

GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)

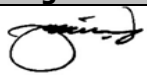
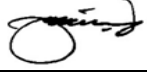

CERTIFICATION AUDIT REPORT


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

Raub Mining & Development Co. Sdn Bhd

-Individual Certification-

ANNUAL SURVEILLANCE AUDIT
10th March 2020

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	20/03/2020	Issued as Draft Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	27/03/2020	Issued as Final Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	09/04/2020	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	

Acknowledgment by Raub Mining & Development Co. Sdn Bhd					
Rev	Date	Description	Management Representative	Role	Signature
B	09/04/2020	Acceptance of the contents	Hiresh Kumar a/l Vesivanathan	Manager	

Declaration

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

WITH INTEGRITY WE SERVE



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Table of Contents

SECTION I : PUBLIC SUMMARY REPORT	3
1.1 Certification Scope	3
1.2 Company details and Contact information.....	3
1.3 Certification Unit.....	3
1.4 Map Showing Geographical Location	4
1.5 Production Area, Actual and Projected FFB Production (MT)	5
1.6 Certificate Details.....	6
1.7 Qualification of the Lead Assessor and Assessment Team.....	7
1.8 Audit Methodology	8
1.9 Audit Plan Information	8
1.10 Audit Result Summary Findings	8
1.11 Stakeholder Consultation.....	9
1.12 Recommendation	11
1.13 Date of Next Surveillance Audit.....	11
1.14 Confidentiality	11
1.15 Abbreviations Used	12
SECTION II : ASSESSMENT FINDINGS BY PRINCIPLES AND CRITERIA.....	13
2.1 Principle 1 : Management commitment and responsibility	13
2.2 Principle 2 : Transparency	16
2.3 Principle 3 : Compliance to legal requirements.....	19
2.4 Principle 4 : Social responsibility, health, safety and employment condition	23
2.5 Principle 5 : Environment, natural resources, biodiversity, and ecosystem services	40
2.6 Principle 6 : Best practices.....	53
2.7 Principle 7 : Development of new planting.....	58
2.8 Details of Audit Findings.....	62

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

SECTION I : PUBLIC SUMMARY REPORT**1.1 Certification Scope**

Global Gateway Certifications Sdn. Bhd. (GGC) has conducted the Certification Assessment of Raub Mining & Development Co. Sdn Bhd. During this Annual Surveillance Audit (ASA 1), the audit team were briefed by Estate Manager, of the supply base disposition. The estate consists only Raub Mining & Development Co. Sdn Bhd.

This assessment was conducted onsite on 10th March 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	Raub Mining & Development Co. Sdn Bhd
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Business Address	Bukit Koman, P.S.12, 27600 Raub, Pahang.
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Contact Person	Mr. Hires Kumar a/l Vesivanathan
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Office Telephone	+603 355 1200/+603 355 2200
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E-Mail	romsb_raub@yahoo.com
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1.3 Certification Unit**Name of the Certification Unit**

No	Name of the Certification Unit	Site Address	GPS Reference of the site office	
			Longitude	Latitude
1.	Raub Mining & Development Co. Sdn Bhd	Bukit Koman, P.S.12, 27600 Raub, Pahang.	E 101° 51' 15.42"	N 3° 50' 37.20"

MPOB License Information

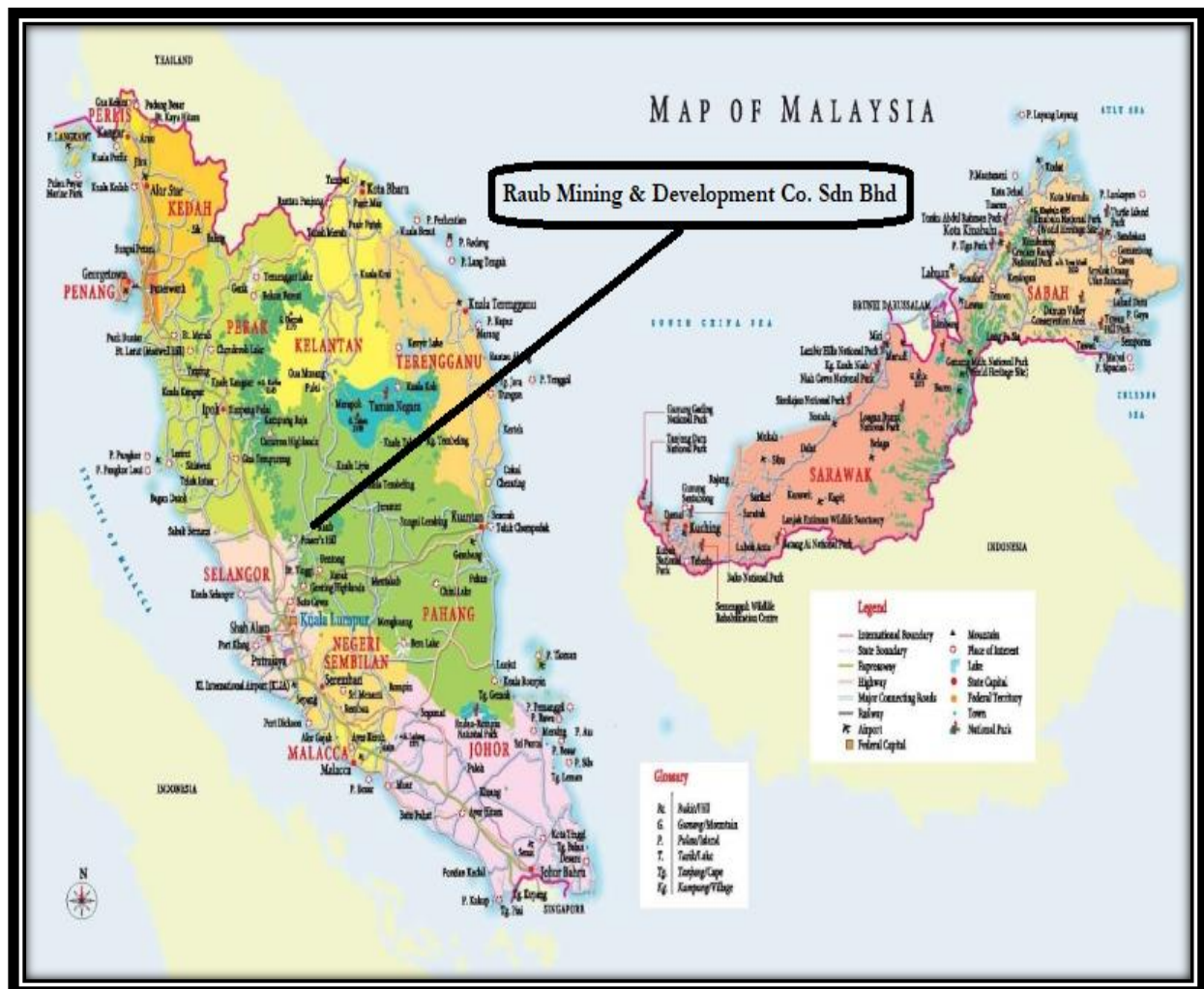
No	Name of the Site	LICENCE NUMBER	EXPIRY DATE	SCOPE ACTIVITY
1.	Raub Mining & Development Co. Sdn Bhd	501308102000	31.03.2021	"Menjual & Mengalih FFB"

Others Sustainability Certification

No	Name Of The Site	Others Sustainability Certifications
1.	Raub Mining & Development Co. Sdn Bhd	NIL

1.4 Map Showing Geographical Location

1) Raub Mining & Development Co. Sdn Bhd



Name of the Certification Unit	FFB Summary (MT)		
	Projected from last audit	Actual Production for 12 Months [Mar 2019-Feb 2020]	Projected Production for next 12 Months [Mar 2020-Feb 2021]
Raub Mining & Development Co. Sdn Bhd	21,000.00	16,817.52	21,500
Total	21,000.00	16,817.52	21,500

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-RMD001-MSPO-01-2019
Initial certificate issued date	30 th April 2019
Certificate expiry date	29 th April 2024
Stage 1 assessment date	18 th January 2019
Stage 2 / Main Assessment	18 th March 2019
Annual Surveillance 1 [ASA 1]	10 th March 2020
Annual Surveillance 2 [ASA 2]	January 2021
Annual Surveillance 3 [ASA 3]	January 2022
Annual Surveillance 4 [ASA 4]	January 2023

1.7 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: **Muhammad Syafiq bin Abd Razak**

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

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

During this assessment, he assessed on the aspect of Management Commitment and Responsibility, Transparency, 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: **Hj. Ahmad bin Sukiman**

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

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

Auditor

Name: **Mohamad Razin bin Bakal**

Graduate in Degree of Accountancy with University Putra Malaysia. Having 17 years of working experience in various field in Malaysia, Africa and Indonesia. Have enough knowledge and experiences in oil palm estate operation inclusive of estate administrative, budget preparation, jungle clearing, new planting, nursery establishment and management, harvesting, field upkeep and maintenance, safety and health, vehicle running and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Involved in MSPO auditing since 2018. Qualified as Lead Auditor/Auditor for MSPO 2530:2013, ISO 14001:2015 and ISO 9001:2015 from Sirim Berhad. Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of compliance to Transparency and Social responsibility, health, safety and employment condition. He is able to speak and understand Bahasa Malaysia and English.

1.8 Audit Methodology

The audit was conducted based on sampling following the method as specified in the MSPO requirements (MSPO-Questionnaire Self-Assessment – RA). In the case of this certification unit, sampling calculation was not applied as there is only one estate namely "Raub Mining & Development Co. Sdn Bhd".

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

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

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

1.9 Audit Plan Information

Audit Date	10 th March 2020
Name of site(s) visited	Raub Mining & Development Co. 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	0	No action requires
Minor Nonconformities	0	No action requires
Area of Concern	1	No action requires
Noteworthy /Positive Comments	6	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.

During this Annual Surveillance Audit (ASA 1), 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.	Stakeholders A (Sprayers Gang)	<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 were treated equally with no discrimination based on gender. • They claimed that the management provides good living quarters with proper domestic waste collection and promptly attend to quarters repairs. • They confirmed wages are being paid more than the Minimum Wage Order 2018 of RM1, 100.00 per month and understand all the deductions being made. 	No action requires	Positive findings

2.	Stakeholders B (Harvesting Gang)	<ul style="list-style-type: none"> • Good understanding about MSPO. • They are very happy with the management and hopes to extend their contract. • They have good understanding about complaint and grievance mechanism. • PPE given by company – free. • They claimed that the management provides good living quarters with proper domestic waste collection and promptly attend to quarters repairs. • They confirmed wages are being paid more than the Minimum Wage Order 2018 of RM1, 100.00 per month and no issue on wages received as well as the deductions made. 	No action requires	Positive findings
3.	Stakeholders C (Contractors)	<ul style="list-style-type: none"> • They have good understanding about MSPO. • They informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work. • They were aware that any complaints or suggestions could be forwarded to the mill/estate management. • The company has good relation with supplier and there is no issue with company's performance. 	No action requires	Positive findings
4.	Stakeholders D (Supplier)	<ul style="list-style-type: none"> • Informed that the payment was made promptly. • The contract agreement with the management is fair and transparent. • The company has good relation with supplier and there is no issue with company's performance 	No action requires	Positive findings

		<ul style="list-style-type: none"> • He has good understanding about complaint and grievance mechanism. 		
5.	Stakeholders E (Estate - Gender Committee Representatives)	<ul style="list-style-type: none"> • There was no discrimination, sexual harassment or violence case reported thus far. • The Management is quite supportive on the Committee activities. 	No action requires	Positive findings

1.12 Recommendation

The company has established sustainability policy, objectives and procedures that define an effective system for the administration and control of sustainability management system throughout all operation activities of Raub Mining and Development Co. Sdn Bhd. 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 Annual Surveillance Audit (ASA 1).

This report will be internally reviewed for certification decision by GGC and external peer review by independent reviewers (Qualified by MPOCC) not required. During Annual Surveillance Audit (ASA 1), based on MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO)] Part 3: General Principles for Oil Palm Plantations and Organized Smallholders), there was 1 area of concern 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 was no major non-conformity findings. Therefore, the Lead Auditor recommends to continuing a certificate of compliance "MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders" to Raub Mining & Development Co. 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 Company has established MSPO Policy signed and approved by Mr. Tai Swe Chong (General Manager) date on 1st August 2018.

As evidence, sighted latest MSPO Policy Training on 28th February 2020 at RMDC Office. Conducted by Mr. K.S.K Lachumenan (Estate Manager) and attended by 7 participants.

During interview with the staff and workers, they are aware regarding the MSPO Policy and the implementation of the MSPO and able to answer the interviewer's question.

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

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

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

Stated on the MSPO Policy; "To continuously improve our operations in line with social, environmental and economic aspects".

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

Criterion 2 Internal audit

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

Summary Internal audit will be conducted once in a year as per stated on MSPO Procedure; Internal Audit; Doc No. MSPO-01; Rev: 1.0, dated 08th January 2019.

Internal audit procedure was made available Flowchart of internal audit were available [pg. 3 of 4].

Sighted the RMDC Internal Audit plan for year 2019 prepared by Mr. Tai Swe Chong (General Manager).

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 Company has established MSPO Procedure; Internal Audit; Doc No. MSPO-01; Rev: 1.0, dated 08th January 2019. Prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager).

Latest internal audit conducted on 14th January 2020 – 15th January 2020 by Mr. Tai Swe Chong (General Manager) and Mr. K.S.K Lachumenan (Estate Manager).

Internal audit report was prepared by Mr. Tai Swe Chong (General Manager). 9 Findings were identified, all root cause was available and documented, sighted in audit checklist.

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

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

Summary The internal audit conducted by Mr. Tai Swe Chong (General Manager) and Mr. K.S.K Lachumenan (Estate Manager). The findings were documented in the Internal Audit Findings Summary.

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

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

Criterion 3 Management review

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

Summary Management review meeting was conducted on 21st January 2020. Management review meeting (MRM) report were made available prepared by Mr. Nathan Gunasekaran and approved by Mr. K.S.K Lachumenan.

Conducted at Raub Oil Mill Meeting Room. Attended by All RMDC Management (Manager, Asst. Manager, Office Admin and Field Staff. Sighted attendance record and photographs, and attended by 7 respective staffs.

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 Continuous plan for year 2020 was verified by Mr. K.S.K Lachumenan, Estate Manager and approved by Mr Tai Swe Chong, General Manager on 27th January 2020.

As evidence, on social:

- Issues: Transportation
- Objective: To provide safe transportation for workers and outsiders.
- Improvement Plan: To carry out main road repairs as soon as possible with collaboration with mill management.
- Monitoring: Budgeted & On-Going process
- PIC: Estate Manager/Mill Manager

As evidence, on environmental:

- Issues: Minimize soil and water pollution.
- Objective: To ensure clean and zero pollution environment.
- Improvement Plan: Installation of oil traps at diesel storage tank and clean the oil trap periodically.
- Use of tray to collect the engine oil or lubricant oil during service & maintenance of vehicles.
- Monitoring: Line site inspection checklist, tractor inspection & maintenance checklist, oil traps cleaning inspection checklist.
- PIC: Estate Manager/Assistant Manager

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 There is no new application of new technology implemented during the certification period. The current practices continued and guide by Mr. Tai Swe Chong (General Manager).

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 Trainings were conducted for the introduction and implementation of any new information or technology that is feasible and applicable to the company.

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 Raub Mining and Development Co. Sdn. Bhd has established Standard Operating Procedures (SOP) for Stakeholders Engagement / Negotiation – MSPO 03, Rev 1.0, Date: 1st December 2018. The policy has identified the procedure of arrangement for consultation and communication by Raub Mining and Development Co. Sdn. Bhd with their relevant stakeholders and how their concern and view are addressed.

Sighted the Internal and External Stakeholder Meeting conducted on 27th November 2019, attended by 27 participated. The meeting was collaborated between Estate and Mill which conducted at Bilik Mesyuarat Raub Oil Mill. The agenda discussed are;

- i. Briefing on Company Policy
- ii. Briefing on MSPO
- iii. Briefing on complaints and request procedure
- iv. Action Plan for existing strategic and future
- v. Other Matters.

No complaints or request made during the meeting.

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

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

Summary Sighted Memo from Estate Manager dated 2nd January 2020. The memo enlighten summary of documents listed as a guideline for Raub Mining & Development Co. Sdn. Bhd. to determine the confidentiality status or available for public disclosure.

The classification of management documents as below;

Documents	Confidential	Non Confidential
Land Tittle	/	
Company Account Statement	/	
Environment Policy		/
Social Policy		/
Sexual Harassment Policy		/
OSH Policy		/
Zero Burning Policy		/
Environment Assessment and Impact Report		/

Social Impact Assessment Report		/
External Audit Report		/
Stakeholder minute meeting		/
Emergency Rescue Plan and Procedure		/

All these confidential and non-confidential documents are available and sighted in the estate office.

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

Criterion 2 Transparent method of communication and consultation

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

Summary Raub Mining and Development Co. Sdn. Bhd has established Standard Operating Procedures (SOP) for Stakeholders Engagement/Negotiation – MSPO 03, Rev 1.0, Date : 1st December 2018. The policy has identified the procedure of arrangement for consultation and communication by Raub Mining and Development Co. Sdn. Bhd with its relevant stakeholders and how their concern and view are addressed.

Estate has shown a good communication, by publish the flow chart of Procedure "Pengurusan Aduan Pekerja/Stakeholder" at the notice board in front of estate office and housing complex. The feedback can be forward to estate management to Complain box.

Sighted sample complaint form submitted by the internal stakeholder :

Sample No. 1

Complainer : Ab. Majid bin Abdul Manaf
Complaint : i. Lampu Dapur and Lampu
ii. Ruang tamu tidak berfungsi

Dated received : 20th February 2020

Action taken : Lampu baru ditukar di dapur dan ruang tamu. The issue solved on 28th February 2020 and verified by estate manager.

Sample No. 2

Complainer : Villiyammah A/P Thamimalai
Complaint : i. Pintu lock Rosak and Pam
ii. Tandas rosak

Dated received : 17th February 2020

Action taken : Repair has been rectified and done. The issue solved on 20th February 2020 and verified by estate manager.

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 Sighted letter of appointment for the responsible person in charge of consultation and communication, Mr. JR Kalaiselvam (Field Supervisor) and approved by Mr. K.S.K Lachumenan (Estate Manager) dated 1st January 2020.

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 The company has established list of stakeholders prepared by Mr. Nathan A/L Gunasegaran (Assistant Manager) dated 1st November 2019.

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

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

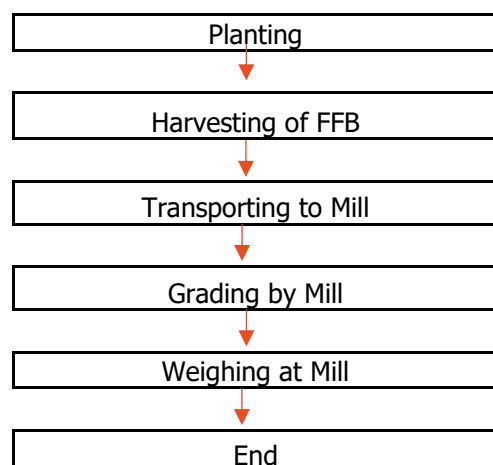
Criterion 3 Traceability

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 The company has established Standard Operating Procedure: FFB Traceability Procedure. SOP MSPO-04, Rev: 1, Dated 1st November 2018.

The purpose of this procedure is to establish a suitable identification and traceability of oil palm Fresh Fruit Bunch (FFB) production traceable from the plantation activities till dispatch of Palm Oil Mill

The traceability process flow of delivery FFB from field to Palm Oil Mill as below;



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

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

Summary Random check has been conducted in order to inspect on compliance with the traceability system in the estate.

The regular inspection has been carried out by the staff, Assistant Manager and Estate Manager using inspection form and occasionally by the General Manager during field visit.

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

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

Summary Sighted letter of appointment for the responsible person is, Mr. Jegan a/l Shanmugam (Cadet Assistant) approved by Mr. K.S.K Lachumenan (Estate Manager) dated on 1st January 2020.

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

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

Summary All deliveries or transportation of FFB's record was properly maintained by the estate management. Sighted Daily Bunch Record, Delivery Note, Grading Chit and Mill Weighbridge Ticket kept in the office for reference.

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 Raub Mining & Development Co. Sdn Bhd has established its List & summary of applicable laws and regulations that are applicable for the estate. The applicable laws include:

1. Environmental Quality Act 1974 (Act 127)
2. OSHA Act 1994 (Act 514)
3. Factories and Machinery Act with regulations 1967 (Act 139)
4. Uniform Building By Law, 1986
5. Pesticides Act 1974 (Act 149)
6. Electricity Supply Act 1990 (Act 447)

7. Petroleum (Safety Measures) Act 1984 (Act 302)
8. Fire Services, 1984
9. Local Government, 1976
10. Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446)
11. Employment Act 1955 (Act 265)
12. Employees Social Security Act 1969 (Act 4)
13. Employees Social Security Act 1969 (Act 4)
14. Trade Union Act 1959 (Act 262)
15. Minimum Retirement Age Act 2012
16. National Wage Consultative Council Act 2011, Minimum Wages Order 2018
17. Weights and Measures Act 1972 (Act 71)
18. MPOB Act 1998 (Act 582)

Raub Mining & Development Co. Sdn Bhd (ESTATE) has developed its Linesite Inspection checklist for the month of February 2020. Linesite inspection was carried out by Mr Nathan A/L Gunasekaran (Assistant Manager) – 4 times a month.

The monthly VMO visit is conducted by Mr N. Siritaran R. Narayanan (Penolong Pegawai Perubatan U32, LPPM 2827) on 24.09.2019 covers the following area;

1. Surau
2. Ground
3. Pest Control
4. Building
5. Waste
6. Safety

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

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

Summary Sighted lists of permits/licenses which has to be monitored and updated periodically such as;

1. MPOB licenses untuk menjual dan mengalih FFB, No. Lesen: 501308102000 expire 31.03.2020 [keluasan estate: 1,550.93 Ha].
2. Permit Barang Kawalan Berjadual (Peraturan-peraturan bekalan kawalan bekalan 1974, Peraturan 9(2), No.Siri P: C000311 for 9,100 liters diesel for a period of 31.05.2019 till 30.05.2020
3. Perakuan Pendaftaran, Akta Bekalan Elektrik 1990, Pepasangan No.: ST(PKN)P/S/PHG/01180 for 85kW effective 26.04.2019
4. Akta Levi Keuntungan Luar Biasa 1998, Certificate of Registration [No. 000477] effective from 15th July 2008.
5. Fire Extinguisher, expires on 6th June 2019 (2 unit) & 23rd October 2019 (36 unit).

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 Any changes to legal requirements are tracked by means of periodic review and evaluation on the Laws & regulations list to ensure that any new/addition as well as changes and amendment are captured and updated, through the following manner:

1. Enquiring the laws books publisher
2. Communication with law/enforcement officers
3. Website

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

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

Summary The person in charge to monitor compliance and to track and update the changes in regulatory requirements is Mr Nathan A/L Gunasegaran (Assistant Manager), signed by the Manager, Mr K.S.K Lachumenan on 01.01.2020.

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 land title is kept in the estate's office and were sighted during the audit.

Lot No	Titled Ha	Ownership
PT 23120	1,850.8812	Raub Mining & Development Co. Sdn Bhd
	1,850.8812	

Syarat-Syarat Nyata : Untuk tanaman kelapa sawit

Verified evidence of annual payment of quit rent for 2019 paid to the Pejabat Daerah dan Tanah, Daerah Raub, Negeri Pahang amounted to RM182,760.00

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 Raub Mining & Development Co. Sdn Bhd.

Estate Area Statement:

Description	Hectare
Mature Oil Palm	1,446.72
Immature Oil Palm	0.00
Building site, roads, etc.	120.46
Unplantable areas, Swamps	82.76
Unsuitable planting area (steep etc.)	6.80
Ex-Mining MC483	23.07
Ex-Mining MC482	9.71
Durian farm lot 17	2.83
Areas under smallholdings	121.61
TNB Rentice	9.34
Spinal Road (PTG)	23.31
Raub Oil Mill	4.27
Total	1,850.88

Note: Sighted 8 Deed of Agreements between 15 smallholders with Raub Mining & Development Co. Sdn Bhd (for areas under smallholdings).

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 The Perimeter Boundary Plan Lot 31152 (HSD 10803 PT 23120), Plan No. VG/324/RMD/19/P2 dated 06.11.2019 indicating the location of the boundary stones.

Total number of peg boundary markers sighted on the map is 32 boundary stone. During field visit, auditors also check a few physical boundary stones and verify it with company's GPS coordinate and GGC own GPS coordinate. The coordinate checked by GGC unit are matched to the data that prepared by staff of the Estate.

Verified 3 boundary markers, one each for the Estate as follow;

1. Boundary Stone ID No: 3 GPS Coordinate: 101°51'3.41"E, 3°49'16.94"N
2. Boundary Stone ID No: 13 GPS Coordinate: 101°50'45.71"E, 3°52'17.40"N
3. Boundary Stone ID No: 32 GPS Coordinate: 101°51'35.31"E, 3°49'4.02"N

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. There is no evidence of conflict present in this estate. There is no violence on instigated violence in maintaining peace because company has a clear procedure for land conflict.

Estate land is fully owned by Raub Mining & Development Co. Sdn Bhd.

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 within or surrounding the estates. There are also no land disputes or claims involving the estate. Estate land is fully owned by Raub Mining & Development Co. Sdn Bhd.

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 estate. There are also no land disputes or claims involving this estate. Estate land is fully owned by Raub Mining & Development Co. Sdn Bhd. Therefore, no maps for recognized customary rights is available.

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

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

Summary There is no customary land in or surrounding the estate. There are also no land disputes or claims involving this estate. Estate land is fully owned by Raub Mining & Development Co. Sdn Bhd.

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 Company has established MSPO Procedure: Social Impact Assessment (SIA), Rev.: 0 dated 1st August 2018. The procedure has been prepared by Mr. Nathan A/L Gunasekaran (Assistant Manager) and Approved by Mr. K.S.K Lachumenan (Estate Manager).

Sighted latest SIA done by Raub Mining & Development Co. Sdn. Bhd. dated 4th December 2019. Survey was conducted with 21 participants randomly selected respondents. The respondents randomly choose among workers and other stakeholders in Raub Mining & Development Co. Sdn. Bhd. The SIA is prepared by Mr. Mr. K.S.K Lachumenan (Estate Manager) and Approved by Mr. Tai Swe Chong (General Manager).

The general objectives of Social Impact Assessment (SIA) are :

1. To ensure Social Impact Assessment is done as per the MSPO 2530:2013 Criteria 4.4.1
2. To ensure all activities and facilities of Raub Mining & Development Co. Sdn. Bhd. meet all the criteria in line with its Social Policy
3. To identify social impact with the affected relevant internal stakeholders especially employees.
4. To ensure actions taken in response to the recommendations of assessment report and feedback from affected stakeholders
5. To ensure a timetable with responsibilities for mitigating the negative impacts is reviewed and updated, the implementation of this SIA management plan, monitoring, reviewing and continuous improvement.

SIA questionnaire for internal and external covered the following areas :

No	Social Impact Survey Criteria
1	Access and Use Rights
2	Economic livelihood and working condition
3	Subsistence Activities
4	Cultural and Religious Values
5	Health Facilities
6	Educational Facilities
7	Other community value, resulting from changes in improvement of transport / communication / influx of migrant labour force

Sample taken based on Borang Soal Selidik Penilaian Impact Social as follows;

Impact Negative

1. SIA Survey Criteria (Transportation)

Social Impact : Amenities for staff and workers

Mitigation Measure: Estate Manager will provide good management practices to improve road condition heads to RMDC office stage by stage

Impact Positive

2. SIA Survey Criteria (House Facilities):

Social Impact : Worker and staff housing quarters

Mitigation Measure: Estate Manager will carry out problematic the house repairs and upkeep as fast as possible.

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 Standard Operating Procedure Complaint & Grievance – Doc. No: MSPO-03. Prepared by Mr. Nathan A/L Gunasekaran (Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager) effective from 1st December 2018

This procedure is a reference to management and staff in handling of any complaints and grievance from any stakeholder including individuals, government organization and non-government organization concerning the implementation of MSPO.

Sighted flow chart of complaints and grievances designed for External and Internal Stakeholder in the company SOP.

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 Standard Operating Procedure Complaint & Grievance – Doc. No: MSPO-03. Prepared by Ms. Nathan A/L Gunasekaran (Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager) effective from 1st December 2018

The procedure and flowchart are to specify steps for identification and verification of complaints and grievance in order to ensure management is committed to an open and transparent approach to resolve grievances with the involvement of affected stakeholders.

Sighted sample complaint form submitted by the internal stakeholder as below;

Sample No. 1

Complainer : Ab. Majid bin Abdul Manaf
Complaint : i. Lampu Dapur and Lampu
ii. Ruang tamu tidak berfungsi

Dated received : 20th February 2020

Action taken : Lampu baru ditukar di dapur dan ruang tamu. The issue solved on 28th February 2020 and verified by estate manager.

Sample No. 2

Complainer : Villiyammah A/P Thamimalai
Complaint : i. Pintu lock Rosak and Pam
ii. Tandas rosak

Dated received : 17th February 2020

Action taken : Repair has been rectified and done. The issue solved on 20th February 2020 and verified by estate manager.

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 In order to ease the employees and relevant stakeholders to lodge the complaint, the complaints and grievances form and box are available at estate office and worker quarters.

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 the Internal and External Stakeholder Meeting conducted on 27th November 2019, attended by 27 participated. The meeting was collaborated between Estate and Mill which conducted at Bilik Mesyuarat Raub Oil Mill. The agenda discussed are;

- i. Briefing on Company Policy
- i. Briefing on MSPO
- ii. Briefing on complaints and request procedure
- iii. Action Plan for existing strategic and future
- iv. Other Matters.

No complaints or request made during the meeting.

One area of concern (AOC) has been raised to estate. Sighted the training done by estate management for MSPO requirement. However, during the interview session with the estate workers, the auditor found that the workers still not fully understand with the complaint and grievance procedure.

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

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

Summary Sighted all internal complaints filled, responded and the records being maintained for the last 24 months.

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 The contribution made to the internal and external stakeholders as below;

- i. Purchased of sport equipment for RMDC workers amounted RM 38.00
- ii. Donation for " Majlis Bacaan Doa Selamat " for RMDC workers amounted RM 450.00
- iii. Donation for "Sambutan Kanak – Kanak OKU for Raub" worker amounted RM 100.00

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 "Occupational Safety and Health Policy". Established on 1st August 2018 which was approved by Mr. Tai Swe Chong (General Manager). Local OSH Policy has been prepared in both languages (English and Bahasa Malaysia) for easily understood by all levels of its employees.

The policy outline the commitment to following :

- 1) Provide and ensure a safe and healthy working environment.
- 2) Ensure that all employees and stakeholders are given information, rules, instruction, training and supervision on safe working procedures.
- 3) Identify and investigate all type of accidents, diseases, poisoning and hazardous conditions and preventive measure not to repeat.
- 4) Compliance with legislative requirements, especially the Safety and Health Act 1994 and the Factory and Machinery Act 1967.
- 5) Ensure that all employees and stakeholders carrying out work or field activities are provided with appropriate personal protective equipment and recognize standards.
- 6) Ensure all contractors and suppliers comply with safety and health rules and regulations.
- 7) Nurture and enhance occupational safety and health through training to all employees and stakeholders.
- 8) Ensure the awareness of occupational safety and health policies is disseminated to be understood and practiced by employees and all stakeholders.

Sighted the Internal and External Stakeholder Meeting conducted on 27th November 2019, attended by 27 participated. The meeting was collaborated between Estate and Mill which conducted at Bilik Mesyuarat Raub Oil Mill. The agenda discussed are;

- i. Briefing on Company Policy
- ii. Briefing on MSPO
- iii. Briefing on complaints and request procedure
- iv. Action Plan for existing strategic and future
- v. Other Matters.

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 "Occupational Safety and Health Policy". Established on 1st August 2018 which was approved by Mr. Tai Swe Chong (General Manager). Local OSH Policy has been prepared in both languages (English and Bahasa Malaysia) for easily understood by all levels of its employees. The policy is displayed in office entrance for public viewing.

The policy has been communicated to external and internal stakeholder as follows;

Sighted the Internal and External Stakeholder Meeting conducted on 27th November 2019, attended by 27 participated. The meeting was collaborated between Estate and Mill which conducted at Bilik Mesyuarat Raub Oil Mill. The agenda discussed are;

- i. Briefing on Company Policy
- ii. Briefing on MSPO
- iii. Briefing on complaints and request procedure
- iv. Action Plan for existing strategic and future
- v. Other Matters.

HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive). HIRARC sighted for the followings work operation :-

1. Chemical spraying
2. Fertilizer application
3. Harvesting
4. Culvert Maintenance
5. Chemical Store
6. Desilting drains
7. Diesel tank
8. External Transport
9. Fertilizer Store
10. FFB Loading
11. Wiring
12. Lubricant Store
13. Manual Selective spray
14. Pruning
15. Rai bait
16. Road maintenance
17. Travelling To & From Work
18. Transport FFB
19. Transport Fertilizer
20. Chemical Issue
21. Premix
22. Electrical Work
23. Workshop
24. Diesel Issuance
25. Receive chemicals
26. Stacking Fertilizer
27. Unloading FFB
28. Loading FFB
29. Tractor Driving
30. Planting Oil Palm
31. Gardening
32. Office Compound
33. Land Preparation for replanting
34. Heat Stress & UV light
35. Fire Outbreak
36. Firearms
37. Estate Machinery Noise
38. AP

Raub Mining & Development Co. Sdn. Bhd. has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training records file for each staffs and workers. Training record includes:-

No	Program	Actual Month Conducted
1	Fire Fighting Equipment inspection	Jan 2020 Feb 2020
2	Fire Aid box inspection & Replenish	Jan 2020 Feb 2020
3	Vehicle Inspection	Jan 2020 Feb 2020
4	Workshop Inspection	Jan 2020 Feb 2020
5	Introduction for new worker	Jan 2020 Feb 2020
6	MSPO for Manager and Executive	Feb 2020
7	Personal Protective Equipment (PPE) Training	Jan 2020
8	SOP – Premixing Chemical	Feb 2020
9	SOP – Chemical Store Mgmt	Feb 2020
10	Safety Data Sheet (SDS) Training	Feb 2020
11	SOP – Chemical Spraying	Jan 2020
12	SOP – Manuring	Jan 2020
13	SOP – Company Policy	Jan 2020
14	SOP – FFB Harvesting & Pruning	Jan 2020
15	SOP – Loading FFB	Jan 2020
16	SOP – Empty Chemical Containers Collection	Jan 2020

Raub Mining & Development Co. Sdn. Bhd. has provided appropriate PPE for all workers in their operations. PPE Issuance and replacement record. Sighted for:-

- a. Field staff
- b. Harvesters
- c. Field Workers
- d. General Workers

During field visit, sighted the workers have been trained with safety and the workers wear the PPE appropriately.

Company has established the Standard Operating Procedure of Chemical Handling – Prepared by Mr. Nathan A/L Gunasekaran (Assistant Manager) and Approved by Mr. Tai Swe Chong (General Manager) effective date on 6th November 2018

The company has appointed Occumed Consultation & Services Sdn. Bhd to carry out CHRA Assessment for Raub Mining & Development Co. Sdn. Bhd. The site visit was carried out on 21st August 2018 by Dr. Yasriza bin Yahaya (JKKP HIE 127/171/2(8)-2018/070). Sighted the annual medical surveillance report carried out on 30th January 2020 for 12 pesticides applicators.

The Estate Manager was appointed as the Chairman of the Operating Unit ESH Committee. Sighted letters of appointment for all the committees " Jawatan Kuasa

Keselamatan dan Kesihatan Pekerja Ladang (JKKP) bagi sesi 2020 " signed by The ESH Chairman.

The OSH Committee meeting has been conducted on 26th February 2020. The agenda of meeting as follows:

- i. Utusan Pengerusi
- ii. Pengesahan minit mesyuarat yang lepas
- iii. Isu – Isu yang belum diselesaikan
- iv. Hasil pemeriksaan tempat kerja
- v. Kemalangan, Kemalangan Nyaris, Kejadian berbahaya, keracunan pekerjaan dan penyakit pekerjaan sejak mesyuarat yang lalu.
- vi. Latihan & Program keselamatan tahunan
- vii. Kajisemula objektif / Prosedur Kerja Selamat / HIRARC.
- viii. Perbincangan tentang Laporan Audit / Arahan / Maklumat baru daripada Jabatan Kerajaan atau agensi – agensi lain berkaitan keselamatan & kesihatan sejak mesyuarat lalu.
- ix. Perkara – perkara berbangkit berkaitan dengan keselamatan & kesihatan – Mesyuarat sebelum.
- x. Perkara – perkara berbangkit berkaitan dengan keselamatan & kesihatan – Terkini.

Sighted the emergency procedure for the Raub Mining & Development Co. Sdn. Bhd. Emergency response plan is available in local language (Malay and English). The procedure covers Emergency procedure for Fire, Accident, During harvesting, spraying application, fertilizer application, and General Worker.

The ERP has been explained to all workers and staffs during training on 26th December 2019 attended by 13 participants at Field RPC 8 & 9. Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board.

First Aid Training was conducted on 23rd October 2019 by Mr. Pughal Selvan (Certified First Aider). Sighted picture, training material and attendance list attended by 18 participants.

During field visit, sighted first aid box and records maintained by first aiders at the work places area.

Raub Mining & Development Co. Sdn. Bhd. has submitted the JKKP 8 for year 2019 in 3rd January 2020. Based on their record, no accident and injuries recorded thus far.

Bsed on the record for year 2020, there are 2 accident reported involved harvester at the harvesting operation on 20th January 2020 and 7th February 2020. The accident has been reported to JKKP Department on 27th January 2020 and 21st February 2020 respectively and subsequently HIRARC for harvesting activity has been update accordingly.

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

Criterion 5	Employment conditions
Indicator 1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.

Summary Sighted the "Social and Human Right Policy". Established on 1st August 2018 which was approved by Mr. Tai Swe Chong (General Manager).

The company has committed to carry out this policy in all company's operations through:

1. Compliance with established laws and regulations including labour laws, land title and workers' housing.
2. Ensure minimum retirement age policy is complying.
3. Provided the relevant training and development associated with their roles and responsibility.
4. Prohibit employing worker by coercion, children and young persons shall not be employed or exploited, the minimum age shall comply with local, state and national legislation.
5. Paying salaries to employees and staffs on a minimum wages order.
6. Respect and protect human rights and workers' rights (including temporary workers, contracts or foreign workers).
7. Freely of discrimination and prejudice against gender, race, religion, nationality and political views.
8. Provide a harmonious work environment to employees, customers and stakeholders and
9. Provide workplace free of sexual harassment whether directly or indirect only against all workers, societies and stakeholders.

Sighted the Internal and External Stakeholder Meeting conducted on 27th November 2019, attended by 27 participated. The meeting was collaborated between Estate and Mill which conducted at Bilik Mesyuarat Raub Oil Mill. The agenda discussed are;

- i. Briefing on Company Policy
- ii. Briefing on MSPO
- iii. Briefing on complaints and request procedure
- iv. Action Plan for existing strategic and future
- v. Other Matters.

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.
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Summary All workers enjoy the same scale of pay and provided with equal housing and work facilities.

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



Raub Mining & Development Co. Sdn. Bhd.

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. Interview with staff and workers confirmed that they understand the terms and conditions of their employment. Sighted sample of worker wages as below;

No	I/C or Passport	Nationality	Wages (RM)
1	C 0696154	Indonesia	1,396.50
2	AU 382307	Indonesia	1,349.20
3	C 4882387	Indonesia	1,437.20
4	AU 041742	Indonesia	1,642.30
5	B 1956815	Indonesia	1,218.90
6	AU 382399	Indonesia	1,712.40
7	B 2591875	Indonesia	2,004.55
8	630523-06-5409	Malaysia	2,112.05
9	691111-06-5161	Malaysia	1,977.30

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

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

Summary The payment for employees of contractors was monitored by the management through obtaining the pay slips from the contractors for all their workers.

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.

Sample of payslip for the contract workers for Ilham Motif Sdn. Bhd (Contract Harvesting).

- Pay slip month of : January 2020

- Worker Name : Dulaman
- Emp Code : AT 767400
- Salary Earned : RM 1,197.70

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 Raub Mining & Development Co. Sdn. Bhd. has established a system to record their worker particular which consist of the following information ;

1. Name
2. Identity Number
3. Pay Rate
4. Designation
5. Sex
6. Date of Birth
7. Marital Status
8. Race
9. Date Joined and Resigned
10. Address

Workers employed consist of local, India and Indonesian.

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 Inspection of a sampled employee contracts confirmed that terms and conditions are clearly outlined. The contract agreement for worker covers local and foreign workers and the term and conditions are documented are above the industry minimum standard.

Employment contracts were available in language that understood by the workers. The contracts provide a details about the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday, annual leave, period of notice to terminate the contract, etc.

The contract agreement is signed by both parties' employee and employer and accompanied with respective witnesses.

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. Raub Mining & Development Co. Sdn. Bhd. is using 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 The working hour, break time and rate of overtime has been clearly stated in the Employment Contract for reference.

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 pay slips clearly shows the calculations of gross salary, statutory deductions and net salary. During interview with workers confirmed that they are being paid according the stipulated minimum wage.

No	I/C or Passport	Nationality	Wages (RM)
1	C 0696154	Indonesia	1,396.50
2	AU 382307	Indonesia	1,349.20
3	C 4882387	Indonesia	1,437.20
4	AU 041742	Indonesia	1,642.30
5	B 1956815	Indonesia	1,218.90
6	AU 382399	Indonesia	1,712.40
7	B 2591875	Indonesia	2,004.55
8	630523-06-5409	Malaysia	2,112.05
9	691111-06-5161	Malaysia	1,977.30

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 free legalization cost, PERKESO, annual leave, sick leave and etc. Since 1st Jan 2019 foreign worker are cover under PERKESO.

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

Workers provided with medical and accident insurance:

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

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

Indicator 11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.

Summary The workers quarters were found habitable and in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Treated water and electricity were provided to the housing for free of charge.

Sighted weekly inspection done on 6th March 2020. The inspection was carried out by Mr. JR Kalai (Field Staff) and verified by Mr. Nathan A/L Gunasekaran (Assistant Manager).

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 "Social and Human Right Policy". established on 1st August 2018 which was approved by Mr. Tai Swe Chong (General Manager).

The Policy has been prepared in both languages (English and Bahasa Malaysia) for easily understood by all levels of its employees.

The purpose of policy is to prevent all forms of sexual harassment and violence at the workplace has been incorporated in the Social and Human Right Policy.

The Mill Manager was appointed as the Chairman of Gender Committee. Sighted letters of appointment for the Gender Committee for session 2020 " signed by The Chairman.

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 "Social and Human Right Policy". Established on 1st August 2018 which was approved by Mr. Tai Swe Chong (General Manager). The Policy has been prepared in both languages (English and Bahasa Malaysia) for easily understood by all levels of its employees.

The policy of Freedom Of Association And The Human Right & Business Ethics at the workplace has been incorporated in the Social and Human Right Policy. Local or foreign workers are given the freedom which it is an optional for them to join worker union formed in mill. Thus, their freedom are not restrict by Raub Mining & Development Co. Sdn. Bhd. 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 Kemasyarakatan dan Hak Asasi Manusia". Established on 1st August 2018 which was approved by Mr. Tai Swe Chong (General Manager).

The Policy has been prepared in both languages (English and Bahasa Malaysia) for easily understood by all levels of its employees.

The policy of free from child labour at the workplace has been incorporated in the Social and Human Right Policy. There are no children below ages of 18 working in the Raub Mining & Development Co. Sdn. Bhd. and this was proven through checking the list of employees as well as their biodata and through verification visits at estate. The workers were understood 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 Sighted the SOP for "Training & Competency Procedure" Doc. No: MSPO-10, Rev. No: 1.0, was established on 1st November 2018 which was approved by Mr. Tai Swe Chong (General Manager).

Raub Mining & Development Co. Sdn. Bhd. has established a comprehensive annual



OSH training plan for its staffs and workers and this was sighted in the training records file for each staffs and workers.

Sighted Photographs, Training material and Attendance form for all training which has been conducted in 2020 for Executive, Staff and Worker. The list of program as below;

1. Fire Fighting Equipment inspection
2. Fire Aid box inspection & Replenish
3. Vehicle Inspection
4. Workshop Inspection
5. Introduction for new worker
6. MSPO for Manager and Executive
7. Personal Protective Equipment (PPE) Training
8. SOP – Premixing Chemical
9. SOP – Chemical Store Mgmt
10. Safety Data Sheet (SDS) Training
11. SOP – Chemical Spraying
12. SOP – Manuring
13. SOP – Company Policy
14. SOP – FFB Harvesting & Pruning
15. SOP – Loading FFB
16. SOP – Empty Chemical Containers Collection

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 Sighted the Training Needs Analysis prepared by Mr. Jegan S/O Shanmugam (Field Staff) and Approved by K.S.K Lachumenan (Estate Manager) dated 29th January 2020.

The Training Needs Analysis which has been identified for Executive, Staff and Worker as listed below:-

1. MSPO Awareness
2. Complaints & Grievance
3. Safety & Health Procedure
4. No open burning & impact
5. Internal Auditor
6. Social Impact Assessment
7. HIRARC
8. Legal Requirement
9. Grass Cutting
10. Empty Chemical Container Collection
11. Document Control
12. Field Upkeep Task

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 Comprehensive annual training plan for the year 2020 was made available. Raub Mining & Development Co. Sdn. Bhd. has planned training for all employees as required in training need analysis.

Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training. The list of program as below;

No	Program	Actual Month Conducted
1	Fire Fighting Equipment inspection	Jan 2020 Feb 2020
2	Fire Aid box inspection & Replenish	Jan 2020 Feb 2020
3	Vehicle Inspection	Jan 2020 Feb 2020
4	Workshop Inspection	Jan 2020 Feb 2020
5	Introduction for new worker	Jan 2020 Feb 2020
6	MSPO for Manager and Executive	Feb 2020
7	Personal Protective Equipment (PPE) Training	Jan 2020
8	SOP – Premixing Chemical	Feb 2020
9	SOP – Chemical Store Mgmt	Feb 2020
10	Safety Data Sheet (SDS) Training	Feb 2020
11	SOP – Chemical Spraying	Jan 2020
12	SOP – Manuring	Jan 2020
13	SOP – Company Policy	Jan 2020
14	SOP – FFB Harvesting & Pruning	Jan 2020
15	SOP – Loading FFB	Jan 2020
16	SOP – Empty Chemical Containers Collection	Jan 2020

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 Raub Mining & Development Co. Sdn Bhd has established its policy on Environmental which applies to its estates operations signed by the General Manager, Mr Tai Swe Chong on 01.08.2018.

Based on the Environmental Policy, the Company committed towards the implementation of the following practices:

1. To carry out estate activities in accordance with established legal and regulatory framework, those relating to Environmental Quality.
2. To practice a "Zero Burning" policy on new planting, replanting except in specific situation
3. To ensure that estates activities follow the guidelines of current industry practice
4. To plan, implementing, monitoring and measuring predetermined activities to mitigate environmental impacts and greenhouse effect.
5. To promote and provide awareness of environmental conservation through training to all employees and stakeholders, and
6. Ensure awareness of the environmental policy is disseminated to be understood and practiced by employees and all stakeholders.

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

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

Summary Raub Mining & Development Co. Sdn Bhd has established the MSPO Procedure on Environmental Management Plan Ref No. MSPO-05, Rev 1.0 dated 01.11.2018 prepared by Mr Nathan A/L Gunasekaran (Assistant Manager), approved by Mr. K.S.K. Lachumenan (Manager) with the objective to ensure all activities and facilities which related to palm oil plantation operation of are in accordance to the legal and legislation requirements of Malaysia covering state and national level.

The management has conducted environmental aspect and impact assessment for all its' activities in year 2020. The environmental assessment findings are recorded in document titled "Environmental Aspect & Impact Assessment (EAIA), Appendix 1.0, under Environment Management Plan (EMP) prepared by Mr Nathan A/L Gunasekaran (Assistant Manager), approved by Mr. K.S.K. Lachumenan (Manager) on 01.12.2019.

The environmental aspect & impact assessment (EAIA) register has identified columns for Environmental Aspect, Environmental Impact, Environmental Impact Analysis (Frequency/likelihood (a), Consequence (b), Impact (aXb), -ve or +ve), Mitigation Measure and Monitoring Program.

The environmental impact assessment has covered 15 keys Environmental aspect with samples as follow;

1. Use of petrochemical (petrol, diesel, etc.) for transportation activities.
2. Human sewage waste generated from workers linesite and office site.
3. Domestic waste from workers linesite and office site.
4. Oil leakage from tractors/ lorries
5. Schedule waste generation and spillage
6. Disposal of polybags and fertilizer bags
7. Emission of greenhouse gaseous from nitrogen fertilizer usage
8. Smoke emission of heavy vehicle such as tractors and backhoe
9. Generation of empty chemical containers

The Environmental Management Plan (EMP) has been incorporated with Environmental Aspect & Impact Assessment (EAIA) prepared by Mr Nathan A/L Gunasekaran (Assistant Manager), approved by Mr. K.S.K. Lachumenan (Manager) on 01.12.2019.

Sample evidences of Environmental Management Plan (EMP) established by the estates includes;

No	Environmental Aspect	Env. Impact	Mitigation Measure
1	Human sewage waste generated from workers linesite and office site	Water & Soil pollution	Schedule for sewage tank servicing – weekly basis through linesite monitoring checklist
2	Domestic waste from workers linesite and office site	Water & Soil pollution	Systematic collection of garbage/ domestic waste done by contractor Mido Recycle Sdn Bhd twice a week, dispose to Municipal Council landfill.
3	Emission of greenhouse gases from nitrogen fertilizer usage	Global warming	To follow the Agronomist recommendation on fertilizer application. Monitoring through fertilizer programme and application.
4	Disposal of polybags and fertilizer bags	Land pollution	To ensure all fertilizer bags are collected after use, Empty fertilizer bags are re-use for loose fruit collection. Monitoring using fertilizer bags "in & out" records.
5	Scheduled waste generation and spillage	Land & Water pollution	To conduct training on scheduled waste attendant. Monitoring using schedule waste checklist records.

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 Environmental Improvement Plan has been incorporated in the Continuous Improvement Plan Year 2020 (Environmental) verified by Mr K.S.K Lachumenan (Manager), approved by Mr Tai Swe Chong (General Manager) on 27.01.2020.

The sample evidence of improvement plan on issue of minimize air pollution, include the following improvement activities;

1. To follow the Agronomist recommendation on fertilizer programme to minimize greenhouse gases emission.
2. To ensure regular changing of exhaust filter of estate tractors.
3. To ensure zero burning practices at line site and at working place.

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 program of Continuous Improvement Plan (Environmental) 2020 verified by Mr K.S.K Lachumenan (Manager), approved by Mr Tai Swe Chong (General Manager) on 27.01.2020 includes the following issue:

1. Minimize soil and water pollution
2. Minimize air pollution

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 The training programme and implementation on Environmental aspects for year 2020 as follow;

1. Scheduled waste handling safety practices held on 02.02.2020 attended by 13psn.
2. Recycle waste awareness held on 07.02.2020 attended by 18psn.
3. HBV monitoring practices held on 02.01.2020 & 03.02.2020 attended by 3psn.
4. Zero burning practices scheduled on March, June, Sept and December 2020
5. Wildlife management and no hunting practices scheduled on March, June, Sept and December 2020
6. Environmental performance committee meeting scheduled on November 2020.

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

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

Summary The Minute of Sustainability Management Review Meeting (MRM) Report held on 21.01.2020 attended by 7 personnel, discussed the following environmental issues

1. Environmental management plan negative findings
2. Action plan to overcome environment negative findings

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 Diesel and Electricity Usage is conducted based on litre/mt FFB transported and kWh/mt FFB.

Description	Actual Jan - Dec 2019
FFB,mt	17,911.27
Diesel, liter	87,739
Average, Liter/mt FFB	4.89
Diesel baseline value	Nil
Electricity, kWh	47,877
Average, kWh/mt FFB	2.67
Electricity baseline value	Nil

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 The estimate of direct usage of Non-renewable Energy and Electricity Consumption for its operation in 2020;

Description	Estimated Jan-Dec 2020
FFB,mt	18,950
Diesel, liter	81,100
Average, Liter/mt FFB	4.28
Electricity, kWh	49,300
Average, kWh/mt FFB	2.60

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

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

Summary The estate applied mill by-products as organic fertilizer such as Empty Fruit Bunch for all its mature area. The EFB Unloading at Field record for year 2019 tabulated below;

Mill By-Product	Area	MT	Ha
Empty Fruit Bunches	All area	24,298.82	1,337.60

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 The Inventory of Scheduled Wastes Records shown below;

1. SW305 – spent lubricating oil – balance Nil. Last disposal of 0.385mt on 10.01.2020
2. SW102 – used batteries – balance Nil. Last disposal of 0.078mt on 10.01.2020
3. SW410 – Used filter & PPEs – balance Nil. Last disposal of 0.048mt on 10.01.2020
4. SW409 - Fertiliser bags – balance 2,221 pcs as at 09.03.2020
5. SW409 - Empty chemical container – balance 42pcs as at 21.02.2020

Mido Recycle Sdn Bhd has been appointed as the licensed contractor to collect the scheduled wastes in the estate.

The Scheduled Waste Inventory is reported to DOE Eswis on monthly basis.

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 Raub Mining & Development Co. Sdn Bhd has established the MSPO Procedure on Waste Management Ref No. MSPO-07, Rev 1.0 dated 01.11.2018 prepared by Mr Nathan A/L Gunasekaran (Assistant Manager), approved by Mr. K.S.K. Lachumenan (Manager)

As a sample evidence, the Waste Management Plan (WMP) for 2019-2020 describes the measurement to control for Spent Lubricating Oil include;

1. Code: SW305

2. Category: Spent Lubricating Oil
3. Source of Pollution: Vehicles (tractors, lorry, backhoe, motors)
4. Control Measures: Stored in containers which are durable and which are able to prevent spillage or leakage of scheduled waste into the environment – metal drum, Spillage should be cleaned thoroughly bu using spill kit, and the material used for cleaning should be kept in a container and be disposed as scheduled waste (SW)
5. Action: Workshop to update inventory on spent lubricating oil every month and fill up Fifth Schedule as per requirement by DOE, proper management & handling should contain list of scheduled waste generated and inventory of scheduled waste.

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 Raub Mining & Development Co. Sdn Bhd has established the MSPO Procedure on Waste Management Ref No. MSPO-07, Rev 1.0 dated 01.11.2018 prepared by Mr Nathan A/L Gunasekaran (Assistant Manager), approved by Mr. K.S.K. Lachumenan (Manager).

The SOP described the schedule waste disposal flow as follow;

1. Schedule waste identified
2. Collection and storage of schedule waste
3. Disposal of schedule waste.

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 During site visit it has been sighted that the chemical containers are punctured and disposed in an environmentally and socially responsible way to prevent contamination of water source or to human health.

The measurement to control the empty pesticide containers include;

1. Environmental aspect: Generation of empty chemicals containers
2. Env. Impact: Land pollution
3. Env. Impact Level: 4
4. Env. Impact Analysis: Negative
5. Mitigation Measure: To ensure regular collection of empty chemical containers by contractor.

6. Monitoring Programme: Disposal records and inventory records for chemical drums

Empty pesticide containers have been disposed to Mido Recycle Sdn Bhd totaling 252pcs on 21.02.2020. The balance as at 21.02.2020 is 42pcs.

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 The domestic waste from the housing area is well managed and all domestic wastes are collected 2 times a week and disposed to Municipal Council landfill using an appointed contractor, Mido Recycle Sdn Bhd.

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

Criterion 4 Reduction of pollution and emission including greenhouse gas

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

Summary The polluting activities has been assessed during environmental aspect and impact assessment (EAIA). The EAIA assessment findings including list of polluting sources are recorded in document titled "Environmental Aspect & Impact Assessment (EAIA)".

As a sample evidence, the assessment on greenhouse gas emissions has been planned based on the following activity;

1. Environmental aspect: Emission of greenhouse gases from nitrogen fertilizer usage
2. Env. Impact: Air Pollution - Global warming
3. Env. Impact Level: 4
4. Env. Impact Analysis: Negative
5. Mitigation Measure: To follow the Agronomist recommendation on fertilizer application.
6. Monitoring Programme: Monitoring through fertilizer programme and application

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

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

Summary The Environmental Policy of Raub Mining & Development Co. Sdn Bhd listed down its commitment on the following environmental aspects;

1. To practice "Zero Burning" policy on new planting, replanting except in specific situation.
2. To plan, implementing, monitoring and measuring predetermined activities to mitigate environmental impacts and greenhouse effect.

3. To promote and provide awareness of environmental conservation through training to all employees and stakeholders.

The Environmental Management Plan (EMP) to reduce pollutant from the activity of storage and disposal of triple rinsed empty chemical containers which will cause land pollution;

1. Environmental aspect: Schedule waste generation and spillage.
2. Impact: Land and water pollution
3. Env. Impact Level: 2
4. Env. Impact Analysis: Negative
5. Mitigation Measure: To conduct training on schedule waste attendant.
6. Monitoring Programme: Schedule waste checklist records and schedule waste training.

The Environmental Management Plan (EMP) to reduce emission from the activity of FFB collection – emission of greenhouse gases from diesel engine which will cause global warming;

1. Environmental aspect: Emission of greenhouse gases from nitrogen fertilizer usage
2. Env. Impact: Air Pollution - Global warming
3. Env. Impact Level: 4
4. Env. Impact Analysis: Negative
5. Mitigation Measure: To follow the Agronomist recommendation on fertilizer application.
6. Monitoring Programme: Monitoring through fertilizer programme and application

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

Criterion 5	Natural water resources
Indicator 1	<p>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:</p> <ol style="list-style-type: none"> 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

Raub Mining & Development Co. Sdn Bhd has established the MSPO Procedure on Water Management Plan Ref No. MSPO-08, Rev 1.0 dated 01.11.2018 prepared by Mr Nathan A/L Gunasekaran (Assistant Manager), approved by Mr. K.S.K. Lachumenan (Manager) with the objective to ensure the water are been utilized effectively, minimizing pollutants that may escape from estates operations and enter to the local water systems, to avoid damage to the health and welfare of downstream users and the downstream environment.

The Water Management Plan Procedure has been established by the estate. The estate has outlined it identification of water source as follow;

1. Source of water: Local authority
2. Use of water: Drinking water
3. Remarks: Pengurusan Air Pahang Berhad.

The Water Management Plan for Estate include;

1. Record water usage
2. Analyse water quality and ensure compliance with the legal requirements for in-house treated water and used for drinking, either from river or borewell.
3. Analyse incoming water quality as well as outgoing water quality to determine if estates operations have a positive, zero or negative effect.
4. Analyse ground water table if bore well is uses for water supply.
5. Continue training of sprayers to minimize accidental overspray near buffer zones and within water courses.
6. Restoration of natural vegetation in riparian area where been removed.
7. Regular inspection to ensure no bunds, weir and dam constructed across main river or waterways.
8. Apply water harvesting practices where able practicable.
9. Apply way to optimize water and nutrient usage to reduce wastage.

The water quality report for Sg. Bukit Koman (Upstream and Downstream) analyzed by FGV Agri Service Sdn Bhd, Jengka, Pahang issue date 17.02.2020.

Parameters	Location	
Location	Raw Water- Upstream of Sg. Bukit Koman	Raw Water- Downstream of Sg. Bukit Koman
pH	5.93	5.39
BOD (ppm)	3	5
COD (ppm)	21	37
NH ₃ -N (ppm)	1.2	0.6
Total Susp. S (ppm)	11	24
Total Solids (ppm)	94	226
Tot. Dis Solid	87	211
Total Nitrogen	2.2	2.0
Chloride as Cl	6.19	25
Sulphate as SO ₄ ²⁻	103.5	273.4

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 There is Sg Bukit Koman passing through the estate's land. No dam or bund being constructed across the river.

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

Indicator 3 Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).

Summary 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:

- Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.
- 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 Raub Mining & Development Co. Sdn Bhd has established the MSPO Procedure on Rare, Threatened, Endangered & High Biodiversity Management Ref No. MSPO-06, Rev 1.0 dated 01.11.2018 prepared by Mr Nathan A/L Gunasekaran (Assistant Manager), approved by Mr. K.S.K. Lachumenan (Manager).

The HCV assessment is carried out based on the format of Identification of High Biodiversity Value Habitat Area. From the findings, the management has declared RTEs, River – Sg Bukit Koman, Temple and Surau as the HBV management area.

The summary of the assessment area's attributes and characteristic relevant to the determination of HCV presence;

- HCV 3 – there are RTE ecosystem and habitat in the assessment area.
- HCV 4 – There is a river (Sg Bukit Koman) in the assessment area.
- HCV 6 – there are Temple and Surau presence in the assessment area.

The definition/understanding of the HCV types is based on the following criteria;

- HCV 1 – Concentrations of biological diversity including endemic species, and rare, threatened or endangered (RTE) species that are significant at global, regional or national levels.



2. HCV 2 – Large landscape-level ecosystems and ecosystem mosaics, that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.
3. HCV 3 - Rare, threatened, or endangered ecosystems, habitats or refugia.
4. HCV 4 – Basic ecosystem services in critical situations including protection of water catchments and control of erosion of vulnerable soils and slopes.
5. HCV 5 – Sites and resources fundamentals for satisfying the basic necessities of local communities or indigenous peoples (for example for livelihoods, health, nutrition, water), identified through engagement with these communities or indigenous peoples.
6. HCV 6 – Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples.

The HCV management area focused on the following;

1. RTEs
2. River – Sg Bukit Koman
3. Indian Temple
4. Surau

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 management strategies to protect and conserve the HBV habitat includes;

Type	Management Action
HCV 3 - Rare, threatened, or endangered ecosystems, habitats or refugia.	To ensure that there is no any form of hunting being carried out within the estate compound and to educate the workforce regarding penalties of hunting without license.
HCV 4 – Basic ecosystem services in critical situations including protection of water catchments and control of erosion of vulnerable soils and slopes.	Training must be conducted to all sprayers and manures regarded to estate buffer/riparian zone. Field conductor to show buffer/riparian zone marking

HCV 6 – Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples.	To ensure that constant monitoring is being conducted to report monitoring outcomes or sightings.
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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 The High Biodiversity Monitoring Sheet focused the following elements;

1. Endangered Species/Wildlife
2. Signage HBV Marking/Illegal Hunting, etc.
3. Riparian zone
4. Illegal hunting activities
5. Land/water pollution/Chemical spraying
6. Other activities observed that may impact HBV protection

The observation made on Surau and Temple area covers the following monitoring parameters;

1. Cleanliness
2. Signboard
3. Chemical spraying
4. Other pollution
5. Vandalism
6. Water supply
7. Fencing
8. Recycle bin

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 The Environmental Policy of Raub Mining & Development Co. Sdn Bhd has listed down its commitment on the following environmental aspects;

1. To practice "Zero Burning" policy on new planting, replanting except in specific situation.
2. To plan, implementing, monitoring and measuring predetermined activities to mitigate environmental impacts and greenhouse effect.
3. To promote and provide awareness of environmental conservation through training to all employees and stakeholders.

During site visit, no evidence of open burning in estate area either in the plantation or in linesite area. Sighted signage of zero burning being erected by the estate at the strategic locations.

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

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

Summary No significant risk of diseased palm was reported in the estate. Open burning during new plantings and re-plantings is not allowed.

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

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

Summary No controlled burning being sought by the estate. 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**

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

Summary The following practices to be implemented by the management during replanting in accordance to its Standard Operating Procedure, Ref No. SOP-002, issue date: January 2019.

Excavate all old timber stumps, utility poles, boulders, etc. and place these in clearly marked stacks for subsequent removal.

1. Palms are felled and the entire palm bole and root mass are excavated.
2. Trunks are chipped at 45° to the grain and the chips must be less than 7.5cm (3 inches) thick and should be spread thinly into 1 - 2 layers thick.
3. Fronds should be chopped into 3 equal parts and stacks along the side of chips.

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 The estate has implemented Good Agriculture Practice (GAP) as seen from visit to the estate and seen from the document and also interviewing the workers.

Estate have 3 types of Manuals-

- 1) Estate Standard Operating Procedure (Best Practice)
- 2) Estate Safe Operating Procedure (Prosedur Kerja Selamat Operasi Perladangan)
- 3) MSPO Procedure (8)

The document was well maintained and implemented.

- 1) Estate Standard Operating Procedure (Best Practice) (19) includes:
 - i. SOP 1 – Land Preparation For Replanting
 - ii. SOP 2 – Replanting
 - iii. SOP 3 – Mechanical Felling, Chipping and Stacking
 - iv. SOP 4 – Lining
 - v. SOP 5 – Planting Density
- 2) Estate Standard Operating Procedure Prosedur Kerja Selamat Operasi Perladangan) (22) includes:
 - i. SOP 1 – Keselamatan di Pejabat
 - ii. SOP 2 – Tingkah Laku Umum Semasa Bekerja
 - iii. SOP 3 – Penunggang Motosikal
 - iv. SOP 4 – Penuaian dan Mengutip Buah Sawit
 - v. SOP 5 – Penyimpanan dan Pengurusan Stor Bahan Kimia
 - vi. SOP 6 – Pembancuh Bahan Kimia
 - vii. SOP 7 – Pengangkutan Bahan Kimia
 - viii. SOP 8 – Penyemburan Racun
 - ix. SOP 9 – Pengurusan Bekas Bahan Kimia Kosong
 - x. SOP 10 – Mengutip Tong Bahan Kimia Kosong
- 3) MSPO Procedure (8) includes:
 - i. SOP 1 – Internal Audit
 - ii. SOP 2 – FFB Traceability
 - iii. SOP 3 – Stakeholders Communication & Consultation

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 Sighted Estate Standard Operating Procedure (Best Practice); SOP NO. 10 dated on January 2019 for "Conservation".

Where the terrain is 25 degrees or steeper, oil palm planting not recommended for this area. Estate management only practice and maintain procedure for oil palm planting for the terrains below 25 degrees.

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

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

Summary The estate has a visual reference system to identify each field or block. Each field has the signboard with block number, year of planting, progeny, number of palms and acre only.

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 2018/2019 – 2020/2021. The estate budget includes the projected FFB, OER, PK and etc production which projected for three years from 2018/2019 until 2020/2021.

It also incorporated item such as general charges, estate maintenance, process shift labour, general services, processing cost, fixed assets and etc. Sighted documented Business and Management Plan prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager).

As evidence in,

FY	2018/19	2019/20	2020/21
FFB	26,059.00	27,361.95	25,993.85
OER %	19.50	20.00	20.50
KER %	5.00	5.00	5.00
FFB Price	501.66	520.00	540.00
P&L	6,282,190.90	6,434,966.00	6,286,228.80

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 Sighted replanting programme for the next 3 years as follow for estate;

- Year 2019 = Nil ha
- Year 2020 = Nil ha
- Year 2021 = 349 acres @ 141 ha

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 2018/2019 – 2020/2021. The estate budget includes the projected FFB, OER, PK and etc production which projected for three years from 2018/2019 until 2020/2021.

It also incorporated item such as general charges, estate maintenance, process shift labour, general services, processing cost, fixed assets and etc. Sighted documented Business and Management Plan prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager).

As evidence in,

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FFB Price	501.66	520.00	540.00
P&L	6,282,190.90	6,434,966.00	6,286,228.80

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 estate performance is recorded in the monthly "Oil Palm Revenue Expenditure" to headquarters. Details on the actual vs budget i.e. Upkeep maintenance, FFB Production, capital expenditure are shown therein.

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

Criterion 3 Transparent and fair price dealing

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

Summary There is no existing mechanism of determining FFB pricing for the estate as the crops being processed by its own Mill. The company will make an announcement for tender for other services like harvesting, EFB Transport, Tining, Uproot and etc,

For others, pricing mechanism is set thru open tender process. Announcement will be made available to all contractors and they will deliver their quotation to the estate. The contractors have signed an agreement with the estate to provide services. The agreement has detailed the pricing mechanism for the service offered.

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 All contracts are kept in estate office. Sighted the contract Agreement signed by contractor and Raub Mining & Development Co. Sdn Bhd. As evidence, sampled:

- Sighted the Contract Agreement between estate with Teng Yap Keong (Hire of Back Hoe) sealed on 01.01.2020
- Sighted the Contract Agreement between estate with Woon Yee Kem (Harvesting Contractor) sealed on 01.01.2020

Monthly contract payment shall be paid on or before seventh (7) day of the following month.

As evidence sighted the invoice send by:

- Teng Yap Keong (Hire of Back Hoe) to estate on 29th February 2020. Estate paid to the contractor on 06th March 2020.; Cheque; RM 4,920.00
- Woon Yee Kem (Harvesting Contractor) to estate on 29th February 2020. Estate paid to the contractor on 06th March 2020.; Cheque; RM 5,847.84.

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 All the contractors are aware that estate will be certified under MSPO. Therefore, the contractor has been informed by estate management to follow the MSPO standard requirement.

Sighted the contract agreement/payment Woon Yee Kem (Harvesting Contractor) slip



with their workers:

i. Dulamin – AT 767400

January 2020
= RM RM 1,197.70

ii. Samsul Zohri – AT 767331

January 2020
= RM RM 1,205.20

iii. Saprudin – AT 767203

January 2020
= RM RM 1,187.70

iv. Bambang – C0970565

January 2020
= RM RM 1,212.70

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

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

Summary All contracts are kept in estate office. Sighted the contract Agreement signed by contractor and Raub Mining & Development Co. Sdn Bhd. As evidence, sampled:

- Sighted the Contract Agreement between estate with Teng Yap Keong (Hire of Back Hoe) sealed on 01.01.2020
- Sighted the Contract Agreement between estate with Woon Yee Kem (Harvesting Contractor) sealed on 01.01.2020

Monthly contract payment shall be paid on or before seventh (7) day of the following month.

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 10th March 2020. Sighted audit plan dated 13th February 2020 (2nd Revision) which have been accepted address to Mr. K.S.K Lachumenan (Estate Manager). 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 Estate verified the work done by the contractors before all the payment paid to the contractors. Estate also inspect the contractor's workers. As per interviewed and also during site visit, the workers aware with OSH requirement. As example, the workers wear the PPE during the work task that given to them.

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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 for Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. Sdn Bhd.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 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 Raub Mining & Development Co. Sdn Bhd.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 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 Raub Mining & Development Co. Sdn Bhd.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 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 Raub Mining & Development Co. Sdn Bhd.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 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 Raub Mining & Development Co. Sdn Bhd.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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 Raub Mining & Development Co. 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

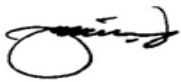
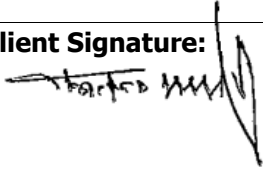
- 1) The estate management has demonstrated fully commitment during the entire audit process.
- 2) Top management continuously establishes directions for the middle and upper management to execute in ways to comply with the MSPO management system in future.
- 3) The management is highly committed to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

Appendix A: Audit Plan

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
09 th March 2020	TBA	➤ Travelling to Raub, Pahang.	MS	MRB/ ABS
10 th March 2020	08:00 – 09:00	➤ Centralize Opening Meeting at Raub Mining & Development Co. Sdn. Bhd [Estate]: <ul style="list-style-type: none"> • Presentation by the manager/coordinator • Presentation by Lead Auditor. ➤ Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable).	MS	MRB/ ABS
	09:00 – 13:00	Raub Mining & Development Co. Sdn. Bhd [Estate] <ul style="list-style-type: none"> ➤ Document Audit: <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	MRB/ ABS
	10:30 – 12:30	➤ Estate inspection: <ul style="list-style-type: none"> ➤ Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MS	MRB/ ABS
	13:00 – 14:00	➤ Lunch	MS	MRB/ ABS
	14:00 – 16:00	➤ Continue document review <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	MRB/ ABS
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 1.	MS	MRB/ ABS

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
11 th March 2020	08:00 – 13:00	Raub Oil Mill Sdn Bhd [Mill] <ul style="list-style-type: none"> ➤ Document Audit: <ul style="list-style-type: none"> Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	MRB/ABS
	10:30 – 12:30	<ul style="list-style-type: none"> ➤ Mill inspection: <ul style="list-style-type: none"> Workshop, Laboratory, Environment, OHS, Chemical Stores, Workers Welfare and Interview, Clinic, Landfill, Mill Housing, Schedule Waste, POME and etc. 	MS	MRB/ABS
	13:00 – 14:00	➤ Lunch	MS	MRB/ABS
	14:00 – 15:30	<ul style="list-style-type: none"> ➤ Continue document review <ul style="list-style-type: none"> Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	MRB/ABS
	15:30 – 16:30	➤ Verify any outstanding issues, auditor discussion and end of audit for day 2.	MS	MRB/ABS
	16:30 – 17:30	<ul style="list-style-type: none"> ➤ Centralize Closing Meeting at Raub Oil Mill Sdn Bhd: <ul style="list-style-type: none"> Chaired by the audit Lead Auditor Welcome and introduction by the Lead Auditor Presentation of findings by the audit team Questions & answers and Final summary by Lead Auditor ➤ End of assessment 	MS	MRB/ABS
12 th March 2020	TBA	➤ Travelling back from Raub, Pahang.	MS	MRB/ABS

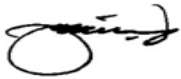
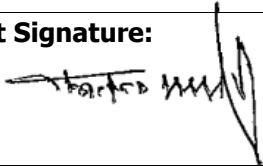
Appendix B : Non-Conformity details

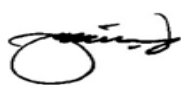
Non-Conformities Identified During This Audit			
Major Nonconformities:	Non-were raised during this audit.		
Minor Nonconformities:	Non-were raised during this audit.		
Area of Concern:	The following area of concern were raised for this audit.		
Company Name	Raub Mining & Development Co. Sdn. Bhd.		
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance	<input checked="" type="checkbox"/>	Recertification
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		
Client Number	GGC-K1-MSPO-2019		
NC No. / Ref.	K1/MSPO/AOC/01	Date Detected	11 th March 2020
Site(s) concern	Raub Mining & Development Co. Sdn. Bhd.	Target Completion	-
Normative Reference and Requirement	4.4.2.4 Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.		
NC Type	<input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Area of Concern		
Description of Non-Conformity	The Awareness and Sustainable Procedure is not effectively understand by the worker		
NC Objective Evidence: Sighted the training done by estate management for MSPO requirement. However, during the interview session with the estate workers, the auditor found that the workers still not fully understand with the complaint and grievance procedure.			
Lead Auditor Signature: 		Client Signature: 	

Non-Conformities Identified During Previous Audit

Minor Nonconformities:

The following NC's were raised for this audit.

Company Name	Raub Mining & Development Co. Sdn Bhd		
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance	<input type="checkbox"/>	Recertification
Audited Standard	MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		
Client Number	GGC-K1-MSPO-2018		
NC No. / Ref.	K1/MSPO/MINOR/01	Date Detected	19 th March 2019
Site(s) concern	Raub Mining & Development Co. Sdn Bhd	Target Completion	Next Surveillance Audit
Normative Reference and Requirement	4.3.1.1 Minor All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.		
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		
Description of Non-Conformity	No signage displayed during site visit		
NC Objective Evidence:			
As per site visit, no signage was displayed on the diesel tank as per "Panduan Permohonan Permit Untuk Membeli Barang-Barang Kawalan Berjadual Di Bawah Peraturan-Peraturan Kawalan Bekalan 1974".			
Lead Auditor Signature:		Client Signature:	
			
Root cause Analysis (to be filled by client):			
MSPO Principles is still in progress of learning and implementation especially display signages for diesel tank.			
Corrective action planned (to be filled by client):			
To display signage physically at RMDC diesel tank.			
Preventive Action (to be filled by client):			

Monitor and ensure this signboard is maintain as per "Peraturan-Peraturan Kawalan Bekalan 1974".	
Review of corrective/preventive 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date Verified: 10 th March 2020	Lead Auditor Signature: 

Company Name	Raub Mining & Development Co. 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	MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC/K1/MSPO/2019			
NC No. / Ref.	K1/MSPO/MINOR/02	Date Detected	19 th March 2019	
Site(s) concern	Raub Mining & Development Co. Sdn Bhd	Target Completion	Next Surveillance Audit	
Normative Reference and Requirement	<p>4.4.4.2 Minor</p> <p>The occupational safety and health plan shall cover the following:</p> <p>d) The management shall provide the appropriate 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).</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p>			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	No submission has been made.			

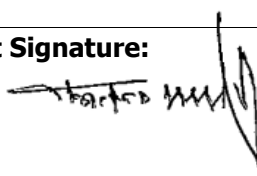
NC Objective Evidence:

- d) PPE issuance and replacement record seen. Training "Prosedur Kerja Selamat Pemakaian PPE Secara Betul", dated 13th October 2018. During site visit, one of the workers did not wear the proper PPE provided by the management.
- j) RMDC registered under MyKKP on 18th January 2019 via <http://mykkp.dosh.gov.my>. As details of Registration No.: PH/19/04/133659. Application was submitted on 7th January 2019. However, no submission has been made prior to this application. As per Guidelines on Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease) Regulations 2004. [NADOPOD]
- [CHART 1: WHAT AN EMPLOYER MUST DO IN THE CASE OF AN ACCIDENT, DANGEROUS OCCURRENCE, OCCUPATIONAL POISONING OR OCCUPATIONAL DISEASE] – Submit this register to DOSH HQ before 31st January of each year.

Lead Auditor Signature:



Client Signature:



Root cause Analysis (to be filled by client):

MSPO documentation is still in the process of learning and implementation, specific measures will be implemented for "PPE Usage and maintenance training" and yearly basis NADAPOD submission.

Corrective action planned (to be filled by client):

The document the activities into related MSPO Principles files.

Preventive Action (to be filled by client):

Monitor and ensure these related issues has been maintained by all PIC.

Review of corrective/preventive action (to be filled by Lead Auditor)

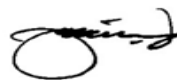
All the evidence submitted were found adequate and therefore this minor non-compliance is closed.

NC Closed: ☒ Yes ☐ No

Site verification: ☒ Yes ☐ No

Date Verified: 10th March 2020

Lead Auditor Signature:



Appendix C : List of Stakeholders Contacted

Attendance List

Internal Stakeholders

- 1) Raub Mining & Development Co. Sdn Bhd management team and staff
- 2) Gender Committee Representatives
- 3) Male and Female workers
- 4) Workers Representatives
- 5) Foreign Workers Representatives
- 6) NUPW

External Stakeholders

- 1) Estate Contractors
- 2) Estate Suppliers