction of bunds, weirs and dams across main rivers or waterways passing through an estate..

Summary

Evidence, no bunds, weirs and dams across the river.

In Compliance☒ **Yes**☐ No☐ Not Applicable**Indicator 3**

Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).

Summary

Sighted during site visit, the house being provided with 200 gallon of PVC water tank.

In Compliance☒ **Yes**☐ No☐ Not Applicable**Criterion 6 Status of rare, threatened, or endangered species and high biodiversity value area****Indicator 1**

Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:

- a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.
- b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.

Summary

Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities done through a survey on 20th April 2019. Rare and threatened species such as:

- a) Kera
- b) Musang Tanggalong



- c) Beruk
- d) Musang Binturong
- e) Landak Borneo
- f) Teledu
- g) Mengkira
- h) Musang Belang Tenggiling
- i) Ular sawa Panjang
- j) Ular Sawah Darah

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Indicator 2 If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:
a) Ensuring that any legal requirements relating to the protection of the species are met.
b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities and developing responsible measures to resolve human-wildlife conflicts.

Summary Measures to Discouraging any illegal or inappropriate hunting taken by installing signboard that shows the restriction to hunting in estate area. Sighted "No hunting" signboard during the sight visit in phase 4/Block 19, Phase 2/Block47.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Indicator 3 A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.

Summary Management plan sighted in document estate HBV Assessment Report. Management plan was effectively implemented. Verified the Meeting minutes and attendance for Training and awareness programme on HBV to prohibit any activities within wildlife corridor boundary as stated in the point number 3 under HBV Management Plan.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Criterion 7 Zero burning practices

Indicator 1 Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.

Summary Policy for zero burning practice sighted as per "Polisi Alam Sekitar Sinaron Sinua Plantation Sdn Bhd. SOP for new planting sighted as per "Agricultural Technical Policy No. 2: Land Clearing & Preparation". Point number 2.2.3 stating :Clean clearing with Zero Burning method should be practiced at all time

During site visit there are no trace of burning, Zero burning policy is implemented.

In Compliance ☒ **Yes** ☐ **No** ☐ **Not Applicable**

Indicator 2 A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop..

Summary No replanting works carried out in the estate.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 3 Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.

Summary No replanting works carried out in the estate.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 4 Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.

Summary No replanting works carried out in the estate.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

2.6 Principle 6 : Best practices

Criterion 1 Site management

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

Summary Sinaron Sinua Plantation Sdn Bhd established Standard Operating Procedure for estates as listed below:

No.	SOP	Policy No.
1	Pre-development survey, assessment and planning	ATP 1 – 1
2	Land clearing & preparation	ATP 2 - 2
3	The management of oil palm nursey	ATP 3 - 3
4	Road construction	ATP 4 – 4
5	Soil conservation	ATP 5 - 5
6	Establishment & maintenance of mucuna bracteate and other legumes cover crop	ATP 6 - 6
7	Planting & supplying	ATP 7 – 7
8	Palm replacement	ATP 8 – 8
9	Manuring	ATP 9 – 9
10	Pest and disease management	ATP 10- 10
11	Weed control	ATP 11 - 11
12	Bunch census	ATP 12 – 12
13	Harvesting	ATP 13 - 13
14	Frond pruning	ATP 14 -14
15	Water management	ATP 15 – 15



16	Environment	ATP 16 – 16
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Person in charge will monitor the work flow and ensure all operations as per guided in the SOP. All SOP and procedures are kept and will be updated periodically.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 2 Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.

Summary Seen in the Agricultural Technical Policy No.1, Pre-Development Survey, Assessment and Planning under b. Soil Suitability and Topography, Table 1 Land Suitability Classification Based on Terrain stated:-

Terrain Class	Ave. angle of slope	Complex Slope Mapping Units	Oil Palm Suitability Classification
Flat	0-2°	C1	Highly Suitable
Undulating	2-5°	C2	Highly Suitable
Rolling	6-15°	C3	Suitable
Hilly	16-25°	C4	Moderately Suitable
Very Steep	>25°	C5	Unsuitable

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 3 A visual identification or reference system shall be established for each field.

Summary The estate has a visual reference system to identify each field or block. Each field has the signboard with block and phase number, hectare and month & year planting.

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 Estate 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, Sinua Estate Cashflow document for 6 years from 2019 until 2024.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 2 Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.

Summary No replanting program, as the first phase planted in year 2013.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 3 The business or management plan may contain:
a) Attention to quality of planting materials and FFB.
b) Crop projection: site yield potential, age profile, FFB yield trends.
c) Cost of production: cost per tonne of FFB.
d) Price forecast.
e) Financial indicators: cost benefit, discounted cash flow, return on investment.

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

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 4 The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.

Summary The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e. Upkeep maintenance, FFB Production, capital expenditure are shown therein.

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 Sighted, Contract Agreement on "Membekal dan membeli tandan buah segar sawit" between Sinaron SinuaPinataion Sdn Bhd and Wonder Choice Sdn Bhd dated 1st November 2018. The Contract valid from 1st November 2018 until 1st November 2022.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary The Contract Agreement is fair and transparent. Seen, under clause 7. Syarat – Syarat Pembayaran stated "Pembayaran akan dilakukan secara online kepada pembekal. Pembayaran dalam masa 30 hari daripada tarikh invoice dikeluarkan.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Criterion 4 Contractor

Indicator 1 Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.

Summary No contractor being engaged in the Estate.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary No contractor being engaged in the Estate

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

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

Summary No contractor being engaged in the Estate

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

Indicator 4 The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.

Summary No contractor being engaged in the Estate.

In Compliance ☒ **Yes** ☐ No ☐ Not Applicable

2.7 Principle 7 : Development of new planting

Criterion 1 Oil palm shall not be planted on land with a high biodiversity value

Indicator 1 Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 2 No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Criterion 2	Peat land
Indicator 1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Criterion 3	Social and Environmental Impact Assessment (SEIA)
Indicator 1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders.
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Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.
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Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed.
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Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Criterion 4	Soil and topographic information
Indicator 1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 2 Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Criterion 5 Planting on steep terrain, marginal and fragile soils

Indicator 1 Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 2 Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 3 Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Criterion 6 Customary land

Indicator 1 No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 2 Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 3 Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 4 The owner of recognized customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 5 Identification and assessment of legal and recognised customary rights shall be documented.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 6 A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 7 The process and outcome of any compensation claims shall be documented and made publicly available.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

Indicator 8 Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for all estates.

In Compliance ☐ Yes ☐ No ☒ **Not Applicable**

2.8 Details of Audit Findings

Details Non-Conformity

- See Appendix B -

Details of Area of Concern

- nil -


Details of Noteworthy / Positive Findings

- 1) Good cooperation and commitment from the management and staff
- 2) Good relationship being maintained with surrounding communities
- 3) Good positive feedback received from internal and external stakeholders.
- 4) Proactive and highly committed Management Team in establishing directions in complying with the MSPO certification


Appendix A: Audit Plan

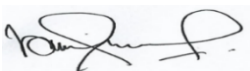

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
13 th June 2019	08:00 – 09:00	<ul style="list-style-type: none"> ➤ Opening Meeting at Sinua Estate: <ul style="list-style-type: none"> • Presentation by the manager/coordinator • Presentation by Lead Auditor. ➤ Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable). 	IBI	SS/WMA
	09:00 – 13:00	Sinua 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. 	IBI	SS/WMA
	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. • Stakeholder Meeting 	IBI	SS/WMA
	13:00 – 14:00	<ul style="list-style-type: none"> ➤ Lunch / Rest 	IBI	SS/WMA
	14:00 – 15:00	<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. 	IBI	SS/WMA
	15:00 – 16:00	<ul style="list-style-type: none"> ➤ Verify any outstanding issues and auditor discussion. 	IBI	SS/WMA
	16:00 – 17:00	Closing Meeting at Sinua Estate: <ul style="list-style-type: none"> ➤ Chaired by the audit Lead Auditor <ul style="list-style-type: none"> • 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 	IBI	SS/WMA

Appendix B: Non-Conformity details

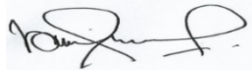
Non-Conformities Identified During This Audit			
Major Nonconformities:		The following NC's were raised for this audit.	
Company Name		Sinaron Sinua Plantation Sdn Bhd	
Stage of Audit		Initial Stage 1	<input type="checkbox"/>
		Initial Stage 2	<input checked="" type="checkbox"/>
		Surveillance	<input type="checkbox"/>
		Recertification	<input type="checkbox"/>
Audited Standard		Part 3: General Principles for Oil Palm Plantations and Organized Smallholders	
Client Number		GGC-N4-MSPO-2019	
NC No. / Ref.	N4/MSPO/MAJOR/01	Date Detected	13 th June 2019
Site(s) concern	Sinaron Sinua Plantation Sdn Bhd	Target Completion	90 days
Normative Reference and Requirement	4.2.3.1 Major The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).		
NC Type	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		
Description of Non-Conformity	Incompliance to MSPO Procedure		
NC Objective Evidence: The actual FFB process flow is contradict with the Company's MSPO Procedure on Traceability.			
Lead Auditor Signature: 		Client Signature: 	
Root cause Analysis (to be filled by client): Lack of awareness			
Corrective action planned (to be filled by client): The procedure to be amended in accordance with the actual process flow.			
Preventive Action (to be filled by client): The procedure to be checked and amended according to actual process flow. Procedure will be strictly adhered.			
Review of corrective/preventive action (to be filled by Lead Auditor) The Standard Operating Procedure for Traceability has been revised on 20 th June 2019. The evidence submitted was found adequate and the major non-compliance is closed. Continuous implementation will be further verified in the next assessment.			

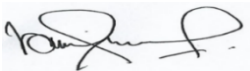




NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 11 th July 2019	Lead Auditor Signature: 


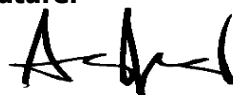
Company Name	Sinaron Sinua Plantation Sdn Bhd			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-N4-MSPO-2019			
NC No. / Ref.	N4/MSPO/MAJOR/02	Date Detected	13 th June 2019	
Site(s) concern	Sinaron Sinua Plantation Sdn Bhd	Target Completion	90 days	
Normative Reference and Requirement	4.4.2.2 Major The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties			
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: Evidence, all the complaints raised by the stakeholders dated 21 st September 2018, 21 st December 2018, 22 nd January 2019 and 24 th January 2019 are some without name and being resolve in an effective, timely and appropriate manner.				
Lead Auditor Signature: 		Client Signature: 		
Root cause Analysis (to be filled by client): Lack of awareness				
Corrective action planned (to be filled by client): The complaints forms to be filled in with complete details and resolved in an effective, timely and appropriate manner.				
Preventive Action (to be filled by client): To ensure forms to be completed accordingly				
Review of corrective/preventive action (to be filled by Lead Auditor)				


All the evidences submitted were found adequate and the major non-compliance is closed. Continuous implementation will be further verified in the next assessment.

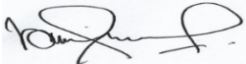

NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 11 th July 2019	Lead Auditor Signature: 


Company Name	Sinaron Sinua Plantation 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 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-N4-MSPO-2019			
NC No. / Ref.	N4/MSPO/MAJOR/03	Date Detected	13 th June 2019	
Site(s) concern	Sinaron Sinua Plantation Sdn Bhd	Target Completion	90 DAYS	
Normative Reference and Requirement	4.4.4.2 Major b. The risks of all operations shall be assessed and documented.			
NC Type	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	Inadequate HIRARC during the audit.			
NC Objective Evidence: b. Inadequate Hazard Identification, Risk Assessment and Risk Control (HIRARC) covering all activities and operations be assessed and documented for the followings:- a. All the activities under Agricultural Technical Policy except Harvesting. b. Labour lines, Gate House, Chemical Store, Pre-mixing Store, Schedule Waste Room, Repeater House and watching tower..				
Lead Auditor Signature: 	Client Signature: 			
Root cause Analysis (to be filled by client): Lack of awareness				
Corrective action planned (to be filled by client): To add the HIRARC covering all other activities as highlighted.				
Preventive Action (to be filled by client):				

To ensure the HIRARC be prepared for any other new activities and operations in the estate.	
Review of corrective/preventive action (to be filled by Lead Auditor)	
The additional HIRARC have been established on 18 th June 2019. All the evidences submitted were found adequate and the major non-compliance is closed. Continuous implementation will be further verified in the next assessment.	
NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 11 th July 2019	Lead Auditor Signature: 

Company Name	Sinaron Sinua Plantation 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 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-N4-MSPO-2019			
NC No. / Ref.	N4/MSPO/MAJOR/04	Date Detected	13 th June 2019	
Site(s) concern	Sinaron Sinua Plantation Sdn Bhd	Target Completion	90 days	
Normative Reference and Requirement	4.5.3.3 Major The 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.			
NC Type	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	Standard Operating Procedure for handling of used chemicals are not according to Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 .			
NC Objective Evidence: Sighted in the Sinaron Sinua Plantation Sdn Bhd's Chemical Handling procedure: "Cara pengendalian bekas dan bungkusan racun" stated:- v) Bungkusan atau bekas yang telah dirosakkan mesti dibungkus dengan beg plastic yang lebih besar bagi mengurangkan risiko pencemaran semasa pengendalian. vi) Bungkusan serpihan tersebut mestilah ditanam sekurang kurangnya satu meter dari paras tanah di tapak penimbunan/pelupusan yang telah dikhaskan dan mempunyai papan tanda amaran) Stating that chemical containers has to be buried 1 meter deep inside the land fill.				
Lead Auditor Signature: 		Client Signature: 		
Root cause Analysis (to be filled by client):				


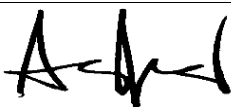

Lack of awareness	
Corrective action planned (to be filled by client):	
SOP is prepared in accordance to the Regulatory requirement.	
Preventive Action (to be filled by client):	
To ensure procedure to be set up in accordance with the statutory and regulatory requirement.	
Review of corrective/preventive action (to be filled by Lead Auditor)	
Seen, the Standard Operating Procedure on Chemical Handling being amended on 17 th June 2019. The evidence submitted was adequate and the major non-compliance is closed. Continuous implementation will be further verified in the next assessment.	
NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 11 th July 2019	Lead Auditor Signature: 

Company Name	Sinaron Sinua Plantation 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 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-N4-MSPO-2019			
NC No. / Ref.	N3/MSPO/MAJOR/5	Date Detected	13 th June 2019	
Site(s) concern	Sinaron Sinua Plantation Sdn Bhd	Target Completion	90 days	
Normative Reference and Requirement	4.5.4.1 Major An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.			
NC Type	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	Assessment for greenhouse gas emissions not available during audit.			
NC Objective Evidence: Assessment of polluting activities in the estate sighted in document "MSPO-06 Lampiran 1: Panduan Penilaian Kesan Aspek Alam Sekitar Untuk Ladang". However, assessment for greenhouse gas emissions not available during audit.				
Lead Auditor Signature: 		Client Signature: 		



Root cause Analysis (to be filled by client):	
Lack of awareness	
Corrective action planned (to be filled by client):	
The pollution assessment to be prepared	
Preventive Action (to be filled by client):	
The assessment to be conducted regularly (as required)	
Review of corrective/preventive action (to be filled by Lead Auditor)	
The Greenhouse Gas Emissions being assess with Enzo GHG Calculator. The evidence submitted was adequate and the major non-compliance is closed. Continuous implementation will be further verified in the next assessment.	
NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 11 th July 2019	Lead Auditor Signature: 

Minor Nonconformities:	The following NC's were raised for this audit.
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Company Name	Sinaron Sinua Plantation 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 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-N4-MSPO-2019			
NC No. / Ref.	N4/MSPO/MINOR/01	Date Detected	13 th June 2019	
Site(s) concern	Sinaron Sinua Plantation Sdn Bhd	Target Completion	Next Surveillance	
Normative Reference and Requirement	4.4.1.1 Minor Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	There is no evidence sighted during the audit.			
NC Objective Evidence: SIA was conducted on 1 st March 2019. However, no management plan on the mitigation of the negative impacts and promote the positive ones was available.				

Lead Auditor Signature: 	Client Signature: 
Root cause Analysis (to be filled by client):	
Lack of awareness	
Corrective action planned (to be filled by client):	
The management plan on the mitigation of negative impacts and promotes the positive ones as highlighted in the SIA is now available.	
Preventive Action (to be filled by client):	
To ensure the plans are implemented to mitigate the negative impact and promote the positive ones as raised in the SIA.	
Review of corrective/preventive action (to be filled by Lead Auditor)	
The evidence submitted was adequate and the minor non-compliance is closed. Continuous implementation will be further verified in the next assessment.	
NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 11 th July 2019	Lead Auditor Signature: 

Company Name	Sinaron Sinua Plantation 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 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-N4-MSPO-2019			
NC No. / Ref.	N4/MSPO/MINOR/2	Date Detected	13 th June 2019	
Site(s) concern	Sinaron Sinua Plantation Sdn Bhd	Target Completion	Next Surveillance	
Normative Reference and Requirement	4.3.2.2 Minor The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	No evidence during the audit			

NC Objective Evidence:	
No evidence:-	
<ol style="list-style-type: none"> 1. Declaration of infrastructure areas in the Area Statement Report 2. Legal Agreement between Sinaron Sinua Plantations Sdn Bhd and Sentosa Serimas Sdn Bhd, whom operating the sawmill in the Estate area 	
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 checked="" type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified:	Lead Auditor Signature:

Area of Concern:	Non-were raised during this audit.
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Appendix C: List of Stakeholders Contacted

Internal Stakeholders

- 1) Sinaron Sinua Plantation Sdn Bhd Management team and staff
- 2) Local Workers Representatives
- 3) Foreign Workers Representatives

External Stakeholders

- 1) Mustadi Malo, Beneficiary
- 2) Herman Jainis, Kampung Sinua
- 3) Affindy Jining, Kampung Sinaron