

GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)

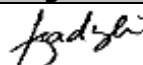
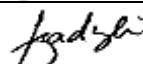
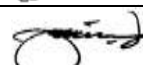
CERTIFICATION AUDIT REPORT

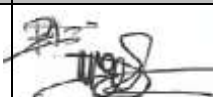
Part 3 : General Principles for Oil Palm Plantations and Organized Smallholders

Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd
(HSYR & CGSB)

-Group Certification-

ANNUAL SURVEILLANCE AUDIT 01
24th June 2020 – 25th June 2020

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	17/07/2020	Issued as Draft Report	Mohd Fadzli Bin Bistamam	Lead Auditor	
B	21/07/2020	Issued as Final Report	Mohd Fadzli Bin Bistamam	Lead Auditor	
B	27/07/2020	Final Report Approved	Muhammad Syafiq bin Abd Razak	Certifier	

Acknowledgment by HSYR & CGSB					
Rev	Date	Description	Management Representative	Role	Signature
B	27/07/2020	Acceptance of the contents	Ravindaran A/L Sebramaniam Miggat Anak Aseng	Estate Managers	

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 **Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB)**. During this **Annual Surveillance Audit 1 (ASA 1)**, the audit team were briefed by Estate Manager, of the supply base disposition.

This assessment was conducted onsite on **24th June 2020 - 25th June 2020** to assess the compliance of the certification unit against the **"MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholder"**. The scope of certification is **"Management of Sustainable Oil Palm Plantations from Cultivation, Planting and Production of Fresh Fruit Bunches"**.

1.2 Company details and Contact information

Company Name	Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB)
Business Address	Tingkat 4, 1-E, Lebuhr Penang, 10200 George Town, Pulau Pinang.
Contact Person	Mr. Lim Ban Aik
Office Telephone	+604-262 6431
E-Mail	hsyrpenang@gmail.com

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

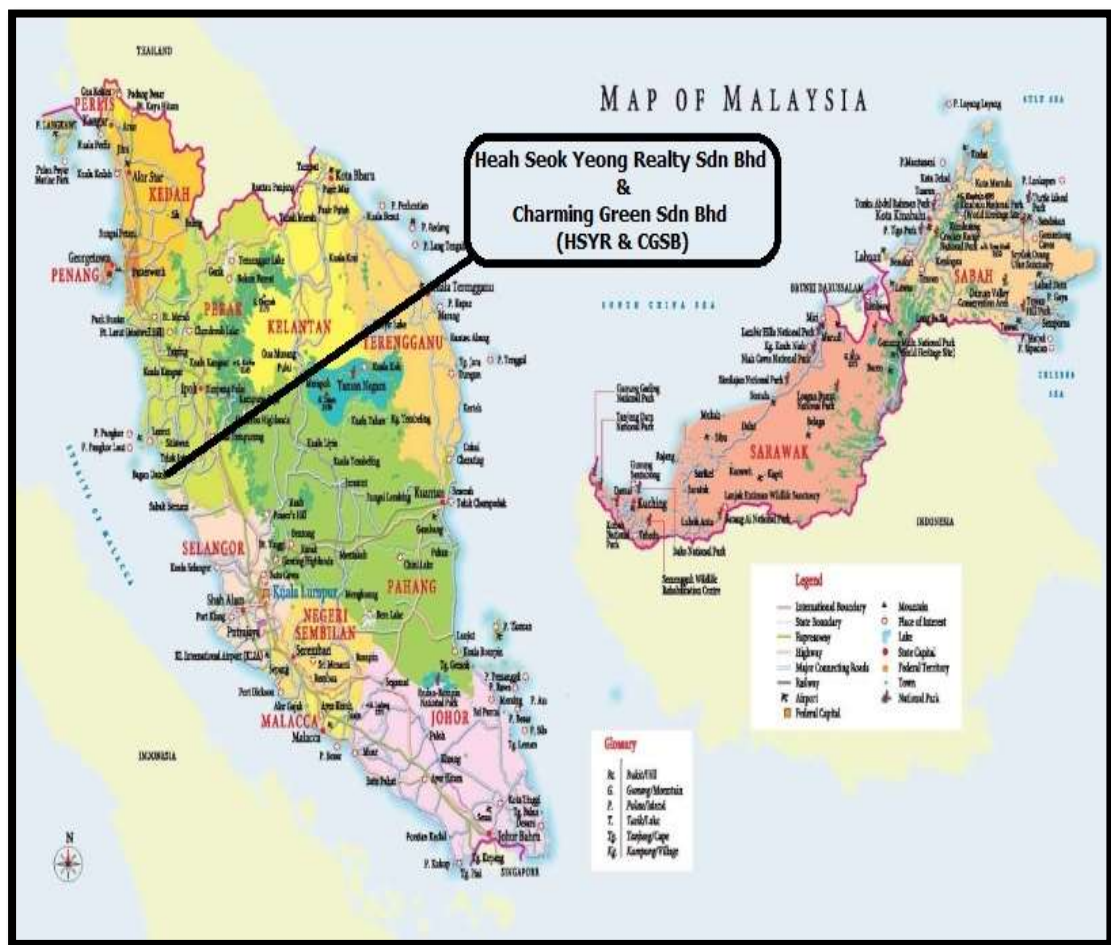
No	Name of the Certification Unit	Site Address	GPS Reference of the site office	
			Longitude	Latitude
1.	K'lapa Bali Estate	35800 Slim River, Perak, Malaysia.	101.35777	3.8488889
2	Sungei Chinoh Estate	35700 Trolak, Perak, Malaysia.	101.375	3.85388

MPOB License Information

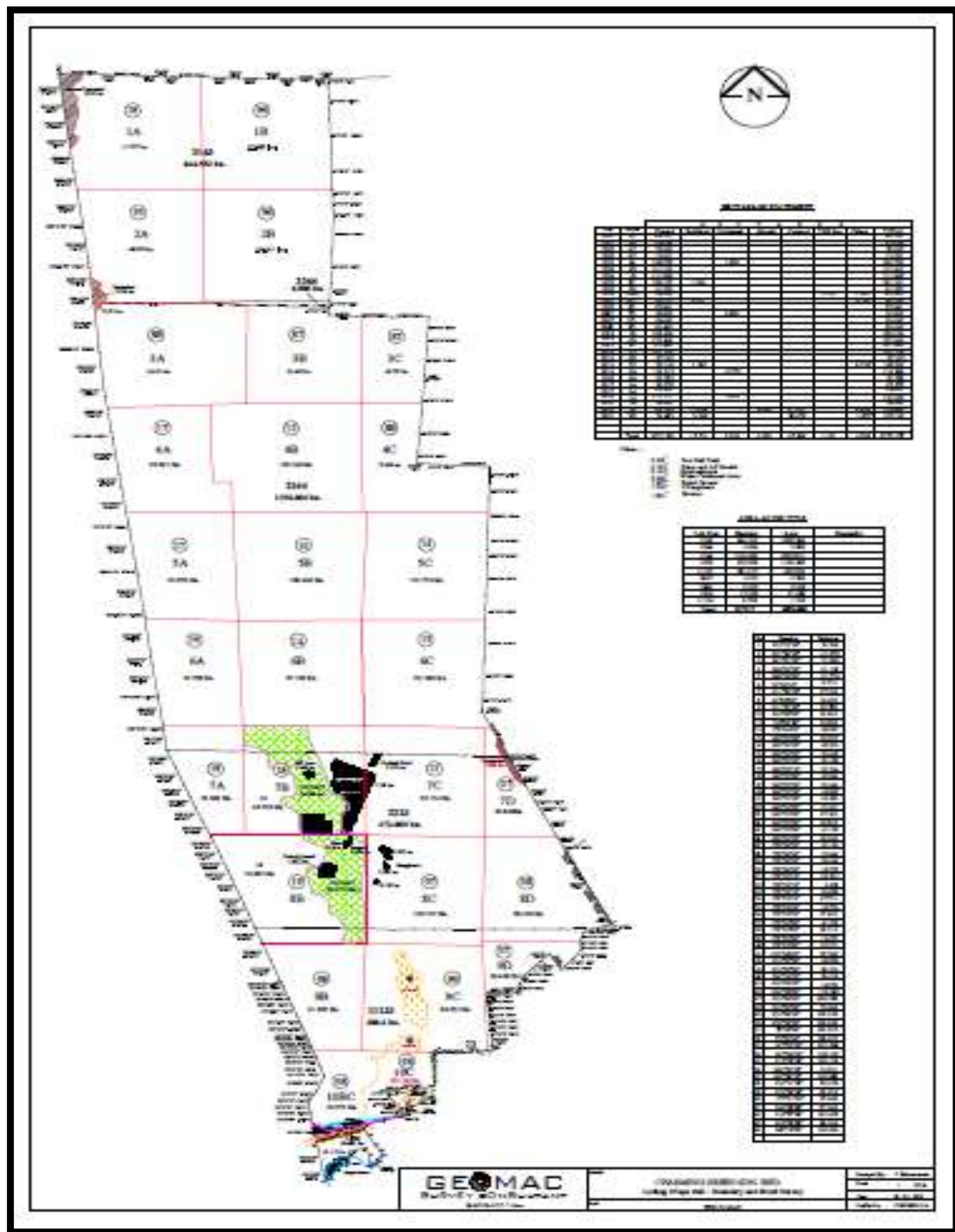
No	Name of the Site	LICENCE NUMBER	EXPIRY DATE	SCOPE ACTIVITY
1	K'lapa Bali Estate	503428302000	30/11/2020	"Menjual dan Mengalih FFB"
2	Sungei Chinoh Estate	617224002000	28/02/2020	"Menjual dan Mengalih FFB"

Others Sustainability Certification

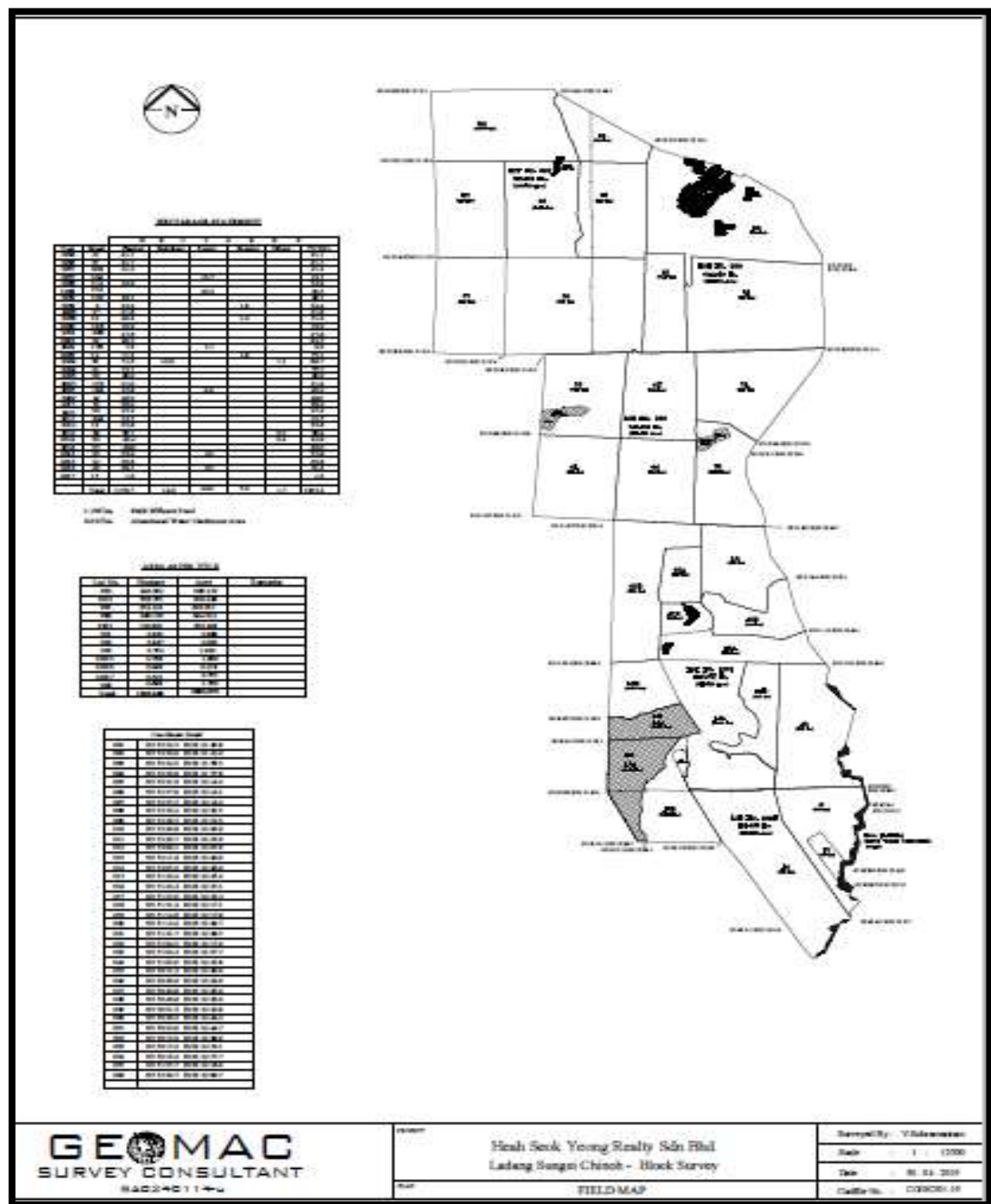
No	Name Of The Site	Others Sustainability Certifications
1.	NIL	NIL

1.4 Map Showing Geographical Location**a) Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB)**

b) K'lapa Bali Estate



c) Sungei Chinoh 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
K'lapa Bali Estate	2,377.17	2,272	1,806
Sungei Chinoh Estate	1,235.33	1,170	1,168
Total	3,612.50	3432	2,974

Name Of The Supply Base	Area Summary (HA)		
	Conservation Area	HCV	Others
K'lapa Bali Estate	0.440 (water catchment)	1.637 (Burial Site)	-
Sungei Chinoh Estate	1.735 (pond & water catchment)		44.00 (Forest planting)
Total	2.175	1.637	44.00

Name of the Certification Unit	FFB Summary (MT)		
	Projected from last audit	Actual Production for 12 Months [June 2019-May 2020]	Projected Production for next 12 Months [June 2020-May 2021]
K'lapa Bali Estate	32,300	19,759.55	35,700
Sungei Chinoh Estate	20,200	16,398.52	22,300
Total	52,500	36,158.07	58,000

1.6 Certificate Details**Certification body**

Global Gateway Certifications Sdn. Bhd.,
No. 10 Jalan Rasmi 7, Taman Rasmi Jaya,
68000 Ampang,
Selangor Darul Ehsan, Malaysia.
Tel.: +603 4256 2689; Fax: +603 4256 2687
Website: www.ggc.my

Assessment standard

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

Certificate number

GGC-KBSC001-MSPO-00-2019

Initial certificate issued date

11th July 2019



Certificate expiry date	10 th July 2024
Stage 1 assessment date	3 rd May 2019
Stage 2 / Main Assessment	19 th June 2019 – 20 th June 2019
Annual Surveillance 1 [ASA 1]	24 th June 2020 – 25 th June 2020
Annual Surveillance 2 [ASA 2]	May 2021
Annual Surveillance 3 [ASA 3]	May 2022
Annual Surveillance 4 [ASA 4]	May 2023

1.7 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: Mohd Fadzli bin Bistamam

Post graduate qualification in Agricultural Engineering with more than 7 years working experience in Oil Palm Plantation Industry. More than 7 years of working experience in Oil Palm Plantation Industry with skills in Good Agricultural Practices (GAP) and Integrated Pest Management (IPM). Experience in managing estate workers, handling of mineral and peat soil and knowledgeable in chemical control of weeds and Pest & Diseases in Oil Palm Plantation Sector.

Fully trained in similar agriculture certification programs such as RSPO, MSPO and ISCC. Completed and certified in ISO 9001:2015, RSPO Lead Auditor Course, MSPO Training and ISCC Basic Training. Thus, became qualified Lead Auditor for the above programs.

Involved in Oil Palm Sustainability Audit since year 2016. Involved in audits conducted in Malaysia, Indonesia, Papua New Guinea, Ivory Coast, India and Singapore.

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

Auditor

Name: **Hj. Ahmad Bin Sukiman**

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

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

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 and MSPO 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 Management Commitment and Responsibility, Social responsibility, health, safety and employment condition. He is able to speak and understand Bahasa Malaysia and English.

1.8 Audit Methodology

The audit was conducted based on sampling following the method as specified in the MSPO requirements (MSPO-Questionnaire Self-Assessment – RA). In the case of this certification unit, sampling calculation was applied. Therefore, total numbers of supply based assessed in the audit are 2 estates out of 2 estates.

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.

The Prime Minister, Tan Sri Muhyiddin Yassin did announce that the Conditional Movement Control Order (CMCO) ended 9th June 2020 and replaced with the Recovery Movement Control Order (RMCO). The RMCO would take effect from 10th June 2020 until 31st August 2020 with more lenient restrictions.

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

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

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

1.9 Audit Plan Information

Audit Date	24 th June 2020 – 25 th June 2020
Name of site(s) visited	<ul style="list-style-type: none"> • K’lapa Bali Estate • Sungei Chinoh Estate
Total number of man-days spent	6 man-days

1.10 Audit Result Summary Findings

Category	Numbers	Status (Closed/Open/Not Applicable/No Action Requires)
Major Nonconformities	0	No action requires
Minor Nonconformities	0	No action requires
Area of Concern	0	No action requires
Noteworthy /Positive Comments	6	No action requires

1.11 Stakeholder Consultation

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

During this Annual Surveillance Audit 1 (ASA 1) audit, the audit team has conducted stakeholder consultations involving both internal and external stakeholders as to understand the practices in relation to environmental, social performance and their performance with respect to the MSPO requirements. The meeting was conducted without the present of estate management.

At the start of meeting, the auditor explained the purpose of the audit followed by an evaluation of the relationship between the stakeholders before discussions continued. The auditor recorded comments

made by stakeholders and verified with the estate management before incorporating into the assessment findings. There was no negative complaint or feedback received during the audit or during the field assessment when interviewing with the external and internal stakeholders. The details is as per table below:

No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken. [What we did]	Assessment team findings [Outcome]
1.	All Stakeholders	Most of the stakeholders who attended the meeting are aware about what is MSPO.	Management will continue briefing to all stakeholders on MSPO awareness	Positive findings
2.	Harvesters	<ul style="list-style-type: none"> Complaints and grievances from workers were solved completely internally. Briefing of PPE awareness will be done very morning during muster ground. 	No action requires	Positive findings
3.	Neighbouring estate	<ul style="list-style-type: none"> Has good communication with the estate management. Boundary markers are well discussed and agreed between both parties. There is no conflict ever happened with mill & estate. 	No action requires	Positive findings
4.	Local communities	Good relationship with the estate management	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 Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB). 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 1 (ASA 1) Audit.

This report will be internally reviewed prior to certification decision by GGC and externally peer reviewed by independents panel reviewers (qualified and trained by MPOCC). During this Annual Surveillance Audit 1 (ASA 1) Audit, based on MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders), there were no Non-conformities raised to the facility that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted with no major non-conformity findings. Therefore, the lead auditor recommends to continue the certificate of compliance MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders to **Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB)**.

1.13 Date of Next Surveillance Audit

The second annual surveillance assessment (ASA 2) visit will be scheduled after 12 months from the date of this audit.

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
CSPK	Certified Sustainable Palm Kernel
DOE	Department of Environmental
DOSH	Department of Occupational Safety and Health Malaysia
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
FFB	Fresh Fruit Bunch
FGS	Finished Good Stock
GAP	Good Agriculture Practise
GHG	Greenhouse Gas
GGC	Global Gateway Certifications Sdn Bhd
HIRARC	Hazard Identification, Risk Assessment and Risk Control
ISCC	International Sustainability & Carbon Certification
IPM	Integrated Pest Management
MPOB	Malaysian Palm Oil Board
MPOCC	Malaysian Palm Oil Certification Council
MSPO	Malaysian Sustainable Palm Oil
NCR	Non-Conformance Report
NGO	Non-Government Organization
OHS	Occupational Health & Safety
OHSAS	Occupational Health and Safety Assessment Series
PK	Palm Kernel
POM	Palm Oil Mill
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
SEIA	Social Environmental Impact Assessment
SOP	Standard Operating Procedure

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 Sustainable Policy updated 01/06/2019 outlining its commitment for MSPO implementation signed by company's Director Mr Lim Ban Aik.

Sighted record of MSPO Policy briefing provided for K'lapa Bali estate employees under MSPO Awareness Training on 15/01/2020 which was attended by 154 estate employees.

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

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

Summary The emphasis for continual improvement is been stated in "commitment statement" of the policy.as well as throughout the "Sustainability Policy".

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

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

Summary The estate conducts internal audit once year. For year 2020 internal in Sungei Chinoh Estate was planned on 17th February 2020 for K'lapa Bali Estate 18th February 2020 for Sungei Chinoh Estate. The company has appointed Mr Fabian Lim, Ms. Demi Koi and Mr Tan Kee Chong as company's MSPO Internal auditors.

Sighted MSPO Internal Audit report for audit carried out on 18/02/2020 which has two NCRs for HBV non-compliances. The NCR has closed upon completion of corrective action.

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

Indicator 2 The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.

Summary The company has established Sustainable Internal Audit Procedure No. 20 updated 02/01/2019 outlining processes for auditing, reporting and follow-up.

Non-conformities are identified during the internal audit in Sungei Chinoh Estate are reported in the Internal Audit Report and one NCR and 9 Area Of Concern (AOC) were raised to in order to take corrective action to address non-compliances.

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

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

Summary Internal audit report findings for both estates were discussed in management review meeting held on 25/02/2020.

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

Criterion 3 Management review

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

Summary Management review meeting is planned once year upon completion of internal audit. Latest management review meeting was held on 25/02/2020 upon completion of internal audit on 17/02/2020 as per the sighted meeting minutes. The meeting was attended by Company Director, Estate Managers, Corporate Manager, Senior estate assistant managers, sustainability officer, and key staffs. One NCR and 5 Area Of Concern (AOC) were raised were discussed in the management review together with corrective action taken by respective staff to address non-compliances.

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 The estate has established 'Continuous Improvement Action Plan' dated January 2020 for K'lapa Bali Estate. The improvement plan prepared by Mr Fabian covers following key areas:

- Occupational Safety & health, (Review of training matrix, implementation of mechanical spreader, improving safety and welfare of guards, etc)
- Social & Welfare
- (Appointment of PIC to oversee ERP Team, CCTV at FFB. Repair of road and linesite, etc)
- Environment, Riparian and Biodiversity.
- (Appointing PIC for waste management, marking of riparian zone, planting trees, etc)

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 estate management obtains new technology information from ISP, Planters Magazine and year PIPOC. Sighted the estate has budgeted for new technology in Budget 2020 for purchase of Drawn Hayter grass cutter, Eurostar 9540 Tractor, Hook Crane for fully mechanize manuring process, etc.

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

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

Summary Training are planned annually for the estate which includes new technology when applied. Sighted training certificate for estate 9 field workers and tractor drivers on "Basic Training of Eurostar Tractor" dated 12/09/2019 by Eurostar Tractor (M) Sdn Bhd for the introduction of Eurostar 9540 Tractor.

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 Sustainability Manual has been established by Headquarters under SOP No. 16: Stakeholders Management; Dated 01st June 2013 revised on 2nd January 2019 as the consultation and communication procedures to relevant stakeholders. SOP has outlined the

- request & response,
- consultation & communication
- complaint & grievance

Training on the company policies and procedures had been conducted to all estate internal stakeholders on 10.06.2020 as per attendance list sighted during the audit. For external stakeholders, briefing was conducted on 11th March 2020 at Conference Hall, KY Restaurant Slim River. Sighted stakeholder meeting minute prepared by Mr. Fabian Lim Chin Wen, the estate assistant manager. The meeting was attended by 33 participants.

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

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

Summary As per interviewed with Mr. Tan Lay Guan and Mr. Miggat (Estate Managers), some of the documents publicly available and some of the documents need to get permission from HQ level. Sighted the "Master List of Sustainability Documents"; Dated 15th May 2019: Version 1.0. All these documents were sighted in the estate office. Example confidential documents identified by the management such as:

1. Daily FFB Records
2. Land Titles
3. Quit Rent Records
4. Medical surveillance report as per CHRA recommendation
5. Workers' individual personal file
6. Warning letter file

Requests for official documents through the estate office will have to go through the Estate Managers from each estate, 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 Sustainability Manual has been established by Headquarters under SOP No. 16: Stakeholders Management; Dated 01st June 2013 revised on 2nd January 2019 as the consultation and communication procedures to relevant stakeholders. SOP has outlined the

- request & response,
- consultation & communication
- complaint & grievance

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

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 in K'lapa Bali Estate is Mr. Ravindran Subramaniam as per appointment letter (KB. 437/07/2019) dated 2nd January 2019. Approved by Mr. Tan Lay Guan (Estate Manager).

The person in charge for consultation and communication in Sungei Chinoh Estate is Mr. Tee Aun Seng.

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 the list of stakeholders prepared by Mr. Fabian Lim Chin Wen dated January 2020. The list includes:

Government / Statutory Bodies

- MPOB
- DOSH
- KPDNKK
- DOE
- Department of Immigration Malaysia
- Pejabat Tanah dan Galian
- Jabatan Bomba dan Penyelamat, Slim River

Non-Governmental Organization

- All Malayan Estates Staff Union (AMESU)
- National Union of Plantation Workers (NUPW)
- MAPA

Service Providers / Contractors / Suppliers

- MPOA Security Services Sdn Bhd
- PUSPAKOM Sdn Bhd
- FOMEMA Sdn Bhd
- Maybank Slim River
- Lembaga Air Perak
- Union Harvest Sdn Bhd

Meeting with the external stakeholders was conducted on 11th March 2020, attended by 33 personnel. All discussion details sighted in "Stakeholders Meeting Minutes for Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB)".

As for visit made by JKKP, the details are recorded into JKKP Officer Visiting Book. The latest visit by JKKP officer was on 30.09.2019.

For estate internal stakeholders, there are records of communication between workers and the management sighted during the audit. The records sighted are generally more to complain of the damaged/broken workers houses. Actions have been taken to all the complains made.

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

Criterion 3 Traceability

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

Summary Sighted the Standard Operating Procedure of FFB Traceability under No 17 with an objective all FFB are traceable and transparent to the respective harvesting fields. The SOP dated 01st June 2013 and revised on 2nd January 2019. Sighted all records done by estate management. From field to the mill. Estate will record all the bunch that harvest by the harvester using "KP Form". Then the record will transfer to Crop Book and Crop Summary by Estate Staffs. Then salary will be generated by estate system (Lintaramax).

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

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

Summary The traceability procedures and practice are being continuously monitored by Mr. Inthiran Anamalai (K'lapa Bali Estate) & Mr. Marzuki Yahya (Sungei Chinoh Estate) to ensure all flows and forms are properly recorded on daily basis. On top of that, internal audit is also being conducted by Internal audit from HQ as per internal audit report dated 17 & 18th February 2020.

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 in K'lapa Bali Estate is Mr. Inthiran Anamalai dated 2nd January 2019 (Ref: KB. 437/06/2019). Approved by Mr. Tan Lay Guan (Estate Manager).

The person in charge for traceability in Sg. Chinoh Estate is Mr. Marzuki Yahya dated 2nd January 2020. Approved by Mr. Migat Aseng (Estate 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 KLK Tanjung Malim POM and Syarikat Cahaya Muda Perak (Oil Mill) Sdn Bhd. Decision being made by Purchasing Department.

Sighted all records done by estate management. From field to the mill. Estate will record all the bunch that harvest by the harvester using "KP Form". Then from field, the FFB will weight by weighbridge operator and will key in the data as per procedure. The weighbridge operator will print the weighbridge ticket and give to the driver. The FFB arrives in a mill in trucks or trailers.

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

Mill: KLK Tanjung Malim POM
Seller: K'lapa Bali Estate

Date: 02.06.2020
W/B Ticket No: A237272
Vehicle No: PKQ 9880
Material: FFB
Weight: 21,300 kg

Mill: Syarikat Cahaya Muda Perak (Oil Mill) Sdn Bhd
Seller: Ldg K'lapa Bali
Ticker No: F0018838
Date: 06.06.2020
Material: FFB
Weight: 23,970 kg

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

2.3 Principle 3 : Compliance to legal requirements

Criterion 1 Regulatory requirements

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

Summary

The Companies, Charming Green Sdn Bhd and Heah Seok Yeong Realty Sdn Bhd had established and updated list of applicable laws and regulations that are applicable for the estates as per List of Summary of Applicable Laws and Regulations signed by the Estate Manager, Mr Tan Lay Guan and Mr Miggat Anak Aseng on 09.06.2020.

The permits/licenses being monitored and updated by the Assistant Manager and verified by the Estate Manager dated 31.01.2020.

1. Permit Barang kawalan berjadual No Permit A017416 (8,000 liters) for Charming Green Sdn Bhd expires 19.09.2019. Sighted "Permohonan Permit untuk membeli barang kawalan berjadual (Peraturan-peraturan kawalan bekalan, 1974) for renewal dated 21.04.2020.
2. Permit Barang Kawalan Berjadual No Siri P: A001281 (10,000 liters) for Heah Seok Yeong Realty Sdn Bhd No. Rujukan: KPDNHEP/P/TPH/600-2/1/6/15 expires 25.11.2020.
3. Lesen MPOB (menjual dan mengalih FFB) for Charming Green Sdn Bhd (2,377ha). No lesen 503428302000 expires 30.11.2020.
4. Lesen MPOB (menjual dan mengalih FFB) for Heah Seok Yeong Realty Sdn Bhd (1,235ha). No lesen 617224002000 expires 28.02.2021.

The Monthly/Yearly Returns for year 2019/2020 include the following;

1. JTK – details of workforce as at 31.05.2020
2. MPOB – penyata bulanan pengeluaran buah kelapa sawit, MPOB (EL) ETA for the month of April 2020 dated 06.06.2020
3. JKPP 8 (I)/(IV) dated 31.01.2020 – yearly submission

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

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

Summary The list of all laws in a legal requirement register covers the detail requirements that related to MSPO compliance. These documents include information on title of documents, regulatory authority/summary, requirements, current status and remarks.

All 43 documents are in compliance with the applicable local, state, national and ratified international laws and regulations includes.

1. Akta Pencegahan dan Pengawalan Penyakit Berjangkit 1988 [P.U.(B)189]
2. Environmental Quality Act 1974 (Act 127)
3. Environmental Quality Act (Scheduled Waste Regulations) 2005
4. Environmental Quality (Sewage) Regulations 2009
5. OSHA Act 1994 (Act 514)
6. OSH (Classification, Labeling, and safety Data Sheet of Hazardous Chemicals) Regulations 2013
7. OSH (Control of Industrial Major Accident Hazards) Regulations 1996

The linesite report by HA (K'lapa Bali), Mr Inthirakumar A/L Balakrishnan, visited 4 times in May 2020 i.e. 09.05.2020, 16.05.2020, 23.05.2020, and 29.05.2020. The linesite report by HA (Sg Chinoh), Mr Inthirakumar A/L Balakrishnan, visited 4 times in June 2020 i.e. 06.06.2020, 13.06.2020, 18.06.2020 and 23.06.2020.

From the Inspection checklist of VMO visit (K'lapa Bali), the visit has been done once in March 2020 on 03.03.2020.

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 Based on interview with Mr Fabian Lim Chin Wen (Assistant Manager) and Mr Gopi Balakrishnan (Office Administrator), any new amendments or any regulations once received through the following manner:

1. HQ Department
2. Communication with law/enforcement officers
3. Website

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

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

Summary The letter of appointment for the responsible person in Charming Green Sdn Bhd, Mr Fabian Lim Chin Wen (Assistant Manager) approved by Mr Tan Lay Guan (Estate Manager) on 02.01.2019.

The letter of appointment for the responsible person in Heah Seok Yeong Realty Sdn Bhd, Mr Gopi Balakrishnan (Office Administrator) approved by Mr Miggat Anak Aseng (Estate Manager) on 02.01.2020.

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

Criterion 2 Land use rights

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

Summary Both estate's land title are available and maintained. As evidence in K'lapa Bali Estate;

- 1) Lot No 2223 – 472.8744ha
- 2) Lot No 2164 – 1,156.5897ha
- 3) Lot No 2163/2264 – 448.5529ha
- 4) Lot No 1826 – 13.4305ha
- 5) Lot No 11133 – 286.2ha
- 6) Lot No 3944 – 0.2216ha
- 7) Lot No 8627 – 3.953ha
- 8) Lot No 11134 – 0.708ha

Total as per title = 2,382.53ha

Syarat-syarat Nyata: "Tanaman Kelapa Sawit" except the following Land Title;

Lot No	Syarat-syarat Nyata
2164	Getah
2163/2264	Getah
3944	Perniagaan – Pusat Latihan/Sekolah
8627	Perniagaan- Lapangan Terbang

Sighted "Borang Permohonan Tukar Syarat sebanyak 2 permohonan kepada kelapa sawit" addressed to Pejabat Tanah Batang Padang, Sungkai, Perak for Lot No. 2163/2264 – 448.5529ha and Lot No. 2164 – 1,156.5897ha dated 10.04.2019.

For Sungei Chinoh Estate, land title is available and well maintained. As evidence, sighted the following land title and Syarat-syarat Nyata;

Lot No	Hectare	Syarat-syarat Nyata
992	248.5778	Pertanian
1021	342.9705	Pertanian
991	252.1238	Dusun
986	263.6523	Dusun
3235	134.8613	Dusun
301	0.8448	Getah
302	0.8473	Getah
303	0.7942	Getah
16915	0.7685	Getah

16916	0.0484	Getah
16917	0.3223	Getah
306	0.688	Getah
Total Land Title	1,246.4992	

Evidence of "Borang Permohonan Tukar Syarat sebanyak 7 permohonan kepada kelapa sawit" addressed to Pejabat Tanah Batang Padang, Sungkai, Perak Ref No. PTBP (D) 27/3007 (A&B) dated 06.03.2019.

Evidence also "Borang Permohonan Tukar Syarat sebanyak 3 permohonan kepada kelapa sawit" addressed to Pejabat Tanah Batang Padang, Sungkai, Perak Ref No. PTBP (D) 27/3013 dated 10.04.2019.

Evidence of annual payment of quit rent for 2020 paid to Kerajaan Negeri Perak – Bil Cukai Tanah dan Parit/ Tali Air, Daerah Batang Padang, Perak amounted to RM120,564.00.

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

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

Summary Both estates demonstrated legal ownership of their land by having legal land titles to the land. The copy of land titles are kept in the both estates office. Evidence of annual payment of quit rent the state government is available in the form of receipts.

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

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

Summary The estate map demarcated with Boundary and Block Survey and Boundary Stone Census furnished with 133 GPS coordinates in K'lapa Bali Estate and 26 GPS Coordinates in Sungei Chinoh Estate.

Samples of GPS coordinate in K'lapa Bali as follow;

1. Stone No. 1 Block 8B: N03°49'18.06", E101°21'05.4"
2. Stone No.7 Block 8B: N03°49'38.1', E101°20'57.2"
3. Stone No. 12 Block 9CD: N03°48'45.8', E101°22'05.7"
4. Stone No.18 Block 10BC: N03°48'33.5', E101°21'20.0"
5. Stone No.5 Block 3C: N03°52'29.1', E101°21'40.4"

For Sungei Chinoh Estate, Samples of GPS as follow;

1. Stone No. 8 Block 21: N35143.7, E1012141.9
2. Stone No.17 Block 12: N34954.5, E1012257.1
3. Stone No.21 Block 19: N35140.3, E1012236.7
4. Stone No.26 Block 39: N35340.1, E1012148.2

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

During interview with stakeholders, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported.

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

Summary There is no customary land in or surrounding the estate. There are also no land disputes or claims involving this estate. The company has proper legal land tile for the land ownership. Therefore, no maps for recognized customary rights is available.

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

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

Summary There is no customary land in or surrounding the estate. There are also no land disputes or claims involving this estate. The company has proper legal land tile 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 estate conducts SIA once a year to identify plans required mitigating the negative impacts and promoting the positive ones.

Last SIA was conducted in February 2020 in Sungei Chinoh Estate and April 2020 in K'lapa Bali Estate. The assessment was conducted using "Internal Baseline Questionnaire for Estate", a standard questionnaire form. The assessment was conducted by Estate Assistant Manager Mr Ravindran and assisted by Mr Fabian, Assistant Manager / MSPO Coordinator. The assessment questionnaire has covered following key areas:

- Workers' rights and road usage
- Working condition
- Religious issues
- Health and Education

Estate workers have participated in SIA questionnaire as sighted from the completed Questionnaire forms. The estate has established management plan to mitigate negative impacts identified from the assessment.

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 The company has established SOP No.16 'Stakeholder Management' dated 01/01/2013 and last revised on 02/01/2019. The SOP has identified processes required for stakeholder identification, Request & Response, Consultation & Communication and Complaint & Grievances. The company has developed "Stakeholder Logbook" to record any Request & Response, Consultation & Communication and Complaint & Grievances. Sighted, all the complaint and grievances being resolve in an effective, timely and appropriate manner.

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 The company has established SOP No.15 'Stakeholder Management' dated 01/01/2013 and last revised on 02/01/2019. All disputes are handled as per the procedure.

Sighted, all the complaint and grievances being resolve in an effective, timely and appropriate manner.

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

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

Summary The company has developed "Stakeholder Logbook" to record complaint & Grievances. The "Stakeholder Logbook" is made available by the estate management outside of the office near the suggestion box where anyone can write in complaints after office hours.

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 The complaint mechanism has been explained to both internal and external stakeholder. External stakeholder was briefed on 11/03/2020 during the latest meeting was held as sighted from the meeting minutes. The meeting also attended by internal stakeholders. To estate workers were briefed on the complaint mechanism during muster ground on 12/02/2020 as sighted from records Training Program 2020.

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 Complaints records are retained since MSPO implementation by the estate in year 2018. The oldest complaint form sighted dated 19/08/2018.

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 company actively contributes to local development in the form of monetary and other assistance requested by local communities. This is evident from series of monetary contribution to MELOLISA education foundation as sighted from receipt issued by the foundation amounting RM 3,000 (Receipt No. 0004 dated 14/02/2020), RM 1,500.00 (Receipt No. 00024 dated 10/04/2020) and RM 3,000.00 (Receipt No. 00063 dated 14/05/2020) for cheques issued by the estate management.

Beside monetary contribution, the estate also fulfill request made by nearby government school (SK Kuala Slim) as sighted from request letter written by the school Headmaster Mr Zulkarnan dated 14/02/2020b for grass cutting of the school field. Also sighted acknowledgement letter from the school HM dated 20/05/2020 for fulfilling the request.

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 The estate has established "Occupational Safety and Health Policy" Ladang Kelapa Bali and Ladang Sungei Chinoh updated 02/01/2020 and signed by company director Mr Lim Ban Aik which is in line with the OSH Act. The policy is regularly briefed to estate workers during morning muster ground.

The estates have established OSH Committee in line with Health & Safety legal requirements. Estate's OSH committee members are appointed once every two years.

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

The estate has established "Occupational Safety and Health Policy" Ladang Kelapa Bali and Ladang Sungei Chinoh updated 02/01/2020 and signed by company director Mr Lim Ban Aik which is in line with the OSH Act. The policy is regularly briefed to estate workers during morning muster ground.

Risk assessment was conducted through HIRARC for K'lapa Bali Estate and Sungei Chinoh Estate based on the severity and the likelihood. HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive).

HIRARC sighted for the followings work operations:

1. P&D Census
2. Tall Palm Census
3. Trunk Injection
4. P&D Spraying
5. FFB Infield Collection

Sighted OSH training record for Weedicide/ Pesticide Spraying dated 10/01/2020 conducted by Mr Mohan (estate field maintenance staff) attended by 5 sprayers, Safe driving techniques dated 10/04/2020 conducted by Mr Mahen (field conductor) attended by 5 drivers, Sexual Harassment briefing conducted on 20 May 2020 by Mr Fabian (Estate Assistant Manager) attended by 154 estate employees.

During site visit to both K'lapa Bali and Sungei Chinoh Estates, noted field workers are wearing proper PPE. PPE distribution records are maintained in individual worker's record. Sighted record PPE distribution for estate workers for various of PPEs such as:

- Apron
- Rubber gloves
- Mask
- Helmet

Both estates have established OSH Committee. Its committee members are appointed once every two years. Sighted latest 12 committee members in K'lapa Bali Estate (6 workers' representatives + 6 Management representatives) appointed in year 2019 with Estate Manager as the OSH committee Chairman. Safety committees meeting are held once every 3 months. Sighted latest OSH Committee meeting minutes which was held on 09/03/2020, the meeting was chaired by Estate Manager Mr Tan Lay Guan and attended by all 12 committee members.

Trained first aiders are present in all the estates during the audit. Sighted Certificate issued by Health ministry which valid till May 2022. First aid training also conducted by estate HA, Mr Inthirakumar on 20/08/2020 attended by 154 estate workers.

The company has conducted CHRA on 27/03/2019 as sighted form CHRA Report Ref No. HQ/14/ASS/00/357-2019/108 prepared by DOSH Registered Assessor Mr Ganesrajoo A/I Nagarajoo [DOSH Registration: JKPP HIE 127/171-2 (357)].

Based on CHRA, pesticide Sprayers are required to do annual medical surveillance. This year medical surveillance was conducted on 21/06/2020 by OSH Doctor Nurain Binti Daiah (DOSH Reg, No. HQ/16/DC/00/1551) involves total 11 estate employees from Sungei Chinoh Estate including sprayers and one supervisor. The test result shows all employees are fit to work.

The estate keep tract of its accident records.as sighted from quarterly log titled "Laporan Kemalangan" Jan-March 2020. Sighted accident investigation report (K'lapa Bali Estate) dated 13/01/2020 for Mr Islam Safiqul (Harvestor) who had minor incident of torn pricking on his right leg. Also sighted submission of JKPP 8 and JKPP6 for year 2019 to DOSH.

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	The company has established "Sustainability Policy" updated 01/01/2020 and signed by company director Mr Lim Ban Aik. The "Sustainability Policy" has stated on good social in paragraph no.2 which the statement includes elaboration on respect for employee rights, no forced or bonded labour, no child or young person labour, freedom of association and right to collective bargaining, minimum income standard, etc,
In Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	According to the estate manager stated that there are no discriminatory practices within the company. This was further verified by the estate workers during site visit interviews. In addition, Sustainability Policy under paragraph 2, Sub-clause titled "Equal employment Opportunities and Diversity" the company has stated its commitment to provide equal opportunity.
In Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	Workers' salaries are paid in compliance with per minimum wage legal requirements as well as NUPW trade union as well collective agreement. (Refer to 4.4.5.5 salary details)

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 Workers' salaries are paid in compliance with per minimum wage legal requirements as well as NUPW trade union as well collective agreement.
(Refer to 4.4.5.5 salary details)

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 Workers list and their particulars are well maintained by the estate. Workers' salaries and overtimes are paid as per minimum wage legal requirements. Sighted employment contract and salary slip for following estate workers. Sample sighted include:

- Name : Mr Sadaka Hossen (Harvester)
Date of Employment contract signed : 04/08/2017
Salary details for the month of May 2020: No of days worked : 21 days
Sick Pay : 2 days
Holiday Pay :3 days
Total days : 26 days
Total Pay : RM 2, 027.11
- Name : Ms Chintamarhi (Field worker)
Date of Employment contract signed : 10/07/1993
Salary details for the month of May 2020: No of days worked : 23 days
Holiday Pay :2 days
Total days : 25 days
Total Pay : RM 1,164.10

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 All estate workers are provided with employment contract outlining term and condition of employment including annual leave, sick leave, vacation leave, wages, working hours and working days. Contracts are signed by both employees and the employer as sighted in clause 4.4.5.5.

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

Indicator 7 The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.

Summary Working hours are specified in the employment contract as 6.30am to 2.30 pm inclusive of 30 minutes break at 11.30 am. Company uses check roll system to record working hours.

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 Working hours are specified in the employment contract as 6.30am to 2.30 pm inclusive of 30 minutes break at 11.30 am. Company uses check roll system to record working hours.

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 Wages and overtime are paid in compliance with collective MAPA/NUPW Collective Agreement 2019 and employment Act 1955. (Refer to 4.4.5.5 salary details).

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 Other social benefits offered by the company include price bonus when CPO price increase, productivity bonus, transport subsidy for worker's school children, housing, free medical services, etc.

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 There are total 80 houses available in K'lapa Bali estate's Workers quarters, 65 houses are occupied by workers. Local workers with family are provided one whole house while 3-4 foreign workers share one house. Houses are provided free. Water is provided free for all houses. Electricity supply from TNB and paid by the workers for their own consumption.

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 In paragraph 2 sub clause ix of the "Sustainability Policy" has stated its commitment of zero tolerance of any type of harassment, bullying or violence. K'lapa Bali Estate also has gender committee chaired by Ms Juniah (Chief Clerk) which periodically meet to discuss on sexual harassment and violence. In Sungei Chinoh Estate, there is only 1 female employee who also joining the Gender Committee in K'lapa Bali Estate.

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 Trade union NUPW has its members within the estate and according the estate manager there is no restriction for estate workers joining any trade union. In paragraph 2 of company's "Sustainability Policy" has stated 'Freedom of association and right to collective bargaining'.

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 In paragraph no.2 under sub-clause (iii) titled 'no child or young person labour', the company's top management has elaborated it's commitment in regards to minimum age employment.

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

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

Criterion 6 Training and competency

Indicator 1 All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.

Summary Both estates have established comprehensive annual training plan for its staffs and workers and this was sighted in the training records file for each staffs and workers. The training plan for 2020 was sighted and verified. Month of training planned and date actual of training conducted and training attendance sheets are available properly documented and maintained at estate office.

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

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

Summary Training need analysis has been carried out for all estate employees prior to planning annual training program. Based the training need assessment the estate management has established "Kelapa Bali Estate – Training Matrix -2020" which has identified type of training required for executives/staff, Harvester, Field workers, chemical handlers, Pre-mix,/waste management and others. The training types classified into OSHA, Environment and Social. As evidence, sighted the training needs prepared by the Estate Assistant Manager for each individual worker.

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

Indicator 3 A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.

Summary All workers involved in the operations have been adequately trained in safe working practice. Both estates have a comprehensive annual training plan for its staffs and workers and this was sighted in the training records file for each staffs and workers. The training plan for 2020 was sighted.

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

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

2.5 Principle 5 : Environment, natural resources, biodiversity, and ecosystem services

Criterion 1 Environmental management plan

Indicator 1 An environmental policy and management plan which shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.

Summary Charming Green Sdn Bhd and Heah Seok Yeong Realty Sdn Bhd had established Environmental Policy signed by Mr Lim Ban Aik, Director which was revised on 02nd January 2020. Based on the Environmental Policy, both companies are committed towards implementing the following practices:

1. Compliance with all relevant statutory and regulatory requirements or relevant laws
2. Compliance with MSPO certification principles and criteria.
3. Implement zero burning on all oil palm cultivation activities
4. Continuous monitoring of agrochemicals use
5. Educate and continuous training to all stakeholders and plantation personals on environmental issues and updates.
6. Incorporate alternative and newer methodologies where deem as beneficial and applicable for both the plantation and the environment.

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

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

Summary The estate has conducted Environmental Risk Assessment (ERA) for all its' activities in year 2020. The environmental assessment findings are recorded in document titled "Environmental Risk Assessment" prepared by Mr. Fabian Lim Chin Wen (Assistant Manager), approved by the Estate Manager on 15.01.2020

The Environmental Risk Assessment covers 18 work activities of the plantation covering elements of work activity, environmental impacts, environmental impact assessment (severity/quantity/probability), assessment (SxQxP), significance, mitigation measure and monitoring programs and frequency.

Sighted the Environmental Risk Assessment (ERA) prepared by Mr. Fabian Lim Chin Wen (Assistant Manager), approved by Estate Manager 15.01.2020 covers 18 operations such as Nursery (planting), Nursery (watering), replanting (land preparation), replanting (transplanting), weeding (spraying), weeding (scheduled waste – chemical container), pruning, circle sanitation (racking of debris), EFB mulching (placement of EFB mulching), road & paths (construction and maintenance), upkeep drains, boundaries (upkeep), P & D management (application of pesticides), manuring, harvesting & collection (harvesting), harvesting & collection (transporting FFB), domestic waste landfill and line site (accommodation).

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 Action Plan to mitigate the negative impact was incorporated in environmental risk assessment (ERA) for all its' activities. For example sighted in K'lapa Bali Estate;

1. Work activity: Manuring – application of fertilizer
Environmental impacts: Potential pollution to underground water table and drains, air pollution and greenhouse effect.
Mitigation measures: Application of fertilizer based on SOP standards, avoid spillage of fertilisers, empty fertilizer bags to be collected and stored in designated store
2. Work activity: Scheduled waste programme – chemical containers.

Environmental impacts: Soil contamination – chemicals can seep through soil to contaminate groundwater.

Mitigation measures: Used chemical containers should be triple rinsed and punctured to render them neutral/safe and send to waste managers, chemicals should not be sprayed on bare grounds, near waterways, drain edges, or in riparian zone to prevent contamination of natural waterways.

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

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

Summary Both estate managements have established programs to promote the positive impacts to the environment. Example sighted Sungei Chinoth "Continuous Improvement Action Plan 2020":

Description	Mitigation Method /Action Plan	Time Frame/ Completion Date
Planting of vetiver grass at culvert point to prevent erosion	A continuous programme. Supervisor to identify and planting vetiver grass at low lying areas, priority at flood prone fields	Scheduled Mar 2020 – on going
Reduce chemical spraying volume by review spraying nozzle output quarterly	Replace spraying pump nozzle quarterly to ensure constant flow rate/ha	Scheduled Mar 2020 – on going
Installation of lightning arrestor to Manager Bungalow, office and weighbridge	To prevent electrical items from lightning.	Scheduled Feb 2020 – completed 19.02.2020
Reduce power usage by installing 5 solar power street light in compound	5 points solar power to be installed in year 2020	Scheduled June 2020 – on going
Old bulb to be replaced with LED lower energy bulb to reduce energy use	All Manager bungalow installed with LED lower energy bulb.	Scheduled Feb 2020 – completed on 17.02.2020

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 environmental training programme for year 2020 includes;

1. MSPO awareness – all staff & workers
2. Linesite/Office cleaning (SOP) – office worker
3. Riparian zone – all workers except harvesters
4. Premix and waste management (SOP – premix/storekeepers)
5. Company policy – all staff & workers
6. Manuring (SOP) – all workers

The training implementation for both estates in 2020 as below;

Programme	K'lapa Bali Estate	Sungei Chinoh Estate
	Date done (Attendees)	Date done (Attendees)
Linesite/office cleaning (SOP)	30.01.2020 (4psn)	12.02.2020 (2psn)
MSPO awareness	15.01.2020 (154psn)	17.01.2020 (23psn)
Premix and waste management (SOP)	27.02.2020 (8psn) 15.03.2020 (8psn)	04.03.2020 (2psn)
Riparian zone awareness	03.03.2020 (154psn)	09.03.2020 (6psn)
Manuring (SOP)	05.02.2020(9psn) 25.03.2020(9psn)	06.03.2020 (19psn)
Company Policy	10.06.2020 (154psn)	09.06.2020 (27psn)

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

In K'lapa Bali Estate, the "5th Welfare and Environmental Committee Meeting Minute 2020" held on 08.01.2020 attended by 3 executives, 3 staffs and 6 workers representatives discussed the following action;

1. Replacement of light bulb with LED to ensure lower electric bill for all workers.
2. All rivers are prohibited place for fishing and other water activities.

While in Sungei Chinoh Estate, the ESH and Welfare Committee Meeting held on 07.04.2020 attended by 2 executives, 3 staffs and 5 workers representatives discussed the following;

1. Repair done on Hindu Temple for water leaking pipe
2. HA to monitor a monthly Go Green Day on every 8th of the month.
3. Assistant have to check the rubbish pit monthly.
4. HA and Supervisor to check the estate compound and house condition.

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

K'lapa Bali Estate has maintained record of Diesel Monitoring for a period of 2016 – 2019/2020. The diesel consumption baseline value per ton FFB (2017-2019) is 1.98 litres/ton FFB.

For the year 2020, the diesel consumption as follow;

Month	Litre	FFB	Litre/mt FFB
January - May	48,084	10,243.18	4.70

Estate has maintained record of Electricity Consumption per FFB (MT) for a period of 2016 – 2019/2020. The electricity consumption baseline value per FFB (MT) (2017-2019) is 1.40 kWh/ton FFB.

For the year 2020, the electricity usage (kWh) as follow;

Month	kWh	FFB	kWh/mt FFB
January - May	37,297	10,243.18	3.65

In Sungei Chinoh Estate, the diesel and electricity consumption as per table below:

Month	Litre	FFB	Litre/mt FFB
January - May	22,140	6,904.02	3.21

Month	kWh	FFB	kWh/mt FFB
January - May	53,241	6,904.02	7.71

The Energy Usage Reduction Plan 2020 was prepared by Mr. Fabian Lim Chin Wen (Assistant Manager), approved by Estate Manager covers 8 methods of reduction plan, includes;

1. Conversion of florescent lighting to energy saving bulbs or LED bulb – current light bulbs at the quarters are periodically change to LED tube lamps
2. Conversion of street lamps to LED light bulbs – two sets have been placed
3. Utilize fan and minimize the use of air conditioners – offices are built with both fans and air conditions. Fans are use primary before switching on the air conditioning if required

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 annual estimate of non-renewable energy being established for the year 2020 as follow;

Estate	Estimated diesel usage	Estimated FFB	Fuel Efficiency
	Liter	Ton	Liter/ton FFB
K'lapa Bali	160,000	32,000	5.00
Sungei Chinoh	48,000	22,000	2.18

The annual estimate of electricity usage being established for the year 2020 as follow;

Estate	Estimated Electricity usage	Estimated FFB	Electricity Efficiency
	kWH	Ton	kWH/ton FFB
K'lapa Bali	108,000	32,000	3.38
Sungei Chinoh	72,000	22,000	3.27

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

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

Summary

The use of renewable energy is not implemented as yet at K'lapa Bali Estate. In order to reduce power usage, Sungai Chinoh Estate has planned to install 5 units solar power street lights on its Complex.

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

Charming Green Sdn Bhd and Heah Seok Yeong Realty Sdn Bhd has established SOP 15.0, Title: Waste Management dated 01.01.2013, revised and approved by Estate Manager on 02.01.2019 with the objective to ensure waste materials are handled and store accordingly.

The Identification of Waste 2020 has been established on 03.03.2020, prepared by Mr. Fabian Lim Chin Wen (Assistant Manager), approved by Estate Manager consist of;

1. Battery
2. Spent lubricant/filters
3. Lubricant containers – metal
4. Lubricant containers – plastic
5. Clinical waste – syringe, needle & swab.

The Inventory of Scheduled Waste established by K'lapa Bali Estate and Sungei Chinoh Estate. This document is well kept and constantly updated by the person in-charge.



Evidence of the G-Planter UPPCR Collection Form dated 12.05.2020 for 183pcs of 20L plastic pesticide containers, 85pcs of 4L metal drum and 3.5kg used PPEs but has yet reported to e-swis (as informed by Mr Fabian Lim Chin Wen (Assistant Manager).

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 The Waste Management Plan has been established on 02.01.2020 based on the following items;

1. Clinical waste – syringe, needle, swab
2. Batteries
3. Lubricant containers – plastic
4. Lubricant containers – metal
5. Fertilizer bags
6. Spent lubricants/ oil filter
7. Chemical containers – plastic
8. Chemical containers – metal
9. Used PPE – apron, respirator, nitrile glove
10. Domestic waste

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

Indicator 3 The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.

Summary Charming Green Sdn Bhd and Heah Seok Yeong Realty Sdn Bhd has established Standard Operating Procedure No. 13.0 on Pre-mix and Chemical Handling dated 01.01.2013, revised and approved by Estate Manager on 02.01.2019 with the purpose to ensure chemicals are mixed and ready to be used and all chemicals are handled in a proper way.

Estate has also maintained record of Monitoring Pesticide Usage for a period of 2020 i.e. Chemical Store Record includes;

1. Monocrotophos
2. Glyphosate
3. Contest (Cypermethrin)
4. Rat bait
5. Amine
6. Garlon
7. Activator
8. Metsulfuron methyl
9. Aluminium sulphate

10. Soda Ash
11. Mitac

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 The establishment of Standard Operating Procedure No. 13.0 on Pre-mix and Chemical Handling dated 01.01.2013, revised and approved by Estate Manager on 02.01.2019 is to ensure chemicals are mixed at designated area with access to clean water and appropriate tools for measuring.

After mixing the chemicals,

1. All tools, measuring cups, measuring jugs, containers, and chemical drums are washed thoroughly.
2. All tools, measuring cups, measuring jugs and containers are dried and kept at designated area.
3. Grey water from the sump is recycled into empty jerry cans/premix drums for next premix session.
4. The mixing area is kept clean by washing
5. All PPEs are rinsed and hang to dry before keeping into designated area.
6. Empty chemicals containers are punctured and triple rinsed to render as neutral/safe before sending to SW store.

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 Charming Green Sdn Bhd and Heah Seok Yeong Realty Sdn Bhd had established SOP 15.0, Title: Waste Management dated 01.01.2013, revised and approved by Estate Manager on 02.01.2019 with the objective to ensure waste materials are handled and store accordingly.

Domestic waste for linesite area is well managed and recorded by the estate. All domestic wastes are disposed 4 times a month at landfill located at the following area;

1. Block 6C (2km from linesite) of K'lapa Bali Estate
2. Block 31 (3km from line site) of Sungei Chinoh Estate.

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

Criterion 4 Reduction of pollution and emission including greenhouse gas

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

Summary The estate has implemented its GHG Calculator to calculate the total emission from FFB production in 2019.

Estate	Planted Ha	FFB (MT)	tCO ₂	tCO ₂ /mt FFB
K'lapa Bali	1,716	22,822.80	7,803.12	0.342
Sungei Chinoh	1,072	17,205.60	3,454.88	0.201

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

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

Summary The Environmental Action Plan for 2020 with the objective to reduce significant pollutant and emission was incorporated in Environmental Risk Assessment (ERA) for all its' activities have been established in both estates. Document in K'lapa Bali Estate prepared by Mr. Fabian Lim Chin Wen (Assistant Manager), approved by Estate Manager on 15.01.2020 includes the sample below;

1. Work Activity: Application of pesticides
2. Environmental Impacts: Potential soil and water contamination from pesticides and disposal of used pesticide containers
3. Environmental Impact Assessment: 18 (Low)
4. Mitigation measures: Washing from spraying equipment should not be discharge into drains, no form of P & D should take place at drain edges, drains, or riparian zone to prevent contamination of natural water ways, schedule waste on disposal of used pesticide containers by triple rinsing and punctured to render it natural and safe.

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

Criterion 5 Natural water resources

Indicator 1 The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:

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

f) Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.

Summary

Water management plan has been established in both estates. K'lapa Bali Estate has identified its water source from:

1. River water (Sg Telau)
2. Surface water
3. Local Authority
4. Rain water

The estate has established map of location points of taking water samples from river – Sg Telau, upstream and downstream. The water sampling taken at designated points (incoming & outgoing) has been analyzed by Kuala Lumpur Kepong Berhad, Kota Damansara, Petaling Jaya. The Certificate of Analysis for incoming and outgoing water samples from sampling points of KBE 1A and KBE 1B. The result that was reported on 06.02.2020 indicated the following;

Parameter	KBE 1A (in coming)	KBE 1B (out going)
Dissolved Oxygen (% Sat)	83	81
pH	7.2	7.2
COD (mg/L)	33	32
BOD (5days @ 20°C) (mg/L)	9	7
NH ₃ -N, ppm	2	3
Suspended Solid, ppm	32	22
WQI	71	71
Class	III	III
Remarks	Slightly Polluted	Slightly Polluted

The Certificate of Analysis from Jabatan Kesihatan Malaysia for raw and treated water samples taken on 12.02.2020;

Parameter	Water Intake Point (River)	Water at Treatment Tank	Water at Labour line
Turbidity (NTU)	31.7	4.10	4.11
pH	8.78	8.54	8.51
Chlorine	0	0.40	0.41

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

Indicator 2 No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.

Summary As per interview with Mr. Fabian Lim Chin Wen (Assistant Manager), no bunds or dams being constructed across the river of Sg Telau (passing through K'lapa Bali Estate).

No river passing through the Sungei Chinoh estate.

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

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

Summary Based on interview with Mr. Fabian Lim Chin Wen (Assistant Manager), there were road side drains constructed along the main road and also silt pit at hilly area (Block 5B,5C and 8D).

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

Criterion 6 Status of rare, threatened, or endangered species and high biodiversity value area

Indicator 1 Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:

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

Summary The Biodiversity Report resulted from the survey conducted by K'lapa Bali Estate dated 10.04.2019 which was carried out by 17 respondents using "Borang Soal Selidik – Senarai Semak Pemantauan Fauna". The survey resulted the following fauna and flora observed by the assessor from Perhilitan Daerah Tapah;

1. Fauna – wild boar, oriental pied hornbill, common kingfisher, peregrine falcon, red jungle fowl, monitor lizard, little egret, python, long-tailed macaque.
2. Flora – Brazil nut, Pokok Ara sungai, Betel nut palm.

In Sungei Chinoh Estate, the report, verified by the Estate manager on 09.04.2019, resulted from the survey conducted by the estate dated 27 & 28.03.2019 which was carried out by 8 respondents

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 In K'lapa Bali Estate, HCV evaluation plan has been established for planted area along the jungle boundary (Gunung Besout) and along the Sg Telau buffer zones even though no RTEs being identified during the survey processes.

Interviews with the workers indicated that they could demonstrate a good understanding towards the environment issues. They are aware that they are not allowed to hunt or poaching the wild animals in the estate compound.

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

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

Summary The estate has established Biodiversity Management Plan – K'lapa Bali and Sungei Chinoh Estates (2019 – 2024) for 3 hot spots identified by the estate as stated in the Biodiversity report.

1. Immediate Action Plan
 - a. To mark out the river inlet and outlet point in map -done 02.04.2019
 - b. To identify buffer zone in map -done 04.04.2019
 - c. To educate workers & staffs on the important of riparian zone -done 03.03.2020
2. Medium Term Action Plan
 - a. To put up signage at river inlet & outlet point and mark physical for workers to identify the riparian.
 - b. To notify authority on illegal activities affecting river riparian zone.
 - c. Put up signage for no hunting nearby forest boundary – done 04.04.2019
3. Long term action plan
 - a. Set up SOP on management of riparian zone – done 02.01.2019
 - b. Train workers on management of riparian zone like to no chemical spraying inside buffer zone – done 02.01.2019
 - c. To set up buffer zone between estate and forest reserve – done 04.04.2019

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 Charming Green Sdn Bhd Bhd and Heah Seok Yeong Sdn Bhd are committed towards implementing the following practices on environment:

1. Implement zero burning on all estate's practices.
2. The replanting technique deals with oil palms which have reached the end of their economic life, which are mechanically felled with excavators, shredded and pulverize in situ or left decomposed along planting rows.
3. No burning is to be carried out for its replanting technique. The zero burning technique replenishes soil organic matter, improves the physical properties of

the soil and enhances its fertility through the recycling of nutrients resulting in reduced use of chemical fertilizers.
Sighted signage on zero burning being erected by the estate at the strategic locations.

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

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

Summary Estate replanting programme for 2019-2023 based on SOP 2.0: Replanting. No significant risk of diseased palm was reported. No replanting programme for Sungei Chinoh Estate as the palm has not reach the end of its economic life.

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

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

Summary No controlled burning being sought by the estate.

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 Old standing palms are precision felled and the entire palm bole and root mass are uprooted.

The felled palm trunks and fronds are chipped and shredded to pieces about 3" thick, shredded and pulverized *in situ* or spread evenly over the entire planting row.

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 Both estates have implemented Good Agriculture Practice (GAP) as seen from visit to the estate and seen from the document and also interviewing the workers.
Estate have 2 types of Manuals-
Standard Operating Procedures (21). As examples:

- Nursery Operations
- Replanting
- Upkeep Mature/Immature Oil Palm

- Roads & Paths
- Upkeep Drains
- Boundaries
- Oil Palm Pest Management
- Manuring Immature and Mature Oil Palm
- Harvesting and Collection
- Loading/Transporting FFB
- Upkeep Office/Linesite/Housing

Safe Operating Procedures (17). As examples:

- Chemical Store
- Trunk Injection Against Bagworm/Nettle Caterpillar
- Shoot Drenching Against Rhinoceros Beetle
- Rat Baiting
- Termite (White Ant) Treatment.
- Leaf Pest Foliar Spraying
- Strip Spraying
- Spot Spraying
- Manual Manuring Application
- Raw Water Treatment

Regular inspection and supervision are conducted by Mandore, Supervisor, Executives as well as HQ Department. The monitoring of implementation is being done through internal audit by the HQ team as per internal audit report dated 17 & 18th February 2020.

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 The Company has established the Standard Operating Procedure 2.0; Replanting. Date revised on 02nd Jan 2019. It is stated that, where the terrain ranges from rolling – hilly to steep with gradient from 6 degrees to 20 degrees, terrace should be constructed at an average horizontal interval of 7.9 meters.”.

During site visit conducted to the field, there are no steep terrace (>25°) in K’lapa Bali estate. Sg. Chinoh Estate has abandoned an area of 10 ha in block 15B due to steep terrain area >20° slope. Sighted letter approved by Mr. Lim Guan Aik, the Director.

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

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

Summary Both estates have a visual reference system to identify each field or block. Each field has the signboard with block number, year of planting, material & hectare only. As evidence in Sungei Chinoh Estate:

- Block: 23
- Ha: 33
- Year of Planting: 2016
- Clone: Felda Yangambi

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 Both estates had an annual budget for the financial year 2020-2022. The estate budget includes the projected FFB, OER, PK and etc production which projected for three years from 2020 until 2022.

It also incorporated item such as general charges, estate maintenance, general services, fixed assets, etc. Sighted documented Business and Management Plan prepared by Mr. Tan Lay Guan (Estate Manager). Example data sighted for K'lapa Bali Estate:

YEAR	2020	2021	2022
Area Ha	1849	1690	1901
Crop MT	32000	30000	31000
CPO RM/MT	2300	2300	2300
Cost of production	271	260	260
FFB price/MT	450	450	450

For Sungei Chinoh Estate:

YEAR	2020	2021	2022
Area Ha	1170	1083	1083
Crop MT	22000	22000	21000
CPO RM/MT	2500	2500	2600
Cost of production	300	300	320
FFB price/MT	500	500	520

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 Annual Replanting program has been established by the management from year 2019 to 2024. For year 2020, there is a program for block 3B (85 Ha) but was postponed due to spreading of Pandemic COVID 19 and Control Movement Order by the government. These has resulted of no new workers recruitment can be done by the estate. For year 2021 until 2024, the estate has planned replanting program totaling of 588 hectares.

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 Both estates had an annual budget for the financial year 2020-2022. The estate budget includes the projected FFB, OER, PK and etc production which projected for three years from 2020 until 2022.

It also incorporated item such as general charges, estate maintenance, general services, fixed assets, etc. Sighted documented Business and Management Plan prepared by Mr. Tan Lay Guan (Estate Manager). Example data sighted for K'lapa Bali Estate:

YEAR	2020	2021	2022
Area Ha	1849	1690	1901
Crop MT	32000	30000	31000
CPO RM/MT	2300	2300	2300
Cost of production	271	260	260
FFB price/MT	450	450	450

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 HQ is monitoring estate expenditure as per monthly progress report sighted during the audit (Revenue Expenditure). Details in the report includes data such as Budget for the year, Actual cost, Budget cost and the variances.

Sighted monthly progress report on Ladang Sg. Chinoh for May 2020. The report has included all details of estate expenditures such as for harvesting, Upkeep of mature areas, crop production, rainfall record and workers' strength.

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

Criterion 3 Transparent and fair price dealing

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

Summary The pricing mechanisms for products and services is decided by the management team before negotiation done with the buyers/contractor/suppliers. The company will make an announcement for tender for other services like FFB transportation, replanting and hiring excavator.

Sighted the contract agreement between (Charming Green Sdn Bhd) K'lapa Bali Estate with Tang Man Kong Lorry Transport Sdn Bhd (FFB Transport). The contract shall remain in force for 2 Years (as per clause 2 of per the Agreement) commencing from 1st January 2019 until 31st December 2021. Stamp Duty of this Agreement was made on 19.04.2019. Agreed Rate of Payment as stated in SECOND SCHEDULE of the Agreement. The rate of transporting of FFB is based on the weight of mill weighbridge and the rate is based on diesel range.

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

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

Summary All contracts are kept in both estates' office. As evidence in K'lapa Bali Estate, sighted the Contract Agreement between estate with Tang Man Kong Lorry Transport Sdn Bhd (FFB Transport) sealed on 01.01.2019. Payment will be made within 30 days upon receiving the invoice from the contractor. Sighted Contract Journal Voucher dated 31.05.2020 addressed to Tang Man Kong Lorry Transport Sdn Bhd.

Contract Agreement between Sungei Chinoh estate with Tang Man Kong Lorry Transport Sdn Bhd (FFB Transport) sealed on 01.01.2019. Payment will be made within 30 days upon receiving the invoice from the contractor. Sighted invoice issued by the contractor (No. 00011427) dated 30.05.2020 for transporting FFB to Tg. Malim POM. The payment details are prepared by the estate office and later the HQ released the payment to the contractor. Sighted payment record made to this contractor on 05th June 2020.

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

Criterion 4 Contractor

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

Summary All the contractors are aware that estate will be certified under MSPO. Therefore, the contractor has been informed by estate management to follow the MSPO standard requirement. As evidence, sighted clause in contract agreement under First Schedule – Relating to Sustainability Certification.

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 both estates' office. As evidence in K'lapa Bali Estate, sighted the Contract Agreement between estate with Tang Man Kong Lorry Transport Sdn Bhd (FFB Transport) sealed on 01.01.2019. Payment will be paid 30 days after the estate received the invoice from contractors.

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 Both estates were audited by Global Gateway Certifications Sdn Bhd MSPO audited on 24th to 25th June 2020. Sighted audit plan dated 17th June 2020 which have been accepted address to Mr. Lim Ban Aik, (Director). All the auditors are qualified MSPO auditor. As per agreed, the company accept the GGC MSPO Auditors to verify through a physical inspection if required for audit purposed.

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

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

Summary Estate verified the work done by the contractors before all the payment paid to the contractors. Estate also inspect the contractor's workers. As per interviewed and also during site visit, the workers aware with OSH requirement. As example, the workers wear the PPE during the work task that given to them.

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

2.7 Principle 7 : Development of new planting

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

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

Summary Not applicable as no new planting in the 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.
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Summary Not applicable as no new planting in the 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 Not applicable as no new planting in the 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 Not applicable as no new planting in the 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.
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Summary Not applicable as no new planting in the 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.
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Summary Not applicable as no new planting in the 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.
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Summary Not applicable as no new planting in the 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 Not applicable as no new planting in the 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 Not applicable as no new planting in the 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 Not applicable as no new planting in the 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 Not applicable as no new planting in the 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 Not applicable as no new planting in the 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	Not applicable as no new planting in the estate.
	In Compliance <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Indicator 2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.
Summary	Not applicable as no new planting in the estate.
	In Compliance <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Indicator 3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available.
Summary	Not applicable as no new planting in the estate.
	In Compliance <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Indicator 4	The owner of recognized customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.
Summary	Not applicable as no new planting in the estate.
	In Compliance <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Indicator 5	Identification and assessment of legal and recognised customary rights shall be documented.
Summary	Not applicable as no new planting in the estate.
	In Compliance <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Indicator 6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.
Summary	Not applicable as no new planting in the estate.

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

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

Summary Not applicable as no new planting in the estate.

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

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

Summary Not applicable as no new planting in the estate.

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

2.8 Details of Audit Findings

Details Non-Conformity

- See Appendix B -

Details of Area of Concern

- See Appendix B -

Details of Noteworthy / Positive Findings

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

Appendix A: Audit Plan

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
23 rd June 2020	TBA	➤ Travelling to Slim River, Perak.	MFB	SP ABS
24 th June 2020	08:00 – 09:00	➤ Centralize Opening Meeting at K'lapa Bali Estate: <ul style="list-style-type: none"> Presentation by the manager/coordinator Presentation by Lead Auditor. ➤ Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable).	MFB	SP ABS
	09:00 – 13:00	K'lapa Bali Estate <ul style="list-style-type: none"> ➤ Document Audit: <ul style="list-style-type: none"> Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MFB	SP ABS
		<ul style="list-style-type: none"> ➤ Field Inspection / Interview: <ul style="list-style-type: none"> Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MFB	SP ABS
	13:00 – 14:00	➤ Lunch/Rest	MFB	SP ABS
	14:00 – 16:00	➤ Continue document audit: <ul style="list-style-type: none"> Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MFB	SP ABS
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 1.	MFB	SP ABS

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
25 th June 2020	08:00 – 13:00	Sungei Chinoh Estate <ul style="list-style-type: none"> ➤ Document Audit: <ul style="list-style-type: none"> Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, 	MFB	SP ABS



		FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.		
	10:30 – 12:30	<ul style="list-style-type: none"> ➤ Estate inspection: • Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MFB	SP ABS
	13:00 – 14:00	➤ Lunch/Rest	MFB	SP ABS
	14:00 – 15:30	<ul style="list-style-type: none"> ➤ Continue document review • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MFB	SP ABS
	15:30 – 16:00	➤ Verify any outstanding issues and auditor discussion	MFB	SP ABS
	16:00 – 17:00	<ul style="list-style-type: none"> ➤ Centralize Closing Meeting at Sungei Chinoh Estate: ➤ Chaired by the audit Lead Auditor • Welcome and introduction by the Lead Auditor • Presentation of findings by the audit team • Questions & answers and Final summary by Lead Auditor ➤ End of assessment 	MFB	SP ABS

Appendix B : Non-Conformity details

Non-Conformities Identified During This Audit	
Major Nonconformities:	No NC's was raised for this audit.
Minor Nonconformities:	No NC's was raised for this audit.

Appendix C: List of Stakeholders Contacted

Attendance List

Internal Stakeholders

- 1) Estate workers (Spraying gang)
- 2) Estate workers (Harvesting gang)
- 3) Office staff
- 4) Estate security personnel

External Stakeholders

- 1) FFB Transport contractor