

GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)






CERTIFICATION AUDIT REPORT

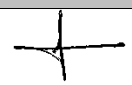
Part 3: General Principles for Oil Palm Plantations and Organized Smallholders

Riverview Rubber Estates Berhad

-Group Certification-

ANNUAL SURVEILLANCE AUDIT 1 8th - 10th September 2020

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	24/09/20	Issued as Draft Report	Surenthiran Panneerselvam	Lead Auditor	
A	09/10/20	Issued as Draft Report	Surenthiran Panneerselvam	Lead Auditor	
A	20/10/20	Incorporated certifier comments	Surenthiran Panneerselvam	Lead Auditor	
B	20/10/20	Issued as Final Report	Surenthiran Panneerselvam	Lead Auditor	
B	22/10/20	Final Report Approved	Muhd Jamalul Arif	Certifier	

Acknowledgment by Riverview Rubber Estates Berhad					
Rev	Date	Description	Management Representative	Role	Signature
B	23/10/2020	Acceptance of the contents	Mr M. Sures Naidu	General Manager	

Declaration

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

WITH INTEGRITY WE SERVE



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

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

Global Gateway Certifications Sdn. Bhd. [hereafter known as GGC] has conducted the Certification Assessment of Riverview Rubber Estates Berhad. During this Annual Surveillance Audit 1 (ASA 1), the audit team were briefed by estate management on the estate background, supply base disposition and safety briefing during the opening meeting. The estate consists of seek for group certification, whereby the estates consists of Teja Estate, Chendrong Estate, Sadong Estate, Buloh Akar 1 Estate, Buloh Akar 2 Estate, Hibernia Estate, Narborough Estate and C.G Plantations Sdn Bhd. This assessment was conducted onsite on 8 - 10 September 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	Riverview Rubber Estates Berhad,
Business Address	31800 Tanjung Tualang, Perak, Malaysia.
Contact Person	Mr. Jasmeet Singh A/L Ravinder Singh
Office Telephone	05-3609201
E-Mail	sures_naidu@riverview.com.my

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.	Teja Estate	Riverview Rubber Estate, 31800 Tanjung Tualang, Perak	101.064494	4.353694
2.	Chendrong Estate	Chenderong Estate, 31800 Tanjung Tualang, Perak	101.043375	4.417194
3.	Sadong Estate	Sadong Estate, 32800, Parit, Perak	100.934203	4.483767



4.	Buloh Akar 1 Estate	Buloh Akar 1 Estate, 32800, Parit, Perak	100.933323	4.501508
5.	Buloh Akar 2 Estate	Buloh Akar 2 Estate, 32800, Parit, Perak	100.942816	4.495823
6.	Hibernia Estate	Hibernia Estate, 34120, Selama Perak	100.6984869	5.1315613
7.	Narborough Estate	35600, Sungkai Perak	101.32116	4.00926
8.	C.G Plantations Sdn Bhd	Riverview Rubber Estate, 31800 Tanjung Tualang, Perak	101.0226741	4.357056

MPOB License Information

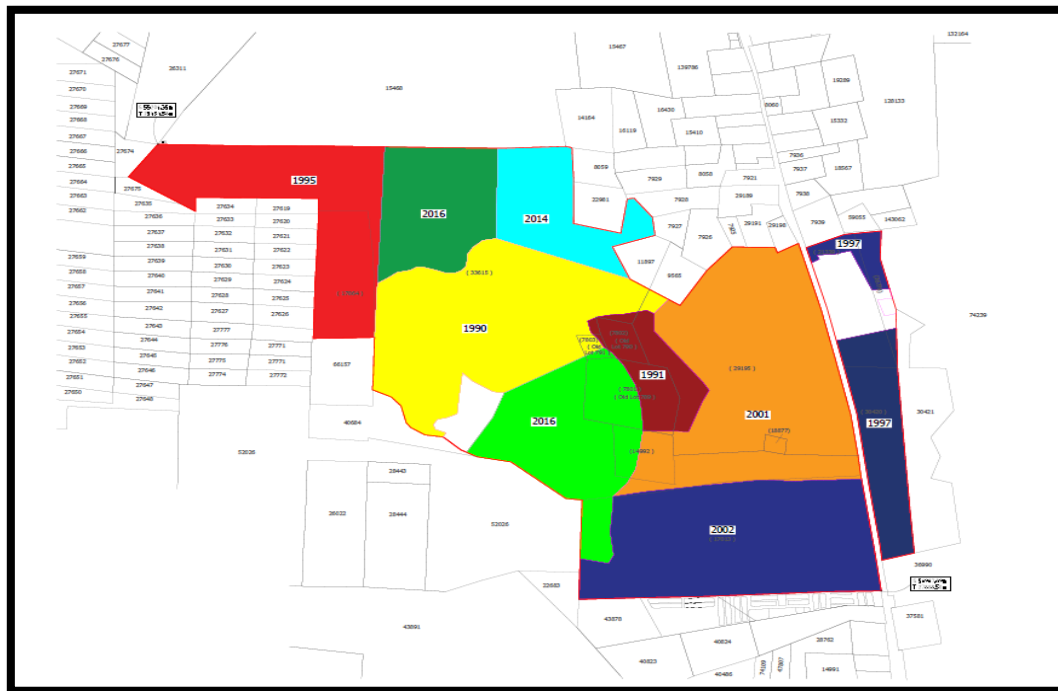
No	Name of the site	License Number	Expiry Date	Scope Activity
1	Teja Estate	501995102000	28.02.2021	Menjual dan Mengalih FFB
2	Chendrong Estate	501995102000	28.02.2021	Menjual dan Mengalih FFB
3	Sadong Estate	501996902000	28.02.2021	Menjual dan Mengalih FFB
4	Buloh Akar 1 Estate	501996902000	28.02.2021	Menjual dan Mengalih FFB
5	Buloh Akar 2 Estate	501996902000	28.02.2021	Menjual dan Mengalih FFB
6	Hibernia Estate	501642102000 619362011000	31.10.2021 30.06.2021	Menjual dan Mengalih FFB Menghasilkan SLGBIJI# & Menyimpan SLGBIJI#
7	Narborough Estate	502030402000	31.07.2021	Menjual dan Mengalih FFB
8	C.G Plantations Sdn Bhd	504458102000	31.05.2021	Menjual dan Mengalih FFB

Others Sustainability Certification

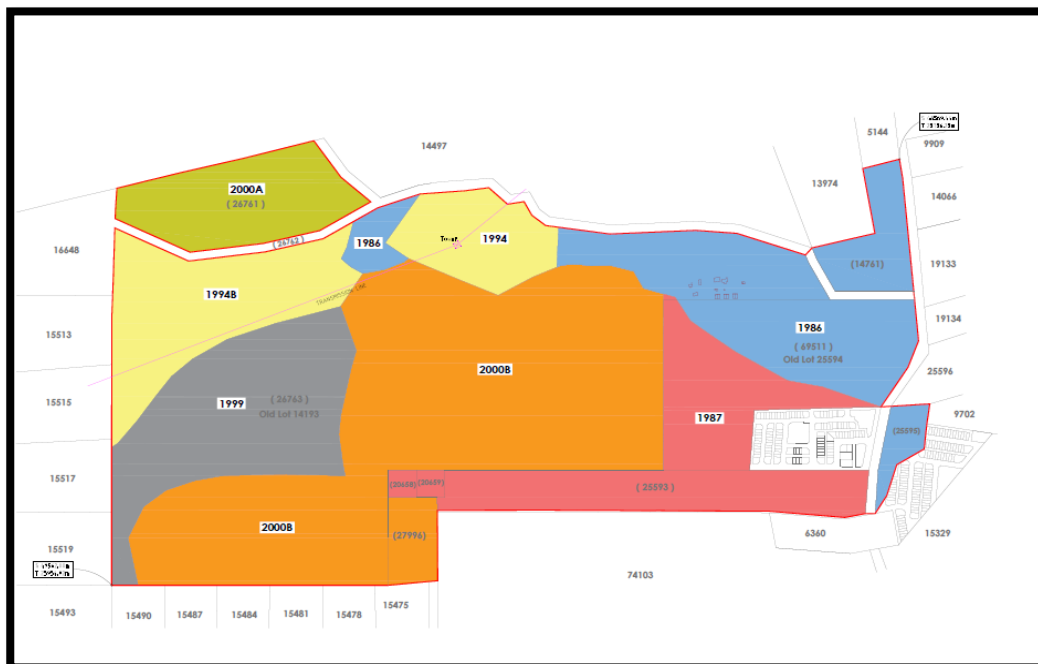
No	Name Of The Site	Others Sustainability Certifications
1	Teja Estate	NIL
2	Chendrong Estate	
3	Sadong Estate	
4	Buloh Akar 1 Estate	
5	Buloh Akar 2 Estate	
6	Hibernia Estate	
7	Narborough Estate	
8	C.G Plantations Sdn Bhd	

1.4 Map Showing Geographical Location

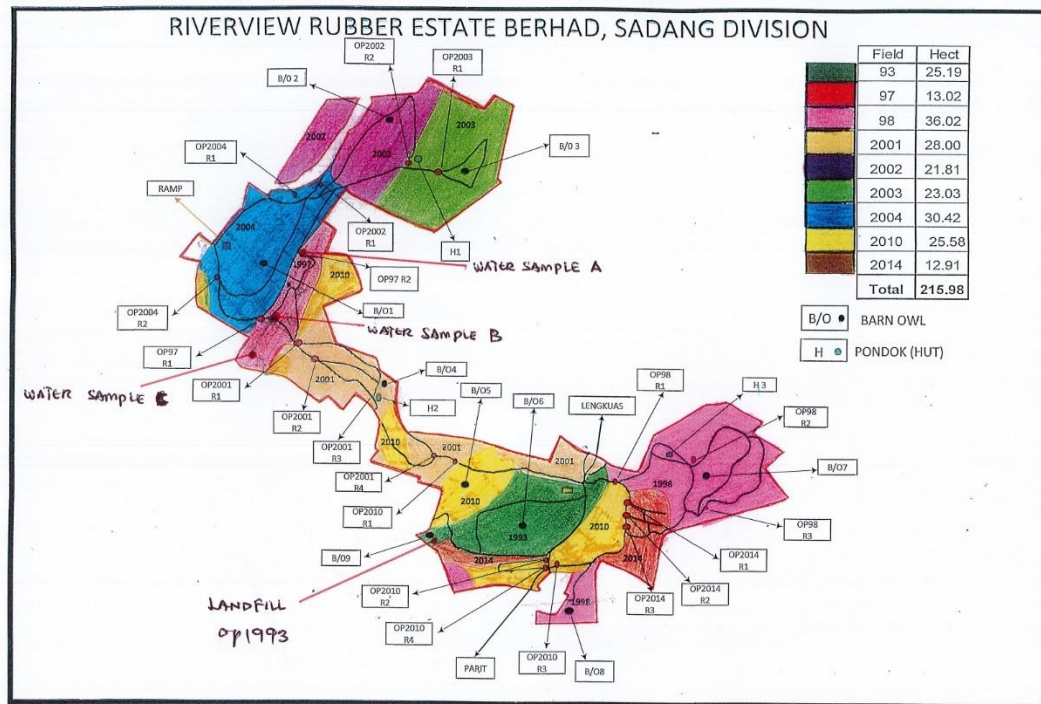
Teja Estate



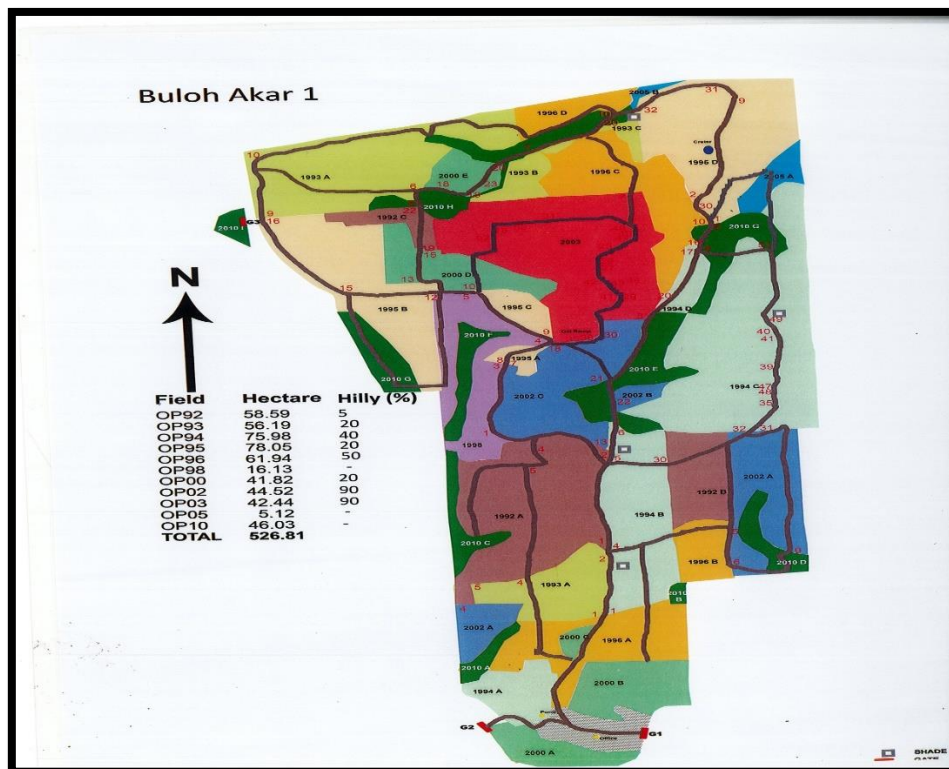
Chendrong Estate



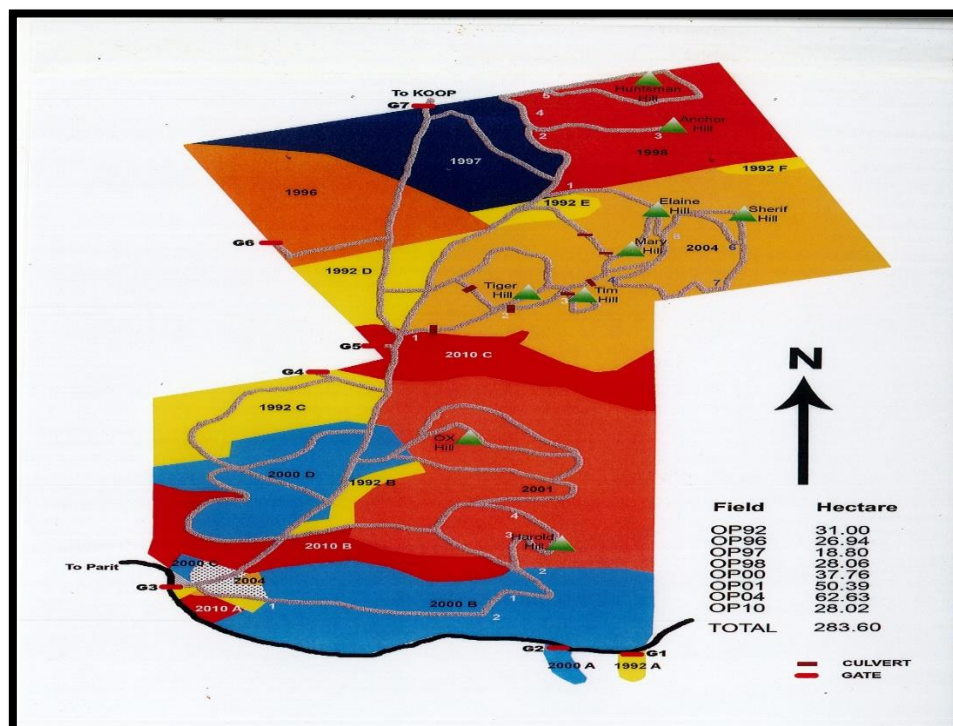
Sadong Estate



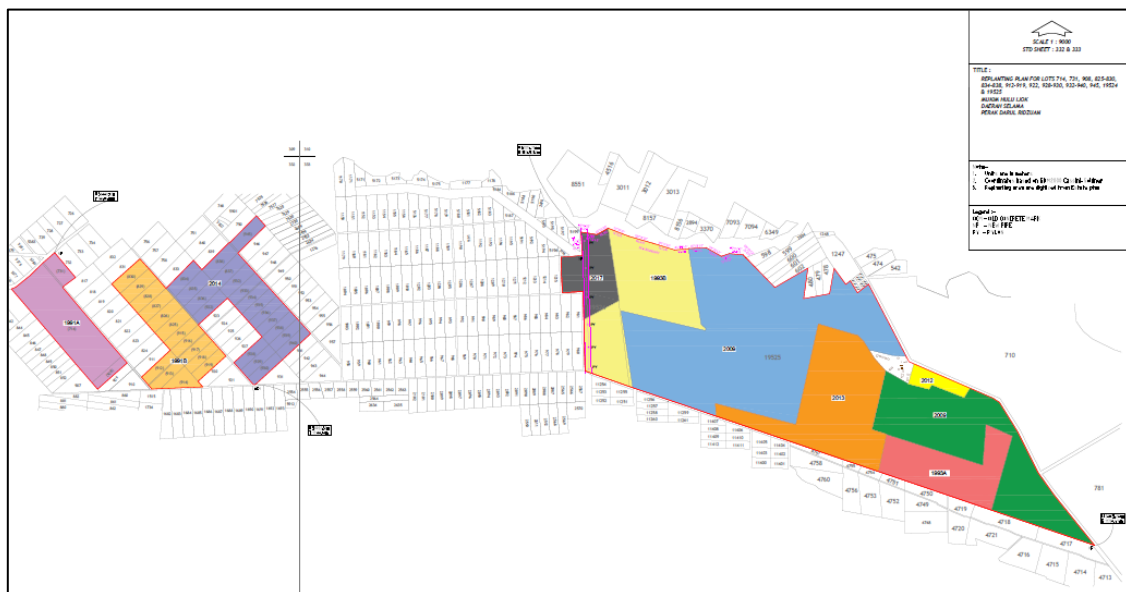
Buloh Akar 1 Estate

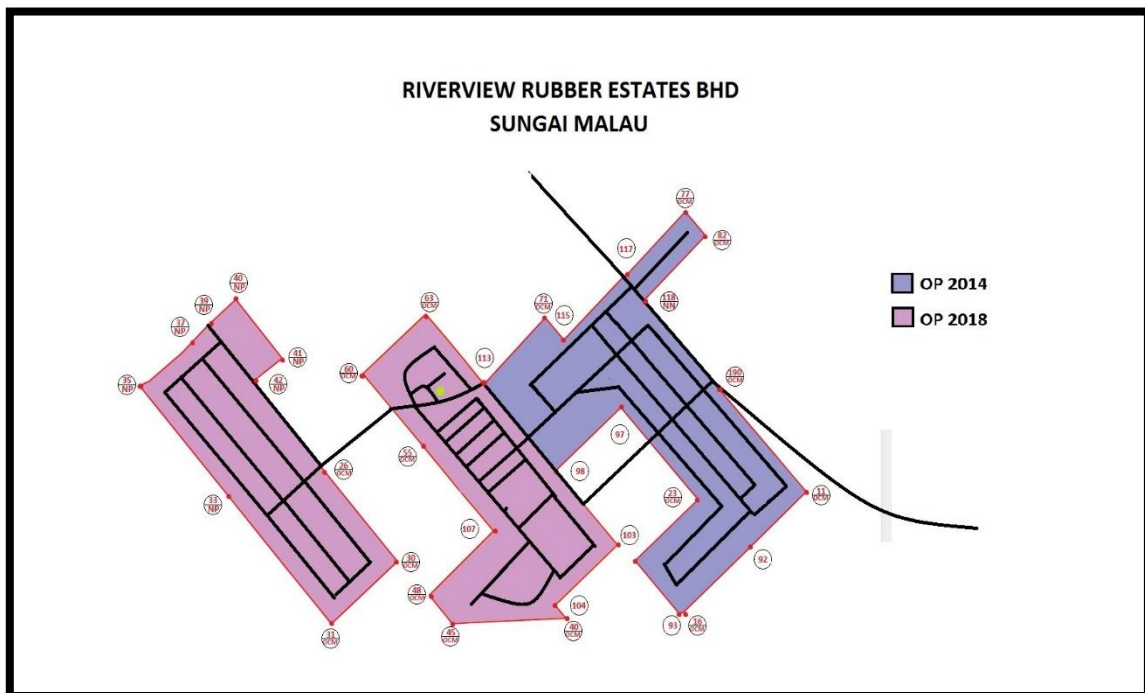
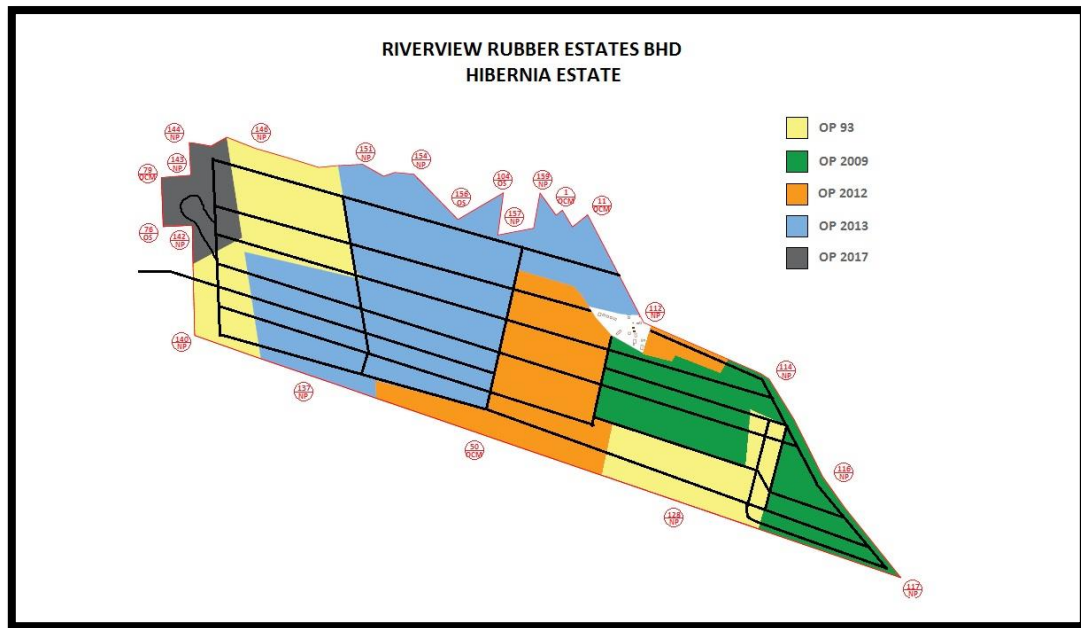


Buloh Akar 2 Estate

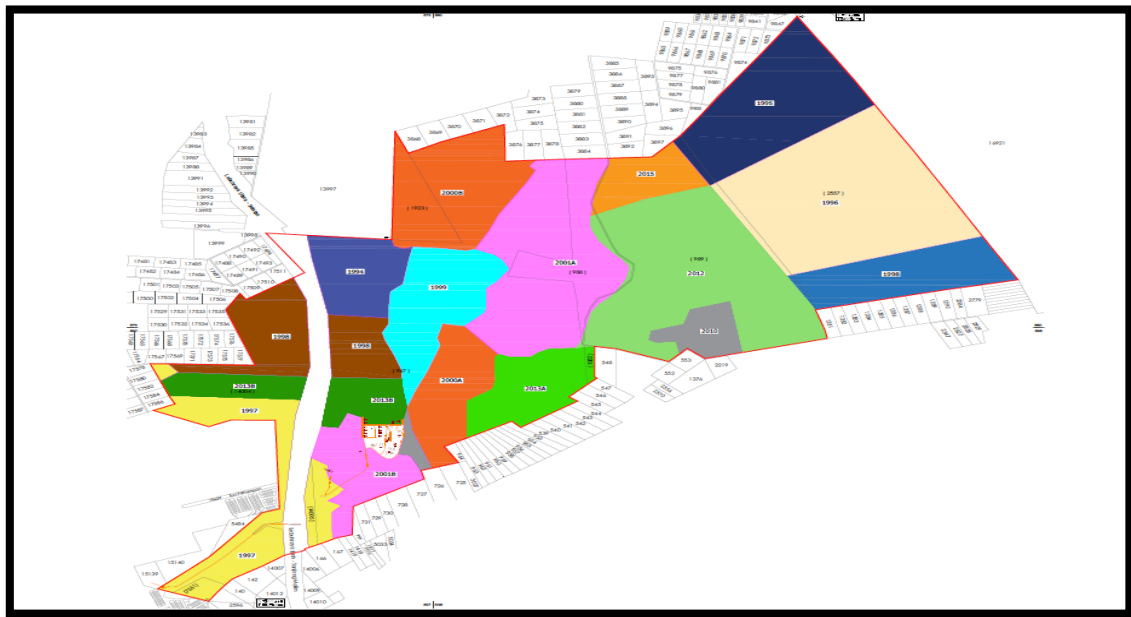


Hibernia Estate

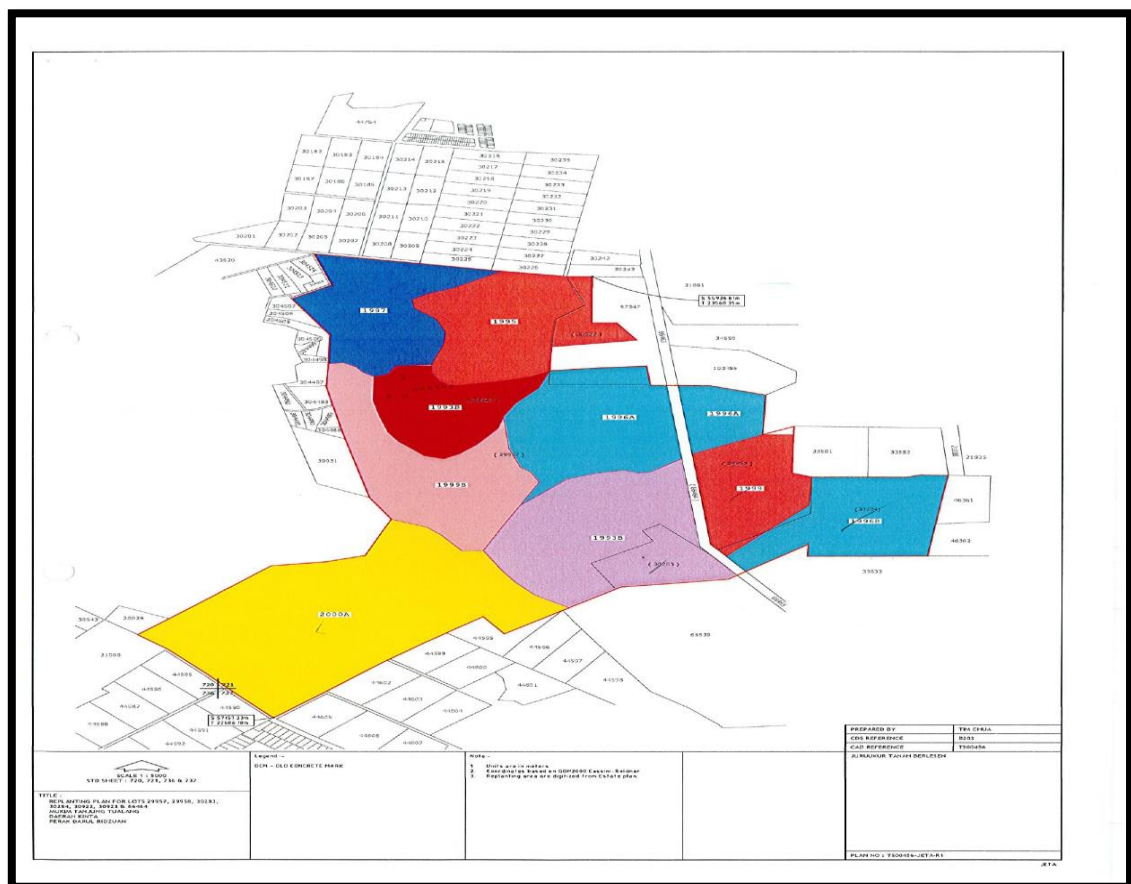




Narborough Estate



C. G Plantations 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
Teja Estate	249.07	239.45	239.45
Chendrong Estate	141.31	131.97	131.97
Sadong Estate	219.4363	215.98	215.98
Buloh Akar 1 Estate	537.0972	526.81	526.81
Buloh Akar 2 Estate	285.4672	283.60	283.60
Hibernia Estate	372.6699	364.89	305.47
Narborough Estate	572.56	552.20	552.20
C.G Plantations Sdn Bhd	225.74	225.38	225.38
Total	2,603.3506	2,540.28	2,480.86

Note: Total certified area as per land title defer from the prior year, as prior year totalled 2,603.3506 Ha (2019) and 2,604.7644 Ha (2020). The differences of 1.4138 Ha was due to seeking clarification with land office. The estate has also submitted to seek clarification to land office on the land area difference appear in the grant and the quit rent statement.

Name Of The Supply Base	Area Summary (HA)		
	Conservation Area	HCV	Others
Teja Estate	0	0	9.62
Chendrong Estate	0	0	9.34
Sadong Estate	0	0	3.4563
Buloh Akar 1 Estate	0	0	10.2872
Buloh Akar 2 Estate	0	0	1.8672
Hibernia Estate	0	0	7.7799
Narborough Estate	0	0	20.36
C.G Plantations Sdn Bhd	0	0	0.36
Total	Nil	Nil	63.0706

Name of the Certification Unit	FFB Summary (MT)		
	Projected from last audit [July 2019 - August 2020]	Actual Production for 12 Months [July 2019 - August 2020]	Projected Production for next 12 Months [July 2020 - August 2021]
Teja Estate	4,310.10	7,907.74	5,530.00
Chendrong Estate	2,401.854	4,567.61	4,320.00
Sadong Estate	3,930.836	6,176.38	5,080.00
Buloh Akar 1 Estate	9,640.623	13,992.41	13,550.00
Buloh Akar 2 Estate	5,104.80	7,075.13	6,770.00
Hibernia Estate	6,604.509	9,735.13	7,100.00
Narborough Estate	9,939.60	16,687.04	12,860.00
C.G Plantations Sdn Bhd	4,056.84	7,278.94	5,860.00
Total	45,989.162	73,509.80	61,070.00



Note: The company has achieved higher crop production comparing with the projected from last audit was due to receiving good amount of crop that period of time as the trend was high. The young palms contributed more bunches.

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-RREB001-MSPO-00-2019
Initial certificate issued date	11 th November 2019
Certificate expiry date	10 th November 2024
Stage 1 assessment date	16 th August 2019
Stage 2 / Main Assessment	23 rd September 2019
Annual Surveillance 1 [ASA 1]	8 th – 10 th September 2020
Annual Surveillance 2 [ASA 2]	Sep 2021
Annual Surveillance 3 [ASA 3]	Sep 2022
Annual Surveillance 4 [ASA 4]	Sep 2023

1.7 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: Surenthiran Panneerselvam

Graduate in PgDip/MSc Oil and Gas Accounting from University of Abertay Dundee, Scotland, UK. Equipped with experience in sustainability audit field and with more than 7 years working experience. Involved in MSPO Assessment since 2017. Fully trained in Malaysian Sustainable Palm Oil (MSPO2530), Roundtable Sustainable Palm Oil (RSPO), ISO9001:2015 and ISO37001:2016. Completed and certified MSPO auditor course in year 2018 held by SGS Academy and ISO9001:2015 auditor course in year 2017 by TOMC. Able to communicate in both English and Bahasa Malaysia (written and spoken). During this assessment, he assessed on the aspect of policies and procedures, best practices and stakeholder's consultation. Able to speak and understand Bahasa Malaysia and English.

Auditor

Name: Md Jefri Bin Sharaai

Bachelor Degree in Chemical Engineering and Master Degree (Science) in Quality & Productivity. Total of 25 years working experiences in various industries and disciplines; manufacturing, production, quality, internal audit, research & development, oil & gas design engineering. Involved in auditing, developing, implementing and maintaining of ISO 9001, ISO 14001 and OHSAS 18001. Having years of auditing experiences in Roundtable on Sustainable Palm Oil (RSPO) and Malaysian Sustainable Palm Oil (MSPO) sustainable programme. Member of GGC MSPO audit team. Able to speak and understand Bahasa Malaysia and English. During this assessment, he assessed on the aspect of policies and procedures, legal requirements, environmental aspects and stakeholder's consultation. Able to speak and understand Bahasa Malaysia and English.

Auditor

Name: Nurulashida Mohd Saad

Graduated in Conservation and Management of Biodiversity with working in 'Sustainability Department for more than 12 years which involves in certification and compliance affairs. Fully trained in agriculture certification programme such as RSPO, MSPO, SCCS, Biodiversity /HCV, ISCC, ISO, and etc. Certified as Lead Auditor/ Auditor for RSPO and MSPO Certification. Able to communicate in Malay and English. During this assessment, he assessed on the aspect of policies and procedures, legal requirements, safety and health, employment condition, social and community engagements, stakeholder's consultation and workers welfare. Able to speak and understand Bahasa Malaysia and English.

1.8 Audit Methodology

The audit was conducted based on the method as specified in the MSPO requirements (MSPO-Questionnaire Self-Assessment – RA). In the case of this certification unit, sampling calculation was determined prior to the audit assessment. Therefore, sampling calculation was applied for this unit of certification. Riverview Rubber Estate Berhad has in total of 8 estates, and CB has sampled and visited 3 estates namely Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate. During audit, company policies, management system procedures, waste management procedures, legal documents, safety procedures and others. Issues that would significantly impact to environmental, safety, social and legal requirements were also verified. The main approach of the audit, was to treat the palm oil estates referred as MSPO Certification Unit [Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate]. Collection of objective evidence was completed during physical site inspection, observation of tasks and processes, interview of stakeholders, interview of officers, review of documents and data. Audit team were grouped and covered the palm oil estate operations, agricultural practices, pest management, pesticide and fertilizer application, occupational safety and health, environmental and other requirements.

Audit team conducts the stakeholder's interview randomly involving internal and external stakeholders during the audit. Stakeholders were interviewed with the absence of estate management. Feedback obtained as part of information and evidence gathered. Audit checklists and questionnaires were used to guide the collection of information and the comments made by external stakeholders. Stakeholders comments were also been taken into consideration in this assessment. Refer to 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, refer to (Appendix C) of MSPO.

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.

1.9 Audit Plan Information

Audit Date	8 th – 10 th September 2020
Name of site(s) visited	Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate
Total number of man-days spent	9 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	5	CAP accepted, Open. To be verify next surveillance audit.
Area of Concern	0	No action requires
Noteworthy /Positive Comments	4	No action requires

1.11 Stakeholder Consultation

As per ACB-Malaysian Sustainable Palm Oil (MSPO); ACB-OPMC4; Issue 2, 4th September 2020; Stakeholder Consultation Requirements for Certification Bodies Operating Oil Palm Management Certification Under Malaysian Sustainable Palm Oil (MSPO) Certification Scheme. The stakeholder consultation shall be carried out in stage 2 audit and recertification audit cycle of the management unit. During this Annual Surveillance Audit 1, the audit team has conducted stakeholder consultations involving both internal and external stakeholders randomly 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.

The aim of stakeholder consultation is to ensure that the MSPO requirements are continuously implemented and adhere to, as well as others aspects that they considered could be improved. However, in surveillance audit, the consultation may be limited to those stakeholders who have raised concerns, complaints or disputes prior to the audit. The auditor begin consultation with brief explained on the purpose of the audit, interviewed and record comments made by the stakeholders. All comments made by the stakeholders are recorded. The comments were verified with the estate management before incorporating into the assessment findings. The details are as per table below,

No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken. [What we did]	Assessment team findings [Outcome]
1.	Stakeholders A (Spraying gang)	<ul style="list-style-type: none"> Workers aware the chemical handling procedure. PPE were equipped during spraying activity. Good relationship with the Management and the Estate will render their assistance when required. No sexual harassment and violence case reported at workplace. Due to COVID-19 – MCO period, all SOP's were followed and social distancing were maintained. 	<p>Estate management provides free PPE to the workers.</p> <p>Adequate training was provided, related to the respective activity.</p>	Positive findings
2.	Stakeholders B (Estate workers – Harvesting Gang)	<ul style="list-style-type: none"> Workers aware PPE usage are very important to avoid accidents. Workers have good understanding about MSPO. Attended training provided by company. Aware of complaint and grievance mechanism. 	Adequate SOP training were provided.	Positive findings
3.	Stakeholders C (Contractor)	<ul style="list-style-type: none"> Contractors were invited to stakeholder meeting, and estate management briefed on the importance of MSPO. 	No action requires	Positive findings

		<ul style="list-style-type: none"> • They informed that the payments were made promptly without any delay. • Contract agreement were signed prior commencement of work. 		
4.	Stakeholder D (FFB Transporter)	<ul style="list-style-type: none"> • Contract agreement were signed prior commencement of work. • Due to COVID-19 – MCO period, all SOP's were followed and social distancing were maintained. Prior entering the estate, temperature reading been taken by the security. • Contractors were invited to stakeholder meeting, and estate management briefed on the importance of MSPO. 	No action requires	Positive findings

1.12 Recommendation

Riverview Rubber Estates Berhad 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. Estate Manager being the person responsible to ensure facility and his subordinates comply to the requirements and procedures stated in this manual. Management commitment \as demonstrated, as the estate management provide awareness training to all personnel in the company. The awareness training given enhance the employees understanding on the procedures and implementation of the MSPO standard. During interview session, the employees are aware of the requirements of MSPO. There was no complaint or feedback received during this Annual Surveillance Audit 1.

This report will be internally reviewed prior to certification decision by GGC. During annual surveillance audit, externally peer review by independents panel reviewers (qualified and trained by MPOCC) are not required. The audit was conducted in accordance to MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders. During this annual surveillance audit, zero non-conformities have been raised to the facilities that being audited. Audit objectives has been achieved as highlighted in the audit plan. The assessment resulted with no major non-conformity findings, therefore lead auditor recommends the continuity of certificate of "MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders" to Riverview Rubber Estates Berhad.

1.13 Date of Next Surveillance Audit

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

1.14 Confidentiality

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

1.15 Abbreviations Used

CHRA	Chemical Health & Risk Assessment
CB	Certification Body
CIP	Continuous Improvement Plan
CMCO	Conditional Movement Control Order
CoP	Code of Practise
CSPO	Certified Sustainable Palm Oil
DOE	Department of Environmental
DOSH	Department of Occupational Safety and Health Malaysia
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
FFB	Fresh Fruit Bunch
GAP	Good Agriculture Practise
GHG	Greenhouse Gas
GGC	Global Gateway Certifications Sdn Bhd
HIRARC	Hazard Identification, Risk Assessment and Risk Control
IPM	Integrated Pest Management
MPOB	Malaysian Palm Oil Board
MPOCC	Malaysian Palm Oil Certification Council
MSPO	Malaysian Sustainable Palm Oil
NCR	Non-Conformance Report
NGO	Non-Government Organization
OHS	Occupational Health & Safety
OHSAS	Occupational Health and Safety Assessment Series
POM	Palm Oil Mill
PPE	Personal Protective Equipment
RMCO	Recovery Movement Control Order
SEIA	Social Environmental Impact Assessment
SOCISO	Social Security Organisation
SOP	Standard Operating Procedure
SW	Schedule Waste

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 Riverview Rubber Estates Berhad has established its Malaysian Sustainable Palm Oil (MSPO) Policy Statement, signed by Dr. Leong Tat Thim, Director on 16th August 2019, outlining its commitment for MSPO implementation. During site visit, MSPO Policy and other sustainability related policy has been displayed on the notice board. Policy are available in both language English and Bahasa Malaysia. As stated in policy:

“Riverview shall adhere to the following key principles of MSPO to which the management shall provide leadership and commitment”:

1. Management commitment and responsibility
2. Transparency
3. Compliance to legal requirements
4. Social responsibility, health, safety, and employment condition
5. Environment, natural resources, biodiversity and ecosystem services
6. Best practices
7. Development of new plantings.

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

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

Summary As stated in the Malaysian Sustainable Palm Oil (MSPO) Policy Statement that Riverview shall also strive for the continual improvement by utilizing its resources and technology in a sustainable manner. Sighted MSPO Policy Statement dated 16th August 2019, signed by Dr. Leong Tat Thim, Director. Stated as below:

“Riverview shall also strive for the continual improvement by utilizing its resources and technology in a sustainable manner”.

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

Criterion 2 Internal audit

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

Summary Internal audit SOP 38: Internal Audit Procedure for Quality Management System under Riverview Group Standard Operating Procedure – Oil Palm Planting.; dated October 2018. Audit frequency shall be carried out once a year. Sighted internal audit notification for the year 2020 has been sent via email to all division by Mr. Jasmeet Singh. Email sent on 7th July 2020.

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 Internal audit SOP 38: Internal Audit Procedure for Quality Management System under Riverview Group Standard Operating Procedure – Oil Palm Planting.; dated October 2018. Audit frequency shall be carried out once a year. The procedure has elaborated on the process such as establish audit notification, performing audit, audit report, corrective action and closing NCR. In regards to corrective action, division should give response or action plan within 2 weeks. Internal audit report is documented evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action by the management.

Internal audit was conducted for Hibernia Estate on 23rd July 2020, Buloh Akar 2 on 29th July 2020 and Sadong Estate on 29th July 2020. All non-conformities are closed within timeframe provided by internal auditor. Sighted internal audit checklist and report which has identified weak points for improvement and positive findings. 5 non-conformities are being raised during internal audit. Seen Internal Audit Corrective Action Request form raised by internal auditor Mr Jasmeet Singh. Sighted the "Internal Audit Corrective Action Request" for CAR No. The corrective action has been made within the timeframe of 7 working days from the internal audit date.

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

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

Summary The internal audit findings were discussed in the latest management review meeting on MRM - 2020 conducted on 14th August 2020 at Tanjung Tualang Office via Zoom. All estates (8 estate) representatives were involved in the meeting. The meeting has discussed internal audit findings and status of corrective action taken on non-conformities identified during the internal audit. As recommended by the top management, suggested to form a task force for MSPO Internal Audit for year 2021. To improve understanding on MSPO requirement and promote cross sharing of information and knowledge.

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 on internal audit report was conducted on 14th August 2020 for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate. Among the issue discusses during the meeting such result and corrective action required from internal audit, sighted meeting minutes dated 14th August 2020. Among the issue been

discussed is MSPO finding in internal audit. The committee discussed and agreed to accept the recommendations by consultant. During the meeting, management has also discussed on the continual improvement activities on environmental, social, occupational safety and health, legal requirement register perspective.

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

Criterion 4	Continual improvement
Indicator 1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.

Summary Sighted the Continuous Improvement Plan 2020 focusing on Environmental, Social and Occupational Safety and Health was made available. Progress update on the continual improvement activities was made during the management review meeting. As sampled taken:

Environmental:

- Plant different type of beneficial plants to control bagworm attack and reduce the pesticide use (Status: Ongoing).
- Stop spraying operation in swamp area and rely on manual grass cutting. (Grass cutting done 2 weeks once and herbicide usage reduced).

Social

- Install solar lamp to save electricity use. (On going)
- Continuous expose and educate all the stakeholder about company & MSPO Policies. (On going)

Occupational Safety and Health

- Review HIRARC register annually (Feb-20)
- To monitor the PPE stock at month end (On going)

The continuous improvement plan are prepared by Mr Jasmeet Singh and approved by Mr. Sures Naidu dated on 14th August 2020 (Hibernia Estate). Continual Improvement Plan for the year 2020 were made available. Below is the item discussed during management review meeting dated 24th June 2019. Change terms of land use from dusun to kelapa sawit for 2 grants. Target to complete by December 2020 (Buloh Akar 2 Estate and Sadong Estate).

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
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Summary The estate obtains information on new techniques, new industry standards and technology through unit managers attending seminars, conferences and as well from newsletters from MPOB and from company's membership with ISP. Attended seminar

organized by MPOB. Planter book (magazine) from ISP, MAPA, NUPW. General manager is one of the ISP, MAPA, NUPW member. New information is evaluated by the estate management and where feasible for adoption will obtain approval from HQ based on cost impact to the company. Some of the new technique and technology been used by the estate such as, using solar lamp to save electricity, water harvesting technique used as rain water used for plant watering.

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 New information is evaluated by the estate management and where feasible for adoption will obtain approval from Operation Director based on cost impact to the company. However, there is no new technology introduced since last audit. According to the Estate Manager when new equipment or technology introduced the estate provides adequate training. As per interview with Assistant Manager, the estate management improvise manual process into mechanization such as mechanical cutter. The mechanization discontinued due inefficient result.

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 Riverview Rubber Estates Berhad has established a communication procedure as referred to SOP 37, Subject: Communication, dated October 2018. The procedure detailed out an outline for the arrangements on:

- i. Grievances and complaints
- ii. Request and Respond
- iii. Stakeholder Meeting and consultation

Internal stakeholder meeting conducted on 15.08.2019 as per minute sighted "Minit Mesyuarat Bersama Pihak Berkepentingan pertama". Sighted "Borang Aduan/Permintaan/ Rundingan" could be accessed by the stakeholders at the estate office. Records of the communications are made available at the time of audit. Latest meeting with the external stakeholders has been conducted on 24th August 2020 at Hibernia Estate office, 21st July 2020 (Buloh Akar 2 Estate and Sadong Estate). Minutes of meeting is made available at the time of audit. 28 stakeholders have attended the meeting which includes; MPOB Taiping, Pejabat Daerah dan Tanah Selama, Balai Polis Selama, BOMBA Selama, adjacent estates, contractors and suppliers. Latest internal stakeholder meeting recorded on 25th & 26th June 2020 (Hibernia Estate), 25th July 2020

(Buloh Akar 2 Estate and Sadong Estate) with no issues highlighted by the workers attended.

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 List of confidential and non-confidential documents and records are available in the Standard Operating Procedure, Oil Palm Replanting (SOP 36, Subject: Filing System, Date: October 2018). Sampled documents are:

Confidential	Non-confidential
Internal audit records	Policy
Stakeholder records	Communication procedure
Stakeholder meeting	Land title
Medical surveillance records	Legal requirement registers
Employee records	CSR records
DOSH visit records	Accident report
JKKP Log	Estate map

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 Riverview Rubber Estates Berhad has established a communication procedure as referred to SOP 37, Subject: Communication, dated October 2018. The procedure detailed out an outline for the arrangements on:

- i. Grievances and complaints
- ii. Request and Respond
- iii. Stakeholder Meeting and consultation

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

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

Summary Sighted an appointment letter as referred to: "Surat Perlantikan Sebagai PIC for Communication & Consultation - MSPO":

Hibernia Estate

Letter dated 2nd January 2020 for En. Wan Mohammad Hajidi bin Wan Muda and approved by Mr Sures Naidu (General Manager).

Buloh Akar 2 Estate

Letter dated 2nd January 2020 for Mr Salim dated 2nd January 2020. Appointment letter is signed off by Mr. Koh Say Ung (Manager).

Sadong Estate

for Mr Ahmad bin Ranjie dated 2nd January 2020. Appointment letter is signed off by Mr. Koh Say Ung (Manager).

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

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

Summary List of stakeholders is available with document named: "List of Stakeholders Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate". The list includes Governments, NGO, Neighboring communities, Estate Communities and Contractors/Suppliers.

As recorded in Buloh Akar 2 Estate the latest meeting with the external stakeholders has been conducted on 21st July 2020 at the Community Hall, Buloh Akar 1 Estate and Internal stakeholder meeting recorded on 25th July 2020 with only issues related to the housing compound is highlighted by the workers attended. Minutes of meeting are made available at the time of audit.

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 SOP on traceability is available as referred SOP 9 (Traceability System) dated March 2019 is made available. In addition, SOP 10 (FFB Harvesting), SOP 11 (Serial number new bunch chit + crop collection), SOP 12 (Loading of FFB), SOP 13 (Security measures for the dispatch of FFB from field to ramp and Mill for SOP FFB) and SOP 14 (GPS Tracking system) are in compliments to the SOP on traceability system. The implementation on site has been verified during the site visit.

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

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

Summary Implementation on the traceability procedure is verified by the estate management and during the Internal Audit conducted on 23rd July 2020 (Hibernia Estate), 29th July 2020 (Buloh Akar 2 Estate and Sadong Estate) reported by Mr Jasmeet Singh (MSPO Officer).

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 appointment letter for the PIC on traceability is available for Hibernia Estate, letter dated 2nd January 2020. The management has appointed En. Wan Mohammad Hajidi bin Wan Muda and approved by En. Sures Naidu (General Manager). Buloh Akar 2 Estate, letter dated 2nd January 2020. The management has appointed En. Salim bin Samsudin and approved by En. Koh Say Ung (Manager). Sadong Estate, letter dated 2nd January 2020. The management has appointed En. Salim bin Samsudin and approved by En. Koh Say Ung (Manager).

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

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

Summary Records are available, sighted during the audit, such as weighbridge ticket, mill statement and transporter invoices. All FFB sold to mill are supported with contracts. Weighbridge ticket information are recorded with Serial number, Lorry No., Supplier, product, Field No., Time and Nett weight.

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 Riverview Rubber Estates Berhad has established and updated list of applicable laws and regulations that are applicable for the estates under the group known as "Register of Legal and Other Requirements", Rev. No. 2 dated 01st January 2020. The following permit and license are sighted;

Hibernia Estate:

1. Permit Khas Barang Kawalan Berjadual (Peraturan-peraturan Kawalan Bekalan 1974 Peraturan 9 (No siri: A00644) - Minyak Diesel, validity until 20th November 2020.
2. Akta Lembaga Minyak Sawit 1998 – No. Lesen: 619362011000 – Menghasilkan SLGBIJI# & Menyimpan SLGBIJI#, validity 30th June 2021.
3. Akta Lembaga Minyak Sawit 1998, No. Lesen: 501642102000, Menjual dan Megalih FFB#, Validity 31st October 2020.
4. Permit Potongan Daripada Gaji Pekerja (Seksyen 24 Akta Kerja 1955), dated 15th April 2010.

Buloh Akar 2 Estate:

1. MPOB (License No. 501996902000 – expiring 28th February 2021), dated 14th February 2020.

2. AKta Kumpulan Wang Simpanan Pekerja 1991 (No Pendaftaran Majikan: 015615672).
3. Perakuan Kelayakan Tetap Menduduk (Kelulusan No. PCF1080120130001), dated 26th February 2013.
4. Perakuan Penentuan Timbang dan Sukat (No. Sijil B1772695 – Expiry 16th May 2020).
5. Kebenaran Untuk Potongan Daripada Gaji (Sekyen 24), effective April 2020.
6. Permit Barang Kawalan Berjadual – Minyak Diesel, A001153, validity 21st October 2010.

Sadong Estate

1. MPOB (License No. 501996902000 – expiring 28th February 2021), dated 13th February 2020.
2. AKta Kumpulan Wang Simpanan Pekerja 1991 (No Pendaftaran Majikan: 015615672).
3. Perakuan Kelayakan Tetap Menduduk (Kelulusan No. PCF1080120 220003), dated 26th September 2012.
4. Perakuan Penentuan Timbang dan Sukat (No. Sijil B1675477 – Expiry 16th January 2021).
5. Kebenaran Untuk Potongan Daripada Gaji (Sekyen 24), effective April 2010.
6. Permit Barang Kawalan Berjadual – Minyak Diesel, A001153, validity 21st October 2020.

MINOR NC: Sighted there are communication evidence on permit renewal via MYEG [Invoice no: IMM/FW/TX/1593506203892 and IMM/FW/TX/1599644878824] and insurance renewal confirmation for "Skim Perlindungan Insurans Kesihatan Pekerja Asing (SIKPA) [No. rujukan: KKM6053052 and KKM6162868]. However, as at audit date, there is no confirmation received from Immigration Department on the status of permit renewal for (Hibernia Estate and Buloh Akar 2 Estate).

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

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

Summary

Riverview Rubber Estates Berhad has established and updated list of applicable laws and regulations that are applicable for the estates under the group known as "Register of Legal and Other Requirements", Rev. No. 2 dated 01st January 2020. The Register of Legal and Other Requirements is prepared by Mr. Jasmeet Singh (Sustainability Executive) and approved by Mr M. Sures Naidu (Senior Manager). Sighted the Register of Legal and Other Requirements that covers the following main subject matter;

1. Land matters
2. Environmental matters
3. Labour and Employee matters
4. Chemical use
5. Wildlife matters
6. Vehicle matters
7. Energy matters

The register enlists information on title of law, description and current status that are related to MSPO requirement sampled such as;

- Environmental Quality Act 1974 (Act 127)
- Environmental Quality Act (Scheduled Waste Regulations) 2005
- OSHA Act 1994 (Act 514)
- Pesticides Act 1974 (Act 149)
- MPOB Act 1998 (Act 582)
- Environmental Quality Act (Sewage Regulations) 2009
- Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446)
- Minimum Wages Order 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 Any new amendments or any regulations be amended through Sustainability Department (HQ), communication with law/enforcement officers and regulatory website and other sources. Sighted that the current legal requirement registered dated 1st January 2020 [Rev.2 revised from, Rev. No. 1] dated 09th March 2019.

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

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

Summary Sighted letter of appointment for the responsible person, En Wan Mohammad Hajidi Wan Muda – Hibernia Estate, as executive dealing with MSPO regulatory update, validity up to 31st December 2020 signed by Senior Manager, Mr. Sures Naidu on 02nd January 2020. Followed by En. Salim Bin Samsudin as person in charge in Buloh Akar 2 Estate for regulatory update related to MSPO, validity up to 2nd January 2021 signed by Manager, Mr. Koh Say Ung on 02nd January 2020. In Sadong Estate, En Ahmad Bin Ranjie appointed as person in charge for regulatory update related to MSPO, validity up to 2nd January 2021 signed by Manager, Mr. Koh Say Ung on 02nd January 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 Riverview Rubber Estates Berhad has list of legal land title, and made available during audit. In total of 38 land title are registered under Hibernia Estate. As sighted, for Grant No.66417, Lot 1801, the estate has made submission to change the "Syarat Nyata" as sighted in the letter dated to Pejabat Daerah dan Tanah Selama dated, 3rd July 2020. The estate has also submitted to seek clarification to land office on the land area

difference appear in the grant and the quit rent statement. Sighted evidence of annual payment of quit rent for year 2020 paid on 24th February 2020.

For Buloh Akar 2 Estate, in total 7 land titles are made available, and 2 land titles (Grant No.0015106166417, Lot 5173 and 00151059, Lot 4758) the estate has made submission to change the "Syarat Nyata" as sighted in the letter dated to Pejabat Daerah dan Tanah Selama dated, 2nd September 2020. For Sadong Estate, in total 13 land titles are registered under the estate. For Grant No.00065191, Lot 6271; 00060894, Lot 3800 and 00065178, Lot 6043, the estate has made submission to change the "Syarat Nyata" as sighted in the letter dated to Pejabat Daerah dan Tanah Selama dated, 2nd September 2020.

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 Hibernia Estate (Area statement):

The legal ownership is extracted from 2019 quit rent of 38 land titles ie "Bil Cukai Tanah dan Parit/Tali Air" Kerajaan Negeri Perak as "Riverview Rubber Estates Berhad".

Description	Ha
Mature	305.47
Immature	59.42
Housing, main road	7.7799
Road Reserved	-
TNB	-
Total area	-
Ha as per Land Title	372.6699

Buloh Akar 2 Estate (Area statement):

Legal ownership of the 2019 quit rent of 7 land titles i.e "Riverview Rubber Estates Berhad" is sighted as per "Geran Hakmilik". Area statement is in accordance with the land title.

Description	Ha
Mature	283.60
Immature	-
Housing, main road	1.87
Road Reserved	-
TNB	-
Total area	285.47
Ha as per Land Title	285.47

Sadong Estate (Area statement):

Legal ownership of the 2019 quit rent of 13 land titles i.e "Riverview Rubber Estates Berhad" is sighted as per "Geran Hakmilik". Area statement is in accordance with the land title.

Description	Ha
Mature	215.98
Others	3.4563
Ha as per Land Title	219.4363

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 During audit, survey map (Hibernia Estate), Plan No: TS00456-HIBERNIA-T1 drawn by M/S Juruukur Mahktar (LJT 399), dated 22nd February 2011, as per title "Contour Plan For Lots 714, 731, 908, 825-830, 834-838, 912-919, 922, 928-930, 932-940, 945, 19524 & 1925" was sighted. The estate maintains its list of coordinates as per boundary stone. A total of 90 boundary stone was recorded.

For Buloj Akar 2 Estate, survey map, Plan No: TS00456-BULOH AKAR-T1 drawn by M/S Juruukur Mahktar (LJT 399), dated 30th December 2011 as per title "Contour Plan for Lots 7182, 7223 & 7229 and part of Lots 5360, 11835, 13669 & 13670" Mukim Belanja, Daerah Perak Tengah is sighted. The estate maintains its list of coordinates as per boundary stone. A total of 98 boundary stone is recorded.

Survey Map, Plan No: TS00456-SADONG-T1 drawn by M/S Juruukur Mahktar (LJT 399), dated 30th December 2011 as per title "Contour Plan for Lots 5528, 13886, 12525, 12527, 12041, 12402, 6043, 5552, 5529, 5553, 6271, 7047, 7048, 3340, 6414, 78324 & 78347" Mukim Belanja, Daerah Perak Tengah is sighted. The estate maintains its list of coordinates as per boundary stone. A total of 143 boundary stone is recorded. Based on the contour map of all the estates the slopes are less than 25°.

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

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

Summary No issues on land dispute was recorded. All land titles are registered under the respective company and quit rent paid accordingly.

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 All land titles are registered under the respective company and quit rent paid accordingly. No records were documented on land encumbrances by customary right.

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

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

Summary Customary rights are not identified as there are no customary land within or surrounding the operating units.

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 identified within or surrounding the estates. There are also no land disputes or claims made on the operating units over customary land. The company has proper legal land titles for the land ownership and quit rent duly paid each year.

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 Social Impact Assessment (SIA) has been conducted for both internal and external stakeholders. Sighted the SIA report is made available as prepared by Mr Wan Mohammad Hajidi bin Wan Muda (Assistant Manager). The assessment is primarily focused on the identification of significant social impacts from the estate's operation. It is concluded that there are no significant negative impacts identified. However, the management will continuously maintain all the positive impact and follow the policies available. The SIA for Internal stakeholders was conducted on 25th & 26th June 2020 with a total of 19 participants while for external stakeholders, it was conducted on 24th August 2020 with 10 participants. Sampled positive impacts identified from the Social Impact Assessment (Internal)/ (External) as follows:

Description
100% of the respondents know about the procedure to make a complaint and request towards estate management.
Management Plan
Continuously providing a way to interacts with estate management. Place the flowchart on how to make any complaint in front of the office.

Description
80% of the respondents agree that the estate provide jobs opportunity towards surrounding communities.
Management Plan
Hired local people and allow them to work with estates. Placed job vacancies banner in front of the estate.

Positive and negative impact is identified and sighted management plan is developed to address the specific impacts. All the action plan is including targeted timeline to resolve.

For both Buloh Akar 2 Estate and Sadong Estate, SIA has been conducted for both internal and external stakeholders. The SIA survey forms were distributed on 25th July 2020 involving internal participants (Estate staff and workers) and 21st July 2020 involving the external participants (i.e Ketua Kampung, Cattle owner, NUPW and smallholders). Sighted the SIA report is made available as prepared by Mr Koh Say Ung (Manager). The assessment is primarily focused on the identification of significant social impacts from the estate's operation. It is concluded that there are no significant negative impacts identified. However, the management will continuously maintain all the positive impact and follow the policies available.

MINOR NC: The assessment was conducted collectively for Buloh Akar 1 Estate, Buloh Akar 2 Estate and Sadong Estate. However, the assessment results do not specifically address in accordance to the respective estates.

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

Riverview Rubber Estates Berhad has established a communication procedure as referred to SOP 37, Subject: Communication, dated October 2018. The procedure detailed out an outline for the arrangements on:

- i. Grievances and complaints
- ii. Request and Respond
- iii. Stakeholder Meeting and consultation

Sighted the complaint form namely, "Borang Aduan/ Permintaan/ Rundingan" are made available outside the respective office for easy retrieval. Records of the communications are made available. The procedure is communicated to the employees during the internal stakeholder meeting and briefing. Sighted internal stakeholders meeting minutes dated 25th and 26th June 2020 (Hibernia Estate), 25th July 2020 (Buloh Akar 2 Estate and Sadong Estate) to disseminate the information on Company's policies and procedures.

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 procedure has stated the timeline involve in the:

"Grievance formally recorded at point of receipt and settled as soon as possible but not more than 30 days" and "The outcome of the resolution is documented and the stakeholder informed officially by estate". The workflow is made available in (Para 1.1 Grievance redressal procedure for external stakeholders).

"The matter shall be settled within seven working days" and "The outcome is documented and feedback from internal stakeholder is recorded". The workflow is made available in (Para 1.2 Grievance redressal procedure for internal stakeholders).

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 Sighted the complaint and Grievance Form at the respective Estate's Office. Complain form is available as referred to "Borang Aduan/ Permintaan/ Rundingan". The said forms can be obtained from office main entrance to make any complaints/requests. Upon completing the forms shall be deposited into the complaint box for further action. The completed forms will be collected by the estate manager to be submitted to the management. Records of complaints are kept recorded as to-date.

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 Procedure for complain has been explained during internal and external stakeholder meeting conducted by estate management. The complaint procedure has been explained during external stakeholders meeting conducted on 24th August 2020 (Hibernia Estate), 21st July 2020 and 25th July 2020 (Buloh Akar 2 Estate and Sadong Estate) to disseminate the information on company's policies and procedures.

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

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

Summary Records of complaint are made available in the file namely, 2.1: Grievances & Responses. During field audit, sighted sampled complaint that were kept and documented.

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 On the CSR programme, Riverview Rubber Estates Berhad has practiced such contributions. Record of contribution is made available at the time of audit. Sampled contribution recorded are on children school expenses, Chinese New Year celebration, Hari Raya Puasa and Family Day.

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 Occupational Safety and Health Policy Statement has been established by the company signed by the Company Director, Dr. Leong Tat Thim dated 16th August 2019. The policy is sighted displayed for public view and has been explained to all stakeholders during the internal and external Stakeholders meeting and the implementation has been verified on-site. The company is committed in providing a safe and healthy working environment as well as preventing injury and ill health to the workers, contractors and visitors through effective management and implementation. In line with the policy, the company shall:

- Comply with Occupational Safety and Health Act and other related laws and regulation as well as MSPO standard, approved code of practices and guidelines.
- Establish occupational safety and health management system at all operating units.
- Provide continuous training and supervision to all categories of employees to build and promote a safe and healthy working environment in full compliance with legislative requirements.
- Train employees to use appropriate protective equipment for their own safety.
- Ensure continuous improvement in the Occupational Safety and Health Management and its performance.

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

Occupational Safety and Health Policy Statement has been established by the company signed by the Company Director, Dr. Leong Tat Thim dated 16th August 2019. The policy is sighted displayed for public view and has been explained to all stakeholders during the internal and external stakeholders meeting.

HIRARC document is made available dated 13th February 2020 (Hibernia Estate), 2nd January 2020 (Buloh Akar 2 Estate). Example risk assessed in the estate such as:

- i. Office operation
- ii. Security
- iii. Road, bridges and culverts
- iv. Spraying
- v. Harvesting
- vi. Collection
- vii. Weighbridge
- viii. Store
- ix. General worker

MINOR NC: However, there is no HIRARC review has been conducted upon accidents as reported in JKKP 6 on 18th March 2019 (commuting to/from work) and 11th February 2019 (fertilizer store).

Annual training program sighted during the audit, "Training Need Analysis: 2020" which includes:

- i. Bunch counter
- ii. Harvester

- iii. Driver
- iv. Sprayer
- v. General worker
- vi. Watchman
- vii. Mandore

"Hibernia Estate Training Matrix 2020" dated 8th September 2020, 5th September 2020 (Buloh Akar 2 Estate) and 3rd September 2020 (Sadong Estate) which table out the training programme for the whole year. Copy of SDS for chemical used in the estate available in the office and displayed at the area where chemical is placed.

PPE issuance record to estate workers is available in the: Personal Protective Equipment (PPE) Issue Record. Record sighted for the harvester, security, sprayer and manuring gang. Individual PPE issuance record to estate workers is available in the: Personal Protective Equipment (PPE) Issue Record. Record sighted for the goggles, gloves, earplug, vest and apron.

The company has established the chemical handling procedure as referred to "Handling of Used Chemical & Containers" dated March 2019 and "Storage of Chemical" dated October 2018. Chemical Register for both estates available during the audit. In all sample estates, CHRA has recommended medical surveillance is conducted for organophosphate exposure.

In Hibernia Estate, the person in charge who are responsible for workers' safety and health is Mr Wan Mohammad Hajidi (Pengerusi) sighted in the Occupational Safety and Health Organization Chart, in Buloh Akar 2 Estate Mr Salim bin Samsudin is appointed and sighted in the appointment letter dated 5th January 2020. In addition, sighted the organization chart for "Jawatankuasa JKPP 2020, Buloh Akar Estate 2" is made available. In Sadong Estate, Mr Koh Say Ung (Manager) is the person responsible and sighted in the JKPP Organization Chart.

Meeting which discuss on issues affecting their business such as employee's health, safety and welfare are included during the OSHA Meeting which was latest conducted on 4th September 2020 (Hibernia Estate), 12th June 2020 (Buloh Akar 2 Estate).

Emergency procedures available as referred to: "Pelan Tindakan Kecemasan – Tumpahan Kimia", "Pelan Tindakan Kecemasan – Kebakaran", "Pelan Tindakan Kecemasan – Kemalangan" for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate. Emergency response team and emergency contact numbers and emergency response team are displayed at the notice board.

Records of employees has been trained with certificate on competent First Aider was made available for Hibernia Estate Sdn Bhd. Training has been conducted by "Angkatan Pertahanan Awam Malaysia Negeri Perak" on 20th July 2019 (Hibernia Estate), 13th August 2020 (Buloh Akar 2 Estate) and 3rd March 2020 (Sadong Estate).

MINOR NC: Found out that there is no monitoring mechanism on the items available in the first aid box within the estates.

No accident recorded in JKPP8 at Hibernia Estate Sdn Bhd for the year 2019 submitted on 13th January 2020 (Hibernia Estate), 2nd January 2020 (Buloh Akar 2 Estate) and the company has newly registered for MyKKP system on the accident notification to DOSH. In Sadong Estate, (2) two accidents has been recorded in JKPP8 for the year 2019 and sighted the latest submission for JKPP8 on the accident notification to DOSH dated 2nd January 2020. Accident occurs at fertilizer store and weeding station.

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 Social Policy statement has been established by the company signed by the Company Director, Dr. Leong Tat Thim dated 16th August 2019. The policy is sighted displayed at the notice board for public view and has been explained to all stakeholders during the internal and external stakeholders meeting. The company believes that a development needs to be socially beneficial. Therefore, the company is adhered to the principles of:

- All employees should be treated fairly in terms of recruitment, terms and conditions, upgrading and representation regardless of race, gender, nationality, political view and any other sources of discrimination.
- To protect women from sexual harassment and other form of violence as well as protecting their rights.
- The company shall respect the rights of all personnel to join trade unions and to bargain collectively.
- Forced labour and child labour are strictly prohibited in Riverview.
- To identify, through consultation, the potential social benefits and determine how might be enhanced for the mutual benefits of the company and the local community.

Briefing on the policies has been communicated to all employees through public display at the notice board and latest training session conducted on 25th & 26th June 2020 (Hibernia Estate), 21st February 2020 (Buloh Akar 2 Estate and Sadong Estate).

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

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

Summary Social Policy Statement has been established by the company signed by the Company Director, Dr. Leong Tat Thim dated 16th August 2019. The policy is sighted displayed at the notice board for public view and has been explained to all stakeholders during the internal and external stakeholders meeting. This have been clearly stated in Point 1 of the said policy where:

"All employees should be treated fairly in terms of recruitment, terms and conditions, upgrading and representation regardless of race, gender, nationality, political view and any other sources of discrimination",

No evidence / complaint lodged to show that the company is engaged in or support of discriminatory practices with regards to race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.

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

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

Summary The management meets legal or industry minimum standards as per the employment act and as per the Minimum Wages Order (Amendment) 2020. Sampled pay slip has been verified during the audit.

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

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

Summary No contractor workers are employed at the time of audit for Hibernia Estate and Buloh Akar 2 Estate. In Sadong Estate, sighted agreed employment contract between the contractor and his employee is made available during the audit. Salary is paid by the contractors above the minimum wages and verified payslip copy.

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 The company has established records that provides an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.

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

Indicator 6 All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.

Summary Employment contract stated the offered position, wages implied, working hours, overtime, allowances, rest day, working on holiday and others. The contract is understood by workers. This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local and Indonesian. All workers enjoy the same scale of pay and provided with equal housing and work facilities. This was confirmed through interview with workers from the estate and also through verification of contracts of service and pay slips of workers.

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

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

Summary Working hours is clearly stated in the respective employment contract/offer letter. Time recording system has been established in the "Checkroll" book. The estate management is responsible to monitor the implementation of the system. Records are made available during the audit. Working hours (6:45am – 2:25pm) with the rest day on Sunday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to Malaysian Law. During site visit, sighted the working hours are displayed at notice board.

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

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

Summary Employment contract stated the offered position, wages implied, working hours, overtime, allowances, rest day, working on holiday etc. The contract is understood by workers. This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local and Indonesian.

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

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

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

MINOR NC: In Buloh Akar 2 Estate and Sadong Estate, sighted employment contract in the "2019 Recruitment (Indonesia)" document stated that:

(Para 7): "Umum - Untuk Semua Pekerja Indonesia" Subsidi Air dan Elektrik disediakan:

- Air – 159 Liter seorang sehari
- Elektrik – 20-unit setiap rumah sebulan

"Majikan akan beri subsidi sebanyak RM4.35 jika kuasa elektrik lebih RM20.00. Bagi anda yang menggunakan elektrik rumah kurang bayaran bil RM20.00, majikan tidak akan membayar subsidi elektrik bulanan bagi pekerja tersebut pada bulan itu". However, sighted the deduction for water supply and electricity was not done in accordance to the subsidies stated in the employment contract for sampled workers.

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

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

Summary All workers have been provided with medical and accident insurance. With regards to local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations. Sighted the evidence on company payment as sampled for SOCSO are made available.

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 Workers housing is in a good condition. Workers are provided with housing facilities at workers linesite and welfare amenities such as temple. Sighted linesite inspection checklist, whereby the appointed staff inspecting the linesite on weekly basis. Sighted Weekly Inspection of Worker's Housing are made available. As sampled, latest housing inspection was conducted by the person in charge on 14th August 2020, 21st August 2020, 28th August 2020 and 4th September 2020.

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 Gender Policy Statement has been established by the company signed by the Company Director, Dr. Leong Tat Thim dated 16th August 2019. As stated, in line with the policy, the company shall:

- Endeavour to prevent sexual harassment and all other forms of violence against women and workers in the workplace or in the course of an employee's work.
- Provide and create opportunities for the development of women's leadership at all levels.
- Encourage actively participation of women in decision making by enrolling them as members of various committees that are already established, such as the Occupational Safety and Health (OSH) committee.
- To establish a Gender Committee to implement and monitor the Policy

- Communicate, explain and make this policy understood by all the stakeholders, including external contractors and other relevant stakeholders.

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

Indicator 13 The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.

Summary Sighted a Social Policy Statement has been established by the company signed by the Company Director; Mr. Leong Tat Thim dated 16th August 2019. The company is committed to adhering to the principles:

"The company shall respect the rights of all personnel to join trade unions and to bargain collectively". The policy has been explained to all estate workers during Internal Stakeholders meeting at the respective estates.

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

Indicator 14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions.

Summary Sighted a Social Policy Statement has been established by the company signed by the Company Director; Mr. Leong Tat Thim dated 16th August 2019. The company is committed to adhering to the principles:

"Forced labour and child labour are strictly prohibited in Riverview Rubber Estates Berhad". No children employed by the estate as per estate workers name list in the "Checkroll system" and site verification.

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 The estate has a comprehensive training matrix in the "Hibernia Estate Training Matrix 2020" for its staffs and workers with the latest updates on 8th September 2020. Sighted in the training records are made available for each staffs and workers. Sample of the training programme includes:

- Company Policies and Objectives
- First Aid
- Recycle waste awareness
- Manuring
- Harvesting Grading & Quality control

Sampled training records (Hibernia Estate) are:

No.	Training	Status
1	Chemical handling & Fertilizing training	Conducted on 26 th May 2020
2	First aid kit training	Conducted on 21 st May 2020

Buloh Akar 2 Estate:

No.	Training	Status
1	Company policy & MSPO policy training/briefing	Conducted on 3 rd September 2020
2	Chemical handling & Fertilizing training	Conducted on 20 th February 2020
3	First aid kit training	Conducted on 13 th August 2020

Sadong Estate:

No.	Training	Status
1	Company policy & MSPO policy training/briefing	Conducted on 3 rd September 2020
2	Harvesting training, Grading training, traceability training and PPE training.	Conducted on 6 th August 2020

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

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 The management has identified training for each target groups as documented in Estate Training Matrix for all estates. Training Need Analysis for the year 2020 is made available which the employees are identified as:

- Bunch counter
- Harvester
- Driver
- Sprayer
- General worker
- Watchman

- Mandore

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 Hibernia estate training matrix 2020 dated 8th September 2020, 5th September 2020 (Buloh Akar 2 Estate) and 3rd September 2020 (Sadong Estate) which table out the training programme for the whole year. Example training planned by the estate are:

- Company Policies and Objectives
- Scheduled waste handling and triple rinsing
- PPE Handling and replacement procedure
- Frond pruning
- Weeding & Spraying
- Oil Palm nursery

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 The estate has established the environmental policy dated on 16th August 2019. The environmental policy was signed by Dr. Leong Tat Thim, Director of Riverview Rubber Estates Berhad. The policy consists of;

- Complying with all statutory, legal and regulatory requirements in matters concerning the environment and biodiversity.
- Integrate our consideration of environmental concerns and impacts into our decision making and actions.
- Minimize the production of waste and reuse or recycle as much of it as possible.
- Minimize the usage of water and energy in all the operations and giving preference to renewable energy over non-renewable energy when feasible.
- As far as possible, purchase products and services that do the least damage to the environment. Conserve natural resources by adopting pollution prevention practices.
- Conduct our operations under the best principles of agriculture, that is compatible with the natural environment and in full support of Integrated pest management (IPM) techniques.
- Protect and conserve any Endangered, Rare and Threatened Tree Species and Animals found within Riverview Estates area.

- Continuously focus on promoting new technologies with low environment impact as well as reducing GHG emissions.
- Establish procedures to ensure that all employees are knowledgeable of, understand and comply with all applicable environmental laws and regulations.

Sighted the policy was communicated on 6th March 2020 (Hibernia Estate), 3rd September 2020 (Buloh Akar 2 Estate) and 3rd March 2020 (Sadong Estate) "Taklimat Mengenai Polisi Syarikat & Polisi MSPO" attended by executives/staff and 27 workers. Evidence of meeting agenda, attendance list and photos were available. Sighted the policy was communicated on 25th & 26th June 2020 (Hibernia Estate), 25th July 2020 (Buloh Akar 2 Estate and Sadong Estate), "Mesyuarat Bersama Pihak Kepentingan Dalaman" attended by 35 workers including head mandore, mandore, watchman, drivers, weeder, bunch counter, harvester". Evidence of meeting agenda, attendance list and photos were available.

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 Environmental Policy is available as referred to: "Polisi Persekitaran", Environmental Policy Statement. Environmental Policy Statement signed by Dr. Leong Tat Thim Director 16th August 2019. Estate has developed the environmental improvement plan incorporated in "Penilaian Impak dan Aspek Alam Sekitar – tahun 2020", dated 1st January 2020 includes the following evidence;

Activity: Spraying

Waste: Empty chemical containers

Pollution: Water and air

Control:

- No spraying activity during rainy day
- Reduce spraying cycle
- Execute spraying calibration

Environmental management plan:

- Reduce pollution through 3R activities
- Maintain the machinery in good condition

Activity: Tractor area

Waste: Waste water

Pollution: Water and land

Control: Ensure sump are in good condition.

Environmental management plan: Ensure waste water is properly managed.

Activity: Diesel store

Waste: Empty diesel container

Pollution: Land, air and water

Impact: Diesel spillage on floor

Control: Ensuring sump in good condition.

Environmental management plan: Ensure chemical wastes are properly managed.

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 Estate has developed the environmental improvement plan incorporated in "Penilaian Impak dan Aspek Alam Sekitar – tahun 2020", dated 1st January 2020 (Hibernia Estate), 2nd January 2020 (Buloh Akar 2 Estate and Sadong Estate) includes not limited to the following evidence;

- Spraying
- Manuring
- Harvesting
- Vehicle Maintenance
- Chemical storage maintenance
- Fertilizer Store maintenance
- Nursery
- Waste Management
- Parking for Vehicles

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

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

Summary The programme to promote the positive impacts on environmental includes;

- Plant more beneficial plants to reduce the pesticides used.
- Reduce the radius of circle spraying where chemical will be applied to reduce the chemical used.
- Dispose domestic waste through landfill.
- Stack frond in between palm rows to enhance water catchment area.

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 Training programme on the environmental management and improvement are available as referred to "Training Matrix 2020", sighted among others the environmental training programme as follow;

- Scheduled waste handling and triple rinsing
- PPE handling and replacement procedure
- Recycle waste awareness
- Manuring
- Weeding & spraying

- Environmental responsibility
- High conservation identification
- Environment committee and responsibilities
- Aspect impact assessment

Sighted training date 19th May 2020 (Hibernia Estate), 5th September 2020 (Buloh Akar 2 Estate) and 5th March 2020 (Sadong Estate):

- “Latihan dan Taklimat penggunaan alat-alat PPE dan pembuangan sampah dan kitar semula” to all workers and staff.
- “Latihan dan Taklimat Cara Penggunaan Alat Pemadam Api dan Carta Plan Tindakan (ERP)” to all workers and staff.

This training correspondence to training matrix which were covered:

- No 4 Fire safety and fire drill
- No.16 Notification of accidents and dangerous occurrences
- No.21 HIRARC and aspect impact assessment
- No.23 ERP
- No 14 Crop forecasting
- No.19 high conservation identification
- No.22 CHRA, action to control, chemical labelling, safety data sheet (SDS)

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

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

Summary The estate conduct regular meetings during “Management Review Meeting” annually where the employees concerns were discussed. Sighted Management Review Meeting minutes dated 14th August 2020 for all estates. Sighted also minutes of meetings “Mesyuarat Alam Sekitar” held on 15th June 2019 (Hibernia Estate and Buloh Akar 2 Estate) and 18th March 2020 (Sadong Estate), attended by the management and workers.

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 Estate has maintained record of Diesel Usage Monitoring (Hibernia Estate) for a period of January to August 2019. Monitoring by establishing baseline values and trends within an appropriate timeframe available during the audit.

Diesel

Target: 2,400 liter/month

Month '2020	Actual Usage 2020 (liter)
Jan	2,200
Feb	2,300
Mar	2,260
April	2,260
May	2,380
June	2,380
July	2,220

Electricity

Target: RM1,400/month

Month 2020	Actual Usage 2020
Jan	733.95
Feb	806.50
Mar	806.50
April	708.55
May	878.25
June	735.25
July	351.60
Aug	616.55

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 Records on the consumption of non-renewable energy and the baseline values are available for year 2020 (Buloh Akar 2 Estate and Sadong Estate). The estate could improve to measure the usage in kwh for better monitoring.

Diesel target 1000 liter/month:

Month	Actual Usage 2019 (liter)	Actual Usage 2020 (liter)
Jan	700	800
Feb	600	660
Mar	800	880
April	1,000	980
May	800	900
June	900	1,300
July	1,000	1,100
Aug	920	1,020
Sep	900	-
Oct	1,100	-

Nov	1,000	-
Dec	900	-
Total	10,620	7,640

Electricity

Month	Actual Usage 2019 Target: 3,057 kwh/month	Actual Usage 2020 Target: 3,656 kwh/month
Jan	6,092	2,972
Feb	6,682	3,072
Mar	3,367.05	-
April	3,654.00	2,983
May	3,169.55	2,413
June	3,569.55	1,982
July	3,292.73	1,131
Aug	2,650.00	1,103.75
Sep	3,066.59	
Oct	2,945.68	
Nov	2,779.32	
Dec	2,606.14	
Total	43,874.61	15,656.75

The increase of electricity consumption due to increase of number of workers.

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

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

Summary In Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate, utilizing renewable energy of solar energy for nursery, road and ramp.

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

Criterion 3 Waste management and disposal

Indicator 1 All waste products and sources of pollution shall be identified and documented.

Summary The estate has established procedures which related to managing of wastes as below;

- a. SOP 33, Schedule Waste, dated October 2018.
- b. SOP 34, Management of Landfill, dated October 2018

Estates has established the following waste category;

- Domestic wastes
- Scheduled waste – SW110, SW409, SW306, SW410

Sighted waste management plan incorporated in the Environmental Management Plan - "Penilaian Impak dan Aspek Alam Sekitar – tahun 2020" dated 1st January 2020 covers the following wastes generated;

- Empty chemical container
- Empty fertilizer bag
- Used engine oil
- Used filters
- Used hydraulic oil
- Used tyre
- Empty diesel container

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

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

Summary Sighted waste management plan incorporated in the "Penilaian Impak dan Aspek Alam Sekitar – tahun 2020" dated 1st January 2020 (Hibernia Estate), 2nd January 2020 (Buloh Akar 2 Estate and Sadong Estate) covers the following wastes generated;

- Empty chemical container
- Empty fertilizer bag
- Used engine oil
- Used filters
- Used hydraulic oil
- Used tyre
- Empty diesel container

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 The estate has established the procedure for schedule wastes management title "SOP 33 Schedule Waste", dated October 2018 and SOP 30 Handling of Used Chemicals & Container", dated March 2019. The estate also implemented triple rinse practices which is describe in the SOP 33, prior dispose the empty containers to license contractor. The estate has recorded spent lubricant oil wastes; however, the estate is in the midst of acquire license contractor for disposal.

MINOR NC: No records that the spent oil, SW305 and SW306 been disposed by legal license contractors as required in the regulation, Environmental Quality Act (Scheduled Waste Regulations) 2005.

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

Indicator 4 Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.

Summary As stated in SOP 30, titled Handling of Used Chemical & Containers updated March 2019,

- All used chemical containers must be triple rinsed at designated area.
- Empty chemical containers shall then be punctured with three holes on top and arrange nicely in storage before disposal.
- Disposal of empty chemical container shall only be done through a licensed DOE agent,
- Record of disposal shall be kept and documented.
- Re-used empty chemical containers must be appropriately labelled and only be used for spraying purpose.

Sighted that all used chemicals containers were triple rinse and disposed to SS Setia Teknologi Enterprise.

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

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

Summary Domestic waste for lineside area is managed by the estate. All domestic wastes are disposed at landfill located at Field 1993 (Hibernia Estate) operated since 2nd January 2019, at Field 1992C (Buloh Akar 2 Estate) operated since 15th December 2019. Sighted rubbish pit record book describes the date of opening and closing as well as the method of closing the landfill layer by layer.

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 Sighted "Pelan Pengurusan Penggunaan Tenaga, Kawalan Pencemaran dan Pemantauan Kesan Pelepasan Gas Rumah Hijau (Greenhouse Gaseous) bagi tahun 2020" updated until August 2020. Assessment of all polluting activities sighted for:

- Diesel Usage
- Chemical use
- Fertilizer use
- Domestic waste
- FFB production
- Water use

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

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

Summary Sighted SOP 26, titled Energy Use and Pollution Reduction updated by the company on March 2018. Among the plan are;

- Vehicles are not to idle their engines when driver is not in them. For example, engines shall be turned off on the weighbridge or when loading at ramp.
- Air conditioning is to be turned off when offices are closed.
- All light bulb replacements are to use low energy lights.

Sighted action plan to reduce identified significant pollutants and emissions established and implemented in estate's Environment Management Plan.

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 Currently estate is using treated Tap water from "Lembaga Air Perak" and no other water sources were used by estate. Water management plan dated is sited. Records for water use is available and assessment of water usage and sources of supply compiled in summary. Estates has established the "Pelan Pengurusan Air" for the "Kawasan Ladang" and "Kawasan Perumahan". Sighted identification of water source;

- River
- Rainwater

Sighted location points (water sampling map) of taking water samples originated from the stream and housing waste water. Sighted certificate of analysis for water sampling taken at three (3) designated points (water sampling point signage & map). The test result tested on 5th August 2020 (Hibernia Estate) water sampling analysis data, as below;

Parameter	Point A	Point B	Point C
pH spec 5.5-9.0	4.6	4.6	4.6
BOD mg/l Spec < 50	<LOQ	<LOQ	<LOQ
COD mg/l Spec < 200	<LOQ	<LOQ	<LOQ
SS mg/l Spec < 100	<LOQ	<LOQ	10
Ammonical Nitrogen mg/l Spec < 20	<LOQ	<LOQ	<LOQ
Dissolved Oxygen mg/l Spec. n/a	6.7	6.9	6.5

Shown that the pH level from the upstream itself out of specification.

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

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

Summary No construction of bunds, weirs and dams across main rivers or waterways passing through an 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 During site visit conducted to estate fields, there were evidence of road side drains constructed along the main road.

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 None RTE species present. However, the estate has established the SOP 24 titled Hunting updated 05th May 2017. Information on HBV habitats collated by monitoring done by Assistance Manager, En. Wan Mohammad Hajidi. Estate also have installed two motion sensor cameras, near wild life corridor to monitor the habitats moving into the estate.



These motion cameras located at OP2013 and OP2018. The monitoring records are continuously implementing every 3 months. Sighted, monitoring records for animals' species done on 24th August 2020 (Hibernia Estate). In Buloh Akar 2 Estate, monitoring records for animals' species done on 20th August 2020. Animals that detected were "burung hantu", "ayam hutan" and "monyet".

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 Sighted SOP related to HBV has been established as follow updated 01st April 2019;

- SOP 22 – Environment (Riparian Issues), Oct 2018
- SOP 23 – Buffer Zone, June 2017
- SOP 24 – Hunting, May 2017
- SOP 25 – Heritage Trees, Feb 2018

Sighted no hunting signage during the site visit. None RTE species present.

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

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

Summary No RTE has been identified within the estate vicinity. However, estates continuously conducting surveillance as Sighted "Rekod Pemantauan Hidupan Liar dan Kawasan Sensitif" of all estates. Sighted no hunting sign board during the site visit.

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

Criterion 7 Zero burning practices

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

Summary The estate has a policy and committed towards implementing of zero burning practices to protect the environment.

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 Currently not applicable as no significant risk of diseased palm was reported. The estate replanting criteria stated the zero burning procedures shall be followed during replanting. No traces of burning sighted during the site visit at the time of audit.

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

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

Summary As per interview with Estate Manager, no special approval application to do open burning. All replanting activities are using the felling method. The practice is observed during field assessment.

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

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

Summary Open burning in relation to new planting, re-planting or other development is not allowed and this was communicated to all employee and stakeholder. Currently, no new planting or replanting activities. However, the estate has established a manual namely, "agricultural reference manual – oil palm planting", updated 1st April 2019.

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 Riverview Rubber Estates Berhad established "Group Agricultural Reference Manual – Oil Palm Planting" (Updated 01.04.2019) and "Standard Operating Procedure – Oil Palm Planting" (Updated 01st November 2019). In total 38 Standard Operating Procedure – Oil Palm Planting has been developed as sampled below:

- General and internal control operations
- Occupational safety and health
- Traceability System
- FFB harvesting
- Serial number new bunch chits + Crop collection
- FFB Loading
- Security measure for dispatch FFB to Ramp to Mill
- FFB Despatch
- Oil Palm Seedling
- Filtered water system
- Boundary maintenance

- Fertilizer storage
- Storage of chemical
- Handling of used chemical & containers
- Respirator use
- Schedule waste
- Management of landfill
- Internal audit procedure

Safety Standard Operating Procedure

- Spraying
- Loading fertilizer
- Manuring
- Pruning
- Loading FFB
- Harvesting
- Weeding
- Loading Oil Palm Seedlings
- Planting seedlings
- Driving tractor/ trailer
- Repairing roof
- Office
- Accident guideline

For operation, estate established Riverview Group Agricultural Reference Manual – Oil Palm Planting updated 1st April 2019.

Section 1: Conventional replanting

Section 2: Underplanting

Section 3: Nursery practice

Section 4: Planting protection

Section 5: Ablation

Section 6: Canopy management

Section 7: Weed control

Section 8: Field upkeep

Section 9: Manuring

Section 10: Harvesting standard

Section 11: Harvesting interval

Section 12: Loose fruit collection

All SOP and procedures are kept and will be updated periodically. The estate regularly conducted training for all workers in the estate operations to ensure that all workers are fully aware and understand the SOP. As sighted, "Estate Visit Report – Checklist" dated 28th and 29th July 2020 conducted by Mr Sures Naidu, General Manager. The inspection is conducted on monthly basis, as sampled taken:

- Office records (Musterchit, stock records – chemical records, PPE records).
- Compound (Labour lines, garage, beneficial plants, ramp maintenance)
- Security (Front gate, lorry – overnight, drop gate)

- Harvesting (harvesting intervals, ripening standards, uncollected bunches)
- Field upkeep (manuring, circle or strip spraying, EFB, road condition).

During site visit, seen "Turnea" and "Casia" in polybags in fertilizer store, and kept in proper wooden stack to avoid spillage. Fertilizer are stored in proper ventilated store and secured. PPE signage and warning signs are displayed at the store as per SOP 28: Fertilizer store. Hibernia Estate compound is flat area. Visited harvesting activity at field 2013, all harvester is equipped with PPE as stated in HIRARC. In Buloh Akar 2 Estate, Section 8 (Field Upkeep) is being observed as per "Group Agricultural Reference Manual – Oil Palm Planting" where no bare ground conditions in the inter-row was sighted at Field 1997, Field 2010 and Field 1992. Fronds are stacked at the centre of the terrace between palm. Acceptable ground condition is also sighted over the 3 planting fields. Based on field visit, Buluh Akar 2 estate is relatively hilly area below 25 degree. The soil series of the estate is local alluvial, clay loam and sandy clay loam in accordance to "Riverview Group – Soil Series". Sadong Estate is relatively hilly area below 25 degree. The soil series of the estate is local alluvial and clay loam in accordance to "Riverview Group – Soil Series". Block 1997 is about 70% & 97% hilly, Block 1993 about 70% hilly. Visited field OP2003, sighted boundary marker has been demarcated and visible.

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 No cover crops as this is flat area, the estate terrain comprise of undulating landscape for palm growth. The soil in Hibernia Estate is mineral soil. EFB application on mature and immature palm for better yielding. EFB is used for the purpose of organic manuring and maintain the land moisture. Mill provide the EFB to the estate, as only transportation cost is incurred by the estate. No terracing in the estate, since it is flat area.

Most of it, is mineral soil (Clay) and partly hilly area (< 25 degree) at Buloh Akar 2 Estate. Implemented frond staking on the inter palm (Lorong susun pelepah). The highest elevation and their subsequent elevation were mitigated to prevent soil erosion by having vegetation comprises of soft grasses and broadleaves as seen throughout the estate in accordance with "Group Agricultural Reference Manual – Oil Palm Planting" Section 7 (Weeding Guidelines). Partly cambered roads were observed in most fields in order to minimize surface runoff by diverting excess rain water into the field drains.

Sadong estate terrain comprised of undulating landscape, and sighted during field visit, some area contains laterite soil. Partly cambered roads were observed in most fields in order to minimize surface runoff by diverting excess rain water into the field drains. Visited field OP2003, interviewed weeder gang and spraying gang. During field visit, they understand the implementation of best practices during performing their daily task. During the audit, the job assigned was collection of loose fruit at Field OP2003.

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

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

Summary During site visit, the estate has a visual reference system to identify each field or block. Each field has signage displayed with field number, year of planting, clone and hectare size. As sighted in Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate;

Field: 1993
Clone: HRU
Hectare: 68.58 Ha

Field: 1998
Clone: HRU
Hectare: 28.06 Ha

Field: OP2002
Hectare: 21.81 Ha
Progeny: HRU
SPH: 129
Task: 10

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

Criterion 2 Economic and financial viability plan

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

Summary Estate management established business plan for 5 years. The budget for all group estates contains details of expenditure for Estate Upkeep & Cultivation, Collection, Estate Expenditure and Estate Overhead. Sighted "Review of past and future estate performance business plan", as below (Hibernia Estate):

PARAMETER	2020	2021
Mature (Ha)	305.47	364.89
Immature (Ha)	59.42	0
Estimate OER (%)	19.85	19.85
Yield (MT/Ha)	25.37	26
FFB Production (MT)	7,750	9,487.14
FFB Price (RM/MT)	449.00	500.00
Ex-Estate Cost (RM/MT)	225.00	250.00
Earnings (RM/mt)	224.00	250.00

Review of last 2 years performance are as follows;

PARAMETER	2018	2019
Mature (Ha)	305.47	305.47

Immature (Ha)	59.42	59.42
Estimate OER (%)	19.85	19.85
Yield (MT/Ha)	22.44	25.66
FFB Production (MT)	6,853.60	7,838.29
FFB Price (RM/MT)	470.70	424.85
Ex-Estate Cost (RM/MT)	235.35	212.43
Earnings (RM/MT)	235.35	212.43

As sighted, Buloh Akar 2 Estate:

PARAMETER	2020	2021
Mature (Ha)	283.60	283.60
Immature (Ha)	0	0
Estimate OER (%)	19.85	19.85
Yield (MT/Ha)	20.41	20.41
FFB Production (MT)	6,336.13	6,336.13
FFB Price (RM/MT)	482.84	482.84
Ex-Estate Cost (RM/MT)	304.00	304.00
Earnings (RM/mt)	304.33	304.33

Business projection review of last 2 years performance are as follows;

PARAMETER	2018	2019
Mature (Ha)	283.60	283.60
Immature (Ha)	0	0
Estimate OER (%)	19.85	19.85
Yield (MT/Ha)	22.08	18.73
FFB Production (MT)	6,250.62	6,421.64
FFB Price (RM/MT)	369.95	595.72
Ex-Estate Cost (RM/MT)	288	321
Earnings (RM/MT)	314.33	294.32

Sighted "Review of past and future estate performance business plan", as below (Sadong Estate):

PARAMETER	2020	2021
Mature (Ha)	215.98	215.98
Immature (Ha)	0	0
Estimate OER (%)	19.85	19.85
Yield (MT/Ha)	17.50	17.50
FFB Production (MT)	4,350.00	4,200.00
FFB Price (RM/MT)	500.00	500.00

Ex-Estate Cost (RM/MT)	200.00	250.00
Earnings (RM/mt)	200.00	250.00

Business projection review of last 2 years performance are as follows;

PARAMETER	2018	2019
Mature (Ha)	203.07	203.07
Immature (Ha)	12.91	12.91
Estimate OER (%)	19.85	19.85
Yield (MT/Ha)	17.23	17.49
FFB Production (MT)	4,119.13	4,641.04
FFB Price (RM/MT)	484.53	399.18
Ex-Estate Cost (RM/MT)	256.24	282.00
Earnings (RM/MT)	379.19	324.72

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 Replanting program for the company as per document "Riverview Plantation Group – 6 Years Replanting Program 2020" is sighted. All fields schedule for replanting had been deferred in view of positive yield performance achieving more than 20mt/ha/yr. In Sadong Estate, the oldest palm is planted in year 1993, as interview with General Manager, there are no replanting planned for coming years. However, the management has prepared the 10 years replanting programme.

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 The financial outlay for current year budget containing Estate Upkeep & Cultivation, Collection, Estate Expenditure and Estate Overhead is sighted. In total;

Hibernia Estate:

Field	Mature/ Immature	Clone	Hectarage
1993	Mature	HRU	68.58
2009	Mature	Felda DxP	41.24

2012	Mature	AAR Hybrid	52.17
2013	Mature	AAR Hybrid	107.99
2014	Mature	Felda Yangambi	34.49
2015	Mature	Felda Yangambi	1.00
2017	Immature	UP Hybrid	9.94
2018	Immature	UP Hybrid	49.48

The document explains the estimated operational costs budgeted by the company for 29 types of costs ranging from plant maintenance, pest control and office and building, harvesting, and assessment. Buloh Akar 2 Estate:

Field	Hectarage	Clone
OP92	31	HRU
OP96	26.94	
OP97	18.80	
OP98	28.06	
OP00	37.76	
OP01	50.39	
OP04	62.63	
OP10	28.02	
Total	283.60	

Field	Mature/ Immature	Clone	Hectarage
1993	Mature	HRU	25.19
1997	Mature		13.02
1998	Mature		36.02
2001	Mature		28.00
2002	Mature		21.81
2003	Mature		23.03
2004	Mature		30.42
2010	Mature		25.58
2014	Mature		12.91

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 All the management plan checked by auditor. As per management plan, the plan can be achieved by the estate management except the cost production and FFB estimate. The monitoring to achieved the target is effectively implemented such field monitoring and enforcement of all SOP. As at 4th December 2019, director report stated revenue for the year on previous year dropped due to lower average FFB selling price compared from the prior year.

Estate management provides "Management Financial Statement - Estimates for the year 2020" (Sadong Estate), recorded production of FFB 5,153 Kg against budgeted 5,000 kg for the year 2019. As recorded, the budgeted production for the year 2020 is 5,260 Kg. Estate management monitor the expenditure and overhead cost through monthly progress report.

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

Criterion 3 Transparent and fair price dealing

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

Summary

FFB pricing is referred to MPOB website and receive update from mill pricing. Contract agreement entered between Riverview Rubber Estates Berhad (Hibernia Estate) and the following contractor is sighted;

- Deep Wood Enterprise dated 1st January 2020, for transportation of Empty Fruit Bunches from Oil Mill.

Sighted work order dated 1st August 2020, with invoice dated on 30th August 2020 [Inv No: 0461], payment made via bank transfer dated 27th August 2020.

- EXW Enterprise for build up rood for nursery 2020, transport charges.

Sighted work order dated 27th July 2020, with invoice dated 31st July 2020 [Inv: NR0720] payment made via bank transfer dated 27th August 2020.

Rate of pay (pricing mechanism) are spelt under Clause 2 (Rates) of the agreement and other terms such as Contractor's Duties and Obligations, Assignment and Severity are specified in the contract. Seen contract between Riverview Rubber Estate Berhad (Ladang Hibernia) and Kilang Minyak Sawit Kamunting Sdn Bhd dated 6th January 2020:

- OER @ 19.85%
- KER @ 5.0%
- Processing charges: RM50/mt
- Cess: RM14/mt

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

Seen contract between Riverview Rubber Estate Berhad (Ladang Buluh Akar 2) and Temerloh Mill Sdn Bhd dated 6th January 2020. Below are the details:

- OER @ 19.85%
- KER @ 5.0%
- Processing charges: RM50/mt
- Cess: RM14/mt

The tender which is applicable accepted by Dr Leong Tat Thim, Chairman for Riverview Rubber Estates Bhd. In Buloh Akar 2 Estate, contract agreement was signed by both contractor and estate management to perform based on special orders and instructions such as trenching new boundary EFB application, road patching, felling and chipping palms. Field supervisor will inspect the job completed by the contractor and signed on the daily task checklist provided by the contractor. As sighted, job task checklist signed by En. Ahmad Ranjie, Field Supervisor and approve by En. Koh Say Ung, Estate Manager. Upon approving the checklist, the payment process will be made via bank transfer.

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 Contractor are briefed on MSPO compliance during Stakeholder meeting – Ladang Hibernia dated 24th August 2020, Ladang Buloh Akar 2 Estate on 21st July 2020. Seen attendance record and photographs as evidence. Stated in contract agreement clause 3.1.12: Contractor are required to understand and comply with MSPO standard and provide any required information under the standard. Contractor shall allow the company's approved MSPO auditors to verify contractor's compliance through a physical inspection if required".

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

Indicator 2	The management shall provide evidence of agreed contracts with the contractor.
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Summary Contract agreement of contractors are made available. Sighted all contract includes an agreement signed by contractor and estate manager with term and condition which includes, contractor must adhere to Riverview Rubber Estates Berhad policies and procedures in compliance to MSPO Standard.

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

Indicator 3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.
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Summary Provision to allow MSPO approved auditors to verify assessments through a physical inspection is sighted under Clause 3.1.18 of the agreement entered. Contractor are required to understand and comply with MSPO standard and provide any required information under the standard. Contractor shall allow the company's approved MSPO auditors to verify contractor's compliance through a physical inspection if required".

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 Control point verifying work completion by estate management. Mills chits for the month is maintained by the management on daily basis – referring to “FFB Despatch Book”. Asst Manager process the FFB transport daily until month end to record its accumulative weight. The summary is forward together with the invoice for payment. Invoice given by the contractor sighted. Estate management will verify the work done by the contractor before the payment paid to the contractor. As interview with the Asst Manager, he will ensure proper PPE usage during work done. Estate also conducted inspection on the contractor’s workers. As per interviewed and also during field visit, the workers aware with OSH requirement. As example, the workers wear the PPE during the work task that given to them.

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

2.7 Principle 7: Development of new planting

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

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

Criterion 2 Peat land

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

Summary At this moment, there were no new plantings involving peat area. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

Criterion 3 Social and Environmental Impact Assessment (SEIA)



Indicator 1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.
Summary	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Indicator 2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders.
Summary	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Indicator 3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.
Summary	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Indicator 4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed.
Summary	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Criterion 4	Soil and topographic information
Indicator 1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.
Summary	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.
In Compliance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Indicator 2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.
Summary	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

Criterion 5	Planting on steep terrain, marginal and fragile soils
Indicator 1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong 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.
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Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong 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.
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Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

Criterion 6	Customary land
Indicator 1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

Indicator 2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.
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Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

Indicator 3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available.
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Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong Estate.

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

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong 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 There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong 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 There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Hibernia Estate, Buloh Akar 2 Estate and Sadong 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) Commitment of estate management in providing relevant information and documents.
- 3) Good relationship being maintained with surrounding smallholders and villages.
- 4) Good positive feedback received from internal and external stakeholders.

Appendix A: Audit Plan

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
7 th September 2020	TBA	Travelling from Ampang, Selangor to Selama, Perak.	SP	JS/NS
8 th September 2020	08:00 – 09:00	Centralize Opening Meeting at Hibernia Estate: <ul style="list-style-type: none"> Presentation by the manager/coordinator Presentation by Lead Auditor Confirmation of assessment scope and finalize Audit plan	SP	JS/NS
	09:00 – 13:00	➤ 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. 	SP	JS/NS
	13:00 – 14:00	Lunch / Break	SP	JS/NS
	14:00 – 16:00	➤ Continue document review <ul style="list-style-type: none"> Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	SP	JS/NS
		➤ Estate Inspection: <ul style="list-style-type: none"> Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	SP	JS/NS
	16:00 – 17:00	Verify any outstanding issues, auditor discussion and end of audit for day 1.	SP	JS/NS

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
9 th September 2020	08:00 – 13:00	Buloh Akar 2 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 	SP	JS/NS



		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. 	SP	JS/NS
	13:00 – 14:00	➤ Lunch/Rest	SP	JS/NS
	14:00 – 16:00	<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. 	SP	JS/NS
	16:00 – 17:00	Verify any outstanding issues, auditor discussion and end of audit for day 2.	SP	JS/NS

Appendix B: Non-Conformity details

Non-Conformities Identified During This Audit

Major Nonconformities:	No Major NC's was raised for this audit.
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Minor Nonconformities:	3 Minor NC's was raised for this audit.
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Company Name	Riverview Rubber Estates Berhad			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input type="checkbox"/>
	Surveillance 1	<input checked="" type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organised Smallholder			
Client Number	GGC-AB1-MSPO-2020			
NC No. / Ref.	AB1/MSPO/MINOR/01	Date Detected	10 th Sep 2020	
Site(s) concern	Hibernia Estate & Buloh Akar 2 Estate	Target Completion	Next surveillance audit	
Normative Reference and Requirement	4.3.1.1 All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	Insufficient monitoring on Permit Renewal			

NC Objective Evidence:

Sighted there are communication evidence on permit renewal via MYEG [Invoice no: IMM/FW/TX/1593506203892 and IMM/FW/TX/1599644878824] and insurance renewal confirmation for "Skim Perlindungan Insurans Kesihatan Pekerja Asing (SIKPA) [No. rujukan: KKM6053052 and KKM6162868]. However, as at audit date, there is no confirmation received from Immigration Department on the status of permit renewal for;

Hibernia Estate

Name	Permit Expiry
Rizaldi Muhamad	4 th September 2020
Sahdi	4 th September 2020
Awaludin	4 th September 2020

Buloh Akar 2 Estate

Name	Permit Expiry
Kisnawadi	4 th September 2020
Supriadi	4 th September 2020

Lead Auditor Signature:

Client Signature:

Cause Analysis (to be filled by client):

Lack of monitoring on permit renewal.

Correction (to be filled by client):

Permit renewal has been submitted to authority.

Corrective Action (to be filled by client):


To speed up the process by contacting all estates. To keep updated with the PIC (Agent) for permit & passport renewal.



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


Estate management has submitted the action plan for foreign workers permit renewal process and monitoring for Hibernia Estate and Buloh Akar 2 Estate dated on 15th September 2020, which prepared by En Wan Mohammad Hajidi, Assistant Manager (Hibernia Estate) and En. Salim Bin Samsudin (Buloh Akar 2), Field Supervisor. To be verified during next surveillance audit.



NC Closed: ☐ Yes ☒ No


Site verification: ☐ Yes ☒ No

Date Verified: 17 th September 2020	Lead Auditor Signature: 
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Company Name	Riverview Rubber Estates Berhad			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input type="checkbox"/>
	Surveillance 1	<input checked="" type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organised Smallholder			
Client Number	GGC-AB1-MSPO-2020			
NC No. / Ref.	AB1/MSPO/MINOR/02	Date Detected	10 th Sep 2020	
Site(s) concern	Buloh Akar 2 Estate & Sadong Estate	Target Completion	Next surveillance audit	
Normative Reference and Requirement	4.4.1.1 Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	Social Impact Assessment (SIA) result does not properly address to respective estates.			
NC Objective Evidence:				
The assessment was conducted collectively for Buloh Akar 1 Estate, Buloh Akar 2 Estate and Sadong Estate. However, the assessment results do not specifically address in accordance to the respective estates.				
Lead Auditor Signature: 		Client Signature: 		
Cause Analysis (to be filled by client):				
Method for SIA assessment is not effective, as SIA was conducted collectively with 3 estates. Resulted to no assessment result available for respective estates.				
Correction (to be filled by client):				
Estate management assigned person in charge to prepare respective estates SIA assessment.				
Corrective Action (to be filled by client):				
The assessment will specifically state for respective estates. To further enhance monitoring mechanism on next SIA assessment.				
Review of correction/corrective action (to be filled by Lead Auditor)				

Estate management has submitted the action plan for Social Impact Assessment (SIA) for Sadong Estate and Buloh Akar 2 Estate dated on 15 th September 2020. To review current SIA report and identify the weaknesses in the assessment. To be verified during next surveillance audit.	
NC Closed: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 17 th September 2020	Lead Auditor Signature: 

Company Name	Riverview Rubber Estates Berhad			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input type="checkbox"/>
	Surveillance 1	<input checked="" type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organised Smallholder			
Client Number	GGC-AB1-MSPO-2020			
NC No. / Ref.	AB1/MSPO/MINOR/03	Date Detected	10 th Sep 2020	
Site(s) concern	All estates	Target Completion	Next surveillance audit	
Normative Reference and Requirement	4.4.4.2 The occupational safety and health plan shall cover the following: b) The risks of all operations shall be assessed and documented. 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			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	Insufficient monitoring on HIRARC and First Aid Box			
NC Objective Evidence:				
<u>Sadong Estate</u> b) There is no HIRARC review has been conducted upon accidents as reported in JKPP 6 on 18 th March 2019 (commuting to/from work) and 11 th February 2019 (fertilizer store).				
<u>All estates</u> i) Found out that there is no monitoring mechanism on the items available in the first aid box within the estates.				
Lead Auditor Signature: 		Client Signature: 		

Cause Analysis (to be filled by client):	
Less awareness and understanding on MSPO Requirements.	
Correction (to be filled by client):	
Assigned person in charge (PIC) to revise the HIRARC and to report to JKPP 6.	
Corrective Action (to be filled by client):	
To revise HIRARC and to speed up the process upon accidents. To enhance MSPO training approach to all personnel.	
Review of correction/corrective action (to be filled by Lead Auditor)	
Estate management has developed the monitoring mechanism for first aid box as per the NC raised. For Sadong Estate, estate management has provided the reviewed HIRARC for transporting workers/ travelling using motorcycles and manuring/ application of fertilizer process revision dated 14 th September 2020. However, will need to verify the implementation and effectiveness of the monitoring mechanism and HIRARC review process in next surveillance audit.	
NC Closed: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date Verified: 17 th September 2020	Lead Auditor Signature: 

Company Name	Riverview Rubber Estates Berhad		
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance 1	<input checked="" type="checkbox"/>	Recertification
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organised Smallholder		
Client Number	GGC-AB1-MSPO-2020		
NC No. / Ref.	AB1/MSPO/MINOR/04	Date Detected	10 th Sep 2020
Site(s) concern	Buloh Akar 2 Estate & Sadong Estate	Target Completion	Next surveillance audit
Normative Reference and Requirement	4.4.5.9 Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.		
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		
Description of Non-Conformity	Non-compliance to the employment contract for Foreign workers		

NC Objective Evidence:

Sighted employment contract in the "2019 Recruitment (Indonesia)" document stated that:

(Para 7): "Umum - Untuk Semua Pekerja Indonesia" Subsidi Air dan Elektrik disediakan:

- Air – 159 Liter seorang sehari
- Elektrik – 20-unit setiap rumah sebulan

"Majikan akan beri subsidi sebanyak RM4.35 jika kuasa elektrik lebih RM20.00. Bagi anda yang menggunakan elektrik rumah kurang bayaran bil RM20.00, majikan tidak akan membayar subsidi elektrik bulanan bagi pekerja tersebut pada bulan itu".

However, sighted the deduction for water supply and electricity was not done in accordance to the subsidies stated in the employment contract for sampled workers as below:

Buluh Akar 2 Estate:

- Worker 1 (payslip July 2020)
- Worker 2 (payslip July 2020)

Sadong Estate:

- Worker 1 (payslip June 2020)
- Worker 2 (payslip June 2020)

Lead Auditor Signature:

Client Signature:

Cause Analysis (to be filled by client):

Lack of awareness on MSPO requirement.

Correction (to be filled by client):

Deduction will be made based on the agreement.

Corrective Action (to be filled by client):

PIC will visit each house to calculate the meter reading and to be written down in a book.

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

Estate management provided evidence of "Surat Persetujuan Potongan Upah". However, to be verified in next surveillance audit.



NC Closed: ☐ Yes ☒ No


Site verification: ☐ Yes ☒ No

Date Verified: 17th September 2020

Lead Auditor Signature:



Company Name	Riverview Rubber Estates Berhad		
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance 1	<input checked="" type="checkbox"/>	Recertification
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organised Smallholder		
Client Number	GGC-AB1-MSPO-2020		
NC No. / Ref.	AB1/MSPO/MINOR/05	Date Detected	10 th Sep 2020
Site(s) concern	Hibernia Estate/Buloh Akar II Estate / Sadong Estate	Target Completion	Next surveillance audit
Normative Reference and Requirement	4.5.3.3 The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.		
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		
Description of Non-Conformity	The estates management unable to provide evidence that the spent lubricating oil (SW305) and spent hydraulic oil (SW306), which are under first schedule waste (Regulation 2), of Environmental Quality Act (Scheduled Waste Regulations) 2005 are disposed at prescribed premises only.		
NC Objective Evidence:			
No records that the spent oil, SW305 and SW306 been disposed by legal license contractors as required in the regulation, Environmental Quality Act (Scheduled Waste Regulations) 2005.			
Lead Auditor Signature:		Client Signature:	
			
Cause Analysis (to be filled by client):			
Lack of awareness on MSPO requirements for schedule waste.			
Correction (to be filled by client):			
Estate management will fill up the form from DOE and submit to e-SWIS.			
Corrective Action (to be filled by client):			
PIC will submit the details for e-SWIS.			
Review of correction/corrective action (to be filled by Lead Auditor)			
Estate management has developed the action plan for schedule waste dated 15 th September 2020 for all estates which comprises to workflow to be executed, included with person in charge, target completion date and action to be taken. To be verified during next surveillance audit.			
NC Closed: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Site verification: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Date Verified: 17 th September 2020	Lead Auditor Signature: 
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Area of Concern:	No AOC was raised for this audit.
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Non-Conformities identified during previous audit
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Major Nonconformities:	No Major NC's was raised during previous audit.
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Minor Nonconformities:	3 Minor NC's was raised during previous audit.
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Area of Concern:	No AOC was raised during previous audit.
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Company Name	Riverview Rubber Estate Bhd			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 3: MSPO Oil Palm Plantations and Organised Smallholders			
Client Number	GGC-AB1-MSPO-2019			
NC No. / Ref.	AB1/MSPO/MINOR/01	Date Detected	27 th September 2019	
Site(s) concern	Narborough Estate	Target Completion	Next ASA	
Normative Reference and Requirement	4.2.2.3 List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor			
Description of Non-Conformity	External stakeholder meeting was not conducted and records of consultation not available.			
NC Objective Evidence: Internal stakeholder meeting (Estate workers) was conducted on 15.08.2019 as per minute sighted "Minit Mesyuarat Bersama Pihak Berkepentingan pertama". However, sighted no evidence of external consultation and communication record is maintained. Company has planned to conduct "Stakeholder Meeting", however it was explained by PIC (assistant Manager) due to not enough quorum the meeting was not conducted.				
Lead Auditor Signature: 		Client Signature: 		
Root cause Analysis (to be filled by client): Method for stakeholder's consultation is not effective through meeting at Riverview, resulted to no stakeholder turn up for meeting.				
Corrective action planned (to be filled by client):				

PIC from Riverview will visit surrounding stakeholders if there are stakeholders couldn't attend the meeting.	
Preventive Action (to be filled by client):	
PIC for communication and consultation in each estate has been brief on the implementation on last Oct 2019.	
Review of corrective/preventive action (to be filled by Lead Auditor)	
CAP accepted. To review implementation onsite during next surveillance audit.	
Comment (Lead Auditor) 8 th September 2020. As sighted during the audit, estate management has conducted the external stakeholder meeting.	
NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date Verified: 8 th September 2020	Lead Auditor Signature: 

Company Name	Riverview Rubber Estate Bhd		
Stage of Audit	Initial Stage 2	<input type="checkbox"/>	Initial Stage 2
	Surveillance	<input type="checkbox"/>	Recertification
Audited Standard	Part 3: MSPO Oil Palm Plantations and Organised Smallholders		
Client Number	GGC-AB1-MSPO-2019		
NC No. / Ref.	AB1/MSPO/MINOR/02	Date Detected	27 TH September 2019
Site(s) concern	Narborough Estate	Target Completion	Next ASA
Normative Reference and Requirement	4.5.1.2 Major The environmental management plan shall cover the following: a) An environmental policy and objectives; The aspects and impacts analysis of all operations.		
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		
Description of Non-Conformity	The environmental management plan did not cover Narborough Estate's environmental policy and objectives.		
NC Objective Evidence:			
Sighted "Penilaian Impak & Aspek Alam Sekitar – 2019" did not cover Narborough Estate's Environmental Policy established on 16 th August 2019 objectives as stated: - <ul style="list-style-type: none"> Protect and conserve any Endangered, Rare and Threatened Tree Species and Animals found within Riverview Estates area. Establish procedures to ensure that all employees are knowledgeable of, understand and comply with all applicable environmental laws and regulations. 			
Lead Auditor Signature: 	Client Signature: 		
Root cause Analysis (to be filled by client):			

Less awareness of the MSPO requirements.	
Corrective action planned (to be filled by client):	
Draft revised "Environmental Policy" will be submitted to MD for approval by Q1 2020.	
Preventive Action (to be filled by client):	
To enhance MSPO training approach to all personnel in Training programme 2020.	
Review of corrective/preventive action (to be filled by Lead Auditor)	
CAP accepted. To review implementation onsite during next surveillance audit.	
<p>Comment (Lead Auditor) 8th September 2020:</p> <p>On 8th September 2020 (ASA 1), estate management provides evidence of "Kajian Impak Hidupan Liar", dated 10th July 2020, prepared by En. Omar Abdul Hamid and approved by En Ang Chai Poa, Senior Manager. The estate management also provide "Kaedah Pemantauan Hidupan Liar di kawasan Ladang Narborough", as stated no hunting activity are allowed in the estate and training and awareness of Environmental Policy will be explained during internal stakeholder meeting. Therefore, as verified during audit, management has conducted internal stakeholder meetings, referring to Principle 2 indicators. NC has been verified and closed as per the evidence provided.</p>	
NC Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date Verified: 8 th September 2020	Lead Auditor Signature:
	


Company Name	Riverview Rubber Estate Bhd		
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance	<input type="checkbox"/>	Recertification
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		
Client Number	GGC-AB1-MSPO-2019		
NC No. / Ref.	AB1/MSPO/MINOR/03	Date Detected	27/09/2019
Site(s) concern	Buluh Akar 1 Estate	Target Completion	Next ASA
Normative Reference and Requirement	4.3.2.1 The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.		
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		
Description of Non-Conformity	Buluh Akar 1 operating unit do not conform to the "Syarat Nyata" as specified in the Land Title.		

NC Objective Evidence:

Land Title at Buluh Akar 1 operating unit which is registered under Riverview Rubber Estates Berhad has 2 lots with "Syarat Nyata" as "Tanaman Dusun-Dusun".

No	Grant No	No Lot	Hectare	Syarat Nyata
1	151060	4760	230.1653	Tanaman Dusun Dusun
2	151062	5360	52.8367	Tanaman Dusun Dusun
3	128923	14788	0.0240	Perusahaan Berat - Pencawang
4	26858	11835	254.0712	Tamanan Komersial – Kelapa Sawit
			537.0972	

Lead Auditor Signature:

Client Signature:

Root cause Analysis (to be filled by client):

Process of changing the status involved company top management and cost.

Corrective action planned (to be filled by client):

To speed up the process by contacting local land Department for appointment.

Preventive Action (to be filled by client):

This is one time correction required.

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

CAP accepted. To review implementation onsite during next surveillance audit.

Comment (Lead Auditor) 8th September 2020:

During annual surveillance audit 1, verified that estate management has submitted the application to "Pejabat Daerah dan Tanah Perak Tengah" dated on 2nd September 2020. Application sighted for Ladang Buloh Akar 1 (GRN 00151060 & GRN 00151062), Ladang Buloh Akar 2 (GRN 00151061 & GRN 00151059) and Ladang Sadong (GRN 00065191, GRN 00060894 and GRN 00065178). Pejabat Tanah Perak Tengah has verified received the letter of application dated on 4th September 2020. To verify the progress of change of land title during next surveillance audit.

NC Closed: ☒ Yes ☐ No

Site verification: ☒ Yes ☐ No

Date Verified: 8th September 2020

Lead Auditor Signature:



Appendix C: List of Stakeholders Contacted

Attendance List

Stakeholders

- 1) Estate management representative – Hibernia Estate
- 2) Estate management representative – Buluh Akar 2
- 3) Estate management representative – Sadong Estate
- 4) Indonesia workers
- 5) Staffs
- 6) Harvester gang
- 7) Spraying gang
- 8) Mandore
- 9) Security
- 10) Contractors