

# GLOBAL GATEWAY CERTIFICATIONS

## MALAYSIAN SUSTAINABLE PALM OIL (MSPO)

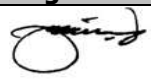
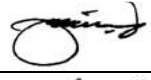

### CERTIFICATION AUDIT REPORT


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

Kluang Rubber Company (M) Berhad  
Kluang Estate

-Individual Certification-

ANNUAL SURVEILLANCE AUDIT 01  
27<sup>th</sup> July 2020

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	25/08/2020	Issued as Draft Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	10/09/2020	Issued as Final Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	22/09/2020	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	

Acknowledgment by Kluang Rubber Company (M) Berhad					
Rev	Date	Description	Management Representative	Role	Signature
B	22/09/2020	Acceptance of the contents	Mr. Balaraman A/L Annamaly	General Manager	

#### Declaration

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

WITH INTEGRITY WE SERVE



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

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

Global Gateway Certifications Sdn. Bhd. (GGC) has conducted the Certification Assessment of Kluang Rubber Company (M) Berhad – Kluang Estate. During this Annual Surveillance Audit (ASA 1), the audit team were briefed by Estate Manager, of the supply base disposition. The estate consists only Kluang Estate.

This assessment was conducted onsite on 27<sup>th</sup> July 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**

<b>Company Name</b>	Kluang Rubber Company (M) Berhad
<b>Business Address</b>	Batu 2, Jalan Mengkibol, P.O. Box 64, 86007 Kluang, Johor, Malaysia.
<b>Contact Person</b>	Mr. Balaraman A/L Annamaly
<b>Office Telephone</b>	+607 7739066
<b>E-Mail</b>	kluangestate@gmail.com

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

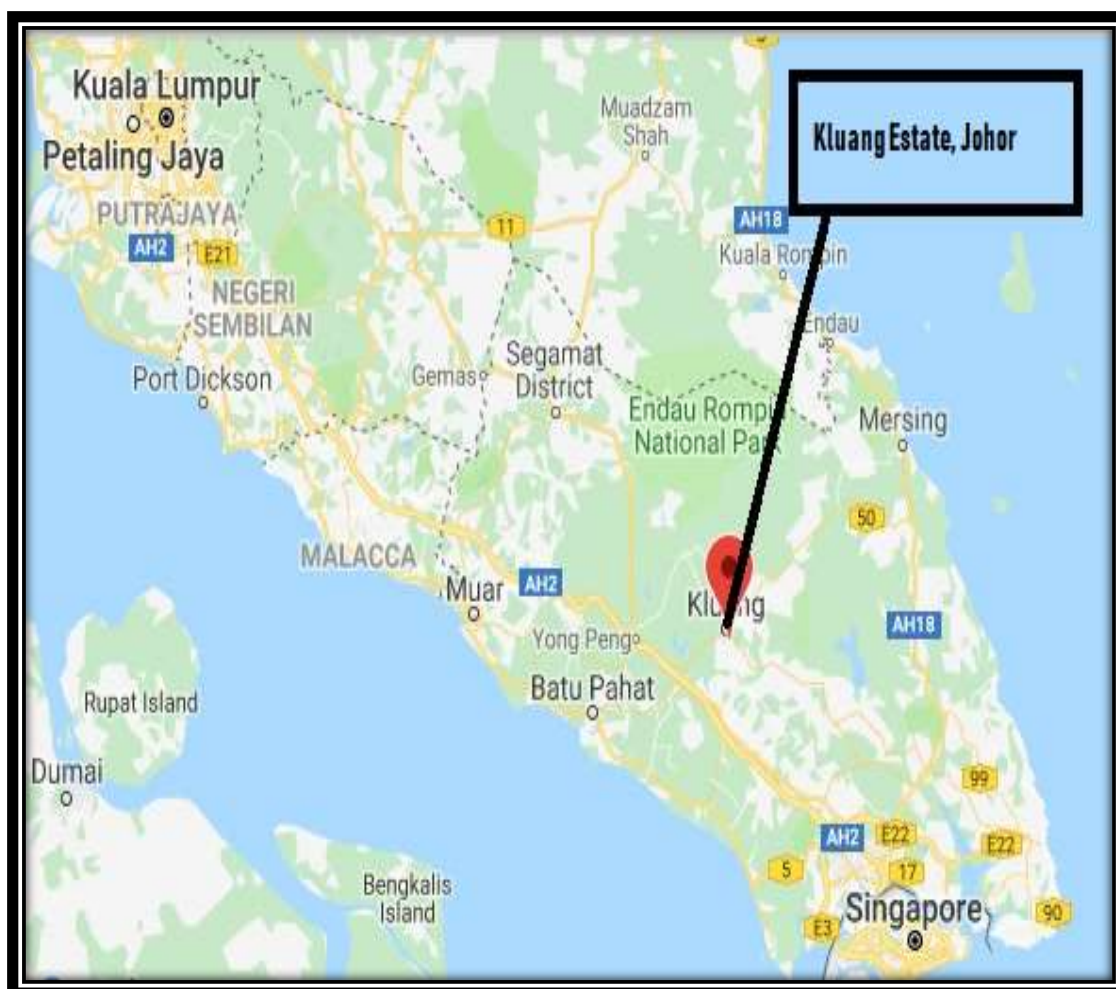
No	Name of the Certification Unit	Site Address	GPS Reference of the site office	
			Longitude	Latitude
1.	Kluang Estate	Batu 2, Jalan Mengkibol, P.O. Box 64, 86007, Kluang, Johor, Malaysia	E 103.3306163	N 2.0017951

**MPOB License Information**

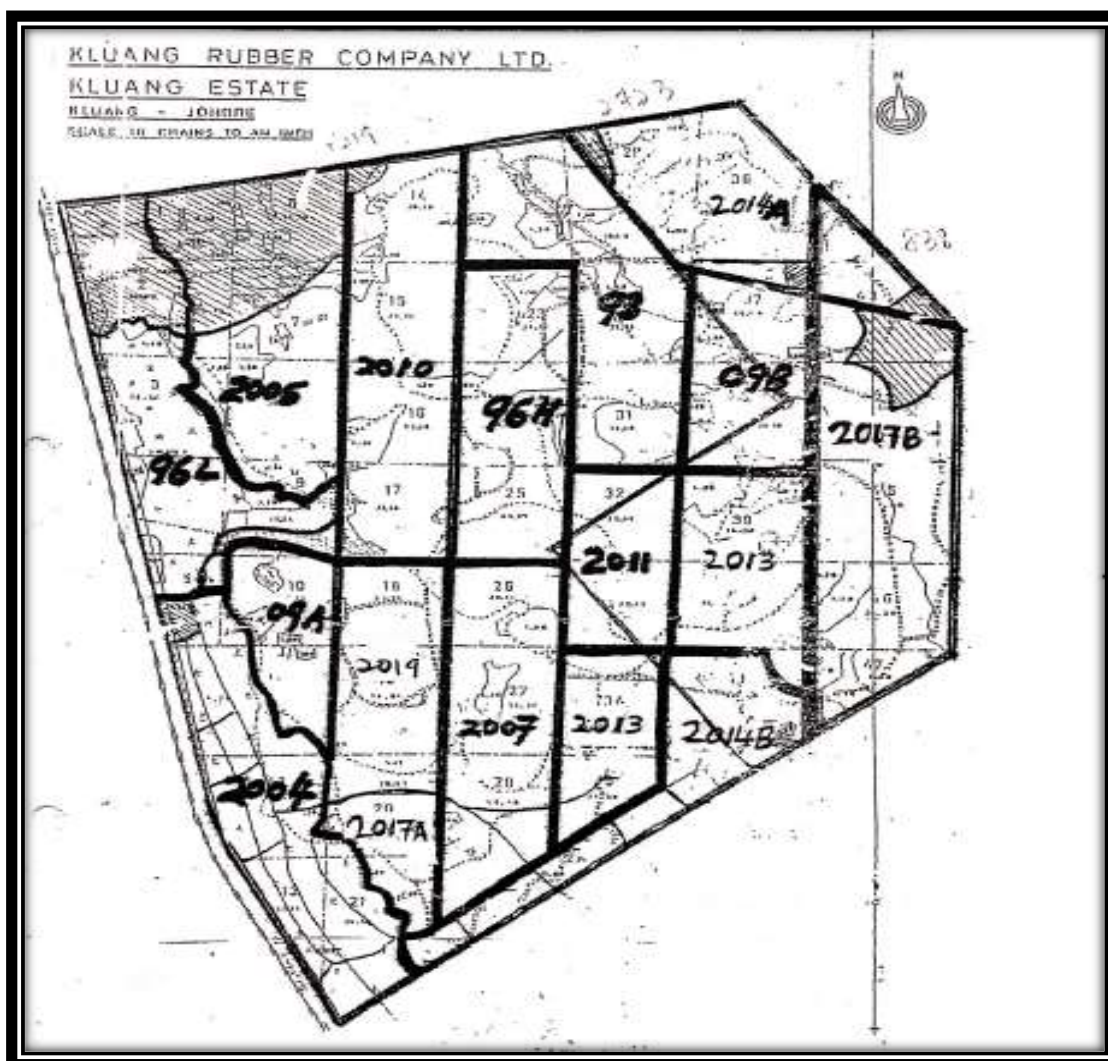
No	Name of the Site	LICENCE NUMBER	EXPIRY DATE	SCOPE ACTIVITY
1.	Kluang Estate	501412602000	31.03.2021	"Menjual & Mengalih FFB"

**Others Sustainability Certification**

No	Name Of The Site	Others Sustainability Certifications
1.	Kluang Estate	NIL

**1.4 Map Showing Geographical Location****1) Kluang Rubber Co. (M) Berhad – Kluang Estate**

## 2) Kluang Estate



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

Name of the Certification Unit	Area Summary (HA)		
	Certified Area (per Land Title)	Planted	Mature
Kluang Estate	765	637	569
<b>Total</b>	<b>765</b>	<b>637</b>	<b>569</b>

Name of the Certification Unit	Area Summary (HA)		
	Conservation Area	HCV	Others
Kluang Estate	Nil	Nil	12
<b>Total</b>	<b>Nil</b>	<b>Nil</b>	<b>12</b>

Name of the Certification Unit	FFB Summary (MT)		
	Projected from last audit	Actual Production for 12 Months [July 2019-June 2020]	Projected Production for next 12 Months [July 2020-June 2021]
Kluang Estate	10,300	9,453.05	10,300
<b>Total</b>	<b>10,300</b>	<b>9,453.05</b>	<b>10,300</b>

## 1.6 Certificate Details

<b>Certification body</b>	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: <a href="http://www.ggc.my">www.ggc.my</a>
<b>Assessment standard</b>	(MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders
<b>Certificate number</b>	GGC-KRC001-MSPO-01-2019
<b>Initial certificate issued date</b>	06 <sup>th</sup> September 2019
<b>Certificate expiry date</b>	05 <sup>th</sup> September 2024
<b>Stage 1 assessment date</b>	24 <sup>th</sup> April 2019
<b>Stage 2 / Main Assessment</b>	4 <sup>th</sup> July 2019
<b>Annual Surveillance 1 [ASA 1]</b>	27 <sup>th</sup> July 2020
<b>Annual Surveillance 2 [ASA 2]</b>	July 2021
<b>Annual Surveillance 3 [ASA 3]</b>	July 2022
<b>Annual Surveillance 4 [ASA 4]</b>	July 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 (3<sup>rd</sup> Batch) held by MPOB. Member of GGC MSPO audit team.

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

During this assessment, he assessed on the aspect of Transparency, Workers Welfare, Best Practices and etc. He is able to speak and understand Bahasa Malaysia and English.

### Auditor

**Name:** **Surenthiran Panneerselvam**

Graduated in PgDip/MSc Oil and Gas Accounting from University of Abertay Dundee, Scotland, UK. Equipped with experience in financial audit, internal audit and sustainability audit. Have more than 8 years working experience. Qualified and involved in MSPO Audit Assessment since year 2017.

Fully trained in audit certification such as MSPO (Malaysian Sustainable Palm Oil), MSPO SCCS (MSPO - Supply Chain) RSPO (Roundtable Sustainable Palm Oil), ISO9001:2015 (Quality Management System), ISO37001:2016 (Anti Bribery Management System). Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of Management Commitment and Responsibility, Stakeholder's Consultation and Social Responsibility, Health, Safety and Employment Condition. Able to communicate in both Bahasa Malaysia and English (written and spoken).

### Auditor

**Name:** **Baskaran Sankaran**

Master of Occupational Safety & Health Risk Management from Open University Malaysia, Diploma in Mechanical Engineering and Management Programme. More than 20 years of working experience in various industries. Involved in RSPO assessment since 2014. Involved in audits conducted in for many different companies in Malaysia and Indonesia.

Completed ISO 9001:2008 and ISO 14001:2004 lead auditor course in 2006 & 2010. Also completed RSPO Lead Auditor training in December 2014. Qualified as Lead Auditor/Auditor in several certification programme such as RSPO, MSPO, ISO and etc. Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of Compliance to Legal Requirements and Environment, Natural Resources, Biodiversity and Ecosystem Services. 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 the estate applied for individual certification.

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

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

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

With reference to the 1<sup>st</sup> Federal Government Gazette (9<sup>th</sup> June 2020), Prevention and Control of Infectious Diseases (Measures Within Infected Local Areas) (No. 7) Regulations 2020, Certification for Agri Commodities was not included in prohibited activities.

Majlis Keselamatan Negara (MKN) had issued the 1<sup>st</sup> Standard Operating Procedure for “Persijilan bagi Agrokomoditi” dated 12<sup>th</sup> June 2020 which need to be complied during the audit process by both parties, the Certification Body and clients.

## 1.9 Audit Plan Information

<b>Audit Date</b>	27 <sup>th</sup> July 2020
<b>Name of site(s) visited</b>	Kluang Rubber Company (M) Berhad
<b>Total number of man-days spent</b>	3 man-days

## 1.10 Audit Result Summary Findings

<b>Category</b>	<b>Numbers</b>	<b>Status (Closed/Open/Not Applicable/No Action Requires)</b>
Major Nonconformities	0	No action requires
Minor Nonconformities	2	Open (Next Surveillance Audit)
Area of Concern	2	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, 01<sup>st</sup> 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"> <li>• They have good understanding about MSPO.</li> <li>• They have good understanding about complaint and grievance mechanism.</li> <li>• PPE given by company – free.</li> <li>• They were treated equally with no discrimination based on gender.</li> <li>• They claimed that the management provides good living quarters with proper domestic waste collection and promptly attend to quarters repairs.</li> <li>• They confirmed wages are being paid more than the Minimum Wage Order 2020 of RM1, 200.00 per month and understand all the deductions being made.</li> </ul>	No action requires	Positive findings

2.	Stakeholders B (Harvesting Gang)	<ul style="list-style-type: none"> <li>• Good understanding about MSPO.</li> <li>• They are very happy with the management and hopes to extend their contract.</li> <li>• They have good understanding about complaint and grievance mechanism.</li> <li>• PPE given by company – free.</li> <li>• They claimed that the management provides good living quarters with proper domestic waste collection and promptly attend to quarters repairs.</li> <li>• They confirmed wages are being paid more than the Minimum Wage Order 2020 of RM1, 200.00 per month and no issue on wages received as well as the deductions made.</li> </ul>	No action requires	Positive findings
3.	Stakeholders C (Contractors)	<ul style="list-style-type: none"> <li>• They have good understanding about MSPO.</li> <li>• They informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work.</li> <li>• They were aware that any complaints or suggestions could be forwarded to the estate management.</li> <li>• The company has good relation with supplier and there is no issue with company's performance.</li> </ul>	No action requires	Positive findings
4.	Stakeholders E (Estate - Gender Committee Representatives)	<ul style="list-style-type: none"> <li>• There was no discrimination, sexual harassment or violence case reported thus far.</li> <li>• The Management is quite supportive on the Committee activities.</li> </ul>	No action requires	Positive findings
5.	Stakeholders F (Temple representative)	<ul style="list-style-type: none"> <li>• Good communication and cooperation with the estate.</li> </ul>	No action requires	Positive findings

		<ul style="list-style-type: none"> <li>• Need financial assistance from the estate for temple purpose.</li> <li>• He has communicated verbally to the management. No forms submitted on his concern.</li> <li>• Receive electric and water supply from estate</li> </ul>		
6	Stakeholders G (Security guard)	<ul style="list-style-type: none"> <li>• Good communication and relationship with the estate.</li> <li>• No boundary issues.</li> <li>• Night shift guard, and go for rounding around estate.</li> <li>• Seen numbers of unknown people use estate territory for jogging purpose (due to COVID-19).</li> </ul>	<p>No action requires</p> <p>Without estate permission</p>	<p>Positive findings</p> <p>Need to verify further during the audit.</p>
7	Stakeholders H (Transporter)	<ul style="list-style-type: none"> <li>• Good communication and cooperation with the estate.</li> <li>• No issues on payment and agreement.</li> <li>• Obtained contract agreement between client and transporter.</li> </ul>	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 Kluang Rubber Company (M) Berhad – Kluang Estate. 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 were 2 minor non-conformities and 2 area of concerns have been raised to the facility that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted was no major non-conformity findings. Therefore, the Lead Auditor recommends to continuing a certificate of compliance "MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders" to Kluang Rubber Company (M) Berhad – Kluang Estate.

### 1.13 Date of Next Surveillance Audit

The next annual surveillance assessment visit will be scheduled after 9-12 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
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
SEIA	Social Environmental Impact Assessment
SOP	Standard Operating

## 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** The company has established MSPO Policy dated 23<sup>rd</sup> December 2017 outlining its commitment for MSPO implementation signed by Executive Director/General Manager, Mr. A Balaraman. The policy been displayed at office notice board.

Briefing to workers on the policy was conducted on 14<sup>th</sup> November 2019 as recorded in daily briefing book. The briefing was conducted during mustercall in the morning. During the meeting, item briefed as below:

- Importance of MSPO policy
- 3P's concept
- MSPO Scope

Sighted the attendance record and training materials of the training conducted. In total of 19 workers attended the training (8 harvester, 1 loader, 8 local weeders, 1 gardener).

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

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

**Summary** The company has established a MSPO Policy which stating their commitment to implanting the following sustainable practices. The policy was signed by the Executive Director/General Manager, Mr. A. Balaraman dated 23<sup>rd</sup> December 2017.

The company is committed to:

1. Comply with the requirements of sustainable plantation operations
2. Comply with all legal and specific requirements
3. Comply with and practice good social responsibility, health and safety and employment condition for our people
4. Safeguard the environment
5. Continuously improve our sustainable management system

Management commitment is evident from the various improvement plan including continuous training plan on sustainability, health & safety and introduction of new technology to improve efficiency, etc.

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

<b>Criterion 2</b>	<b>Internal audit</b>
<b>Indicator 1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.

**Summary** Kluang Rubber Company (M) Berhad has established MSPO Procedure on the [Standard Operating Procedure – “SOP” for Conducting Internal Audits], dated 15<sup>th</sup> October 2018 [IAP-MSPO, 4.1.2.2]. The internal audit conducted by SPO Consultancy Sdn Bhd on 18<sup>th</sup> July 2020 [Report no: Kluang Estate 1/2020].

Sighted internal audit checklist and report which has identified weak points for improvement and positive findings. Corrective action been identified by the estate management in the internal audit report for non-conformance reported. The internal audit surveillance 1 was conducted by SPO Consultancy Sdn Bhd (Mr. Wee Kow Ngoh and Mr. K.Raman). As per internal audit report, in total 5 AOC were raised during the audit.

Internal audit frequency is once a year prior to the external audit schedule, within 10 months from the date of the last certification. Sighted in SOP – Internal Audit. Internal audit plan is available, as per Flow Chart of Internal Audit – [Establishing the internal audit program].

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

<b>Indicator 2</b>	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.
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**Summary** Kluang Rubber Company (M) Berhad has established MSPO Procedure on the [Standard Operating Procedure – “SOP” for Conducting Internal Audits] dated 15<sup>th</sup> October 2018 [IAP-MSPO, 4.1.2.2]. The internal audit conducted by SPO Consultancy Sdn Bhd on 18<sup>th</sup> July 2020. All conformance, non-conformance and area for improvement identified. NC are raised under the indicator listed as below:

- 4.4.4.2 (c)
- 4.4.4.2 (g)
- 4.4.5.3 – Employment contract on new wages 2020
- 4.4.5.7 – working hours displaying
- 4.4.6.1 & 4.4.6.2 – training programme

Report was prepared on 23<sup>rd</sup> July 2020 and signed by the lead auditor, Mr Wee Kow Ngoh from SPO Consultancy.

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

<b>Indicator 3</b>	Report shall be made available to the management for their review.
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**Summary** Internal audit carried out on the 18<sup>th</sup> July 2020 all conformance, non-conformance and area for improvement identified. As per interview with estate manager, management had discussion internally after the internal audit conducted. The management review was conducted on 21<sup>st</sup> July 2020 attended by Mr Lum Man Poo, Mr Manivanan, En Kamarul Hisham.

Item discussed during the meeting as per below:

- Discussion on internal audit findings
- Training program year 2020 unable to conduct due to COVID-19
- JKPP meeting Jun 2020 unable to conduct due to COVID-19
- Salary rate changes on employment contract
- Working hours not displayed on notice board

The meeting minutes prepared by Mr Lum Man Poo, Estate Manager.

**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** As sighted last management review meeting was conducted on 12<sup>th</sup> June 2019, attended by Mr Lum Man Poo, Mr Manivanan and En. Kamarul Hisham. The internal audit was conducted on 18th July 2020 and audit report dated on 23rd July 2020.

Estate management will send the "General Estate Report" on quarterly basis to HQ. The last report was sent on 31st March 2020. The report consists of information on labour status, FFB yield, Replanting programme, other activities such as contribution to workers during MCO lockdown.

**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** Kluang Rubber Co (M) Berhad has established Sustainability Policy. Approved by Mr. A. Balaraman, General Manager; Dated on 23rd December 2017. Stated in the Sustainability Policy; Point no 5 – "To continuously our sustainable management system".

Sighted continual improvement plan for MSPO Implementation, are recorded as below:

Improvement plan	Action plan	Status/ Timeline
Renovation of surau	To provide a good and conducive environment to Muslim devotees	Completed in September 2019

Digital map using drone	Employed drone unit to carry out whole estate palm count and digitalized estate map with contour.	Completed in November 2019
Office compound painting	Repainting of office, meeting room, general store and chemical store	Completed in February 2020
Tractor parking upgrade	Make good and safer condition for tractor parking bay	Completed in March 2020
Replanting F2020	F1993 and 103 acres was fell and replanted in 2020.	Completed in May 2020

The estate is having annual budget (Estimates 2019/2020 was updated by estate manager, dated on 1<sup>st</sup> July 2020. Particulars of estimated expenditure) for its operation improvement plan such as:

1. Re-fabricate FFB ramp
2. Office renovations
3. Purchasing of new fertilizer trailer
4. Purchasing of new roto slasher
5. Re-fabricate tractor parking bay

The last continuous improvement plan for year 2020/2021, was updated on 20<sup>th</sup> July 2020, as per below:

Improvement plan	Action plan	Status/ Timeline
Renovation of Artisan Quarter	To provide a good and conducive living space to estate local driver to stay with family	Begin on 2 <sup>nd</sup> July 2020 and target to completed end of August 2020.
New fertilizer Trailer	To provide better working condition to manuring workers	Purchased on 15 <sup>th</sup> July 2020
Repainting of staff quarters	To provide a food conducive living space to estate workers	Begin on October 2020
Minimised lighting strike at manager bungalow	To provide a safer living condition to estate manager and family	Begin on November 2020.

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

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

**Summary** The company disseminate the new information and techniques or new industry standards and technologies through the training. As per interview with estate manager, estate management has sign up on newsletter with the local authority and other related palm oil agencies to receive the updates. As example, MPOA, MPOB, Labour Office will send an email to estate if there are any new or updated information about the industry.

- The drone mapping was done digital and previously was done through manual counting. Develop digital map using drone and completed in September 2019.
- Mechanical cutter (harvesting technique) new implementation for harvesting technique, begin to apply since 2019.

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

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

**Summary** The company disseminate the new information and techniques or new industry standards and technologies through the training. As per interview with estate manager, below are the new implementation established by the estate management:

- The drone mapping was done digital and previously was done through manual counting. Develop digital map using drone and completed in September 2019.

**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** Kluang Rubber Company (M) Berhad has established the Stakeholder Consultation and Communication Procedure; Date: 01<sup>st</sup> January 2019.

Stakeholder Meeting was conducted for:

- External  
Dated on 16<sup>th</sup> July 2020. Chaired by Mr. Lum Man Poo (Estate Manager).  
Attended by 9 stakeholders.
- Internal  
Dated on 15<sup>th</sup> July 2020. Chaired by Mr. Lum Man Poo (Estate Manager).  
Attended by 5 participants.

Estate has conducted "MSPO Training" on;

- 11<sup>th</sup> January 2020 for MSPO Training; Conducted by Mr. Lum Man Poo (Estate Manager). Attended by 17 workers.
- 15<sup>th</sup> January 2020 for Environmental Policy & Management Plan; Conducted by Mr. Lum Man Poo (Estate Manager). Attended by 17 workers.

Sighted records on request and response matter being addressed by stakeholders in 2019/2020 and action taken by estate management.

**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 List of Documents and Classification prepared by Mr. Lum Man Poo (Estate Manager) and approved by Mr. Balaraman A/L Annamaly (General Manager).

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

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

**Criterion 2 Transparent method of communication and consultation**

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

**Summary** Kluang Rubber Company (M) Berhad has established the Stakeholder Consultation and Communication Procedure; Date: 01<sup>st</sup> January 2019.

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

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

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

**Summary** The person in charge for consultation and communication agenda is led by Mr. Lum Man Poo (Estate Manager) and appointed on 22<sup>nd</sup> April 2019 by Mr. Balaraman A/L Annamaly (General Manager).

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

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

- Summary** Sighted latest stakeholder list updated on 20<sup>th</sup> July 2020. Prepared by Madam V. Ramany (Group Admin Manager) and approved by Mr. Lum Man Poo (Estate Manager).
- a) Government / Statutory Bodies
    - MPOB Kluang
    - Land Office Kluang
    - Majlis Perbandaran Kluang
    - PERKESO Kluang
    - KWSP Kluang
    - Perhilitan Kluang
    - Jabatan Pengairan dan Saliran
    - Kementerian Dalam Negeri Johor
    - Labour Office Kluang
  - b) Contractor & Suppliers
    - Behn Meyer Sdn Bhd
    - Agromate (M) Sdn Bhd
    - Ah Bee Auto Sdn Bhd
    - Lim Hong Ngee Sdn Bhd
    - Syarikat Jun Chong Sdn Bhd
  - c) Neighbouring Estates/Smallholders/Villages
    - Sime Darby – Ellar Estate
    - Sime Darby – Lambak Estate
    - Kampung Yap Tau Sah
    - Kampung Gunung Lambak
    - Kampung Hj Mohd Yassin
  - d) NGO
    - Kluang Happy Sunday Hash
    - KSK Hash
    - Country Walker Hash
    - Kluang Hash House Herriers
    - TGIH Hash

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

<b>Criterion 3 Traceability</b>	
<b>Indicator 1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).
<b>Summary</b>	Kluang Rubber Company (M) Berhad has established the Traceability Procedure; Date: 19 <sup>th</sup> February 2019. Prepared by Mr. Lum Man Poo (Estate Manager) and approved by Mr. Balaraman A/L Annamaly (General Manager).

Check-roll workers are responsible in conducting harvesting operation, which workers are consisting of Kluang estate workers. Estate supervisor will conduct regular inspection.

Base on interview with Mr. Lum Man Poo (Estate Manager), person in- charge of all the estate traceability process, he is well versed with the procedures.

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

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

**Summary** The Management team on harvesting holds the responsibility on regular inspection of traceability system. As per interviewed with Mr. Lum Man Poo (Estate Manager), estate staffs and executives will do the checking for traceability especially for FFB quality.

The internal audit team will do the internal audit for traceability once a year. The effectiveness of the monitoring will evidence in the internal audit and visit report findings.

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

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

**Summary** The person in charge for traceability agenda is led by Mr. Lum Man Poo (Estate Manager) and appointed on 22<sup>nd</sup> April 2019 by Mr. Balaraman A/L Annamaly (General Manager).

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

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

**Summary** FFB being sell to Kluang Oil Palm Processing Sdn Bhd and being monitored by General Manager.

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

- Date Delivery: 18/07/2020
- Weighbridge Ticket No: 027909
- DO No: KE12243/20/21
- Transporter: Ang Giat Ching
- Driver name: Mohd Yusof bin Hassan
- Weight: 5.79 MT
- Seal Number: KE011965

**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** List & summary of applicable laws and regulations that are applicable for Malaysia. The Legal Register has been revised and approved by the respective person-in-charge (PIC) and the Estate Manager.

The estate has renewed and updated all licenses and permits that required for its operation. Some of the licenses and permits sighted include:

1. Lesen MPOB (menjual dan mengalih FFB) for Ladang Kluang (647ha). No lesen 501412602000 expires 31.03.2021.
2. Perakuan kelayakan peraturan-peraturan standard-standard minimum perumahan dan kemudahan pekerja 1990 (peraturan 38(1)(a) for 3 blok x 4 unit "rumah pekerja yang telah diluluskan pada 09.07.2014, approval No. K.5/2014 dated 07.08.2014.
3. Permit Barang Kawalan Berjadual No. Siri :J036364 untuk membeli dan menyimpan diesel (25,000 Liter) valid until 11.02.2021.
4. 60 Mt weighbridge Serial No: 3175384 was last calibrated on 15/06/2020 by Metrology Corporation Malaysia Sdn Bhd valid for 1 year.
5. Pump Gun License No. KLG/A1622 – last renewed on 17/06/2020 kept by Estate Manager Mr Lum Man Poo.

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

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

**Summary** List of all laws applicable to estate operations have been identified in a legal register. In the legal register, the estate has identified 50 laws and regulation that applicable to its operation. Following are some of the laws sighted in the list:

- Environmental Quality Act 1974 (Act 127)
- Environmental Quality Regulations, 1977
- Environmental Quality (Assessment) Order, 1987
- Environmental Quality (Schedule Waste) Regulations, 2005
- Environmental Quality (Declared Activities) (Open Burning) Order, 2003
- Environmental Quality (Sewage) Regulations, 2009
- Environmental Quality (Clean Air), 1978
- OSHA Act 1994 (Act 514)
- OSHA (Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations, 2013
- Trade Unions Act 1959
- Factories and Machinery Act 1967
- FMA, Fencing Machinery and Safety Regulations, 1970
- Pesticides Act 1974 (Act 149)

- MPOB Act 1998 (Act 582)
- Industrial Relations Act 1967 (Act 177)
- Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446)
- National Wages Consultative Council Act 2011 (Act 732), Minimum Wages Order (Amendment) 2018
- Land Conservation Act 1960 (Act 385) (Rev. 1989)
- National Land Code 1965 (Act 56)
- Wildlife Conservation Act 2010
- National Park Act 1980
- Waters Act 1920 (Rev. 1989)

As per the requirement of "Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446)", the estate has carried out weekly inspection of workers housing. Sighted weekly labour quarter inspection carried out by the Staff (Mr Kamarul Hisham) and Assistant Manager (Mr Manivanan A/L Chelliah), Last inspection was carried out 22/07/2020.

**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** According to the Estate Assistant Manager Mr Norhafizan, changes to laws & regulations are monitored through related government department websites, communication with law/enforcement officers, updates received from MAPA, NUPW, MPOB and communication with company's HR department. Legal register will be updated upon confirmation on changes to law/regulation.

**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** Estate Manager is person in-charge for estate's legal compliance. Sighted appointment letter for the responsible person, Mr Lum Man Poo (Estate Manager) signed by the Group General Manager, Mr Balaraman A/L Annamaly on 22/04/2019.

**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** Kluang Rubber Co. (M) Bhd land title is available and well maintained. The estate has the following land title and its Ownership;

Ownership	Lot No	Hectare	Quit Rent Payment (RM) for year 2020
Kluang Rubber Co. (Malaya) Ltd	838	84.8827	6,417.00
Kluang Rubber Co. (Malaya) Ltd	1219	553.8128	60,480.00
Kluang Rubber Co. (Malaya) Ltd	2723	126.8687	17,780.00
TOTAL Land Title		765.5642	84,677.00

Planting of oil palm is permitted as sighted latest updated land title for all three above land titles updated on 26/07/2019.

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

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

**Summary** Sighted 3 copies of land titles kept by the estate. The land titles did not stated its express conditions. The land titles are under 'Permanent Status' (Selama-lamanya).

Total Land Titled Ha	765.5642 ha
Less :	
Acquired by Government	116.68 ha
Swamps & Ravines	1.21 ha
Buildings Site & Roads	10.85 ha
Planted area	636.82 ha

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

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

**Summary** Sighted map of Demarcation of Estate Boundary Geomac Survey Consultant as per Drawing No. : GSC/KRCL/KE/1-19 dated March 2019.

During field visit, auditors also check a few physical boundary stone 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. Sighted also the Boundary Markers Monitoring Checklist done by estate management.

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

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

**Summary** No disputes have been recorded in the estate area. The land title has been legally acquired by the estate.

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

### **Criterion 3 Customary rights**

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

**Summary** There is no customary land in or surrounding all the estates' land titles. There are also no land disputes or claims involving this estate. The estate has proper legal land titles for the land ownership.

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

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

**Summary** Maps are made available to show the legally owned land. There is no customary land in or surrounding all the estate. There are also no land disputes or claims involving this estate. The company has proper legal land tile for the land ownership.

**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 the estate. The company has proper legal land titles for the land ownership.

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

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

### **Criterion 1 Social impact assessment (SIA)**

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

**Summary** The latest Social Impact Assessment (SIA) was conducted on 25<sup>th</sup> February 2020. The report was prepared by En Lum Man Poo, Estate Manager. The assessment was focused on identification of significant social impact from the estate's operations.

Internal stakeholder meeting conducted on 15<sup>th</sup> July 2020, attended by 10 participants from the estate. External stakeholder meeting was conducted on 16<sup>th</sup> July 2020, attended by 9 participants from outside estate [Jogging club representative, cattle owner, temple representative and others].

The assessment was conducted based on interview during the stakeholder meeting. Meeting minutes was documented, and action plan was drafted based on the concern addresses during the meeting.

The SIA were assessed by using scoring system, which refers to severity, likelihood and risk score. The SIA methodology was included with field assessment and document review at the project sites, which generally focused on general field observation, line site, workers living condition, health and safety.

Based on the impact assessment, the highest risk score recorded are 12 and the lowest scoring recorded are 3. Below is the level of risk categorized:

- 1 – 10: Low risk
- 10-15: Moderate risk
- 15-20: High risk
- 20-25: Critical risk

Sampled SIA findings sighted:

Issue	Potential risk	Date	Action taken
Outsiders such as joggers and cyclist use estate route without permission.	Safety risk, interference estate dweller privacy.	9/9/19	Estate watchman to inform outsiders are not allowed to enter without permission.
Wasp nest found in F2009 by harvester.	Safety risk	5/12/19	Estate manager instructed workers to clear the wasp nest immediately. Completed 6 <sup>th</sup> December 2019
Few worker quarters reported with some electrical failure such as sockets, switches and lamp		Arranged contractor or estate personnel to repair the faulty stage by stage	To be completed by 31/3/20.

The mitigation plan of issue and action taken/planned was last updated on 30<sup>th</sup> June 2020. Continuous Improvement Plan for year 2019/2020 was last updated on 1<sup>st</sup> July 2020 and CIP for 2020/2021 was last updated on 20<sup>th</sup> July 2020.

One area of concern has been raised to the estate. Based on the interview with estate management, "Kluang Hash Chapters" running club submitted application for permission for Hash Running Activity. Letter sighted on 3<sup>rd</sup> July 2020 [Ref: KH/3/20]. Seen letter received by the estate management on 16<sup>th</sup> July 2020. The estate management has no record of the individual surpassing the estate boundary for sports

activity purpose which are in accordance to SOP released by “Menteri Keselamatan Negara – MKN”. The management has taken initiative to meet the club representative. However, the compliance of MKN SOP’s were not in order, as they unable to trace the existence of outsider into the estate compound.

**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** Kluang Rubber Company (M) Berhad has established “Prosedur Aduan dan Kilanan Untuk Pekerja, Pembekal, Kontraktor dan Lain-lain Pemegang Amanah” is available at the time of audit. Flowchart of complaint procedure was made available.

Any complaint/ grievance raised by the complainant, estate management shall resolve the complaint within 14 days from the date of complaint, as per the SOP. Complaint form is available at the publicly accessible area such as in the front door of the main office. For those unable to complaint during office hour, they may contact the estate manager for after working hours. The emergency contact number are displayed at the entrance of the estate.

**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** Briefing on grievance report were briefed to workers during morning mustercall, as seen the minutes dated on 2<sup>nd</sup> March 2020. Discussed as below:

- All employees have rights to raise concern/ complaint to employer via written form or verbally.
- Issue concerning to safety, health, social, medical, and other can be reported.
- Action will be taken upon complaint raised.

Complaint form is available at the publicly accessible area such as in the front door of the main office. Sighted 1 complaint dated 20<sup>th</sup> June 2020, at Kluang Estate. The complaint refers to “sink damage”, and management resolve the issue on 20<sup>th</sup> June 2020. The complainant did acknowledge on the replacement of sink, as seen in the complaint form

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

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

**Summary** Complaint form is made available at Kluang Estate main office. Complaint form is available at the publicly accessible area such as in the front door of the main office. For those unable to complaint during office hour, they may

contact the estate manager for after working hours. The emergency contact number are displayed at the entrance of the estate.

**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** Interview with the contractor and workers have verified that they have made aware on MSPO related requirements. During stakeholder meeting, estate management presented the complaint/ suggestion procedures. Internal stakeholder meeting conducted on 15th July 2020, attended by 10 participants from the estate. External stakeholder meeting was conducted on 16th July 2020, attended by 9 participants from outside estate [Jogging club representative, cattle owner, temple representative and others].

**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** Complaint form is available at the publicly accessible area such as in the front door of the main office. Sighted 1 complaint dated 20th June 2020, at Kluang Estate. The complaint refers to "sink damage", and management resolve the issue on 20th June 2020. The complainant did acknowledge on the replacement of sink, as seen in the complaint form.

**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 records on the contribution to local development in the Kluang Rubber Company (Malaya) Berhad was made available. Estate management has contributed home necessities to the needy people in estate due to COVID-19 pandemic attack. Sighted evidence of photographs and items provided to the victims.

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

### **Criterion 4 Employees safety and health**

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

**Summary** OSH policy sighted displayed in the main office (Occupational Safety and Health) signed by Mr. Balaraman A/L Annamaly, Group General Manager, dated 23<sup>rd</sup> December 2017. Briefing on the MSPO related policy has been conducted on 12<sup>th</sup> February 2020 during the daily briefing session. The policy is displayed at the office main entrance, sighted during audit.

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

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

- a) A safety and health policy, which is communicated and implemented.
- b) The risks of all operations shall be assessed and documented.
- c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:
  - i) all employees involved shall be adequately trained on safe working practices; and
  - ii) all precautions attached to products shall be properly observed and applied.
- d) The management shall provide the appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).
- e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.
- f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.
- g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meetings are kept and the concerns of the employees and any remedial actions taken are recorded.
- h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.
- i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.
- j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.

**Summary**

OSH policy sighted displayed in the main office (Occupational Safety and Health) signed by Mr. Balaraman A/L Annamaly, Group General Manager, dated 23rd December 2017. The policy is communicated to all workers and staff Briefing on the MSPO related policy has been conducted on 12<sup>th</sup> February 2020 during the daily briefing session. The policy is displayed at the office main entrance, sighted during audit.

The estate has conducted HIRARC to assess risk of its operation and to establish mitigation measures to reduce health and safety risks. The risk assessment has covered all key activities of the plantation such as:

- Harvesting
- Tractor driving
- FFB transporting
- Fertilizer
- Road maintenance
- Pruning

- Replanting

Last updated on 15<sup>th</sup> July 2018.

Estate has a comprehensive annual training plan for the Staffs and Workers, and this was sighted in the training file. The estate has established annual OSH programme titled "OSHA Program 2020 "Kluang Estate".

The estate retains copies of Safety Data Sheet (SDS) that relevant to its operation both at chemical store noted during site visit to chemical store and as well as at office.

The estate has conducted CHRA as sighted CHRA report ref.no. HQ/04/ASS/00/193-2018/025) dated 12<sup>th</sup> February 2018. Based on the CHRA recommendation (Form F), the estate shall establish PPE's maintenance programme/ procedure & record indicate workers are trained on use and maintenance of PPEs.

PPE training has been conducted on 15<sup>th</sup> January 2020 by Ms Chong and Mr Kuan [Agromate (M) Sdn Bhd]. Seen evidence of attendance list and photographs and training materials.

Sighted latest medical surveillance done for sprayer on 14<sup>th</sup> July 2020. Total of 4 estate workers were subjected to medical surveillance. It was conducted by Dr. Helen Tan Kwa, Klinik Rengam, Kluang.

List of provided PPE to the workers in the are available in the "PPE Issue Book". Seen record of PPE provided to workers. As interviewed with the estate management, no deduction for the damaged PPE, whereby the replacement will be granted upon producing the torn or broken PPE to the office. As per record, the last PPE replacement recorded on 3<sup>rd</sup> July 2020.

SOP Chemical Handling is available [Prosedur Kerja Selamat Bagi Pengeluaran Racun], [Prosedur Kerja Selamat Bagi Membancuh Racun] and [Prosedur kerja selamat bagi operasi membaja secara manual] is available. Morning briefing was conducted on 19<sup>th</sup> February 2020 referring to Safe Chemical Handling.

- Training were emphasized on procedure for spraying.
- Ensure PPE usage are maintained
- Usage of chemical shall be in correct quantity taken and used.
- Chemical spillage shall be handled immediately.

Sighted letter of appointment for PIC for safety & Environment matters, Mr Lum Man Poo, dated 22<sup>nd</sup> April 2019.

Meeting on safety and health was last conducted on 21<sup>st</sup> July 2020 at Kluang Estate. Minutes of meeting is available in the OSH meeting file. Previous meeting conducted 3<sup>rd</sup> March 2020; meeting minutes was made available.

ERP (Emergency response plan) sighted in document. Emergency Respond Plan Procedure and exit routes in file and notice board. During site visit, found contact number and name to be contacted.

Trained first aider is available in the estate. Training certificate (by SPO Consultancy Sdn Bhd – Mr. Raman Krishnan) dated 22<sup>nd</sup> June 2018 sighted during the audit. As interviewed with estate manager, seen First Aid Box Inspection, as sighted:

- Field: F2004 – (Harvester), date inspection: 15<sup>th</sup> July 2020.
- Field: F2014 – (Gen worker), date inspection: 15<sup>th</sup> July 2020.

Last first aid training was conducted on 22<sup>nd</sup> June 2018 by Mr Raman Krishnan. Seen training programme for Safety and Health Programme for the year 2020.

One area of concern has been raised to the estate. No accident has been reported as to date. JKKP 8 report has been submitted to JKKP via email. However, no evidence sighted on the submission as the form was printed on 31<sup>st</sup> January 2020.

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

## **Criterion 5 Employment conditions**

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

**Summary** Policy sighted related to Human Rights:

- a. "MSPO Sexual Harassment and Violence Policy" dated 23<sup>rd</sup> December 2017 and approved by Mr A. Balaraman.
- b. "Good social practices policy", approved by Mr. A. Balaraman dated 23<sup>rd</sup> December 2017.

Briefing to workers on the policy was conducted on 14<sup>th</sup> November 2019 as recorded in daily briefing book.

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

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

**Summary** Policy on workers' social life sighted in the "Good social practices policy", approved by Mr. A. Balaraman dated 23<sup>rd</sup> December 2017. Some of the objectives listed in the policy:

- a. Maintain no discrimination practices and provided equal opportunity and treatment to all.
- b. Ensure that employees' payment and conditions meet the legal minimum standards.

During interview session with estate workers, there were no existence of any discrimination act in the estate. Policy are displayed on the notice board and were communicated to all employees during the morning mustercall.

**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** The salary is according to 'Guidelines on the Implementation on the Minimum Wages'. National Wages Consultative Council Act 2011 (Act 732), Minimum Wage Order 2020. The management pays their workers minimum RM 1,200 as per company policy. As sampled taken:

En Ahmad Bin Kandar

June 2020		
Gaji		RM1,107.60
Paid holiday	1 day	RM46.15
Overtime		RM184.60
		RM1,338.35
Deduction:		
Advance		RM200.00
EPF		RM74.00
	Net salary	RM1,064.35

En. Gopalan a/l Raman

June 2020		
Gaji		RM1,153.75
Paid holiday	1 day	RM46.15
		RM1,199.90
Deduction:		
Advance		RM200.00
EPF		RM66.00
	Net salary	RM993.90

En Deni Suryanto (B4580947)

May 2020		
Gaji		RM1,902.40
Paid holiday	1 day	RM74.89
Production incentive		RM53.20
	Net salary	RM2,030.49

En Dani (B3624682)

May 2020		
Gaji		RM1,902.40
Paid holiday	1 day	RM78.67
Overtime		RM193.83
Production incentive		RM53.20
	Net salary	RM2,228.10

**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** Sighted the Agreement between the Kluang Estate management and contractor (P. Ananthan) is verified during the audit.

Samples taken for payslip May 2019 for:

- 1) Dani Suryanto (B4580947)
- 2) Dani (Passport no.: B3624682)

**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** Name list for estate staff and workers sighted during the audit. "Daftar Pekerja" and "List of workers" record is made available at the time of audit.

Sighted checkroll for the month of May 2020 and July 2020. The details were included with name, gender, nationality, job scope, date of entry. All the details were kept in separate files.

**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** Estate management establish employment contract between employer and workers, which elaborates the date of employment, job scope, working hours, leave eligibility and others. The contract is agreed and signed by both parties. Employment contract for workers and contractors' workers are available during the audit.

Sample taken for:

- 1) Saat (Passport no.: AU097087)
- 2) Sutrisno (Passport no.: B2651215)
- 3) Edi Sutrisno (Passport no.: B4665929)
- 4) Parameswaran a/l Palany (I/C: 850528 – 01-5827)

**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** Time recording is based on attendance book – Employee Attendance. Sighted checkroll for the month of May'2020 and July 2020. Attendance of workers are taken during morning mustercall.

Time of working hours has been displayed at the main office notice board.

**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** Total hours work for the month for each worker sighted during the audit. Working hours are stated in the workers employment letter. The working hours has been displayed at the main office notice board.

Stated as:

- Staff/Office management  
Monday – Friday: 8.00am – 5.00pm  
Saturday: 8.00am – 12.00pm  
Sunday (Rest day)
- Field management/ staff  
Monday – Friday: 6.30am – 4.30pm  
Saturday: 6.30am – 2.30pm  
Sunday (Rest day)
- Field workers  
Monday – Friday: 6.30am – 2.30pm  
Sunday (Rest day)

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

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

**Summary** Salary slips clearly shows the calculations of gross salary, all deductions and net salary of employees. Samples taken for May 2019 for:

- En. Gopalan a/l Raman
- En. Ahmad Bin Kandar

Records have been verified during the Audit. During interview with workers, each worker will receive their pay slip from their employers. They understand on the deduction made by the employer.

**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 regards to local workers, foreign workers, staffs and executives. All local workers are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations. Meantime, all workers are provided with additional benefit such as:

- Free electricity and water.
- Housing for workers.
- Medical expenses.
- Vacation fee payment (AL not utilized will be converted into cash and pay to worker on year- end).

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

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

**Summary** All workers are provided with housing facilities at workers linesite. Electricity and water are provided by the estate without any charges to the workers. Linesite checklist was made available. The linesite inspection is done on weekly basis by estate manager and supervisor. During site visit, found the condition are well maintained. During field visit, housing area were maintained in clean condition.

**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** Estate management has established policy of "MSPO-Sexual Harassment and violence policy" dated 23<sup>rd</sup> December 2017, approved by Mr A. Balaraman. General Manager. The policy highlighted as per below:

- Ensure employees are no subjected to verbal and non-verbal abuse or sexual harassment.
- Maintain condition at the workplace that are free of harassment or violence of any kind.
- No form of harassment based on race, religion, gender, national status.

The policy has been displayed on the notice board at the main office area. During the audit, there were no cases reported in regards to sexual harassment, however, as per interview randomly on the surrounding of the estate, there were no cases involved in sexual harassment.

**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** As per interview with Mrs Ramani, the senior executive, there is only one person is joined the trade union (Saritha a/p Genaadan) in Kluang Estate.

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

Interview with estate workers confirmed that local/foreign workers are allowed to join Union if any.

**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** There is no children and young person been employed as per record "Daftar Pekerja" available at the time of audit. The hiring process will undergo screening test which to ensure all requirements are met in prior to appoint the workers.

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

<b>Criterion 6 Training and competency</b>	
<b>Indicator 1</b>	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.
<b>Summary</b>	<p>Estate has established training programme for the workers at the company. Training need analysis, training programme or training records which include the MSPO related, working SOP, social and environmental element for employee and contractors are made available at the time of audit in the "Training File".</p> <p>One minor non-conformity has been raised to estate. Briefing to workers on the policy was conducted on 14<sup>th</sup> November 2019 as recorded in daily briefing book. The briefing was conducted during mustercall in the morning. However, management has only conducted training for field workers and staff was not included.</p> <p><b>In Compliance</b>    <input type="checkbox"/> Yes                      <input checked="" type="checkbox"/> <b>No</b>                      <input type="checkbox"/> Not Applicable</p>
<b>Indicator 2</b>	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.
<b>Summary</b>	<p>The last training need analysis is available at Kluang Estate dated 01/01/2019, prepared by the Manager, Mr. Lum Man Poo.</p> <p>One minor non-conformity has been raised to estate. During the audit, found there is no training need analysis for the year 2020 was made available, as the last training need analysis was prepared for the year 2019 dated 1<sup>st</sup> January 2019.</p> <p><b>In Compliance</b>    <input type="checkbox"/> Yes                      <input checked="" type="checkbox"/> <b>No</b>                      <input type="checkbox"/> Not Applicable</p>
<b>Indicator 3</b>	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.
<b>Summary</b>	<p>Training programme on environment, social, safety and health related is available in the Safety and health programme for the year 2020, dated 20<sup>th</sup> July 2020 prepared by the Manager, Mr. Lum Man Poo.</p> <p><b>In Compliance</b>    <input checked="" type="checkbox"/> <b>Yes</b>                      <input type="checkbox"/> No                      <input type="checkbox"/> Not Applicable</p>

## 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** Kluang Rubber Co. (M) Bhd has established Environment Policy signed by the Executive Director/ General Manager, Mr A. Balaraman dated 23/12/2017.

Based on the Environmental Policy, the estates are committed towards implementing the following practices:

- Comply with all environmental legislations and other requirement
- Prevent pollution and continuously improve the environmental program.
- Use natural resources in an ecologically sustainable manner by implementing best management practices
- Avoid, minimize and mitigate any adverse environment impacts caused by the plantation and mill operations.
- Maintain open channels of communication with stake holders in regard to environmental issues.
- Ensure all employees are aware of the Company's environmental policy, are motivated to conform, are aware of their own responsibilities and are given the support and training necessary to accomplish them.

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

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

**Summary** The estate has established its Environmental Management Plan dated 01/01/2019 which covers the following;

1. Ecological
2. Soil erosion
3. Air pollution
4. Biomass generation
5. Water pollution (agro-chem & fertilisers)
6. Water pollution (onsite workforce)
7. Water pollution (mill operations)
8. Noise pollution
9. Greenhouse gas emissions
10. Other consideration.

The Company has conducted environmental impact assessment for all its' activities in year 2019. The environmental assessment findings are recorded in document titled "Environment Impact Assessment" prepared on 23/02/2019.

The environment impact assessment covers 7 section/location includes the following;



1. Production and office
2. Parking area
3. Maintenance
4. Store
5. Chemical storage area
6. Line sites
7. Plantation area.

**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 to mitigate the negative impact was incorporated in the environment management plan.

For example;

- Work activity:  
Scheduled waste from estate operations
- Specific Concerns:  
Management of toxic waste (or scheduled waste)
- Mitigation plan:  
Provide safe disposal of toxic waste, provide measures to contain all pollution waste (bunds, oil traps and other measures), develop waste water treatment systems to contain and treat waste water, develop a system to separate solid waste to avoid toxic and non-biodegradable material into landfills (and disposal methods)

**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 programme to promote the positive impacts on environmental was incorporated in the environment management plan. The sample includes;

- Pollution Source:
  - Scheduled waste from estate operations
- Next action plan :
  - To conduct site inspection and documented (for control of pollution sources)
- Next monitoring :
  - Monitoring of surface water quality, heavy metal, hydrocarbons or other common toxins

- Monitoring of ground water quality, heavy metal, hydrocarbons or other common toxins

**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 estate has developed annual training programme for its employees for health & safety. Environmental related awareness are departed to estate workers during morning muster ground meeting as sighted from 'MSPO Daily Briefing' record book where on 28/02/2020 estate manager Mr Lum Man Poo. Record of the briefing shows two way discussion held with workers on the title "Environmental Impact Assessment".

**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** Estate management holds regular meeting with its workers as sighted from muster ground briefing records on following subjects:

- Legal compliance to Malaysian laws on 11/01/2020
- Environmental Policy & Management Plan on 15/01/2020
- Road condition on 22/01/2020
- Environmental Policy on 30/01/2020
- Zero burning policy on 10/02/2020
- Environmental Impact Assessment on 28/02/2020
- Save water & Electricity on 09/03/2020
- Schedule waste management on 12/03/2020
- Domestic waste segregation on 16/03/2020

**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** The estate monitors its usage of diesel on monthly basis against FFB produced as sighted from "Diesel Consumption Monitoring Per Mt FFB Production". Record sighted for year 2020 as follow:

Month	FFB (Mt)	Diesel (L)	Cons. rate
Jan	592.38	820	1.38
Feb	704.86	890	1.26
March	782.82	780	1.07
April	724.39	810	1.12
May	721.34	790	1.10
June	874.56	810	0.93

The estate also monitors its usage of electricity on monthly basis against FFB produced as sighted from "TNB Consumption Monitoring Per Mt FFB Production". Record sighted for year 2020 as follow:

Month	FFB (Mt)	Elect (Kwh)	Cons. rate
Jan	592.38	4283	7.23
Feb	704.86	4545	6.45
March	782.82	4801	6.59
April	724.39	4495	6.21
May	721.34	3945	5.47
June	874.56	6129	7.01

**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 estate has annual estimate for it diesel usage as sighted from its annual "Estimate for 2020/2021" document. For year 2020/2021 it has estimated diesel usage as 9,750 liters and FFB Production at 9,853 Mt.

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

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

**Summary** There was no opportunity to use renewable energy in estate. Operation of vehicle is fully dependent on fossil fuel.

**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 estate has identified sources of pollution/waste and types pollution in document title "Types of Pollution and the source" established 2019 and last updated on 24/04/2019.

Sighted type and source of pollutions includes;

1. Leakage of oil - Diesel store
2. General and domestic waste - Line sites
3. Used paper, printer cartridge - Office
4. Chemical containers, leakage - Chemical stores
5. Plastics, containers, leakage - Fertilizer stores
6. Water pump

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

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

**Summary** Sighted Pollution Prevention Plan dated 02/05/2019 focused on the following pollution source;

1. Diesel & Lubricants Store/Scheduled waste store
2. Line site/housing
3. Chemical store/ mixing area
4. Pump house
5. Rubbish dumping area/ landfill
6. Fertilizer application
7. Chemical application
8. Transport

For example;

- Pollution source : Chemical store/ mixing area
- Specific concerns : Agrochemicals spillage, residues from washing and mixing area
- Mitigation plan: Containment via bunds and proper flooring, spillage kit, proper drainage system into spillage sump.
- Monitoring & action plan: Site inspection by staff and store attendant.

Estate has maintained record of waste collected and disposed for empty chemical drum and empty fertilizer bag. Sighted record of disposal as follow:

- 1,150 pcs of Plastic bag and fertilizer bag
- 250 plastic drum

The above was disposed on 11/07/2020 by "United Green Power Sdn Bhd". Sighted Majlis Perbandaran Kluang" license for recycling (Ref. No. MPK/599/401/PER.KHAS/1933) issued for recycling of waste dated 05/02/2020.

**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** Estate has established Safety Operating Procedure No. 4.4.4.2 titled "SOP For Chemical Handling" 15/05/2019 outlining safety procedures for packing, labeling, and storage of chemicals.

One minor non-conformity has been raised to estate. Under estate's waste management plan dated 20/07/2020 has identified that "All spent oil, fuel filters, oil filters and air filters are disposed at the responsible of the contract foreman" which generated from tractor servicing. However, there is no evidence that the contractor who collected the estates schedule waste has valid license form DOE to collect and dispose the waste from the site.

**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** Empty pesticide containers to be treated as follow;  
 1. Empty containers are to be triple-rinsed and stored in a dedicated area.  
 2. Containers for reuse should be appropriately labeled and 3 holes are to be punctured at the base of those for disposal, and dispose through an accredited vendor.

After mixing the chemicals, to ensure the following;  
 1. All wash water is to be directed to a soakage-pit sited a distance away from the chemical mixing area.  
 2. No water should escape into field drains or streams.

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

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

**Summary** Domestic waste for linesite area is well managed by the estate. All domestic wastes are disposed at landfill located at Block 2019 (1.5km from line site).

**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**

All activities contributing to pollution in the estate has been accessed as per document of Environmental Impact Assessment dated 23.02.2019 includes the following 17 work activities;

1. Usage of computer, light, plan
2. Usage of toilet
3. Printing/scanning
4. Usage of air condition
5. Ventilation system
6. Usage of parking area
7. Usage of lubricant oil
8. Fertilizers storage
9. Scheduled waste
10. General waste
11. Diesel tank
12. Chemical storing (liquid) at storage area
13. Disposal of items (general and domestic waste)
14. Discharge of waste water
15. Application of chemicals (solid and liquid)
16. Good agriculture practice
17. Transportation

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

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

**Summary**

Action plan and monitoring sighted in document of Environmental Management Plan" dated 01/01/2019.

One of the action plan is on water pollution due to agro-chemicals and fertilizers application activities. The action/mitigation plan carried out by the estate are;

1. Avoid fertilizer application close to water bodies or on rainy days.
2. Improve efficiency of fertilizer application (research)
3. Develop reduction plans for high-risk agro-chemicals
4. Develop plans to reduce chemical exposure in sensitive areas workers, settlements, waterways)

The estate has recommended additional monitoring & Action plan on water pollution due to agro-chemicals and fertilizers application activities as follow;

1. Surface and ground water quality monitoring – from lab.
2. Monitoring of surface water including DO, TSS, turbidity, COD, BOD, faecal coliform, oil & grease, agro-chemicals (nitrate, phosphate)
3. Ground water monitoring including agrochemicals (nitrate, phosphate)
4. Monitor efficiency of fertilizer inputs (measure leaf samples vs soil samples)

The estate yet to start river water monitoring plan. According to estate manager river monitoring plan to commence from next year.

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

Criterion 5	Natural water resources
<b>Indicator 1</b>	<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> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources of supply.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.</li> <li>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.).</li> <li>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.</li> <li>e) Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</li> <li>f) Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</li> </ul>

**Summary** Sighted Water Management Plan established by the estates dated 01/02/2019

Syarikat Air Johor Sdn Bhd has been identified as a water source for domestic consumption. Therefore, the water test shall be excused has stated in the water management plan.

The estates outlined it water management plan as follow;

1. Rainfall data to be monitored and maintained daily.
2. Water logged area, damage roads and flooding area to be marked in the estate's map.
3. Road repair and road construction to focus on damage roads due to no proper water management system.
4. Water quality monitoring programme on parameters such as pH, total suspended solid, BOD, COD, Ammoniacal-N, pesticide residue and phosphorus.
5. Water test for treated water from treatment plant. This estate is exempted as the water supply comes from Syarikat Air Johor Sdn Bhd.

Sg Kluang & Sg Mengkibol are passing through the estate land. Buffer zone has been established and demarcated.

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

<b>Indicator 2</b>	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.
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**Summary** Sg Kluang & Sg Mengkibol are passing through the estate 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:

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

**Summary** The estate is surrounded by neighboring estates and smallholders. No RTE species identified in the estate. Biodiversity identification was done by estate manager Mr Lum Man Poo as sighted from document titled "Biodiversity – Wild life found in the Estate" dated 12/03/2020. The identification was by snapping pictures of wild life detected crossing into estate from northern part of the estate which borders with "Gunung Lambak Forest Reserve". Following wildlife species found in the Estate includes:

1. Long-tailed Macaque
2. Wild boar
3. Asian elephant
4. Common treeshrew
5. Bat
6. Oriental pied hornbill
7. Red jungle fowl
8. White-throated kingfisher
9. Crested Serpent Eagle
10. Common Myna
11. White-breasted Waterhen
12. Greater Coucal
13. Spotted wood-owl
14. Large-tailed nightjar
15. Purple heron
16. Little egret
17. Black-thighed Falconet
18. Yellow-vented Bulbul
19. Amboina Box Turtle
20. Asian water monitor lizard
21. Malayan spitting cobra
22. Reticulated python
23. Ratsnake

## 24. Malayan Green Whipsnake

Proper warning signage with statement "No Hunting/No Fishing/No bird catching/No entry without permission" have been displayed at strategic locations in the estate including two main entrances to the estate.

**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** No RTE species identified within the estate. However, there is management plan to protect wild life that enters into estate from "Gunung Lambak Forest Reserve". Some of the management plan sighted include:  
1. Displaying of proper signage at estate boundary with stakeholders and other strategic places.  
2. Prohibition any hunting activity within the estate.  
3. Anyone outsiders found to suspicious hunting within estate will be asked leave immediately.  
4. Briefing to workers on RTE and Biodiversity in the estate.

Also sighted record briefing given to estate workers by the estate manager Mr Lam during muster ground on 02/08/2019 titled "Perlindungan Haiwan Liar".

**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** No RTE species identified within the estate. However, there is management plan to protect wild life that enters into estate from "Gunung Lambak Forest Reserve". Some of the management plan sighted include:  
1. Displaying of proper signage at estate boundary with stakeholders and other strategic places.  
2. Prohibition any hunting activity within the estate.  
3. Anyone outsiders found to suspicious hunting within estate will be asked leave immediately.  
4. Briefing to workers on RTE and Biodiversity in the estate.

**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** Presently replanting is taking place at block no. 96 (73 Ha). During the field visit noted there is no evidence of fire been used for land clearing. The contractor has used felling, chipping and shred method for land clearance as sighted from replanting contract agreement signed by contractor "Hoo Keen Sang Harvesting" and Kluang Estate added 15/12/2019.

**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. Estate replanting programme based on estate's operation policies and agronomic practices.

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

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

**Summary** As per interview with Estate Manager, no special approval needed to do open burning. The practice is observed during field assessment.

**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 has been implemented by the management during replanting:

1. The palm trunk is to be chipped to not more than 10cm thick (approx. 3 inches) to allow rapid disintegration and decomposition of the residue. Remnants of palm bole tissues and bulk of the root mass are to be dug out, broken up and the hole refilled.
2. The shredded pieces are to be stacked in single rows and layer to reduce the thickness of the stack.

**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) Occupational Safety & Health Safety Operating Procedure - PKLS
- 2) Kluang Rubber Company (M) Berhad - MSPO Procedure
- 3) COVIC 19 by Majlis Keselamatan Negara (MKN) - SOP Sektor Agrikomoditi

The document was well maintained and implemented.

- 1) Occupational Safety & Health Safety Operating Procedure – PKLS (3) includes:
  - i. Kandungan
  - ii. Polisi Keselamatan dan Kesihatan Pekerjaan Syarikat
  - iii. Prosedur Kerja Selamat Bagi Operasi:
    - Memotong buah sawit
    - Menolak buah kelapa sawit dengan menggunakan kereta sorong
    - Memangkas pelepah kelapa sawit
    - Memunggah tandan sawit
    - Memotong buah kelapa sawit berhampiran kabel TNB
- 2) Kluang Rubber Company (M) Berhad - MSPO Procedure includes:
  - i. SOP Traceability
  - ii. SOP Internal Audit
  - iii. SOP Consultation & Communication
- 3) COVID 19 by Majlis Keselamatan Negara (MKN) - SOP Sektor Agrikomoditi includes:
  - i. Saringan Kesihatan
    - Pemeriksaan dan Pemantauan Kesihatan Sebelum Operasi
    - Tindakan Pencegahan Semasa Operasi
    - Pemeriksaan Kesihatan ke atas Pelawat/Pembekal
  - ii. Laporan kesihatan (di premis dan penginapan pekerja yang disediakan syarikat)
  - iii. Aplikasi Sejahtera
  - iv. Protokol Pencegahan Penyakit & Sekatan
  - v. Saringan Kesihatan
  - vi. Laporan kesihatan (di premis dan penginapan pekerja yang disediakan syarikat)
  - vii. Aplikasi Sejahtera

As evidence sighted "Taklimat Mengenai Bahaya COVID-19" on 19<sup>th</sup> March 2020 by Mr. Lum Man Poo (Estate Manager). Attended by 17 (workers) and 7 (Estate Management).

**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** Estate is generally area with undulating and hilly at certain area. No steep is more than 25 degrees. During site visit, observed there is no terracing above 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 field marking (boundary marker) sighted during field visit.

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

## **Criterion 2 Economic and financial viability plan**

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

**Summary** Estate had an annual budget for the financial year 2020. The budget includes the projected FFB production, general charges, upkeep & cultivation, collection and immature areas.

Sighted the 3 years business plan for the estate.

FY	2020	2021	2022
Total crop	9,853	10,500	11,500
Estimate OER %	19.25	19.25	19.25
KER	5.00	5.00	5.00
FFB Price	400	400	400

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

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

**Summary** As per interviewed with Estate Manager, there is replanting programme for estate for year 2020-2024:

Field/ Block	Replanting Year	HA
96 (DxP & C)	2020	73
-	2021	-

-	2022	-
-	2023	-
-	2024	-

Oldest palm is year 2004.

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

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

**Summary** Estate had an annual budget for the financial year 2020. The budget includes the projected FFB production, general charges, upkeep & cultivation, collection and immature areas.

Sighted the 3 years business plan for the estate.

FY	2020	2021	2022
Total crop	9,853	10,500	11,500
Estimate OER %	19.25	19.25	19.25
KER	5.00	5.00	5.00
FFB Price	400	400	400

**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 progress report. Details on the actual vs budget i.e. Upkeep maintenance, FFB Production, capital expenditure are shown therein.

As evidence, sighted the Monthly Account for May 2020 prepared by Madam V. Ramany (Group Admin Manager), check by Mr. Lum Man Poo (Estate Manager) and approved by Mr. Balaraman A/L Annamaly (General Manager). The report has been sent to Kluang Rubber Company (M) Berhad, Head Quarters by email on 11<sup>th</sup> July 2020.

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

Criterion 3	Transparent and fair price dealing
<b>Indicator 1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented.

**Summary** Sighted the "Offer to Purchase FFB" between:

Kluang Oil Palm Processing Sdn Bhd dated 1<sup>st</sup> August 2019. Signed and agreed by Mr. Gan Ah Kau, Director of Kluang Oil Palm Processing Sdn Bhd and Mr Cheong Mun Hong, Director.

Pricing formula for CPO & PK:

Extraction rate: min 19.25% (CPO) and 5.00% (PK).

Price so shall be deduction of MPOB Cess and Levy as imposed by statutory bodies, CPO Transport cost RM30/mt of CPO, Processing charges RM55.00/mt of FFB.

The company will make an announcement for tender for other services like ffb transportation, EFB and hiring excavator.

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

<b>Indicator 2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.
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**Summary** All contracts are kept in estate office. Sighted the contract Agreement signed by contractor and Kluang Estate. As evidence, sampled:

- Sighted the Contract Agreement between estate with Mr. P. Ananthan (Harvesting FFB) sealed on 30.06.2020
- Sighted the Contract Agreement between estate with Mr. Ang Giat Ching (Transporting) sealed on 30.06.2020
- Sighted the Contract Agreement between estate with Mr. P. Ananthan (Transporting) sealed on 30.06.2020

Payment will be paid 30 days after the estate received the invoice from contractors.

As evidence sighted the invoice send by 3A Global & Supplies (Transporting FFB) to estate on 30<sup>th</sup> June 2020. Estate paid to the contractor on 01<sup>st</sup> July 2020.; Voucher No: CH002/01/2020; Cheque no (OCBC): No 007037; RM 18,895.67.

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

Criterion 4	Contractor
<b>Indicator 1</b>	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 is certified under MSPO. Therefore, the contractor has been informed by estate management to follow the MSPO standard requirement.

As evidence, sighted of evidence of MSPO clause for contractor in agreement; Appendix I; "Terma & Syarat Perjanjian Kontrak".

Sighted the contract agreement/payment slip for their workers:

1. Mr. Ang Giat Ching (Transporting)  
Mohd Yusof bin Hassan; 810214-01-5019  
May 2020 – RM 2,630.00  
April 2020 – RM 2,730.00  
March 2020 – RM 2,730.00

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

**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 Kluang Estate. As evidence, sampled:

- Sighted the Contract Agreement between estate with Mr. P. Ananthan (Harvesting FFB) sealed on 30.06.2020
- Sighted the Contract Agreement between estate with Mr. Ang Giat Ching (Transporting) sealed on 30.06.2020
- Sighted the Contract Agreement between estate with Mr. P. Ananthan (Transporting) sealed on 30.06.2020

**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 27<sup>th</sup> July 2020. Sighted audit plan dated 22<sup>nd</sup> July 2020 (2<sup>nd</sup> Revised) which have been accepted address to Mr. Balaraman A/L Annamaly (General 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 inspects 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 Kluang Rubber Company (M) Berhad - Kluang Estate.

**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 Kluang Rubber Company (M) Berhad - Kluang Estate.

**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 Kluang Rubber Company (M) Berhad - Kluang Estate.

**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 Kluang Rubber Company (M) Berhad - Kluang Estate.

**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 Kluang Rubber Company (M) Berhad - Kluang Estate.

**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 Kluang Rubber Company (M) Berhad - Kluang Estate.

**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 Kluang Rubber Company (M) Berhad - Kluang Estate.

**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 Kluang Rubber Company (M) Berhad - Kluang Estate.

**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 Kluang Rubber Company (M) Berhad - Kluang Estate.

**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 Kluang Rubber Company (M) Berhad - Kluang Estate.

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

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

**Summary** There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.

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

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

**Summary** There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.

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

#### **Criterion 6 Customary land**

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

**Summary** There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.

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

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

**Summary** There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.

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

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

**Summary** There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.

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

<b>Indicator 4</b>	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.
<b>Summary</b>	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.
<b>In Compliance</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>Not Applicable</b>
<b>Indicator 5</b>	Identification and assessment of legal and recognised customary rights shall be documented.
<b>Summary</b>	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.
<b>In Compliance</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>Not Applicable</b>
<b>Indicator 6</b>	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.
<b>Summary</b>	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.
<b>In Compliance</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>Not Applicable</b>
<b>Indicator 7</b>	The process and outcome of any compensation claims shall be documented and made publicly available.
<b>Summary</b>	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.
<b>In Compliance</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>Not Applicable</b>
<b>Indicator 8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development.
<b>Summary</b>	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kluang Rubber Company (M) Berhad - Kluang Estate.
<b>In Compliance</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>Not Applicable</b>

## 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



<b>AGENDA</b>				
<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>Lead Auditor</b>	<b>Auditor</b>
27 <sup>th</sup> July 2020	08:00 – 09:00	<ul style="list-style-type: none"> <li>➤ <b>Opening Meeting at Kluang Estate:</b> <ul style="list-style-type: none"> <li>• Presentation by the manager/coordinator</li> <li>• Presentation by Lead Auditor.</li> </ul> </li> <li>➤ Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable).</li> </ul>	MS	SP BS
	09:00 – 13:00	<b>Kluang Estate</b> <ul style="list-style-type: none"> <li>➤ <b>Document Audit:</b> <ul style="list-style-type: none"> <li>• Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul> </li> </ul>	MS	SP BS
	10:30 – 12:30	<ul style="list-style-type: none"> <li>➤ <b>Estate inspection:</b></li> <li>➤ 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.</li> </ul>	MS	SP BS
	13:00 – 14:00	<ul style="list-style-type: none"> <li>➤ <b>Lunch</b></li> </ul>	MS	SP BS
	14:00 – 15:30	<ul style="list-style-type: none"> <li>➤ <b>Continue document review</b> <ul style="list-style-type: none"> <li>• Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul> </li> </ul>	MS	SP BS
	15:30 – 16:30	<ul style="list-style-type: none"> <li>➤ Verify any outstanding issues, auditor discussion and end of audit.</li> </ul>	MS	SP BS
	16:30 – 17:30	<ul style="list-style-type: none"> <li>➤ <b>Closing Meeting at Kluang Estate:</b></li> <li>➤ Chaired by the audit Lead Auditor</li> <li>• Welcome and introduction by the Lead Auditor</li> <li>• Presentation of findings by the audit team</li> <li>• Questions &amp; answers and Final summary by Lead Auditor</li> <li>➤ <b>End of assessment</b></li> </ul>	MS	SP BS

## Appendix B : Non-Conformity details

### Non-Conformities Identified During This Audit



<b>Major Nonconformities:</b>	Non-were raised during this audit.
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<b>Minor Nonconformities:</b>	The following NC's were raised for this audit.
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<b>Company Name</b>	Kluang Rubber Company (M) Berhad			
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input type="checkbox"/>
	Surveillance	<input checked="" type="checkbox"/>	Recertification	<input type="checkbox"/>
<b>Audited Standard</b>	MSPO Part 3: Oil Palm Plantations and Organised Smallholders			
<b>Client Number</b>	GGC-P1-MSPO-2019			
<b>NC No. / Ref.</b>	P1/MSPO/MINOR/01	<b>Date Detected</b>	27 <sup>th</sup> July 2020	
<b>Site(s) concern</b>	Kluang Estate	<b>Target Completion</b>	Next Surveillance Audit	
<b>Normative Reference and Requirement</b>	4.5.3.3 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.			
<b>NC Type</b>	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
<b>Description of Non-Conformity</b>	Collection and disposal of schedule waste is not in compliance with Environmental Quality (Scheduled Wastes) Regulations 2005			
<b>NC Objective Evidence:</b>				
Under estate's waste management plan dated 20/07/2020 has identified that "All spent oil, fuel filters, oil filters and air filters are disposed at the responsible of the contract foreman" which generated from tractor servicing. However, there is no evidence that the contractor who collected the estates schedule waste has valid license form DOE to collect and dispose the waste from the site.				
<b>Lead Auditor Signature:</b>		<b>Client Signature:</b>		
				
<b>Root cause Analysis (to be filled by client):</b>				
The estate person incharge was unaware that the contract contractor required a license from the DOE to collect and dispose the waste from the estate.				
<b>Corrective action planned (to be filled by client):</b>				



1. Training for person in charge that manage the SW. 2. To ask the contractor to apply licence from DOE	
<b>Preventive Action (to be filled by client):</b>	
The Scheduled Waste will monitor and check during internal audit	
<b>Review of corrective/preventive action (to be filled by Lead Auditor)</b>	
All the Corrective/Preventive Actions to address identified minor non-conformity has been detailed on an action plan and the intended action reviewed by the Lead Auditor, deemed to be satisfactory and will be followed up at the next surveillance audit.	
<b>NC Closed:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>Site verification:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Date Verified:</b>	<b>Lead Auditor Signature:</b>

<b>Company Name</b>	Kluang Rubber Company (M) Berhad		
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance 1	<input checked="" type="checkbox"/>	Recertification
<b>Audited Standard</b>	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		
<b>Client Number</b>	GGC-P1-MSPO-2019		
<b>NC No. / Ref.</b>	P1/MSPO/MINOR/02	<b>Date Detected</b>	27 <sup>th</sup> July 2020
<b>Site(s) concern</b>	Kluang Estate	<b>Target Completion</b>	Next surveillance audit
<b>Normative Reference and Requirement</b>	4.4.6.1 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.  4.4.6.2 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.		
<b>NC Type</b>	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		

<b>Description of Non-Conformity</b>	No evidence of training record conducted to staff.		
<b>NC Objective Evidence:</b>			
<p>Briefing to workers on the policy was conducted on 14<sup>th</sup> November 2019 as recorded in daily briefing book. The briefing was conducted during mustercall in the morning. However, management has only conducted training for field workers and staff was not included.</p> <p>During the audit, found there is no training need analysis for the year 2020 was made available, as the last training need analysis was prepared for the year 2019 dated 1<sup>st</sup> January 2019.</p>			
<b>Lead Auditor Signature:</b>		<b>Client Signature:</b>	
			
<b>Root cause Analysis (to be filled by client):</b>			
<ol style="list-style-type: none"> <li>1. The estate overlooked training to staff</li> <li>2. The estate overlooked training analysis for year 2020</li> </ol>			
<b>Corrective action planned (to be filled by client):</b>			
<ol style="list-style-type: none"> <li>1. To conduct the training to estate staffs</li> <li>2. To prepare training need analysis accordingly</li> </ol>			
<b>Preventive Action (to be filled by client):</b>			
<ol style="list-style-type: none"> <li>1. Estate will include the training to estate staffs by yearly</li> <li>2. Estate will prepare the training needs analysis by yearly</li> </ol>			
<b>Review of corrective/preventive action (to be filled by Lead Auditor)</b>			
All the Corrective/Preventive Actions to address identified minor non-conformity has been detailed on an action plan and the intended action reviewed by the Lead Auditor, deemed to be satisfactory and will be followed up at the next surveillance audit.			
<b>NC Closed:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<b>Site verification:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Date Verified:</b>		<b>Lead Auditor Signature:</b>	

<b>Area of Concern:</b>	The following AOC's were raised for this audit.
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<b>Company Name</b>	Kluang Rubber Company (M) Berhad			
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input type="checkbox"/>
	Surveillance	<input checked="" type="checkbox"/>	Recertification	<input type="checkbox"/>
<b>Audited Standard</b>	MSPO Part 3: Oil Palm Plantations and Organised Smallholders			
<b>Client Number</b>	GGC-P1-MSPO-2019			
<b>NC No. / Ref.</b>	P1/MSPO/AOC/01	<b>Date Detected</b>	27 <sup>th</sup> July 2020	
<b>Site(s) concern</b>	Kluang Estate	<b>Target Completion</b>		
<b>Normative Reference and Requirement</b>	4.3.1.1 All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.			
<b>NC Type</b>	<input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Area of Concern			
<b>Description of Non-Conformity</b>	Insufficient evidence provided during the audit.			
<b>NC Objective Evidence:</b> <p>Social Impact Assessment (SIA) was conducted on 25<sup>th</sup> February 2020. The report was prepared by En Lum Man Poo, Estate Manager. The assessment was focused on identification of significant social impact from the estate's operations. However, there were issue raised during the stakeholder meeting conducted on 16<sup>th</sup> July 2020 on outsiders such as joggers and cyclist use estate route without permission. However, based on the interview with estate management, "Kluang Hash Chapters" running club submitted application for permission for Hash Running Activity. Letter sighted on 3<sup>rd</sup> July 2020 [Ref: KH/3/20]. Seen letter received by the estate management on 16<sup>th</sup> July 2020.</p> <p>The estate management has no record of the individual surpassing the estate boundary for sports activity purpose which are in accordance to SOP released by "Menteri Keselamatan Negara – MKN". The management has taken initiative to meet the club representative. However, the compliance of MKN SOP's were not in order, as they unable to trace the existence of outsider into the estate compound.</p>				
<b>Lead Auditor Signature:</b>		<b>Client Signature:</b>		
				


<b>Company Name</b>	Kluang Rubber Company (M) Berhad		
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance	<input checked="" type="checkbox"/>	Recertification
<b>Audited Standard</b>	MSPO Part 3: Oil Palm Plantations and Organised Smallholders		
<b>Client Number</b>	GGC-P1-MSPO-2019		
<b>NC No. / Ref.</b>	P1/MSPO/AOC/02	<b>Date Detected</b>	27 <sup>th</sup> July 2020
<b>Site(s) concern</b>	Kluang Estate	<b>Target Completion</b>	
<b>Normative Reference and Requirement</b>	4.4.4.2 j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.		
<b>NC Type</b>	<input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Area of Concern		
<b>Description of Non-Conformity</b>	Insufficient evidence provided during the audit.		
<b>NC Objective Evidence:</b>			
No accident has been reported as to date, and JKPP 8 report has been submitted to JKPP via email. However, no evidence sighted on the submission as the form was printed on 31 <sup>st</sup> January 2020.			
<b>Lead Auditor Signature:</b>		<b>Client Signature:</b>	
			


<b>Non-Conformities Identified During Previous Audit [Main Assessment Audit]</b>
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<b>Major Nonconformities:</b>	Non-were raised during this audit.
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<b>Minor Nonconformities:</b>	The following NC's were raised for this audit.
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<b>Company Name</b>	Kluang Rubber Company (M) Berhad		
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance	<input type="checkbox"/>	Recertification
<b>Audited Standard</b>	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		
<b>Client Number</b>	GGC-P1-MSPO-2019		
<b>NC No. / Ref.</b>	P1/MSPO/MINOR/01	<b>Date Detected</b>	4 <sup>th</sup> July 2019
<b>Site(s) concern</b>	Kluang Estate	<b>Target Completion</b>	Next Surveillance audit
<b>Normative Reference and Requirement</b>	4.4.1.1 Social impact should be identified, and plans are implemented to mitigate the negative impacts and promote the positive ones.		
<b>NC Type</b>	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		
<b>Description of Non-Conformity</b>	No records sighted		
<b>NC Objective Evidence:</b>			
Social Impact Assessment (SIA) was not made available at the time of audit.			
<b>Lead Auditor Signature:</b>		<b>Client Signature:</b>	
		 <b>KLUANG ESTATE</b> Batu 2, Jalan Mengkubol, P. O. Box 64, 86007 KLUANG, JOHOR.	
<b>Root cause Analysis (to be filled by client):</b>			
Lack of awareness on MSPO requirements because since still in the stage of learning and implementation			
<b>Corrective action planned (to be filled by client):</b>			
1. Training for person in charge to manage the SIA documents. 2. To prepare Social Impact Assessment (SIA) accordingly			



<b>Preventive Action (to be filled by client):</b>	
The identification of significant social impact from the estate's operations will update by yearly.	
<b>Review of corrective/preventive action (to be filled by Lead Auditor)</b>	
All the evidence submitted were found adequate and therefore this minor non-compliance is closed.	
<b>NC Closed:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Site verification:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Date Verified:</b> 27 <sup>th</sup> July 2020	<b>Lead Auditor Signature:</b> 

<b>Company Name</b>	Kluang Rubber Co. (M) Bhd			
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
<b>Audited Standard</b>	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders			
<b>Client Number</b>	GGC-P1-MSPO-2019			
<b>NC No. / Ref.</b>	P1/MSPO/MINOR/02	<b>Date Detected</b>	04 <sup>th</sup> July 2019	
<b>Site(s) concern</b>	Kluang Estate	<b>Target Completion</b>	Next Surveillance Audit	
<b>Normative Reference and Requirement</b>	4.5.3.2 A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products			
<b>NC Type</b>	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
<b>Description of Non-Conformity</b>	Inadequate of evidence sighted during the audit			
<b>NC Objective Evidence:</b>				
Inadequate of Waste Management Plan being established by the estate's management.				
<b>Lead Auditor Signature:</b> 		<b>Client Signature:</b> <b>KLUANG ESTATE</b> Batu 2, Jalan Mengkubol, P. O. Box 64, 86007 KLUANG, JOHOR. 		

<b>Root cause Analysis (to be filled by client):</b>	
Lack of awareness on MSPO requirements because since still in the stage of learning and implementation	
<b>Corrective action planned (to be filled by client):</b>	
1. Training for person in charge to manage the SIA documents. 2. To prepare Waste Management Plan accordingly	
<b>Preventive Action (to be filled by client):</b>	
The Waste Management Plan will monitor and check during internal audit	
<b>Review of corrective/preventive action (to be filled by Lead Auditor)</b>	
All the evidence submitted were found adequate and therefore this minor non-compliance is closed.	
<b>NC Closed:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Site verification:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date Verified:</b> 27 <sup>th</sup> July 2020	<b>Lead Auditor Signature:</b> 

<b>Area of Concern:</b>	Non-were raised during this audit.
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<b>Company Name</b>	Kluang Rubber Co. (M) Bhd		
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance	<input type="checkbox"/>	Recertification
<b>Audited Standard</b>	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		
<b>Client Number</b>	GGC-P1-MSPO-2019		
<b>NC No. / Ref.</b>	P1/MSPO/AOC/01	<b>Date Detected</b>	04 <sup>th</sup> July 2019
<b>Site(s) concern</b>	Kluang Estate	<b>Target Completion</b>	Nil
<b>Normative Reference and Requirement</b>	4.3.2.1 The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.		
<b>NC Type</b>	<input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Area of Concern		

<b>Description of Non-Conformity</b>	Hectare stated on MPOB License different than the planted hectare.				
<b>NC Objective Evidence:</b>					
The comparison of declared hectares between MPOB license and planted ha is tabulated below;					
<table border="1"> <tr> <th>Ha as per MPOB License</th> <th>Planted Ha</th> </tr> <tr> <td>647</td> <td>636.82</td> </tr> </table>	Ha as per MPOB License	Planted Ha	647	636.82	
Ha as per MPOB License	Planted Ha				
647	636.82				
<b>Lead Auditor Signature:</b>	<b>Client Signature:</b>				
	 <b>KLUANG ESTATE</b> Batu 2, Jalan Mengkibol, P. O. Box 64, 86007 KLUANG, JOHOR.				

## Appendix C : List of Stakeholders Contacted

Attendance List
Internal Stakeholders
1) Kluang Rubber Company (M) Berhad - Kluang Estate management team and staff
2) Gender Committee Representatives
3) Male and Female workers
4) Workers Representatives
5) Foreign Workers Representatives
External Stakeholders
1) Estate Contractors