

GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)

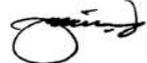
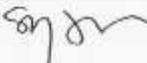
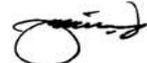
CERTIFICATION AUDIT REPORT

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

RAH PROPERTIES CORPORATION SDN BHD

-Individual Certification-

MAIN ASSESSMENT AUDIT 15th October 2020 – 16th October 2020

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	01/12/2020	Issued as Draft Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
A	14/12/2020	Peer Review 1 Comments	Nzri bin Rasidi	Peer Reviewer 1	
A	14/12/2020	Peer Review 2 Comments	Muhammad Syafiq bin Abu Bakar	Peer Reviewer 2	
B	23/12/2020	Issued as Final Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	30/12/2020	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	

Acknowledgment by RAH Properties Corporation Sdn Bhd					
Rev	Date	Description	Management Representative	Role	Signature
B	30/12/2020	Acceptance of the contents	Puan Rahmah binti Abdul Rahim	Executive Director	

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 RAH Properties Corporation Sdn Bhd. During this Main Assessment Audit (Stage 2), the audit team were briefed by Executive Director, of the supply base disposition. The estate consists only RAH Properties Corporation Sdn Bhd.

This assessment was conducted onsite on 15th October 2020 – 16th October 2020 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	RAH Properties Corporation Sdn Bhd
Business Address	Suite 7-1, Plaza RAH, 111 Jalan Raja Abdullah, 50300 Kampung Baru, Kuala Lumpur.
Contact Person	Puan Rahmah binti Abdul Rahim
Office Telephone	+603-26918888
E-Mail	missrr@aol.com

1.3 Certification Unit

Name of the Certification Unit

No	Name Of The Supply Base	Site Address	GPS Reference of the site office	
			Longitude	Latitude
1.	Ladang RAH Properties Corporation Sdn Bhd	Bukit Tarek, Mukim Kerling, 44100 Ulu Selangor, Selangor.	E 101.554032	N 3.498505

MPOB License Information

No	Name Of The Site	License Number	Expiry Date	Scope Activity
1.	RAH Properties Corporation Sdn Bhd	503976502000	30/06/2021	"Menjual dan mengalih FFB"

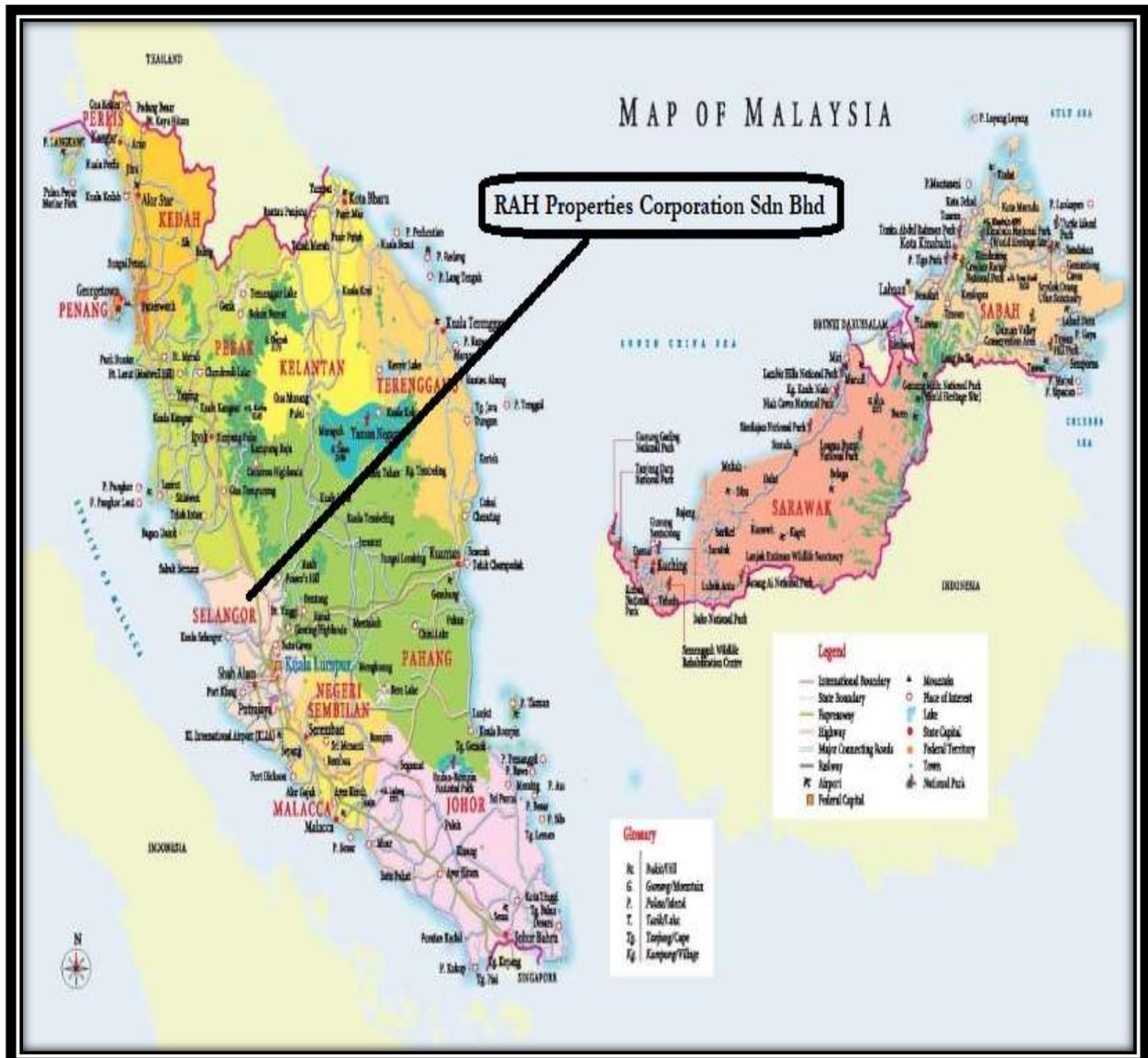


Others Sustainability Certification

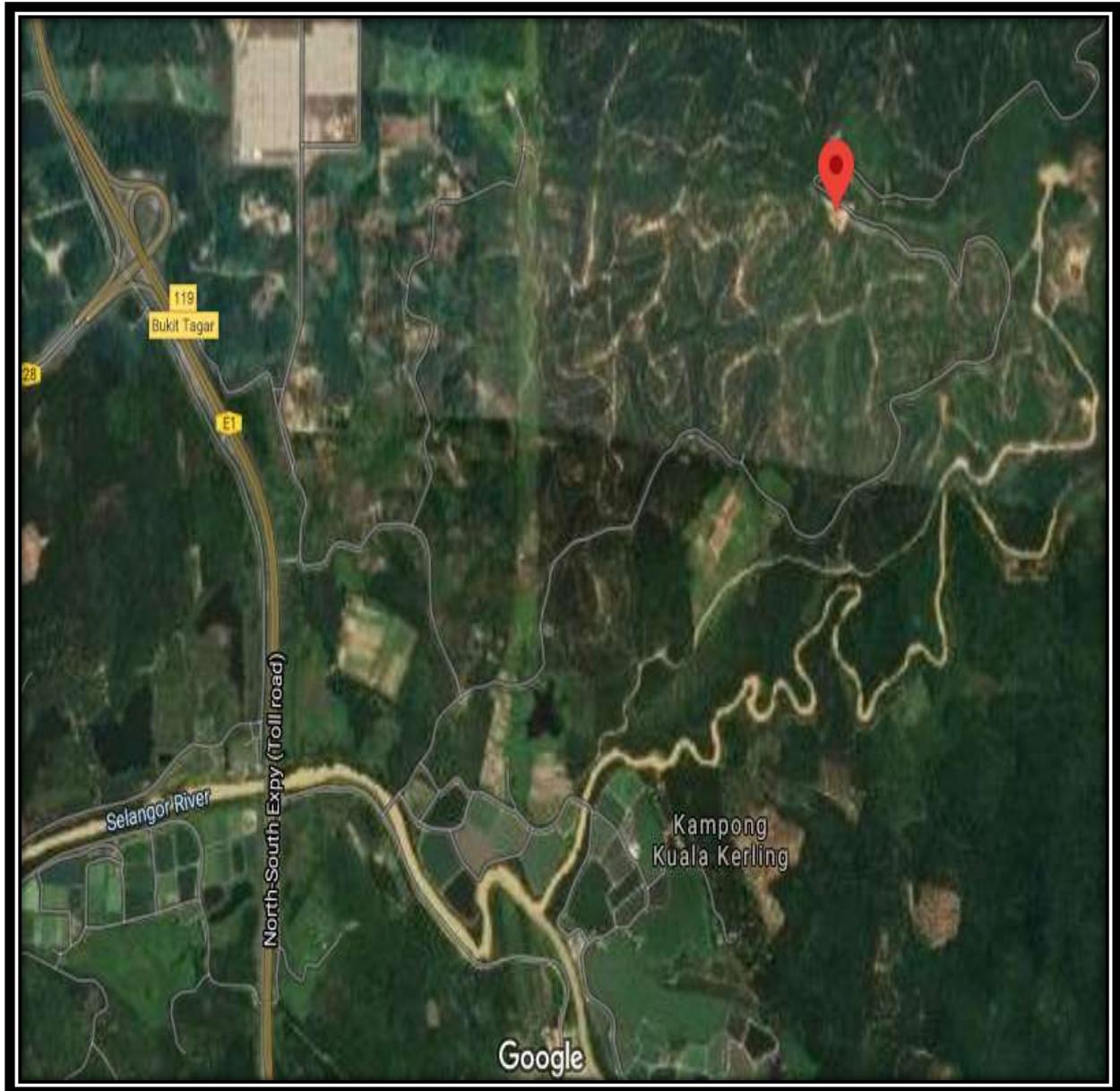
No	Name Of The Site	Others Sustainability Certifications
1.	RAH Properties Corporation Sdn Bhd	NIL

1.4 Map Showing Geographical Location

1) RAH Properties Corporation Sdn Bhd



2) RAH Properties Corporation 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
RAH Properties Corporation Sdn Bhd	695.207	695.13	695.13
Total	695.207	695.13	695.13

Name of the Certification Unit	Area Summary (HA)		
	Conservation Area	HCV	Others
RAH Properties Corporation Sdn Bhd	Nil	Nil	Nil
Total	Nil	Nil	Nil

Name of the Certification Unit	FFB Summary (MT)		
	Projected from last audit	Actual Production for 12 Months [Oct 2019-Sep 2020]	Projected Production for next 12 Months [Oct 2020-Sep 2021]
RAH Properties Corporation Sdn Bhd	NIL	7,771.96	7,755.50
Total	NIL	7,771.96	7,755.50

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-RAH001-MSPO-00-2020

Initial certificate issued date

30th December 2020

Certificate expiry date

29th December 2025

Stage 1 assessment date	16 th July 2020
Stage 2 / Main Assessment	15 th October 2020 – 16 th October 2020
Annual Surveillance 1 [ASA 1]	October 2021
Annual Surveillance 2 [ASA 2]	October 2022
Annual Surveillance 3 [ASA 3]	October 2023
Annual Surveillance 4 [ASA 4]	October 2024

1.7 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: **Muhammad Syafiq bin Abd Razak**

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

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

During this assessment, he assessed on the aspect of compliance to Transparency, Legal and Environment, Compliance To Legal Requirements, Stakeholder's Consultation and Workers Welfare, Best Practices and etc. He is able to speak and understand Bahasa Malaysia and English.

Auditor

Name: Mohd Azmi Samynathan bin Abdullah

He holds Master's in Business Administration. More than 20 years working experience several industries mostly on HR Management. Have experience in second- and third-party auditing system.

Fully trained in ISO9001:2008 (Quality Management System) Lead Auditor Course and successfully completed Malaysian Sustainable Palm Oil (MSPO) Auditor Training course (MPOCC endorsed). Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of of compliance to Management Commitment and Responsibility, Natural Resources, Biodiversity and Ecosystem Services Best Practices. Able to speak and understand Bahasa Malaysia and English.

1.8 Audit Methodology

The audit was conducted based on sampling following the method as specified in the MSPO requirements (MSPO-Questionnaire Self-Assessment – RA). The sampling was calculated and determined prior to the audit assessment. In the case of this certification unit, sampling calculation was not applied as there is only one estate, namely "RAH Properties Corporation Sdn Bhd" for the extension of scope audit.

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.

The Prime Minister, Tan Sri Muhyiddin Yassin did announce that the Recovery Movement Control Order (RMCO) ended 31st August 2020 has been extended for a period of 01st September 2020 until 31st December 2020.

With reference to the Federal Government Gazette (9th June 2020), Prevention and Control of Infectious Diseases (Measures Within Infected Local Areas) (No. 7) Regulations 2020, Certification for Agri Commodities was not included in prohibited activities.

Majlis Keselamatan Negara (MKN) had issued a Standard Operating Procedure for "Persijilan bagi Agrokomoditi" dated 12th June 2020 which need to be complied during the audit process by both parties, the Certification Body and clients.

1.9 Audit Plan Information

Audit Date	15 th October 2020 – 16 th October 2020
Name of site(s) visited	RAH Properties Corporation 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	1	No Action Requires
Minor Nonconformities	1	No Action Requires
Area of Concern	0	No Action Requires
Noteworthy /Positive Comments	5	No Action Requires

1.11 Stakeholder Consultation

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

GGC has published the public notification on 01st September 2020 and as to accommodate a stakeholders' consultation meeting for mill and estate. Therefore, it was conducted on 15th October 2020 – 16th October 2020 in RAH Properties Corporation 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 management.

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

No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken. [What we did]	Assessment team findings [Outcome]
1.	Stakeholder A (Neighbouring Estate)	<ul style="list-style-type: none"> • They have good understanding about MSPO. • They have good understanding about complaint and grievance mechanism. • They have good relationship with the management. • There is no conflict ever happened with mill & estate. 	No action required	Positive findings
2.	Stakeholders B (Government Agencies)	<ul style="list-style-type: none"> • They have good relationship with the management. • The management will provide assistance whenever they requested • No big case or issues reported to them. 	No action required	Positive findings
3.	Stakeholders C (Sprayers Gang)	<ul style="list-style-type: none"> • MSPO awareness, company policy and SOP are briefed among workers during muster call. • Personal Protective Equipment are distributed free of charged by management. • They have good understanding about complaint and grievance mechanism. 	No action required	Positive findings
4.	Stakeholders D (Harvesting Gang)	<ul style="list-style-type: none"> • Complaints and grievances from workers were solved completely internally. • Briefing of PPE awareness will be done very morning during muster ground. 	No action required	Positive findings
5.	Stakeholders E (Female Workers)	<ul style="list-style-type: none"> • They have good understanding about MSPO. • They have good understanding about complaint and grievance mechanism. • PPE given by company – free. • They reported that no sexual harassment and violence case was happened in the workplace. 	No action required	Positive findings

		<ul style="list-style-type: none"> They were treated equally with no discrimination based on gender. 		
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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 RAH Properties Corporation Sdn Bhd. The Estate Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual.

The management is committed to comply with MSPO system by giving awareness training to all personnel involved in this standard to make them understand the procedures and implementation of the standard. The employees are aware of the requirements of MSPO. There was no complaint or feedback received during this Extension of Scope 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), there were 1 major and 1 minor non-conformities has been raised to the facility that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted of major non-conformity findings is closed. Hence, the audit objectives as mentioned in the audit plan had been achieved. Therefore, the Lead Auditor recommends a certificate of compliance "MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders" is awarded to RAH Properties Corporation Sdn Bhd

1.13 Date of Next Surveillance Audit

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

1.14 Confidentiality

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

1.15 Abbreviations Used

BOD	Biological Oxygen Demand
CHRA	Chemical Health & Risk Assessment
CIP	Continuous Improvement Plan
COD	Chemical Oxygen Demand
CoP	Code of Practise
CSPO	Certified Sustainable Palm Oil
CPO	Crude Palm Oil
CSPK	Certified Sustainable Palm Kernel
DOE	Department of Environmental

DOSH	Department of Occupational Safety and Health Malaysia
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
FFB	Fresh Fruit Bunch
FGS	Finished Good Stock
GAP	Good Agriculture Practise
GHG	Greenhouse Gas
GGC	Global Gateway Certifications Sdn Bhd
HIRARC	Hazard Identification, Risk Assessment and Risk Control
ISCC	International Sustainability & Carbon Certification
IPM	Integrated Pest Management
MPOB	Malaysian Palm Oil Board
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
SPO	Sludge Palm Oil

SECTION II : ASSESSMENT FINDINGS BY PRINCIPLES AND CRITERIA

2.1 Principle 1 : Management commitment and responsibility

Criterion 1 Malaysian Sustainable Palm Oil (MSPO) Policy

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

Summary Sighted the following MSPO Policy dated 5th December 2019 approved by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman with commitment towards sustainable production of palm oil, continuous improvement and compliance to legal requirements.

The MSPO policy was communicated to all Internal and external stakeholders via stakeholders' meetings. The details of the said meetings are as follows.

- 1) Internal Stakeholders Meeting
 - Date: 24th February 2020
 - Time: 3.30pm
 - Venue: Pejabat Ladang Kerling
 - Attendance: 36 pax
- 2) Internal Stakeholders Meeting
 - Date: 6th February 2020
 - Time: 10.00pm
 - Venue: RAH Properties Corporation Sdn Bhd, Plaza RAH, Kampung Baru
 - Attendance: 11 pax

In Compliance **Yes** No Not Applicable

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

Summary Sighted MSPO Sustainable Policy dated 5th December 2019 approved by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman with emphasizes on commitment to continual improvement. This is clearly stated in para 4 of the said policy.

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 RAH Properties Corporation Sdn Bhd has established Yearly Internal Audit Plan for 2020. Frequency of internal audit is once a year. Sighted Audit Plan dated 19th February 2020.

The Internal Audit was carried on 19th February 2020 by Tn Hj Abdul Aziz Abu Bakar (Lead Auditor – Consultant from Bio-Angle Sdn Bhd). During the audit five Area of Concern was raised.

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 RAH Properties Corporation Sdn Bhd has established Internal Audit Procedure Doc No: MSPO-RAH-01 prepared by Pn. Rahmah binti Abdul Rahim, Executive Director and approved by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman dated 5th December 2019.

All the findings during documentation audit has been discussed in the Management Review FY 2019 and the action taken by the management on the findings has been confirmed by the Pn. Rahmah binti Abdul Rahim, Executive Director.

In Compliance **Yes** No Not Applicable

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

Summary All findings from internal audit were responded by the estate management within the acceptable timeframe. This request was implemented in due course and documented as evidence. The findings from documentation audit has been discussed and approved for implementation by the respective management unit during management review meeting dated 2nd July 2020.

Sighted Internal Audit Report dated 19/2/2020. The report was prepared by Tn Hj Abdul Aziz Abu Bakar (Lead Auditor – Consultant from Bio-Angle Sdn Bhd.)

During the Internal Audit, five (5) Area of Concerns (AOC) were raised by the internal Auditors. Given below are some sampled AOC's issued during the internal audit.

In Compliance **Yes** No Not Applicable

Criterion 3 Management review

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

Summary Management Review was conducted on 2nd July 2020. Sighted Management Review Meeting Minutes (as proof) dated 2nd July 2020 (Thursday). The details of the said meeting are as follows.

- 1) Date: 2nd July 2020
 - Venue: RAH Properties Office, Plaza RAH
 - Chairman: Pn Rahmah Abdul Rahim



- Attendees
 - Pn Rahmah Abdul Rahim
 - Pn Rosniyati Hussin
 - Mohd Edi Riyars
 - Bambang Surono

- Meeting Agenda
 - Opening by Chairman
 - Explained that the company is in the process of MSPO Certification
 - Review on AOC from Internal Audit and allocation of task to close AOC
 - Closing

In Compliance **Yes** No Not Applicable

Criterion 4	Continual improvement
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.

Summary Sighted Continual Improvement Plan authorized by Pn Rahmah bt Abdul Rahim, Executive Director dated 10/12/2020

The Continuous Improvement Plan has taken into consideration of Safety & Health, Social and Environment areas.

Given below are some sampled Continuous Improvement Plan derived by RAH Properties Corporation Sdn. Bhd.

No	Improvement Plan	Person Incharge	Targeted Date
1	Pemasangan Alat Pemadam Api di pejabat dan perumahan pekerja (Safety)	En Bambang Surono Supervisor	Disember 2019 (Completed)
2	Tong sampah dibekalkan kepada semua unit rumah pekerja. (Social)	En Bambang Surono Supervisor	November 2019 (Completed)
3	Penyediaan tempat pelupusan sampah (Alam Sekitar)	En Bambang Surono Supervisor	Disember 2019 (Completed)

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 adopts new technology and techniques through information obtained from Oil Palm Bulletin from MPOB, Suppliers, Contractors and surrounding estates.

However, as per interview with Pn Rahmah binti Abdul Rahim, Executive Director, RAH Properties Corporation Sdn Bhd have not implemented any suitable new technology/techniques in the Plantation.

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 Training to workers in various aspects of plantation management were conducted throughout the year. As evidence, sighted the training programme for year 2020.

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 RAH Properties Corporation Sdn Bhd has established "Prosedur Pengaduan Awam"; Doc. No: MSPO-RAH-23; Rev: 00: Date: 05th December 2019. Prepared by Pn Rahmah binti Abdul Rahim, Executive Director and approved by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

The above MSPO policies were communicated to all Internal and external stakeholders via stakeholders' meetings. The details of the said meetings are as follows.

Internal Stakeholders Meeting

- Date: 24th February 2020
- Time: 3.30pm
- Venue: Pejabat Ladang Kerling
- Attendance: 36 pax

Internal Stakeholders Meeting

- Date: 6th February 2020
- Time: 10.00pm
- Venue: RAH Properties Corporation Sdn Bhd, Plaza RAH, Kampung Baru

- Attendance: 11 pax

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 RAH Properties Corporation Sdn Bhd has established list of documents which are Publicly (non-confidential) and not Publicly available (confidential) prepared by Pn Rahmah binti Abdul Rahim, Executive Director and approved by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman dated 5th Dec 2019.

Given below are some Sampled confidential and non- confidential documents.

Confidential Documents

No	Document	Status
1	Wages & Salary	Confidential
2	Complaint Records	Confidential

Non-Confidential Documents

No	Document	Status
1	MSPO Policies	Non-Confidential
2	Management Review	Non-Confidential
3	List of Stakeholders	Non-Confidential

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 RAH Properties Corporation Sdn Bhd has established "Prosedur Pengaduan Awam"; Doc. No: MSPO-RAH-23; Rev: 00: Date: 05th December 2019. Prepared by Pn Rahmah binti Abdul Rahim, Executive Director and approved by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

The objective to ensure estate is connected to the relevant stakeholders e'g government departments, agencies, business partners and neighboring communities.

Interview with the staff and estate workers confirmed they have been informed and updated during the stakeholder meeting and that they are aware of the above process.

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 management has appointed Pn Rosniyati binti Hussin, Executive Properties as the person in-charge of transparency vide letter dated 15th January 2020 approved by Dato' Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

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 RAH Properties Corporation Sdn Bhd has established the internal and external stakeholders list prepared by Pn Rahmah binti Abdul Rahim, Executive Director and approved by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman dated 5th Dec 2019

Given below are some sampled list of stakeholders (internal & external) has been categorized as follows:

Internal stakeholders

1. Employees

External Stakeholders

1. Government / Statutory Bodies
 - MPOB
 - KPDKK
 - Balai Bomba dan Penyelamat Kuala Kubu Bharu
 - Pejabat Imigresen Cawangan Kuala Kubu Bharu
 - Balai Polis Kerling
 - Pejabat Tanah dan Galian Hulu Selangor
 - Jabatan Alam Sekitar Negeri Selangor
 - Jabatan Tenaga Kerja Rawang
 - Jabatan Perhililitan Hulu Selangor
 - Perkeso
2. Neighbouring Community/Plantations
 - Perdanan Kemajuan Pertanian Selangor
 - Ladang Bekas Parajurit
 - Orang Asal – Kampung Orang Asli Batu 6
3. Estate Community
 - Surau Committee
4. Others
 - Syarikat Ming Hock Tyre Service
 - Agro Dunia Sdn Bhd
 - Lum Seng Enterprise
 - MZ Sinar Resouces
 - Kilang Sawit Felda Sungai Tenggi



- Etc

The list of stakeholders is adequately maintained and keep update. List of External Stakeholders covering Government Agencies, Neighboring Communities and Suppliers being recorded and maintained properly.

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 Rah Properties Corporation Sdn Bhd has established "Kebolehejekan Buah Tandan Segar Sawit"; Doc. No: MSPO-RAH-05; Rev: 00: Date: 05th December 2019 and FFB Traceability Procedure; Doc. No: MSPO-RAH-02; Rev: 00: Date: 05th December 2019. Prepared by Pn Rahmah binti Abdul Rahim, Executive Director and approved by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

In Compliance **Yes** No Not Applicable

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

Summary Regular inspections will be conducted by Mr. Bambang Surono, Estate Manager to ensure compliance with the established traceability system.

During estate visit, sighted the Estate Manager able to demonstrate on how the system tracks the FFB input.

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 management has appointed Mr. Bambang Surono as the person in-charge of Traceability vide letter dated 15th January 2020 approved by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

In Compliance **Yes** No Not Applicable

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

Summary FFB being sell to Kilang Sawit Sungai Tenggi. Decision being made by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

Sighted the records of delivery or transportation of FFB. This record will be maintained. The documents are kept by the both site (estate and mill).



As evidence in RAH Properties Corporation Sdn Bhd,

- FFB Records:
 - Kilang Sawit Sungai Tenggi
 - Weighbridge Ticket: A00018413
 - DO Number: 02351
 - Vehicle No: WFW 9382
 - Driver Name: Pendy
 - Date: 01/09/2020
 - Quantity: 10.77 MT

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 company has established "List of Applicable Laws & Regulations" on Legal Requirements. Prepared by Pn. Rahmah binti Abdul Rahim (Executive Director) and approved by RAH Properties Corporation Sdn Bhd.

The list is covered the requirements that related to MSPO compliance. There are permits/licenses to be monitored and updated periodically such as permits/licenses for MPOB license, diesel, fire extinguisher and etc. List of legal correspondences permit will be updated Pn. Rahmah binti Abdul Rahim (Executive Director).

However, one major non-conformity has been raised to RAH Properties Corporation Sdn Bhd. During site visit at RAH Properties Corporation Sdn Bhd it was revealed that:

- There is no evidence of Chemical Safety Data Sheet at Chemical Store area as per stated in Occupational Safety and Health Act 1994 [ACT 514], Occupational Safety and Health (Use and Standards Of Exposure Of Chemicals Hazardous To Health) Regulations 2000; Section 25 - Provision of Chemical Safety Data Sheet in a Place of Work.
- There is no evidence of Skid Tank labelling as per stated in the permit.

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 Legal Requirements Register has been established (26/08/2020) based on the following subjects;

1. Environmental
2. Safety and Health
3. Social

4. Other Requirements.

Sighted Permits and Licenses being kept and monitored by the Company.

The company has the following documents;

1. MPOB License, No Lesen: 503976502000, untuk menjual dan mengalih FFB (keluasan estet:695.21ha) for a period of 01.07.2020 to 30.06.2021.
2. Skid Tank – Diesel; No Series: B000956 (10,800 Liter)
3. Permit Kebenaran Menggunakan Bekalan Air Persendirian; No Series: JTKS/6(1)(a)/0024 (17/06/2019 – 16/06/2022).

In Compliance **Yes** No Not Applicable

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

Summary Based on the interview with Pn. Rahmah binti Abdul Rahim (Executive Director), any new laws or regulations that needs to be reviewed shall be by issuing of a new Legal Register. The new amendments or any regulations once received through the following manner:

- HQ Department
- Communication with law/enforcement officers
- Website

The Legal Register shall be reviewed and approved for compliance of the legal and other requirements annually.

In Compliance **Yes** No Not Applicable

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

Summary Sighted letter of appointment of Pn. Rahmah binti Abdul Rahim (Executive Director) on 15th January 2020 as a person responsible to monitor compliance and to track and update the changes in regulatory requirements has been approved by Dato' Abdul Rahim bin Mohd. Ibrahim (Director).

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 The estate has demonstrated legal ownership of its land by having legal land titles to the land. The copy of land title is kept in the estate's office and was sighted during the audit.

The land title under the ownership of RAH Properties Corporation Sdn Bhd.

The express condition (Syarat-syarat Nyata) of the alienated land titles are as follow;

No. Surat Hak Milik	Lot No	Titled Ha	Description of Cultivation
124	399	1.89	Pertanian
HSD 44146	PT 4832	65.82	Tanaman Jangka Panjang (dusun)
PN 01075	5209	268.20	Pertanian
PN 01076	5210	213.20	Pertanian
PN 91974	5208	146.09	Pertanian

As per interviewed, Lot HSD 44146 will replant to Durian. Estate get approval from Pejabat Tanah dan Galian Hulu Selangor on 10th June 2020 to convert as they planed.

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 The estate has demonstrated legal ownership of its land by having legal land titles to the land. The copy of land title is kept in the estate's office and was sighted during the audit.

The land title under the ownership of RAH Properties Corporation Sdn Bhd.

No. Surat Hak Milik	Lot No	Mukim	Titled Ha
124	399	Kerling	1.89
HSD 44146	PT 4832	Kerling	65.82
PN 01075	5209	Kerling	268.20
PN 01076	5210	Kerling	213.20
PN 91974	5208	Kerling	146.09

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 Based on the interview with the Pn. Rahmah binti Abdul Rahim (Executive Director), at this moment, estate in progress to complete all the missing boundary markers. Missing the boundary markers due to soil surface run off and replanting process. This plan of demarcation will be complete by year 2022 by stages.

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 disputes have been recorded in the estate area. The land title has been legally acquired by the estate.

In Compliance **Yes** No Not Applicable

Criterion 3 Customary 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 There is no customary land in or surrounding all the estates' land titles. There are also no land disputes or claims involving these estates. The estate has proper legal land titles for the land ownership.

In Compliance **Yes** No Not Applicable

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

Summary There is no customary land in or surrounding the estates. There are also no land disputes or claims involving these estates. The estate has proper legal land titles for the land ownership. Thus, no maps for recognized customary rights required.

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 negotiation and FPIC are applicable. There is no customary land in or surrounding the estates. There are also no land disputes or claims involving the estates. The company has proper legal land titles for the land ownership.

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 Sighted latest SIA done by estate on 24th February 2020. Survey was conducted with 36 participants (internal/external) randomly selected respondents. The respondents randomly choose among workers and other stakeholders in estate.



The SIA is prepared by Tn Hj Abdul Aziz bin Abu Bakar (Bio-Angel Green Sdn Bhd Consultant) and approved by Pn. Rahmah binti Abdul Rahim (Executive Director).

Post assessment was conducted on 24th February 2020. 36 respondents were involved in the assessment. Sighted 13 questionnaires in the assessment conducted and all responded positive.

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 Company has established the "Prosedur Pengaduan Awam"; Doc. No: MSPO-RAH-23; Rev: 00: Date: 05th December 2019. Prepared by Puan Rosniyati Hussin (Executive) and approved by Puan Rahmah binti Abdul Rahim (Executive Director).

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 Company has established the "Prosedur Pengaduan Awam"; Doc. No: MSPO-RAH-23; Rev: 00: Date: 05th December 2019. Prepared by Puan Rosniyati Hussin (Executive) and approved by Puan Rahmah binti Abdul Rahim (Executive Director).

The procedure was developed to refer to procedures for handling complaints and appeals for all plantation workers including staff, executives and also subject to stakeholders of the organization.

Most of the comments received from estate workers are regarding housing repair.

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 Sighted external stakeholders meeting on 06th February 2020. Attended by 11 participants. Conducted by Tn Hj Abdul Aziz bin Abu Bakar (Bio-Angel Green Sdn Bhd Consultant).

During site observation, company policies and SOP's are displayed on notice board as a form of awareness to all stakeholders around the estates. The complaint form is made available for the stakeholders to lodge any complaints and provided with the complaint box to submit their form.

During stakeholder meeting, interviewed surrounded stakeholders, they able to demonstrate their understanding on estate complaint procedures.

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 As per interviewed with Puan Rahmah binti Abdul Rahim (Executive Director), this is 1st year implementation of MSPO, no negative complaints made by internal and external stakeholders since the system introduce in year 2019.

During site observation, there were no negative complaint sighted at the field site. All complaints being recorded thus far by all estate management.

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 Estate is committed and have contributed to local development. The contribution made to the internal and external stakeholders.

The estate has maintained all corporate social responsibility (CSR) for the development of local communities. In general, the CSR performed by the company consist of the following:

- a) Contribution for the local communities programme
- b) Contribution for the stakeholders (internal/external)

As evidence, sighted a letter on

- "Sumbangan Hari Raya"
- RAH Properties Corporation Sdn Bhd carries out regular maintenance of the access road to their estate. The access road is used by other neighboring plantations including Ladang Bekas Parajurit

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 Sighted the "Polisi Keselamatan dan Kesehatan Pekerja". Established on 05th December 2019 which was approved by Dato' Haji Abdul Rahim bin Mohd. Ibrahim (Chairman Executive). The policy is written in Bahasa language.

Sighted Occupational Safety and Health (OSH) Training Programme Year 2020 for estate. Training covered as per below:

- Harvesting/Pruning Training
- Pesticides Training
- Manuring Training
- Welder and Machinery Maintenance
- First Aid Training
- Emergency Response Procedure (ERP)
- Scheduled Waste Training
- PPE Training

As per interviewed with all person incharge, all workers involved in the operations have been adequately trained in safe working practice.

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

Sighted the "Polisi Keselamatan dan Kesehatan Pekerja". Established on 05th December 2019 which was approved by Dato' Haji Abdul Rahim bin Mohd. Ibrahim (Chairman Executive). The policy is written in Bahasa language.

Risk assessment (Hirarc) was conducted on 14th March 2020. HIRARC sighted for the followings work operation:-

- Harvesting
- Manuring
- Spraying

The Estate has an annual training programme for the Staffs and Workers. Training covered as per below:

- Harvesting/Pruning Training
- Pesticides Training
- Manuring Training
- Welder and Machinery Maintenance
- First Aid Training
- Emergency Response Procedure (ERP)
- Scheduled Waste Training
- PPE Training

There is evidence estate has provided appropriate PPE for all workers in their operations.

Company has established the "Prosedur Operasi Standard Pengendalian Bahan Kimia"; Rev: 00: Date: 03rd March 2020. Prepared by Puan Rosniyati Hussin (Executive) and approved by Puan Rahmah binti Abdul Rahim (Executive Director).

Mr. Bambang Surono (Estate Manager) is appointed person for OSH.

There is no OSH Committee as the estate is under 40 employees.

Company has established the "Pelan Tindakan Kecemasan"; Rev: 00: Date: 03rd March 2020. Prepared by Puan Rosniyati Hussin (Executive) and approved by Puan Rahmah binti Abdul Rahim (Executive Director).

Estate has conducted the 1st aid training on 24th February 2020. Attended by 36 participants. Conducted by Tn Hj Abdul Aziz bin Abu Bakar (Bio-Angel Green Sdn Bhd Consultant).

Estate has sent JKPP 8 (I & II)/(IV) on annually basis to the DOSH. LTA calculation based on local interpretation from DOSH. Sighted the latest JKPP 8 was sent on 09th January 2020.

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 "Polisi Keserataan Peluang" and "Polisi Hak Asasi Manusia". Established on 05th December 2019 which was approved by Dato' Haji Abdul Rahim bin Mohd. Ibrahim (Chairman Executive). The policy is written in Bahasa language. The company is displayed at notice boards outside the office.

Internal MSPO Training

- Date: 24th February 2020
- Time: 3.30pm
- Venue: Pejabat Ladang Kerling
- Attendance: 36 pax

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

All workers enjoy the same scale of pay and provided with equal housing and work facilities. This was confirmed through interview with workers/staff from the estate. Also, through verification of contracts of service and pay slips of workers.

In Compliance **Yes** No Not Applicable

Indicator 3 Management shall ensure that employees' pay and conditions meet legal or industry minimum standards 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 Pay and conditions are documented in the workers' Contract Agreement and wage payment records / pay slip.

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



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 As per interviewed with Puan Rahmah binti Abdul Rahim (Executive Director), there is no contractor has appointed in 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 Employee Record stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc. As evidence:

- Name
- Identify card/Passport No.
- EPF
- SOCSO
- Gender
- Nationality
- Date of birth
- Date of employment
- ETC

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 Employment contract stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc. The contract is in Malay as it is easy to be understood by workers. This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local and Indonesian.

All workers enjoy the same scale of pay and provided with equal housing and work facilities. This was confirmed though interview with workers from the estate and also through verification of contracts of service and pay slips of workers.

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

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 Working hours is 8 hours. From Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law.

Daily attendance recorded during muster call. Estate has used pocket check-roll as a working time recording system.

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 As per interviewed with Puan Rahmah binti Abdul Rahim (Executive Director), the working hour and break time has been clearly stated to estate workers.

Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to Malaysian Law. Sighted gazette public holidays 2020 displayed on notice board.

In Compliance **Yes** No Not Applicable

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

Summary Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker.

Documented payslip was distributed to individual workers on the day of payment. Payment being made through cash and seen the letter of consent from workers to the Management.

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. Productivity incentives and outturn incentive.

With regards to local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations.

In Compliance **Yes** No Not Applicable

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

Water and electricity is provided free.

Sanitary and waste disposal is arranged by estate.

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 Sighted the "Polisi Gangguan Seksual, Keganasan Serta Hak Kebebasan Reproduksi". Established on 05th December 2019 which was approved by Dato' Haji Abdul Rahim bin Mohd. Ibrahim (Chairman Executive). The policy is written in Bahasa language.

The policy to prevent all forms of sexual harassment and violence at the workplace has stated under company policy.

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 the "Polisi Hak Kebebasan Bersuara dan Menganggotai Kesatuan". Established on 05th December 2019 which was approved by Dato' Haji Abdul Rahim bin Mohd. Ibrahim (Chairman Executive). The policy is written in Bahasa language.

Local or foreign workers are given the freedom which it is an optional for them to join worker union formed in estate. Thus, their freedom are not restrict by estate management.

In Compliance **Yes** No Not Applicable

Indicator 14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. 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 Sighted the "Polisi Keserataan Peluang" and "Polisi Hak Asasi Manusia". Established on 05th December 2019 which was approved by Dato' Haji Abdul Rahim bin Mohd. Ibrahim (Chairman Executive). The policy is written in Bahasa language.

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

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

Criterion 6 Training and competency

Indicator 1 All employees, 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 Estate 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 2020 was sighted.

Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training:

Training covered as per below:

- Harvesting/Pruning Training
- Pesticides Training
- Manuring Training
- First Aid Training
- Emergency Response Procedure (ERP)
- Scheduled Waste Training
- PPE Training

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

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

Summary Training need analysis for estate is established for all employees as seen Training Programme for the year 2020.

Sighted the training needs prepared by the Estate Manager for each individual worker.

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. 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 2020 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 Sighted Environment Policy dated 5th December 2019 approved by Dato' Hj Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

Sighted Environment Plan Ref No: MSPO-rpke-06, Rev:0 dated 5th December 2019 prepared by Pn Rahmah Dato Abdul Rahim, Executive Director and approved by Dato' Abdul Rahman bin Mohd Ibrahim, Executive Chairman.

The MSPO policy which includes environmental policy concerning management and protection of the environment according to the applicable laws was communicated to all Internal and external stakeholders via stakeholders' meetings. The details of the said meetings are as follows.

- 1) Internal Stakeholders Meeting
 - Date: 24th February 2020
 - Time: 3.30pm
 - Venue: Pejabat Ladang Kerling
 - Attendance: 36 pax
- 2) Internal Stakeholders Meeting
 - Date: 6th February 2020
 - Time: 10.00pm
 - Venue: RAH Properties Corporation Sdn Bhd, Plaza RAH, Kampung Baru
 - Attendance: 11 pax

Sighted stakeholders meeting minutes.

In Compliance **Yes** No Not Applicable

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

Summary Sighted Environment Policy dated 5th December 2019 prepared by Pn Rahmah bt Abdul Rahim, Executive Director and approved by Dato’ Hj Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

RAH Properties Corporation Sdn Bhd has conducted the aspects and impacts analysis of all operations in the estate. Sighted the said aspects and impacts analysis, prepared by Pn Rahmah bt Abdul Rahim, Executive Director and approved by Dato’ Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman dated 5th Dec 2019.

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 The positive and negative impacts were identified in the Environmental Aspect and Impact Assessment dated 5/12/2019 with mitigation plan prepared by Pn Rahmah bt Abdul Rahim, Executive Director and approved by Dato’ Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

Given below are some sampled aspect and impact analysis and the improvement plan to mitigate the negative impacts and to promote the positive ones.

Activity	Aspects	Impacts	Mitigation Plan
Meracun	Pelepasan gas rumah hijau daripada penggunaan racun	Pencemaran Air	Kawalan Sediada <ul style="list-style-type: none"> Mengurangkan pusingan racun Pelan Kawalan Pengurusan. <ul style="list-style-type: none"> Jadual berkala penyelenggaraan pam
Membaja	Pelupusan Beg Baja di atas tanah	Pencemaran Tanah	Kawalan Sediada <ul style="list-style-type: none"> Beg - beg baja dikumpul dan disimpan di dalam stor dan dilupuskan kepada kontratok yang bekelayakan.

			Pelan Kawalan Pengurusan <ul style="list-style-type: none"> • Latihan kepada pekerja • Memantau dari masa kesemasa
Menyusun Racun dalam stor	Racun tumpah di dalam stor simpanan	Pencemaran air dan tanah	Kawalan Sediada <ul style="list-style-type: none"> • memberi Latihan kepada staf dan pekerja Pelan Kawalan Pengurusan <ul style="list-style-type: none"> • memberi Latihan kepada staf dan pekerja
Positive Impact Identified			
Menuai FFB	Susunan Pelepah	Mengelalkan Kelembapan	Plan to Promote <ul style="list-style-type: none"> • Latihan berterusan kepada pekerja

In Compliance **Yes** No Not Applicable

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

Summary The management has established a Continuous Improvement Plan (CIP) dated 10th December 2019 approved by Pn Rahmah Abdul Rahman, Executive Director.

The CIP is divided into three (3) areas namely Social, Safety & Health and Environment.

Given below are some Continuous Improvement plan:

Improvement Plan	Timeline & Pic	Status
Penyediaan Tong Sampah kepada setiap rumah pekerja (Social)	Feb 2020 En Bambang Surono (Supervisor)	Siap pada Feb 2020
Penanaman tumbuhan bermanfaat (Environment)	May 2019 En Bambang Surono (Supervisor)	Siap pada Feb 2020
Memasang alat pemadam api di pejabat ladang dan perumahan pekerja	Disember 2019 En Bambang Surono	Siap pada Disember 2020



(Keselamatan)	(Supervisor)	
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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 Sighted, awareness and training programme (Training Plan) established and implemented to ensure that all employees understand the policy and objectives of the environmental management.

Sighted "Taklimat" conducted on "Perihal Alam Sekitar" which the policy and objectives of the environmental management and improvement plans dated 3rd March 2020.

The details of the said "Taklimat" are as follows.

- Date: 3/3/2020
- Venue: Kerling Estate
- Presenter: Dato' Abdul Rahim
- Attendance: 14 pax

In Compliance **Yes** No Not Applicable

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

Summary Sighted quarterly Environment Meeting Minutes conducted by Dato' Haji Abdul Rahim bin Mohd Ibrahim, Executive Chairman dated 3rd March 2020.

The details of the said meeting are as follows.

- Date: 3/3/2020
- Venue: Kerling Estate
- Presenter: Dato' Abdul Rahim
- Attendance: 14 pax

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 Monitoring of non-renewable energy (Diesel) has been documented for the year 2020 by the estate.

Given below are the per MT usage (baseline value) of Diesel.

Year	Diesel/Mt
2020 For the month of September 2020 only as they have just started MSPO Certification	9.28

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 estimated direct usage of Diesel by RAH Properties Corporation Sdn Bhd prepared by Pn Rosniyati bt Hussain, Property Executive and approved by Pn Rahmah Abdul Rahman, Executive Director.

No	Year	Diesel
1	October 2020 – Sept 2021	76,355 liters

In Compliance **Yes** No Not Applicable

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

Summary As per interview with Pn Rahmah bt Abdul Rahim, Executive Director, Rah Properties Corporation Sdn Bhd has no plans to implement new techniques or technology (renewable energy) in their estate operations for now.

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 RAH Properties Corporation Sdn Bhd have identified waste products and sources of pollution vide document dated 8th September 2020. The document was prepared by Pn Rosniyati bt Hussain, Property Executive and approved by Pn Rahmah Abdul Rahman, Executive Director.

Given below are the details of the identified waste products and sources of pollution.

No	Type Of Waste	Source/Location
1	Kotak Air Minuman	Pejabat, Rumah Staff, Rumah
2	Tong Racun	Kawasan Stor Racun
3	Beg Baja	Kawasan Stor Baja
4	Tayar	Kawasan Workshop
5	Dram Minyak Hitam	Kawasan Workshop
6	Sisa Makanan	Rumah Pekerja

In Compliance **Yes** No Not Applicable

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

Summary RAH Properties Corporation Sdn Bhd has established Waste Management Plan and Action Plan for year 2020 dated 8th September 2020 prepared by Pn Rosniyati bt Hussain, Property Executive and approved by Pn Rahmah Abdul Rahman, Executive Director.

The plan has identified types of Waste products and sources of pollution.

Given below are the identified waste and action plan (sampled) to reduce pollution and implementation plan.

Source	Type Of Waste	Acton Taken To Reduce
Estate	<ul style="list-style-type: none"> • Fertilizer Bags • Old Tyres • Old Metal and Steel • Old wood or plywood 	<ol style="list-style-type: none"> 1) To send to recycling plant. 2) To store item under lock and key 3) To train workers on waste management
Office Workers	<ul style="list-style-type: none"> • Plastic, Papers, • Glasses, old cloths, Aluminum, Domestic Waste 	<ol style="list-style-type: none"> 1) To separate and record waste 2) To identify waste to be sent to landfill 3) Waste that can be resold are collected to be sold to recycling plant

In Compliance **Yes** No 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 Rah Properties Corporation Sdn Bhd has established Standard Operating Procedure named "Prosedur Operasi Standard Pengendalian Bahan Kimia" Rev 0 dated 3rd March 2020 for handling and storage of chemicals.

In Compliance **Yes** No 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 As per interview with Pn Rahmah bt Abdul Rahim, Executive Director, the used Empty Pesticide containers are rinsed three times, punctured (3 holes) and stored in the store or reused for mixing pesticides.

RAH Properties has not been spraying insecticides for the past two and a half years (2 ½) as such found four (4) empty pesticide containers.

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 As per interview with Pn Rahmah bt Abdul Rahim, Executive Director, all Domestic waste are collected once a week and disposed at the land fill in the estate.

Sighted Domestic Waste landfill during site visit.

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 RAH Properties Corporation Sdn Bhd has carried out assessment of polluting activities in its premises. Sighted Environmental Aspect Impact Assessment dated 5th December 2019 prepared by Pn Rosniyati bt Hussain, Property Executive and approved by Pn Rahmah Abdul Rahman, Executive Director.

In Compliance **Yes** No Not Applicable

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

Summary RAH Properties Corporation Sdn Bhd has carried out assessment of polluting activities in its premises. Sighted Environmental Aspect Impact Assessment dated 5th December 2019 prepared by Pn Rosniyati bt Hussain, Property Executive and approved by Pn

Rahmah Abdul Rahman, Executive Director with action plan to reduce identified significant pollutants and emissions.

Pollutants	Source	Action Plan To Reduce
Drink Cans	Workers	Collected and sold
Pesticide Containers	Estate	Rinse 3 X and reused for mixing chemical.
Domestic Wastes	Workers House	Collect and dispose at land fill

However, one minor non-conformity has been raised to RAH Properties Corporation Sdn Bhd. The management has established Aspect and Impact Assessment dated 5th December 2019. However, during site visit, sighted spillage of diesel at vehicle parking bays, workshop (repair area) and generator room.

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 use for water supply, the level of the ground water table should be measured at least annually.

Summary RAH Properties Corporation Sdn Bhd has established a Water Management Plan 2020 dated 28th August 2020 prepared by Pn Rahmah Abdul Rahman, Executive Director and checked by Pn Rosniyati bt Hussain, Property Executive.

Given below are some sampled Water Management Plan.

Source Of Water	Management Action	Frequency
River -Sungai Tengki	1) Analyse in-coming water quality as well as outgoing water quality to determine if estate operations have	Annually



	<p>positive, zero or negative effect. Water analysis carried out by Kementerian Kesihatan Malaysia</p> <p>Person Responsible:</p> <ul style="list-style-type: none"> • Pn Rahmah bt Abdul Rahman • En Bambang Surono 	
	<p>2) Restoration of natural vegetation in riparian zone where it has been removed</p> <p>Person Responsible</p> <ul style="list-style-type: none"> • En Bambang Surono 	Regular Inspection
Rainwater (For washing only)	<p>Rainwater harvesting at the Plantation office and worker's housing area by drums/container at specific locations. Rainwater used for washing only.</p> <p>Person Responsible</p> <ul style="list-style-type: none"> • En Bambang Surono 	At appropriate interval
Well Water (Drinking Water)	<p>Analyze well water quality to determine if estate operations have positive, zero or negative effect. Water analysis carried out by Kementerian Kesihatan Malaysia</p> <p>Person Responsible</p> <ul style="list-style-type: none"> • Pn Rahmah bt Abdul Rahman • En Bambang Surono 	Six months once.

The Management is monitoring the water quality of Sungai Tengki which is flowing through RAH Properties Corporation Sdn Bhd's plantation at three (3) points namely SO 1 (Entry), SO 2 (Middle) and SO 3 (Exit point) on an annual basis to determine whether the estate operations has any negative impacts on the natural waterways.

Sighted Water Analysis Report, No Makmal BWA0207220/001-003 dated 30th June 2020 issued by "Jabatan Kimia Malaysia". The samples were collected by En Roziman bin Mohammad from Pejabat Kesihatan Hulu Selangor, Kuala Kubu Bahru, Selangor.

The management has established Riparian Zone to protect the water courses i.e. Sungai Tengki.

As no natural vegetation in the riparian areas has been removed, no plan for restoration is necessary.

The management do not use bore well for water supply in the plantation, however drinking water supply is obtained from a well where water is pumped out and stored in a tank. Sighted water testing for the Well water as well as the water stored in tanks dated 29/6/2020 by Jabatan Kimia Malaysia. The water samples were collected by En Roziman bin Mohammad, Penolong Pegawai Kesihatan from Pejabat Kesihatan Daerah Hulu Selangor.

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 No bunds, weirs or dams were built across Sungai Tengki which is passing through the estate.

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 There were road side drains constructed along the main roads to divert and conserve water at designated points.

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 Sighted "Program Pemantauan Kawasan HCV 2020/Kehadiran Haiwan Terancam/Haiwan Liar" conducted from August 2020 until October 2020 by RAH Properties Corporation Sdn Bhd. The collated "Program Pemantauan Kawasan HCV 2020" includes the planted areas as well as the surrounding landscape area which was prepared by Pn Rahmah Abdul Rahman, Executive Director.

The programme has identified the following:



Tarikh	Jenis Haiwan Yang Dikenalpasti & Pegawai Yang Kenalpasti	Bukti Kehadiran	Jumlah	Lokasi
23/8/2020	Wild Boar Burung Hantu <u>Pegawai Yang Kenalpasti</u> En Bambang Surono	Visual Visual	3 ekor 1 ekor	Ladang
30/8/2020	Ayam Hutan Burung Merbok <u>Pegawai Yang Kenalpasti</u> En Bambang Surono Md Mohan Shaik	Visual Visual	3 ekor 5 ekor	Ladang
12/9/2020	Ayam Hutan Babi Hutan <u>Pegawai Yang Kenalpasti</u> En Bambang Surono En Ahmad Sajadi	Visual, Bunyi & Tapak Kaki Visual & Tapak Kaki	8 ekor	Ladang dekat Sungai Tengki
25/9/2020	Burung Hantu Babi Hutan <u>Pegawai Yang Kenalpasti</u> En Bambang Surono	Visual Visual	1 ekor 3 ekor	Ladang
6/10/2020	Ular Sawa	Visual	1 ekor	

	Helang <u>Pegawai Yang Kenalpasti</u> En Bambang Surana	Visual	1 ekor	Ladang
13/10/2020	Ular Senduk Burung Hantu <u>Pegawai Yang Kenalpasti</u> En Bambang Surano En Jaiman Muslian	Visual Visual	1 ekor 1 ekor	Ladang

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 The "Program Pemantauan Kawasan HCV 2020/Kehadiran Haiwan Terancam/Haiwan Liar" conducted from August 2020 until October 2020 by RAH Properties Corporation Sdn Bhd which includes the planted areas as well as the surrounding landscape area has identified some threatened and endangered species.

Given below are the mitigation plan to discourage any illegal or inappropriate hunting and measures to resolve human-wildlife conflicts.

Tarikh	Jenis Haiwan Yang Dikenalpasti & Pegawai Yang Kenalpasti	Jumlah	Plan Mitigasi
23/8/2020	Wild Boar Burung Hantu <u>Pegawai Yang Kenalpasti</u> En Bambang Surono	3 ekor 1 ekor	Put up "Kawasan Larangan Memburu" sign boards at the estate to warn
30/8/2020	Ayam Hutan	3 ekor	

	Burung Merbok <u>Pegawai Yang Kenalpasti</u> En Bambang Surono Md Mohan Shaik	5 ekor	visitors and workers. Education & awareness for workers
12/9/2020	Ayam Hutan Babi Hutan <u>Pegawai Yang Kenalpasti</u> En Bambang Surono En Ahmad Sajadi	8 ekor	Monitor and record wildlife sightings
25/9/2020	Burung Hantu Babi Hutan <u>Pegawai Yang Kenalpasti</u> En Bambang Surono	1 ekor 3 ekor	
6/10/2020	Ular Sawa Helang <u>Pegawai Yang Kenalpasti</u> En Bambang Surana	1 ekor 1 ekor	
13/10/2020	Ular Senduk Burung Hantu <u>Pegawai Yang Kenalpasti</u> En Bambang Surano En Jaiman Muslian	1 ekor 1 ekor	

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 Monitoring and recording of wildlife sightings will be ongoing and management will implement the following monitoring and action plan to protect the wild animals present in the plantation:

- 1) Displaying signages to warn visitors and workers on prohibiting illegal hunting, and caging of protected birds and animals in the plantation
- 2) Education & awareness for workers

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 As per interview with Pn Rahmah bt Abdul Rahim, Executive Director no open burning is practiced in the estate.

As per interview with Pn Rahmah bt Abdul Rahim, Executive Director, RAH Properties Corporation Properties Sdn Bhd strictly prohibits Open Burning neither for domestic waste disposal nor for oil palm replanting. This is clearly stated in Para 2 of their the "Polisi Kod Larangan Pembakaran Terbuka" dated 5/12/2019 approved by Dato Hj Abdul Rahim bin Mohd Ibrahim, Executive Chairman.

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 As there are no significant risk of disease spread or continuation into the next crop from previous crop, no controlled burning to control spread of disease is required/carried out.

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 As per interview with Pn Rahmah Abdul Rahman, Executive Director, no controlled burning is practiced 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 During replanting process, the old palm to be felled, chipped and shredded and the remains will be pulverised and left in the field for self-decomposed.

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 As per interviewed with Puan Rahmah binti Abdul Rahim (Executive Director). The estate has implemented Best Practices base on RAH Properties Kerling Estate – Agriculture Manual dated 01st December 2019.

Estate have 5 types of Manuals-

- 1) RAH Properties Agriculture Manual
- 2) MSPO Procedure
- 3) COVID 19 by Majlis Keselamatan Negara (MKN) - SOP Sektor Agrikomoditi
- 4) Langkah Pencegahan COVID – 19
- 5) SOP Perintah Kawalan Pergerakan Bersyarat (PKPB) W.P Kuala Lumpur, W.P Putrajaya Dan Selangor

The document was well maintained and implemented.

- 1) RAH Properties Agriculture Manual includes:
 - i. Muster Ground
 - ii. Oil Palm Nursery
 - iii. Replanting
 - iv. Mature Upkeep
 - v. Pests /Diseases
 - vi. Manuring Mature and Immature Oil Palm
 - vii. Harvesting and Collection
 - viii. Workshop
 - ix. Roads Bridges and Culverts
- 2) MSPO Procedure includes:
 - i. MSPO-RAH-01 – Internal Audit
 - ii. MSPO-RAH-02 – Traceability
 - iii. MSPO-RAH-03 – Environmental Management Plan (EMP)
 - iv. MSPO-RAH-04 – Pengendalian Bahan Kimia
 - v. MSPO-RAH-05 – Kebolehejekan Buah Tandan Segar Sawit
- 3) COVID 19 by Majlis Keselamatan Negara (MKN) - SOP Sektor Agrikomoditi includes:
 - i. Saringan Kesihatan
 - Pemeriksaan dan Pemantauan Kesihatan Sebelum Operasi
 - Tindakan Pencegahan Semasa Operasi

- Pemeriksaan Kesehatan ke atas Pelawat/Pembekal
 - ii. Laporan kesihatan (di premis dan penginapan pekerja yang disediakan syarikat)
 - iii. Aplikasi Sejahtera
 - iv. Protokol Pencegahan Penyakit & Sekatan
 - v. Saringan Kesehatan
 - vi. Laporan kesihatan (di premis dan penginapan pekerja yang disediakan syarikat)
 - vii. Aplikasi Sejahtera
- 4) Langkah Pencegahan COVID – 19 includes:
- i. Pendahuluan
 - ii. Prosedur Pencegahan Penularan COVID-19
 - iii. Kawalan semasa Operasi
 - iv. Pemandu Lori Keluar dan Masuk Ladang
 - v. Pemeriksaan Kesihatan Bagi Pelawat atau Pembekal
 - vi. Kuarantin Bagi Pekerja Yang Bergejala
 - vii. Disinfeksi
 - viii. Gejala COVID 19
 - ix. Saringan Kesihatan dan Pemantauan
 - x. Prosedur Mengukur Suhu
- 5) SOP Perintah Kawalan Pergerakan Bersyarat (PKPB) W.P Kuala Lumpur, W.P Putrajaya Dan Selangor includes:
- i. Aktiviti dibenarkan
 - ii. Aktiviti tidak dibenarkan
 - iii. Arahan tetap
 - iv. Waktu berkuatkuasa
 - v. Waktu aktiviti dibenarkan
 - vi. Pergerakan Penduduk

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 A management strategy for purpose of planting on slopes above a certain limit is evident in "Polisi Perlindungan Tanah Curam dan Rezab Sungai".

"Tidak menanam pokok kelapa sawit di Kawasan melebihi kecerunan 25 darjah di kawasan penanaman baru".

In Compliance **Yes** No Not Applicable

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

Summary As per interviewed with Pn. Rahmah binti Abdul Rahim (Executive Director), the estate has a visual reference system to identify each field or block. Each field has the signboard with block system such as Block 1, Block 2 and etc.

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 2020. The budget includes the projected FFB production, general charges, upkeep & cultivation, Collection and Immature areas.

FY	2020	2021	2022
Total crop	9,338.32	9,537.65	9,769.87
Estimate OER %	19.50	19.50	19.50
KER	5.00	5.00	5.00
FFB Price	455.50	455.50	455.50

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 As per interviewed with Pn. Rahmah binti Abdul Rahim (Executive Director), no replanting within 5 years.

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 2020. The budget includes the projected FFB production, general charges, upkeep & cultivation, Collection and Immature areas.



FY	2020	2021	2022
Total crop	9,338.32	9,537.65	9,769.87
Estimate OER %	19.50	19.50	19.50
KER	5.00	5.00	5.00
FFB Price	455.50	455.50	455.50

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 account report. Details on the actual vs budget i.e. Upkeep maintenance, FFB Production, capital expenditure are shown therein. The estate will have meeting once a year with their team.

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 FFB sell to the external mill. There is a mechanism of determining FFB pricing for the estate as the crops being processed by external POM. The mill has followed MPOB monthly price.

The company will make an announcement for tender for other services like harvesting, ffb transportation, hiring back hoe, wiring housing and etc.

In Compliance **Yes** No Not Applicable

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

Summary As per interviewed with Pn. Rahmah binti Abdul Rahim (Executive Director), currently no contractor has been appointed by the estate management.

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 As per interviewed with Pn. Rahmah binti Abdul Rahim (Executive Director), currently no contractor has been appointed by the estate management.

In Compliance **Yes** No Not Applicable

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

Summary As per interviewed with Pn. Rahmah binti Abdul Rahim (Executive Director), currently no contractor has been appointed by the estate management.

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 The estate was audited by Global Gateway Certifications Sdn Bhd MSPO auditor on 15th October 2020 – 16th October 2020. Sighted audit plan dated 13th October 2020 (4th Revised) which have been accepted address to Pn. Rahmah binti Abdul Rahim (Executive Director). All the auditors are qualified MSPO auditor. As per agreed, the company accept the GGC MSPO Auditors to verify through a physical inspection if required for audit purposed.

In Compliance **Yes** No Not Applicable

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 As per interviewed with Pn. Rahmah binti Abdul Rahim (Executive Director), currently no contractor has been appointed by the estate management.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 At this moment, there were no new plantings involving peat area. Thus, it is not applicable for RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for RAH Properties Corporation Sdn Bhd.

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.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for RAH Properties Corporation Sdn Bhd.

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.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable RAH Properties Corporation Sdn Bhd.



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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

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 RAH Properties Corporation Sdn Bhd.

In Compliance Yes No **Not Applicable**



2.8 Details of Audit Findings

Details Non-Conformity

- See Appendix B -

Details of Area of Concern

- See Appendix B -

Details of Noteworthy / Positive Findings

- 1) Top management continuously establishes directions for the middle and upper management to execute in ways to comply with the MSPO management system in future.
- 2) The management is highly committed to comply the MSPO system by adopting continuous improvement programs.
- 3) The estate management has demonstrated fully commitment during the entire audit process.
- 4) Good relationship being maintained with surrounding smallholders and villages.
- 5) Good positive feedback received from internal and external stakeholders.

Appendix A: Audit Plan

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
15 th October 2020	08:00 – 09:00	<ul style="list-style-type: none"> ➤ Opening Meeting at RAH Properties Corporation Sdn Bhd: <ul style="list-style-type: none"> • Presentation by the manager/coordinator • Presentation by Lead Auditor. ➤ Confirmation of assessment scope and finalize Audit plan. 	MS	MAS
	09:00 – 13:00	RAH Properties Corporation Sdn Bhd <ul style="list-style-type: none"> ➤ Document Audit: <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	MAS
		<ul style="list-style-type: none"> ➤ Field Inspection / Interview: <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. 		MAS
	10:30 – 12:30	➤ Stakeholder Consultation	MS	
	13:00 – 14:00	➤ Lunch/Rest	MS	MAS
	14:00 – 16:00	<ul style="list-style-type: none"> ➤ Continue document audit: <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	MAS
	15:30 – 16:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 1.	MS	MAS

AGENDA				
16 th October 2020	08:00 – 13:00	RAH Properties Corporation Sdn Bhd <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 	MS	MAS



		records, complaint records, workers records, training records, permits, CIP, etc.		
		<ul style="list-style-type: none"> ➤ Field Inspection / Interview: <ul style="list-style-type: none"> • Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MS	MAS
	13:00 – 14:00	➤ Lunch/Rest	MS	MAS
	14:00 – 14:30	➤ Verify any outstanding issues and auditor discussion.	MS	MAS
	14:30 – 15:30	<ul style="list-style-type: none"> ➤ Closing Meeting at RAH Properties Corporation Sdn Bhd: <ul style="list-style-type: none"> • Presentation of findings by the audit team • Questions & answers and Final summary by Lead Auditor ➤ End of assessment 	MS	MAS
	TBA	➤ Travelling back.	MS	MAS



Appendix B : Non-Conformity details

Non-Conformities Identified During This Audit			
Major Nonconformities:		The following NC's was raised for this audit.	
Company Name		RAH Properties Corporation Sdn Bhd	
Stage of Audit		Initial Stage 1	<input type="checkbox"/>
		Surveillance	<input type="checkbox"/>
Audited Standard		Initial Stage 2	<input checked="" type="checkbox"/>
		Recertification	<input type="checkbox"/>
Client Number		GGC-BV1-MSPO-2019	
NC No. / Ref.	BV1/MSPO/MAJOR/01	Date Detected	16 th October 2020
Site(s) concern	RAH Properties Corporation Sdn Bhd	Target Completion	90 Days
Normative Reference and Requirement	4.3.1.1 Major All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.		
NC Type	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		
Description of Non-Conformity	<ul style="list-style-type: none"> Non-compliance to Occupational Safety and Health Act 1994 [ACT 514] Non-compliance to "Peraturan-Peraturan Kawalan Bekalan 1974" 		
NC Objective Evidence:			
During site visit at RAH Properties Corporation Sdn Bhd it was revealed that: <ul style="list-style-type: none"> there is no evidence of Chemical Safety Data Sheet at Chemical Store area as per stated in Occupational Safety and Health Act 1994 [ACT 514], Occupational Safety and Health (Use and Standards Of Exposure Of Chemicals Hazardous To Health) Regulations 2000; Section 25 - Provision of Chemical Safety Data Sheet in a Place of Work. there is no evidence of Skid Tank labelling as per stated in the permit. 			
Lead Auditor Signature:		Client Signature:	
			
Cause Analysis (to be filled by client):			
1) The MSDS documents were kept in our office in KL. 2) The skid tank labeling were not in place as the requirement as per stated in the permit was overlooked.			

Correction (to be filled by client):	
1) The MSDS documents to be placed in the estate. 2) The skid tank to be labelled as per required in the permit.	
Corrective Action (to be filled by client):	
1) The MSDS documents have been put in a file, labelled and placed in the estate (see attachment). 2) A 5ft x 5ft signage with details of the diesel tank has been installed within the diesel storage area (see attachment).	
Review of corrective/corrective action (to be filled by Lead Auditor)	
All the evidence submitted were found adequate and therefore this major non-compliance is closed.	
NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 27 th November 2020	Lead Auditor Signature: 

Minor Nonconformities:	The following NC's was raised for this audit.
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Company Name	RAH Properties Corporation 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-BV1-MSPO-2019			
NC No. / Ref.	BV1/MSPO/MINOR/02	Date Detected	16 th October 2020	
Site(s) concern	RAH Properties Corporation Sdn Bhd	Target Completion	Next Surveillance Audit	
Normative Reference and Requirement	4.5.4.2 Minor An action plan to reduce identified significant pollutants and emissions shall be established and implemented.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	Spillage of diesel			



NC Objective Evidence:	
The management has established Aspect and Impact Assessment dated 5 th December 2019. However, during site visit, sighted spillage of diesel at vehicle parking bays, workshop (repair area) and generator room.	
Lead Auditor Signature: 	Client Signature: 
Cause Analysis (to be filled by client):	
The leakages and spillage detected were due to faulty machinery or pipes.	
Correction (to be filled by client):	
Each cause of leakages was repaired to stop spillage.	
Corrective Action (to be filled by client):	
<ol style="list-style-type: none"> 1) For the vehicle parking bays and workshop, the spots with leakages were cleaned by placing crusher run on them. Trays are placed underneath vehicles to prevent future spillage should any leakages occur in the future (see attachment). 2) For the generator room, source of leakages were identified and stopped. The room was cleaned and the external area with old spillage spots was cleaned and crusher run put on top (see attachment). 	
Review of corrective/corrective action (to be filled by Lead Auditor)	
All the evidence submitted were found adequate and therefore this minor non-compliance is closed.	
NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 27 th November 2020	Lead Auditor Signature: 

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

Attendance List

Internal Stakeholders

- 1) RAH Properties Corporation Sdn Bhd management team and staff
- 2) Male and Female workers
- 3) Workers Representatives
- 4) Foreign Workers Representatives

External Stakeholders

- 1) Neighboring Estate
- 2) Estate Suppliers
- 3) Government Agency (Bomba/Polis/Klinik)
- 4) MPOB Officer