

# GLOBAL GATEWAY CERTIFICATIONS

## MALAYSIAN SUSTAINABLE PALM OIL (MSPO)

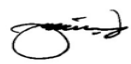




### CERTIFICATION AUDIT REPORT


#### Part 4 : General Principles for Palm Oil Mills

TH Plantations Berhad  
Mamahat Complex [Mill]

-Group Certification-

MAIN ASSESSMENT AUDIT  
26<sup>th</sup> March 2019

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	30/05/19	Issued as Draft Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
A	11/06/19	Peer Review 1 Comments	Remi bin Rasidi	Peer Reviewer 1	
A	11/06/19	Peer Review 2 Comments	Mohd Zuhaili bin Mukri	Peer Reviewer 2	
B	12/06/19	Issued as Final Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	18/06/19	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	

Acknowledgment by TH Plantations Berhad					
Rev	Date	Description	Management Representative	Role	Signature
B	18/06/19	Acceptance of the contents	Mr. Ahmad Anuar bin Sairi	General Manager (CEO's Office)	

#### **Declaration**

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

WITH INTEGRITY WE SERVE



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

## SECTION I : PUBLIC SUMMARY REPORT

### 1.1 Certification Scope

**Global Gateway Certifications Sdn. Bhd. (GGC)** has conducted the Certification Assessment of **TH Plantations Berhad, Mamahat Complex [Mill]**. During this **Main Assessment (Stage 2) Audit**, the audit team were briefed by sustainability member, of the supply base disposition. The source of FFB supplies to Mamahat POM are from their own estate [Mamahat Estate] and from out-grower and other smallholders.

This assessment was conducted onsite on **26<sup>th</sup> March 2019** to assess the compliance of the certification unit against the "**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills**". The scope of certification is "**Production Of Sustainable Crude Palm Oil And Palm Kernel**".

### 1.2 Company details and Contact information

<b>Company Name</b>	TH Plantations Berhad
<b>Business Address</b>	Menara TH Platinum, Level 31-35, No. 9 Persiaran KLCC, 50088 Kuala Lumpur.
<b>Contact Person</b>	Mr. Ahmad Anuar bin Sairi
<b>Office Telephone</b>	+603 2603 4800
<b>E-Mail</b>	anuar@thplantations.com

### 1.3 Certification Unit

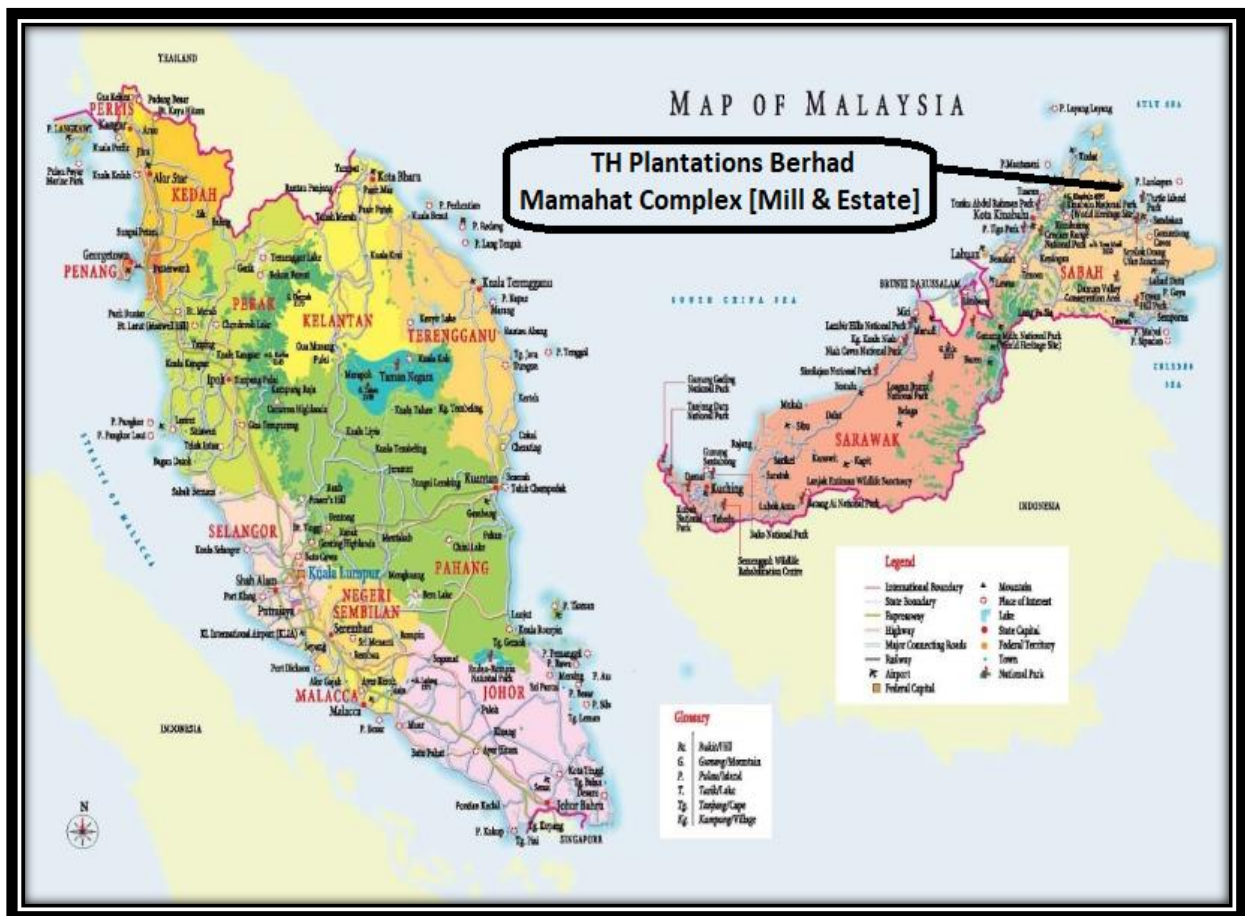
<b>Name of the Certification Unit</b>	Kilang Sawit Ladang Mamahat	
<b>Mill Capacity (MT/HR)</b>	25	
<b>Site Address</b>	Locked Bag No. 29, 89109 Kota Marudu, Sabah.	
<b>GPS Reference of the site office</b>	<b>Longitude</b>	E 117°56'84.31"
	<b>Latitude</b>	N 6°46'70.64"

<b>MPOB License Information</b>	<b>License No.</b>	526917004000
	<b>Scope of Activity</b>	<ol style="list-style-type: none"> <li>1. Menjual dan Mengalih – PK, CPO, SPO</li> <li>2. Membeli dan Mengalih – FFB, PK, CPO</li> <li>3. Menyimpan – PK, CPO, SPO</li> <li>4. Mengilang FFB</li> </ol>
	<b>Expiry Date</b>	31 <sup>st</sup> March 2020

<b>Others Sustainability Certification</b>	NIL
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**1.4 Map Showing Geographical Location**

**1) TH Plantations Berhad – Mamahat Complex [Mill & Estate]**





Kilang Sawit Ladang Mamahat	Projected from last audit	Actual Production for 12 Months [Mar 2018-Feb 2019]	Projected Production for next 12 Months [Mar 2019-Feb 2020]
FFB Summary (MT)	NIL	2,766.32	635.00
CPO Summary (MT)	NIL	511.05	120.65
PK Summary (MT)	NIL	94.40	22.23

## 1.6 Certificate Details

<b>Certification body</b>	Global Gateway Certifications Sdn. Bhd., No. 10 Jalan Rasmi 7, Taman Rasmi Jaya, 68000 Ampang, Selangor Darul Ehsan, Malaysia. Tel.: +603 4256 2689; Fax: +603 4256 2687 Website: <a href="http://www.ggc.my">www.ggc.my</a>
<b>Assessment standard</b>	(MSPO) Part 4: General Principles for Palm Oil Mills
<b>Certificate number</b>	GGC-THPB009-MSPO-00-2019
<b>Initial certificate issued date</b>	18 <sup>th</sup> June 2019
<b>Certificate expiry date</b>	17 <sup>th</sup> June 2024
<b>Stage 1 assessment date</b>	12 <sup>th</sup> February 2019
<b>Stage 2 / Main Assessment</b>	26 <sup>th</sup> March 2019
<b>Annual Surveillance 1 [ASA 1]</b>	March 2020
<b>Annual Surveillance 2 [ASA 2]</b>	March 2021
<b>Annual Surveillance 3 [ASA 3]</b>	March 2022
<b>Annual Surveillance 4 [ASA 4]</b>	March 2023



## 1.7 Qualification of the Lead Assessor and Assessment Team

### Lead Auditor

**Name:** **Muhammad Syafiq bin Abd Razak**

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

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

During this assessment, he assessed on the aspect of Management Commitment & Responsibility, Transparency, Legal, Safety and Health, Social, Stakeholder's Consultation, Workers Welfare, Environment, Best Practices and etc. He is able to speak and understand Bahasa Malaysia and English.

### Auditor

**Name:** **Ismadi bin Hj. Ismail**

He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang. 24 years of working experiences with various plantation companies and skills in Best Agriculture Practices (GAP) for plantation. Fully trained in CoP, MSPO and OSHAS. Qualified as Lead Auditor/Auditor for MSPO and CoP. Involved in MSPO assessment since 2017. Completed and certified MSPO Auditor course in 2017 held by SGS (M) Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. Member of GGC MSPO audit team.

During this assessment, he assessed on the aspect of Transparency, Safety and Health, Employment Condition, Social and Community Engagements, Stakeholder's Consultation and Workers Welfare. Able to speak and understand Bahasa Malaysia and English.

### Auditor

**Name:** **Hj. Ahmad bin Sukiman**

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

During this assessment, he assessed on the aspect of Legal, Stakeholder's Consultation, Workers Welfare and Environment. Able to speak and understand Bahasa Malaysia and English.

## 1.8 Audit Methodology

The audit was conducted based on sampling following the method as specified in the MSPO requirements (MSPO-Questionnaire Self-Assessment – RA). The sampling was calculated and determined prior to the audit assessment. In the case of this certification unit, sampling calculation was not applied as there is only one palm oil mill, namely “**Kilang Sawit Ladang Mamahat**”.

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

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

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

## 1.9 Audit Plan Information

<b>Audit Date</b>	26 <sup>th</sup> March 2019
<b>Name of site(s) visited</b>	Kilang Sawit Ladang Mamahat
<b>Total number of man-days spent</b>	3 man-days

## 1.10 Audit Result Summary Findings

Findings category		
<b>Category</b>	<b>Numbers</b>	<b>Status (Closed/Open/Not Applicable/No Action Requires)</b>
Major Nonconformities	2	Closed
Minor Nonconformities	1	Open (Next Surveillance Audit)
Area of Concern	0	No action requires
Noteworthy /Positive Comments	5	No action requires



## 1.11 Stakeholder Consultation

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

GGC has published the public notification on 22<sup>nd</sup> February 2019 and as to accommodate a stakeholders' consultation meeting for mill and estate. Therefore, it was conducted on 25<sup>th</sup> March 2019 - 26<sup>th</sup> March 2019 in TH Plantations Berhad, Mamahat Complex [Mill & Estate] to gather information from the local communities in accordance to Certification Scheme and Stakeholder Consultation requirements.

During this Main Assessment (Stage 2) audit, the audit team has conducted stakeholder consultations involving both internal and external stakeholders as to understand the practices in relation to environmental, social performance and their performance with respect to the MSPO requirements. The meeting was conducted without the present of mill management.

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

No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken. [What we did]	Assessment team findings [Outcome]
1.	Stakeholders A (Contractors)	<ul style="list-style-type: none"> <li>• They have good understanding about MSPO.</li> <li>• He is clear that if he employs a worker, he has to officially inform estate management. He also knows the working hours, minimum salary, Socso &amp; EPF (for local workers) that has to be paid as he has been briefed in the Stakeholders meeting.</li> <li>• They informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work.</li> <li>• They were aware that any complaints or suggestions</li> </ul>	No action requires	Positive findings

		<p>could be forwarded to the mill/estate management.</p> <ul style="list-style-type: none"> <li>• He is very happy with the management and hopes to continue his contract for a long time.</li> <li>• The company has good relation with supplier and there is no issue with company's performance.</li> </ul>		
2.	Stakeholders B (Contractors)	<ul style="list-style-type: none"> <li>• Most of the stakeholders attended the meeting are aware about the MSPO.</li> <li>• Most of them has little knowledge on the existence of method/ mechanism of complaints/ grievances.</li> <li>•</li> </ul>	Management will continue briefing to all stakeholders on MSPO and complaint and grievance mechanism	Will review by next surveillance audit
3.	Stakeholders C (Government Agency)	<ul style="list-style-type: none"> <li>• Concerned about poaching or illegal hunting.</li> <li>• Requested the estate or mill to share the outgoing water sampling analysis result.</li> </ul>	Management to review the surveillance exercise on RTEs as well as sharing the water analysis result for mutual benefits.	Will review by next surveillance audit
4.	Stakeholders D (Government Agency)	<ul style="list-style-type: none"> <li>• He said he was not invited during last stakeholder's meeting.</li> <li>• Requested the Mill to response to District's Development Plan especially in obtaining Sijil Menduduki Bangunan which was initiated since 2013.</li> </ul>	Management to handle the issue amicably.	Will review by next surveillance audit
5.	Stakeholders E (Government Agency)	<ul style="list-style-type: none"> <li>• Suggested the management to make a ground visit and to extend the CSR programme to their base camp.</li> </ul>	To continue and strengthen the good relationship with all the stakeholders	Will review by next surveillance audit
6.	Stakeholders F (Government Agency)	<ul style="list-style-type: none"> <li>• They are always invited by company to participate in stakeholder meeting annually.</li> <li>• They have good understanding about MSPO.</li> <li>• They have good understanding about complaint and grievance mechanism.</li> </ul>	No action requires	Positive findings

7.	Stakeholder G (Neighbouring Estate)	<ul style="list-style-type: none"> <li>• They have good relationship with the management.</li> <li>• There is no conflict ever happened with mill &amp; estate.</li> </ul>	No action requires	Positive findings
8.	Stakeholder H (Mill workers)	<ul style="list-style-type: none"> <li>• MSPO awareness, company policy and SOP are briefed among workers during muster call.</li> <li>• Personal Protective Equipment are distributed free of charged by management.</li> <li>• They have good understanding about complaint and grievance mechanism.</li> <li>• They are very happy with the management and hopes to continue their contract for a long time.</li> <li>• Company well managing the welfare, health and safety of their workers.</li> <li>• Housing facilities is provided with water and electrical supply.</li> <li>• They have been treated equally without any discrimination. Their salary was according to Minimum Wage Order 2018.</li> </ul>	No action requires	Positive findings
9.	Stakeholders I (Mill - Gender Committee Representatives)	<ul style="list-style-type: none"> <li>• They have been treated equally without any discrimination.</li> <li>• No sexual harassment reported.</li> </ul>	No action requires	Positive findings

## 1.12 Recommendation

The company has established sustainability policy, objectives and procedures that define an effective system for the administration and control of sustainability management system throughout all operation activities of TH Plantations Berhad, Mamahat Complex [Mill]. Mill Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual. All operating units also assist by TH Plantations Berhad, Sustainability and Investor Relations Department.

The management is committed to comply with MSPO system by giving awareness training to all personnel involved in this standard to make them understand the procedures and implementation of the standard. The

employees are aware of the requirements of MSPO. There was no complaint or feedback received during this Main Assessment (Stage 2) Audit.

This report will be internally reviewed prior to certification decision by GGC and externally peer reviewed by independents panel reviewers (qualified and trained by MPOCC). During this Main Assessment (Stage 2) Audit [based on MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO)] Part 4: General Principles For Palm Oil Mills, there were 2 major and 1 minor non-conformities have been raised to the facility that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted of major non-conformity findings is closed. Therefore, the Lead Auditor recommends a certificate of compliance **"MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles For Palm Oil Mills"** is awarded to TH Plantations Berhad, Kilang Sawit Ladang Mamahat.

### 1.13 Date of Next Surveillance Audit

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

### 1.14 Confidentiality

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

### 1.15 Abbreviations Used

BOD	Biological Oxygen Demand
CHRA	Chemical Health & Risk Assessment
CIP	Continuous Improvement Plan
COD	Chemical Oxygen Demand
CoP	Code of Practise
CSPO	Certified Sustainable Palm Oil
CPO	Crude Palm Oil
CSPK	Certified Sustainable Palm Kernel
DOE	Department of Environmental
DOSH	Department of Occupational Safety and Health Malaysia
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
FFB	Fresh Fruit Bunch
FGS	Finished Good Stock
GAP	Good Agriculture Practise
GHG	Greenhouse Gas
GGC	Global Gateway Certifications Sdn Bhd
HIRARC	Hazard Identification, Risk Assessment and Risk Control
ISCC	International Sustainability & Carbon Certification
IPM	Integrated Pest Management
MPOB	Malaysian Palm Oil Board
MSPO	Malaysian Sustainable Palm Oil
NCR	Non-Conformance Report
NGO	Non-Government Organization

OHS	Occupational Health & Safety
OHSAS	Occupational Health and Safety Assessment Series
PK	Palm Kernel
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
SEIA	Social Environmental Impact Assessment
SOP	Standard Operating
SPO	Sludge Palm Oil



## SECTION II : ASSESSMENT FINDINGS BY PRINCIPLES AND CRITERIA

### 2.1 Principle 1 : Management commitment and responsibility

#### Criterion 1 Malaysian Sustainable Palm Oil (MSPO) Policy

**Indicator 1** Policy for the implementation of MSPO shall be established.

**Summary** TH Plantations Berhad has established Sustainability Policy. The policy has been proved by Mr. Muzmi bin Mohamed; Chief Executive Officer dated on 1<sup>st</sup> March 2019.

MSPO Policy was briefed to the:

- a) External Stakeholders
  - Stakeholder Meeting was conducted on 12<sup>th</sup> December 2018 by En. Abdul Kahar bin Sariman (Estate Manager) and attended by 31 stakeholders. The meeting was collaborated between Mamahat Estate and Mamahat Palm Oil Mill.
- b) Internal Stakeholders
  - MSPO Awareness for Internal Stakeholder was conducted on 01st March 2019 by En. Abdul Naziz Ashady bin Abdul Rahman attended by 55 workers and 13 Management Staff.

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

**Indicator 2** The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation.

**Summary** TH Plantations Berhad has established Sustainability Policy. The policy has been proved by Mr. Muzmi bin Mohamed; Chief Executive Officer dated on 1<sup>st</sup> March 2019.

Stated in the Sustainability Policy; Point no 2 – “To continuously improve our operations in line with social, environmental and economic requirements”.

**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** TH Plantations Berhad has established MSPO Procedure on the Internal Audit. MSPO-TH-01; Rev 0; Date 10/01/2018. The internal audit done annually by team appointed as Internal Auditors from TH Plantations Berhad, Head Quarters.

**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** TH Plantations Berhad has established MSPO Procedure on the Internal Audit. MSPO-TH-01; Rev 0; Date 10/01/2018.

The purpose of this procedure is to describe the audit process conducted internally to determine TH Plantations Berhad's estate and mill operations are effectively implemented to comply with the Malaysian Sustainable Palm Oil (MSPO) standards.

The internal audit conducted by En. Mohd Uzair bin Rozali and En. Mohd Shahrul bin Usran on 16<sup>th</sup> November 2018. 8 major and 1 minor Non – conformities being raised during audit. The Non – conformities being closed on 16<sup>th</sup> January 2019.

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

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

**Summary** Sighted the internal audit report done by Sustainability & Investor Relations Department. Conducted by En. Mohd Uzair bin Rozali and En. Mohd Shahrul bin Usran on 16<sup>th</sup> November 2018. 8 major and 1 minor Non – conformities being raised during audit. The report is available for Management to review and being responded in timely manner.

**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** TH Plantations Berhad has established the Management Review Procedure. MSPO-TH-02; Rev 0; Date 10/01/2018.

Sighted "Management Review Meeting 02/2019" on 18<sup>th</sup> February 2019. Prepared by En. Razali bin Harun (Mill Engineer) and approved by En. Abdul Naziz Ashady bin Abdul Rahman (Mill Manager).

As per stated in the procedure, the estate manager is responsible for arranging the meeting, preparing meeting agenda, determine scheduled date and meeting minutes. The agenda shall be as listed below:

1. Review action items from previous meetings.
2. Review the suitability of the policy.
3. Review process performance and product conformity including suitability and achievement of the quality objectives and other measures.
4. Review feedback from customers and other interested parties including data relating to customer perception of whether the organization has met customer





## 2.2 Principle 2 : Transparency

### Criterion 1 Transparency of information and documents relevant to MSPO requirements

**Indicator 1** The management shall communicate adequate information to other stakeholders on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.

**Summary** TH Plantations Berhad has established the Stakeholder Communication & Consultation Procedure. MSPO-TH-03; Rev 2; Date 5/04/2018.

Sighted stakeholders' meeting with:

a) External Stakeholders

- Stakeholder Meeting was conducted on 12<sup>th</sup> December 2018 by En. Abdul Kahar bin Sariman, The Estate Manager attended by 31 stakeholders. The meeting was collaborated between Mamahat Estate and Kilang Sawit Ladang Mamahat.

b) Internal Stakeholders

- Latest meeting with Internal Stakeholders was held on 1st March 2019 attended by 55 internal stakeholders. The meeting was conducted by Mill Manager. Sighted in the minutes of meeting the agenda on Complaints and Request Procedure being briefed to all workforce.

However, one minor non-conformity has been raised to Kilang Sawit Ladang Mamahat. Sighted training and briefing being conducted to all internal stakeholders. However, in the interview session with internal stakeholders during site visit, they are still lack of awareness on MSPO compliance.

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

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

**Summary** Sighted Reference Document List guideline by Head, Sustainability and Investor Relations, last updated 10<sup>th</sup> April 2018 as stated below:-

No	Reference Document	Confidential	Non-Confidential
1	Policy		/
2	Standard Operating Procedure	/	
3	Management and Discussion Analysis		/
4	Corporate Information		/
5	Corporate Structure		/
6	Board Directors		/
7	Senior management Profiles		/



8	Corporate Responsibility		/
9	Statement of Corporate Governance		/
10	Statement on Risk Management & Internal Control		/
11	Audit Committee Report		/
12	Additional Compliance Information		/
13	Performance Statistic		/
14	Consolidated Financial Statements		/
15	www.thplantations.com.my		/

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

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

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

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

**Summary** TH Plantations Berhad has established the Stakeholder Communication & Consultation Procedure. MSPO-TH-03; Date 5<sup>th</sup> April 2018 (second release).

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

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

**Indicator 2** The management shall nominate management officials at the operating unit responsible for issues related to Indicator 1 (4.2.2.1).

**Summary** The person in charge for transparency agenda is Puan Maslin binti Legam, appointed on 12<sup>th</sup> November 2018 by the Mill Manager, En. Abdul Naziz Ashady bin Abdul Rahman.

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

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



**Summary** Sighted latest stakeholders list updated on 15<sup>th</sup> February 2019. The stakeholders list was updated by En. Mohd Hazree bin Haron.

	No of stakeholders
Smallholders	37
Government	20
Supplier / Contractor	26
Local Community	7
<b>Total</b>	<b>90</b>

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

**Criterion 3 Traceability**

**Indicator 1** The management shall commit itself to implement and maintain the requirements for traceability and shall establish a standard operation procedure for traceability.

**Summary** The THP has established the MSPO Procedure: Title FFB Traceability. MSPO-TH-04; Rev 0; Date 1<sup>st</sup> November 2017.

Sighted all records done by Mill Management. Sighted the Security will check the followings before the vehicles are allow to enter the mill premises:-

- a) Date
- b) Vehicle Number
- c) Name of driver
- d) Name of Supplying Estate / Field No
- e) Time in / Out

Later, the loaded FFB to be weighed at the weighbridge:-

- a) Date of weighing
- b) Name of Supplier
- c) Gross/Tare/Net Weight
- d) Contact Number
- e) Weighbridge ticket number
- f) Description of contents
- g) Vehicle number
- h) Name of driver
- i) Time in / out

Then, the FFB being unload at ramp and the crop being graded by grading team. Result of grading being recorded in Grading Chit.

Upon completion, the vehicles need to weigh empty in order to obtain actual FFB weight, data synchronizing from the first weighing.

The lorry will left the mill with Received Ticket.



Base on interview with the Person In – Charge of all the Mill, they are well versed with the procedures.

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

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

**Summary** The Mill Management team holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Mill Advisor and Internal Audit Team. The effectiveness of the monitoring will evidence in the internal audit and visit report findings.

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

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

**Summary** The person in charge for traceability agenda is Puan Maslin binti Legam, appointed on 12<sup>th</sup> November 2018 by the Mill Manager, En. Abdul Naziz Ashady bin Abdul Rahman.

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

**Indicator 4** Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.

**Summary** Purchases and sales will base on demand and has agreeable documentation with the supplier. Sighted the records of sales, delivery or transportation of FFB. This record being maintained and the documents are kept by the both site (estate and mill).

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

## 2.3 Principle 3 : Compliance to legal requirements

### Criterion 1 Regulatory requirements

**Indicator 1** All operations shall be in compliance with applicable local, national and ratified international laws and regulations.

**Summary** The company has established and updated list of applicable laws and regulations that are applicable for the Mill as per "Plantation Quality Management System (PQMS) – Summary Compliance. The legal register is prepared by SIR Department.

Sighted the Summary of Compliance updated on 12.02.2019. It includes the following:

1. Occupational Safety and Health Act 1994
2. Factories and Machinery Act, 1967
3. Uniform Building By Law, 1986



4. Pesticides Act 1974 (Act 149)
5. Petroleum (Safety Measures) Act, 1984
6. Electricity Supply Act, 1990
7. Fire Service Act, 1984
8. Code of practice for safe working in a confined space, 2001
9. Environmental Quality Act 1974
10. Local Government Act, 1976
11. Workers' Minimum Standards of Housing and Amenities Act 1990
12. Akta Kerja 1955
13. Employee Provident Fund Act 1991
14. Employees Social Security Act 1969
15. Akta Kesatuan Sekerja, 1959
16. Minimum Retirement Age Act, 2012
17. National Wage Consultative Council Act 2011, Minimum Wages Order (Amendment) 2018
18. Weights and Measures Regulations 1981.
19. Sabah Labour Ordinance
20. Jadual Pematuhan, Department of Environment
21. Jadual Pematuhan, Department of Environment (for THP Sabaco Sdn Bhd) No Lesen:001889, Ref No. ASSH(B)91/110/622/062 Capacity 20 mt/hr validity 01.07.2018 to 30.06.2019
22. MPOB, 1998

The list covered the details requirements that related to MSPO compliance. These documents include information on title of laws, subject, reference number, etc, requirement, status of compliance and enforcing agency.

However, one major non conformity has been raised to Kilang Sawit Ladang Mamahat. Details as per below:

- 1) Syahriani Binti Lapping, Passport No. AT892882, Nationality: Indonesia, employed as Pemungut Kelapa Sawit with THP Sabaco Sdn Bhd at Sungai Koyah, Tenegang, Jalan Segama, Locked bag No. 6, Sabah.
- 2) Late renewal of Permit Barang Kawalan Berjadual which has expired on 27.07.2018. Submission date for license renewal was done twice i.e. 30.10.2018 (rejected by agency) and 22.03.2019 (status processing).
- 3) 12 types of chemicals have not been included in the list of chemicals used (Table 07) of the CHRA report 2014 dated 22.02.2014.
- 4) Overtime payment of 14 hours per day has been granted to Mr. Resman Bin Nayoh, Employee's Code KHB029 for the works done on 04.02.2019.

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

**Indicator 2** The management shall list all relevant laws related to their operations in a legal requirements register.

**Summary** Sighted list of permits/licenses being monitored and updated by Pn Maslin Binti Legam (Kerani Akaun) such as;



- a) Lesen Berniaga Serial No. A277606 expiry 31.12.2019
- b) MPOB License No. 526917004000 valid till 31.01.2020
- c) Perakuan Penentuan Timbang dan Sukat, No Siri Alat: B139283369 (60mt) last inspected by L.A.K. Weighing Systems Sdn Bhd on 18.07.2018.
- d) Jadual Pematuhan, Department of Environment (for THP Sabaco Sdn Bhd No Lesen:001889, validity 01.07.2018 to 30.06.2019)
- e) Permit Barang Kawalan Berjadual No Siri : S014011 No Rujukan : PPDNKK.SDK.282011 (SK) for 50,000 liters Euro 2M/Diesel expiry 27.07.2018 (sighted submission of extension application through <http://bless2.bless.gov.my/bless2/private> on 22.03.2019).
- f) Sighted "Surat Sokongan Pelesenan Produk Petroleum" from Jabatan Bomba dan Penyelamat Malaysia, Zon 6 Sandakan Sabah dated 26.07.2018.
- g) Lesen Jeti Persendirian/Midstream Rujukan LPPS: 600-13/1/206 for a period of 12.07.2018 to 31.12.2018. Sighted renewal form submitted to Pengurus, Lembaga Pelabuhan-Pelabuhan Sabah, Sandakan, Sabah on 15.10.2018
- h) Lesen Bagi Pemasangan Persendirian No Siri 33611, Akta Bekalan Elektrik 1990 (Peraturan 9) for a period of 21.11.2018 to 20.11.2019.
- i) Lesen Jabatan Alam Sekitar under Seksyen 18(1), Akta Kualiti Alam Sekeliling 1974 for "Menduduki atau menggunakan premis yang ditetapkan" expiry 30.06.2019.
- j) Perakuan Kebolehan, Peraturan 5(2), No Perakuan 073/2017 for Mr Abdul Naziz Ashady Bin Abdul Rahman, I.C No. 821006-12-5321 (Jurutera Stim Gred Dua) effective 20.04.2017.
- k) Perakuan Kekompeten for Mr Raymond Bin Rukimin I.C No. 840523-12-5497 No Perakuan PW-T-1-B-0410-2006 expiry 12.06.2020.
- l) Perakuan Kebolehan, Peraturan 5(2), No Perakuan H/ED/75/08 for Mr Omar Bin Redzuan, I.C No. 860912-49-6265 (Dandang Stim dan Enjin-Enjin Stim Gred Dua) effective 23.12.2008.

Mill is using the same "Lesen Menggaji Pekerja" with Mamahat Estate, Ref No.: JTK.H.SDK.600-4/1/1/01261/004304 for 283 Indonesian workers for a period of 05.07.2018 to 04.07.2019.

Permit Sekatan Kerja Lebih Masa (had maksima 120 jam dan pekerja tidak boleh dibenarkan bekerja lebih 12 jam sehari) for a period of 22.02.2018 to 22.02.2020.

Sighted Permit Potongan Daripada Gaji Pekerja Seksyen 113 (4), Ordinan Buruh (Sabah Bab 67) which was expired by 01.11.2018 for the following purposes;

- a) Bayaran Pemprosesan Dokumen Perjalanan (tidak termasuk bayaran levi, jaminan bank, insuran pampasan am pekerja dan pemeriksaan kesihatan (GROWARISAN)
- b) Pembelian kerbau untuk tujuan mengangkut buah kelapa sawit.
- c) Pembelian barangan runcit/kantin
- d) Barangan stor (minyak diesel, petrol, air bateri dan helmet.
- e) Pembelian sabit kelapa sawit yang dirosakkan atau dihilangkan
- f) Tabung haji
- g) Tabung pekerja
- h) Bayaran potongan perubatan
- i) Potongan bayaran zakat

j) Bayaran passport (tanggungjawab pekerja)

However, sighted letter of extension Bil (522) dlm. LST10/2018/JTK dated 16.10.2018 addressed to Pegawai, Jabatan Tenaga Kerja, Kota Kinabatangan, Sabah with regards to "Memohon pembaharuan permit potongan gaji pekerja di bawah Seksyen 113 (4) Ordinan Buruh (Sabah Bab 67) THP Sabaco Sdn Bhd".

Sighted "Senarai Nama Warga Kerja dan Keluarga Kilang Sawit Ladang Mamahat".

Sighted Program Lawatan Perumahan Kilang 2019 prepared and visited by Hospital Assistant, Pn Sitti Zainah Binti Haming last inspection done on 09.03.2019 and 16.03.2019.

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

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

**Summary** Based on interview conducted, Pn Salmah Binti Salior (Kerani Am) did mentioned that any new amendments to any regulations through the following manner:

- HQ Department
- Communication with law/enforcement officers
- Enquiring the laws books publisher
- Website

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

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

**Summary** Sighted letter of appointment for the responsible person, Pn Salmah Binti Salior (Kerani Am) signed by Mr Abdul Naziz Ashady Bin Abdul Rahman (Mill Senior Assistant Manager) dated 12.11.2018.

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

**Criterion 2 Land use rights**

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

**Summary** The Mill is situated in the Land Title of CL085330409 valid till 31.12.2096 with the approximate area of 9.87ha. The copy of land title is kept in the mill office and was sighted during the audit. Evidence of annual payment of land tax paid by Mamahat Estate to Majlis Daerah Beluran amounted to RM465.80. Sighted also quit rent paid by Mamahat Estate to Jabatan Tanah dan Ukur Daerah Sandakan amounted to RM2,795.00 in the form of receipts.

**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 legal use of the land.

**Summary** Sighted Land ownership of the company in the Land Title of CL085330409 belongs to Syarikat Sabaco Sdn Bhd. Mill was built within the Mamahat Estate's area.

**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** As the Mill was built within the Mamahat Estate's area, the permanent fence had been constructed to demarcate the vicinity of the mill area. Mill is situated within the estate land title No. CL085330409.

**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** As the Mill is built within Mamahat Estate, no disputes have been recorded in mill area. There is no evidence of conflict present in this mill.

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

### **Criterion 3 Customary land 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** As the Mill is built within Mamahat Estate, thus no issue of land encumbered by customary rights.

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

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

**Summary** As the Mill is built within Mamahat Estate, thus no issue of land encumbered by customary rights.

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

**Indicator 3** Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.

**Summary** There is no land conflict or disputes recorded by the mill. The Mill land title and ownership are legally identified and documented.

**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 should be implemented to mitigate the negative impacts and promote the positive ones.

**Summary** Sighted, the latest Social Impact Assessment was conducted on 17<sup>th</sup> December 2018. The purpose of Social Impact Assessment is to measure and assessing on "Kerosakan Jalan Utama Menuju Ke Kilang"

21 respondents were involved in the assessment. Seen in the review report, the mitigation plan on the negative's response. Post assessment was conducted on 23<sup>rd</sup> December 2018.

**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** Sighted MSPO Procedure, Stakeholder Communication and Consultation Procedures, Ref No: MSPO – TH -03, Rev: 0, Dated 1<sup>st</sup> November 2017 and Second Release on 5<sup>th</sup> April 2018 has been established and documented. Sample of Grievance Form as per Appendix 3.

The procedure and flowchart outlined the mechanism to handle issues highlighted by all the stakeholders and resolved effectively, timely and appropriate manner that is accepted by all parties.

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

**Indicator 2** The system shall be able to resolves disputes in an effective, timely and appropriate manner, which is accepted by all parties.

**Summary** Merely, one complaint being recorded in 2018 and zero in 2019 to date. Complaints forms seen and being responded by the Management. Seen samples of complaints dated 17/12/18 by Mr. Mohammad Azrih bin Putang on "Kerosakan Jalan Utama Menuju Ke Kilang". Work was completed on 23<sup>rd</sup> December 2018.

**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 complaints.

**Summary** Complaint Form seen for External and Internal Stakeholders. Complaint form is available at the office and the complaint being place in the Drop Box outside the office.

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

**Indicator 4** Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.

**Summary** Stakeholder Meeting was conducted on 12<sup>th</sup> December 2018 by En. Abdul Kahar bin Sariman, The Estate Manager attended by 31 stakeholders. The meeting was collaborated between Mamahat Estate and Kilang Sawit Ladang Mamahat.

Latest meeting with Internal Stakeholders was held on 1<sup>st</sup> March 2019 attended by 55 internal stakeholders. The meeting was conducted by Mill Manager. Sighted in the minutes of meeting the agenda on Complaints and Request Procedure being briefed to all workforce.

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

**Indicator 5** Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.

**Summary** Merely, one complaint being recorded thus far. Issues is attended and has been resolved in timely manner.

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

**Criterion 3 Commitment to contribute to local sustainable development**

**Indicator 1** Palm oil millers should contribute to local development in consultation with the local communities. Where the mill is an integral part of a plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.

**Summary** Mill is committed and have contributed to local development. The contribution made to the internal and external stakeholders. As evidence, the management has organized activities as follows:-

- Sighted, a Corporate Social Responsibility contribution on Sambutan Maulidur Rasul 2018 for Complex Ladang Mamahat Mosque dated 7<sup>th</sup> December 2018 amounting RM750.00

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

**Criterion 4 Employees safety and health**

**Indicator 1** An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act139) shall be documented, effectively communicated and implemented.

**Summary** Sighted the Occupational Safety & Health Policy. Established on 1<sup>st</sup> March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language. The policy being displayed at the Notice Board and awareness programme to all the Stakeholders. 2019 OSH Plan sighted with an objective "Kearah Kemalangan Sifar".

**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 chemicals used at the palm oil mill:
  - i) all employees involved are adequately trained on safe working practices; and
  - ii) all precautions attached to products should 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 shall 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 that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meetings shall be kept and the concerns of the employees and any remedial actions taken shall be recorded.
- h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.
- i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.
- j) Records shall be kept of all accidents and be reviewed periodically a t quarterly intervals.

**Summary**

Sighted the Occupational Safety & Health Policy. Established on 1<sup>st</sup> March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.

The Mill has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training 2019 file.

NO	TOPIC	MONTH PROGRAMME
1	Fire Drill	April / May / Oct
2	PPE Training	March
3	First Aid Training	April
4	Chemical Handling Training	May
5	Confined Space Training	April

Training records for Annual Training Programme on Safety was sighted on 1<sup>st</sup> March 2019 conducted by Mill Executives attended by 55 participants.



Mill has provided appropriate PPE for all workers in their operations. Person in-charge of in issuing PPE is Puan Norazura bt Ahmad, the Storekeeper. PPE Issuance and replacement record sighted for:-

- 1) Staff/AP
- 2) General Workers

The type of PPE is included in the HIRARC assessment chart for all type of job activities.

The last CHRA was conducted on 22<sup>nd</sup> February 2014 by Klinik Mansor Sdn Bhd, JKPP HQ/11/ASS/00/289. Seen a letter from Klinik Mansor Sdn Bhd dated 8<sup>th</sup> March 2019 on the new CHRA has been conducted and awaiting the report to be ready and submit to Mill.

Company has established Standard Operating Procedure for transporting, receiving, handling, storage and disposal of chemicals, MNL/OSH/2009/1 - 1.14 dated 1<sup>st</sup> March 2009.

Seen, all the Medical Surveillance report for 23 workers conducted on 12<sup>th</sup> December 2018. The Chemical Register Hazardous to Health which registered 40 hazardous chemicals dated 1<sup>st</sup> January 2019.

The person in charge for OSH is En. Abdul Naziz Ashady (The Senior Assistant Manager In – Charge) dated 18<sup>th</sup> January 2018. OSH Committee Chart 2019 sighted. Seen, Letter of appointment for committee members dated 13<sup>th</sup> March 2019.

Emergency Response Procedure Standard Operating Procedure, MNL/OSH/2009/1-1.21 dated 1<sup>st</sup> March 2009 sighted. The ERP has clearly justified procedures when dealing with chemical spillage, accident and others.

Emergency response plan include the emergency contact number, Emergency Respond Plan Procedure and exit routes in file and notice board. ERP Chart 2019 indicates Puan Sitti Zainah binti Haming as First Aider for Kilang Sawit Ladang Mamahat.

Seen, submission of JKPP 8 (I & II)/(IV) on annually basis to the DOSH was on 13<sup>th</sup> February 2019. LTA calculation based on local interpretation from DOSH.

However, one major non-conformity has been raised to Kilang Sawit Ladang Mamahat. Details as per below:

- b. Inadequate HIRARC being assessed and documented particularly on CPO Despatch.
- d. No evidence an audiometry test being conducted to all employees who worked in the area or work process as stipulated under Factories And Machinery (Noise Exposure) Regulations 1989.  
Part VI Audiometric Testing Programme, Regulation 20 - General.  
(1) An occupier shall establish and maintain an audiometric testing programme for all employees exposed to noise level at or above the action level.

- g. Evidence the interval of meeting being conducted in- consistently and against the Occupational Safety and Health (Safety and Health Committee) Regulation 1996,  
Part IV Meetings of Safety and Health Committee, Regulation 21 - Frequency of meetings of committee.

(1) A safety and health committee shall meet as often as may be necessary commensurate with the risks attendant on the nature of work at the place of work but shall not meet less than once in three months.

Sample taken as follows:-

- a. 28<sup>th</sup> May 2018
- b. 24<sup>th</sup> October 2018
- c. 13<sup>th</sup> December 2018
- d. yet to be conducted as at 26<sup>th</sup> March 2019

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

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

**Summary**                      Sighted in the Social Policy on Respect and protection of basic Human Rights of all Employees (including temporary, contract and/or foreign workers) Established on 1<sup>st</sup> March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language

This policy covers:-

- "Mematuhi perundangan dan peraturan – peraturan yang ditetapkan termasuk untuk undang –undang buruh, undang –undang hakmilik tanah serta perumahan pekerja".
- "Memastikan polisi persaraan minima dipatuhi".
- "Menyediakan latihan dan pembangunan yang berkaitan dengan peranan dan tanggungjawab pekerja dan kakitangan tersebut".
- "Melarang pengambilan tenaga kerja tidak sah secara paksaan dan pekerja di bawah umur".
- "Membayar gaji kepada pekerja dan kakitangan berdasarkan perintah gaji minima".
- "Menghormati dan melindungi hak asasi manusia dan pekerja ( termasuk pekerja sementara, kontrak dan atau pekerja asing".
- "Tidak mengamalkan sikap diskriminasi dan prejudis terhadap jantina, bangsa, agama, kewarnegaraan dan pandangan politik".
- "Menyediakan persekitaran kerja yang harmoni kepada pekerja ,pelanggan dan orang yang berkepentingan".
- "Memastikan Suasana kerja bebas daripada gangguan seksual samada secara langsung atau tidak langsung kepada semua pekerja, masyarakat dan pihak berkepentingan keseluruhannya".



The Mill is displayed at notice boards outside the office. Communication of all the policies to workforce is through training and during muster call.

**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** Sighted in the Social Policy on Free from discriminatory practices against sex, race, religion, nationality and political opinions. Established on 1<sup>st</sup> March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer).

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

All workers enjoy the same scale of pay. This was confirmed through interview with workers/staff from the mill. Also, through verification of contracts of service and pay slips of workers.

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

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

**Summary** Pay and conditions are documented in the workers' Contract Agreement and wage payment records / pay slip.

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

Interview with both Mill staff and workers and with both male and female confirmed that they understand the terms and conditions of their employment. Sample taken on the following worker:-

- Ajrayih bin Haris – 720111-12-5419 - Feb 2019  
Basic Salary = RM888.51  
Work on Restday = RM169.24  
Overtime = RM1,142.36

Deduction  
KWSP = RM 117.00  
SOCSSO = RM11.25  
SIP = RM4.50  
Canteen = RM 14.00

Net salary = RM 2,053.40



**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 in the mill.

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

**Indicator 5** The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.

**Summary** Sighted, the registration card Pendaftaran Pekerja-Pekerja under Akta Keselamatan Dalam Negeri, 1960 Keselamatan Dalam Negeri (Undang –Undang Pendaftaran Pekerja),1960 (Peraturan 3) for Puan Hawla bt Takudang – 640415-12-6242, En. Jatil bin Idah 670416-12-5599 and En. Mohd Shahrin bin Sapri 930526-12-6451

The registration card stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc.

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

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

**Summary** Sighted, Employment Contract between THP Sabaco Kilang Ladang Mamahat Sdn Bhd and the workers. The Agreement stated all the term and conditions according to Malaysian Law. The contract is in Bahasa Malaysia.

This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local and Indonesian. Sample taken on Puan Masriah Bt Dudukok 940207-12-6154, En. Adin bin Befing 900118-12-6519 and En Sahim bin Jayan 700402-12-6421.

**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 the employees and employers.

**Summary** Working hours is 8 hours. From Saturday to Thursday. The overtime maximum is 104 hours according to Malaysian Law. Daily attendance recorded during muster call. Mill has used punch card as a working time recording system.

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

**Indicator 8** The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirement applicable.

**Summary** The working hour and break time have been clearly stated in the Employment Contract. Sighted in the Contract Agreement the rate of overtime which agreed by both parties. There is no complaint received regarding payment or are forced to work overtime during site interview.

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

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

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

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

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

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

**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.

**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.

**Summary** All workers are provided with housing facilities at workers linesite, clinic, football field, shop, crèche, TASKA and mosque. Water and electricity is subsidized free.

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

**Indicator 12** The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.

**Summary** Sighted in the Social Policy. Established on 1<sup>st</sup> March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.



The policy to prevent all forms of sexual harassment and violence at the workplace has stated under the following number:

- h) "Menyediakan persekitaran kerja yang harmoni kepada pekerja, pelanggan dan orang yang berkepentingan."
- i) "Memastikan Suasana kerja bebas daripada gangguan seksual samada secara langsung atau tidak langsung kepada semua pekerja, masyarakat dan pihak berkepentingan keseluruhannya"

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

**Indicator 13** The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or 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 in the Social Policy. Established on 1<sup>st</sup> March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.

The policy on respect the right of all employees to form or join trade union has been stated under the following number:

- f) "Menghormati dan melindungi hak asasi manusia dan pekerja (termasuk pekerja sementara, kontrak dan atau pekerja asing)."

**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.

**Summary** Child and young person policy is incorporated in the Social Policy. The policy was established on 1<sup>st</sup> March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.

The policy on Children and young persons shall not be employed or exploited. has been stated under the following number:

- d) "Melarang pengambilan tenaga kerja tidak sah secara paksaan dan pekerja di bawah umur."

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

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

**Criterion 6 Training and competency**

**Indicator 1** All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.

**Summary** Training and Development policy is incorporated in the Social Policy which established on 1<sup>st</sup> March 2019 which was approved by En. Muzmi bin Mohamed (Chief Executive Officer). The policy is written in Bahasa and English language.

The statement under the following number:

- b) "Menyediakan latihan dan pembangunan yang berkaitan dengan peranan dan tanggungjawab pekerja dan kakitangan tersebut."

The Mill has a comprehensive annual training plan. The training plan for 2019.

NO	TOPIC	MONTH PROGRAMME
Occupational Safety and Health		
1	Fire Drill	April / May / Oct
2	PPE Training	March
3	First Aid Training	April
4	Chemical Handling Training	May
5	Confined Space Training	April
6	Toolbox Training	November
7	Annual safety Training	February

Environmental		
1	Waste handling	March
2	Pollutions Control & Environmental	August
3	Mutual Assistance	May / November
4	Water Treatment	July
5	POME	October

Training records for "Taklimat Alam Sekitar": was sighted on 1<sup>st</sup> March 2018 conducted by En. Abdul Naziz Ashady attended by 55 participants.

**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** Yearly training plan is created based on Training Needs Analysis for workers involved in the operations. Sighted the Training Need Analysis of all workers, staffs and Management which are based on their competencies and job description.

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

**Indicator 3** A continuous training programme shall 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** The Mill has a comprehensive annual training plan for its staffs and workers and this was sighted in the training records file for each staffs and workers.

**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** TH Plantations Berhad has established Environmental Policy signed by En. Muzmi Bin Mohamed; Chief Executive Officer dated 01.03.2019.

Based on the Environmental Policy, TH Plantations Berhad is committed towards implementing the following practices:

- To execute estates and mill operations in line with relevant legislations and the Environment Quality Act
- To practice a "Zero Burning" policy on new land development and replanting activities
- To ensure that estates and mill activities follow the guidelines of current industry practices: and
- To promote and provide the awareness on environmental protection to all employees and stakeholders

Interview with the mill workers and staffs confirmed they have been trained under Environmental Policy and Management Plan. Records of the training in the form of the attendance list, pictorial evidence as well as the training handouts is made available to the audit team during the audit.

**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**

TH Plantations Berhad has established the MSPO Procedure with a title: Environmental Management Plan (EMP) Ref No. MSPO-TH-06 Rev: 00 Date: 01.11.2017 initially released by SIR Department on 01.11.2018. The purpose of the procedure is to provide the relevant guidelines in the preparation and implementation of the Environmental Management Plan (EMP).

The Mill has conducted environmental aspect and impact assessment for all its' activities based on Environmental Risk Assessment Form No: LSM-EMS-EA-F01. The environmental assessment findings are recorded in document titled "Environmental Risk Assessment Form" and last reviewed and updated by Mr Razali Bin Harun (Assistant Manager) and approved by the Senior Assistant Manager, Mr Abdul Naziz Ashady Bin Abdul Rahman on 25.02.2019.

The environmental aspect impact assessment (annually reviewed) has covered 8 main operations that related to environmental aspects such as;

1. Office/lab
2. Receptions
3. FFB, CPO & PK Processing
4. Generation of Steam & Electricity
5. Water & Effluent Treatment
6. Workshop
7. Store
8. Product Storage

**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**

Mill has established the Environmental Management Plan – Mitigation and Monitoring Records; prepared by Mr Razali Bin Harun (Assistant Manager) and approved by the Senior Assistant Manager, Mr Abdul Naziz Ashady Bin Abdul Rahman on 25.02.2019. It consists column of the following;

- 1) No.
- 2) Environment Aspect
- 3) Environmental Impact/Effect of the Impacts,
- 4) Impact Analysis i.e. (a)Frequency/Likelihood, (b)Consequences, (axb)Impact Level
- 5) +ve effect or –ve effect
- 6) Mitigation Measure
- 7) Monitoring Program.

The Mill activities on environmental aspects such as;

1. Receiving & loading of FFB
2. Despatch of CPO & PK
3. EFB disposal & others
4. Sterilization
5. Threshing
6. Pressing



7. Nut/kernel plant
8. Oil clarification
9. Boiler & genset operation
10. Treatment of water
11. POME discharge

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

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

**Summary** Sighted the Management Review Procedure - Continuous Improvement Plan (Appendix 2) prepared by Pn Salmah Binti Salior (General Clerk) and approved by the Senior Assistant Manager, Mr Abdul Naziz Ashady Bin Abdul Rahman on 15.02.2019.

Sighted the Mill's Estimate 2019 regarding the environmental improvement plan i.e. the installation of electrostatic precipitator (ESP) for existing boiler in order to reduce particulate emission.

**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 and management plans and are working towards achieving the objectives.

**Summary** Sighted the Mill training program 2019 for all executives, staffs and workers on the following aspects;

- 1) OSH programme
- 2) Environment programme
- 3) Operation/Management programme

Sighted also the Mill training Program 2019 related on Environment Aspects such as;

- 1) Environmental Committee Audit
- 2) Environmental Committee Meeting
- 3) Waste Handling Training
- 4) Pollution Control & Environmental training
- 5) Scheduled waste handling
- 6) Mutual assistance program

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

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

**Summary** Sighted the minutes of Environmental Management Plan meeting attended by 3 executives on 18.12.2018. Sighted training report of "Taklimat Alam Sekitar" attended by 3 executives, 10 staff & 55 workers held on 01.03.2019.

**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** Mill has maintained record of diesel monitoring for a period of 2016-2018 with an average baseline value of 2.24 liters/ton FFB processed.

Observed also record of Diesel Consumption per MT FFB for year 2019. As at February 2019, the Mill has used 61,218 liters diesel against the FFB processed of 13,307.36 ton or equivalent to 4.60liters diesel/ton FFB versus the baseline of 2.24 litres/ ton FFB.

Sighted record of Diesel Consumption in term kWh/liter for the year 2018 and 2019. As at February 2019, the generated electricity was 63,432 kWh against diesel consumption of 57,767liters or equivalent to 1.098 kWh per liter.

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

**Indicator 2** Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.

**Summary** The projection consumption of diesel for mill has been documented on annual basis based on the financial year with the latest available is for year 2019.

Sighted Diesel Estimate per MT FFB for 2019 with a total of 315,384 litres versus FFB to be processed of 64,000mt or 4.93 litres/ton FFB. The vehicles involved in the use of diesel will be as follow;

- 1) Komatsu WA180
- 2) Genset 1 (500kW)
- 3) Genset 2 (200kW)
- 4) Genset 3 (250kW)
- 5) 3-unit Toyota Hilux

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

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

**Summary** Sighted renewable energy production and utilization of PKS and Fiber as a source of renewable energy for their operations. A total of 3,374.19 mt PKS and 7,591.92mt Fiber has been utilized in 2018.



As at February 2019, a total of 842.40 mt PKS and 1,895.39mt Fiber has been utilized for energy generation.

**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** TH Plantations Berhad has established the MSPO Procedure; Title: Waste Management. MSPO-TH-05; Rev 0; dated 01.11.2017, initially released by SIR Department on 10.01.2018.

The MSPO Procedure describes the following implementation on;

- 1) Waste management
- 2) Scheduled waste disposal
- 3) Domestic waste disposal

Sighted "Buku Laporan Buangan Terjadual" and Inventory of Scheduled Waste (e-swis) as at 25.03.2019. As evidence:

- 1) SW305 – first generated after previous disposal on 18.03.2019, todate balance as at 25.03.2019 is 1.148mt
- 2) SW410 - first generated after previous disposal on 18.03.2019, todate balance as at 25.03.2019 is 0.17mt

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

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

**Summary** The Mill has identified and documented all types of waste that generated from its operation as stated in the "Buku laporan buangan terjadual" and Inventory of Scheduled Waste (e-swis).

Recycling activities for mill by products includes empty fruit bunch, fibre, palm kernel shell, boiler ash and etc.

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

**Indicator 3** The palm oil mill 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. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Wastes) Regulations, 2005.



**Summary** TH Plantations Berhad - Standard Operating Procedure Manual (OSH); Ref. No: MNL/OSH/2009/1-1.14; Safe Operating Procedure (Transporting, Receiving, Handling, Storage and Disposal of Chemicals); dated 01.03.2009.

Sighted Chemical Registration listed 39 names of chemical substances. The list was last updated by Mr Razali Bin Harun (Assistant Manager) and approved by the Senior Assistant Manager, Mr Abdul Naziz Ashady Bin Abdul Rahman on 02.02.2019. However, there are 12 types of chemicals has not been included in the list of chemicals used (Table 07) of the CHRA report 2014 dated 22.02.2014 (please refer 4.3.1.1 for the non-conformity).

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

**Indicator 4** Domestic waste should be disposed as such to minimise the risk of contamination of the environment and watercourse.

**Summary** Mill disposes domestic waste to minimize the risk of contamination of the environment and watercourse. Domestic waste for linesite area are disposed at landfill located at block 07 on Mamahat Estate, 1km from linesite.

**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** Mill identifies and monitor all waste products and polluting activities resulting from its activities.

Mill has established the Environmental Management Plan – Mitigation and Monitoring Records; prepared by Mr Razali Bin Harun (Assistant Manager) and approved by the Senior Assistant Manager, Mr Abdul Naziz Ashady Bin Abdul Rahman on 25.02.2019. It consist column of the following example;

- 1) Mill Activity: POME discharge
- 2) Environment Aspect: Spillage of POME due to leakage /overflow ponding, piping system.
- 3) Environmental Impact: Land, air and water pollution
- 4) Mitigation Measure: Maintain POME free board for ponds over 0.5m; Maintain pump and piping regularly
- 5) Monitoring Program: Mill SOP; ETP log book

Sighted Greenhouse Gas Calculation for 2018;

- 1) FFB produced: 55,112.85mt
- 2) POME produced : 62,633.75mt
- 3) Methane produced : 751.61mt
- 4) Diesel usage : 347,829liters
- 5) CO<sub>2</sub> produced : 932,181.72mt



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

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

**Summary** Mill has adopted the usage of Biotube to reduce the POME discharge. So far, the mill has succeeded to reduce the POME by 30% since 2016.

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

**Indicator 3** Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations

**Summary** The POM is treating POME in accordance to the DOE Limits for final discharge into the land irrigation.

Sighted effluent analysis report, analyzed by Dynakey Laboratories Sdn Bhd on 25.03.2019 for final discharge recorded 10.8mg/L BOD.

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

#### Criterion 5 Natural water resources

**Indicator 1** The management shall establish water management plans 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.  
b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.  
c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc).

**Summary** TH Plantations Berhad has established the MSPO Procedure; Title: Water Management Plan, MSPO-TH-08; Rev 0 dated 01.11.2017 revised on 10.01.2018.

Sighted raw water analysis report, analysed by Dynakey Laboratories Sdn Bhd on 25.03.2019 for upstream and downstream of Sg Mamahat.  
The parameters analysis as follow;

1) Upstream

No	Parameter	Results
1	pH value	6.9 @25°C
2	BOD (3days@30°C),mg/L	ND (<2)
3	COD, mg/L	ND (<15)
4	Amm-N (NH <sub>3</sub> -N),mg/L	ND (<1)
5	Total N, mg/L	1.1



6	Oil & Grease, mg/L	ND (<2)
7	Suspended solids, mg/L	ND (<2)
8	Total solids, mg/L	133

## 2) Downstream

No	Parameter	Results
1	pH value	7.0 @25°C
2	BOD (3days@30°C), mg/L	4.6
3	COD, mg/L	38
4	Amm-N (NH <sub>3</sub> -N), mg/L	ND (<1)
5	Total N, mg/L	1.1
6	Oil & Grease, mg/L	ND (<2)
7	Suspended solids, mg/L	82
8	Total solids, mg/L	1,183

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

**Indicator 2** Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.

**Summary** The POME is discharged to Mamahat estate for land irrigation (furrow system). The BOD is below approved limit of 20mg/L by DOE for land irrigation. Reported to DOE on quarterly basis using OER (online environmental reporting).

Sighted DOE approval for land irrigation stated as per "Syarat-syarat Pengurusan Efluen" in the "Jadual Pematuhan".

Effluent disposal location has been determined based on "Topographical Plan of Land Irrigation Area" dated 10.06.2008 involving Block 8, 9, 13, 14 & 15.

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

## 2.6 Principle 6 : Best practices

### Criterion 1 Mill management

**Indicator 1** Standard operating procedures shall be appropriately documented and consistently implemented and monitored.

**Summary** Mill capacity 25 MT/Hr – Sterilization is by horizontal sterilizer. The mill has implemented Good Milling Practice (GMP) as seen from visit to the mill and seen from the document and also interviewing the workers.

Palm Oil Mill has 6 types of Manuals:

- 1) Standard Operating Procedure (SOP) Manual – Milling Operation
- 2) Standard Operating Procedure (SOP) manual – Occupational Safety & Health

- 3) Standard Operating Procedure (SOP) manual – Technical Mill Operation Procedure
- 4) Standard Operating Procedure (SOP) Manual – Office Administration
- 5) Standard Operating Procedure (SOP) manual – Finance
- 6) TH Plantations Berhad - MSPO Procedure

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

**Indicator 2** All palm oil mills shall implement best practices.

**Summary** The mill is not certified by MPOB Codes of Milling Practice (CoP). However, mill has implemented Good Milling Practice (GMP) as per their own SOP's.

The mill is operating in accordance to Jadual Pematuhan – Syarat-Syarat Lesen Premis Minyak Kelapa Sawit Mentah, Jabatan Alam Sekitar Negeri Sabah JPKKS/12/001889 valid until 30.06.2019 and all the Standard Operating Procedures.

**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** Mill had an annual budget for the financial year 2019. The budget includes the projected FFB production, general charges, upkeep & cultivation, Collection and Immature areas.

Sighted the 14 years business plan for the Mill.

FY	2019	2020	2021
Own crop	63,365	61,389	62,044
Outside	635	500	500
<b>Total</b>	<b>64,000</b>	<b>61,889</b>	<b>62,544</b>
Estimate OER %	21.00	21.00	21.00
KER	4.40	4.40	4.40

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

**Criterion 3 Transparent and fair price dealing,**

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



**Summary** The pricing of FFB is based on MPOB pricing every month and for CPO and PK is based on the tender price by Procurement Department at HQ. As evidence, the price for March 2019 is RM 2,100.00 (Malaysia Average).

The company will make an announcement for tender for other services like annual mill inspection, boiler overhaul, service decanter and etc.

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

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

**Summary** Currently mill don't have any contractors and outsource the work.

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

**Criterion 4 Contractor**

**Indicator 1** In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.

**Summary** As per interviewed with Mill Manager, once the contractor appoints by the mill, all the contractors will be informed by mill management to follow the MSPO standard requirement.

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

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

**Summary** Currently mill don't have any contractors and outsource the work.

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

**Indicator 3** The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.

**Summary** The mill was audited by Global Gateway Certifications Sdn Bhd MSPO auditor on 26<sup>th</sup> March 2019. Sighted audit plan dated 22<sup>nd</sup> February 2019 which have been accepted address to Miss Aisyatul Aizzura Salha Abdul Rahim (Head Sustainability and Investor Relations). All the auditors are qualified MSPO auditor. As per agreed, the company accept the GGC MSPO Auditors to verify through a physical inspection if required for audit purposed.

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



## 2.7 Details of Audit Findings

### Details Non-Conformity

- See Appendix B -

### Details of Area of Concern

- See Appendix B -

### Details of Noteworthy / Positive Findings

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

## Appendix A: Audit Plan


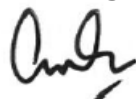
<b>AGENDA</b>				
<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>Lead Auditor</b>	<b>Auditor</b>
24 <sup>th</sup> March 2019	TBA	➤ <b>Travelling from KUL – Sandakan, Sabah.</b>	MS	IBI/AS
25 <sup>th</sup> March 2019	08:00 – 09:00	➤ <b>Centralize Opening Meeting at Mamahat Estate:</b> <ul style="list-style-type: none"> <li>• Presentation by the manager/coordinator</li> <li>• Presentation by Lead Auditor.</li> </ul> ➤ Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable).	MS	IBI/AS
	09:00 – 13:00	<b>Mamahat Estate</b> <ul style="list-style-type: none"> <li>➤ <b>Document Audit:</b> <ul style="list-style-type: none"> <li>• Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul> </li> </ul>	MS	IBI/AS
	10:30 – 12:30	➤ <b>Estate inspection:</b> <ul style="list-style-type: none"> <li>• Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc.</li> </ul>	MS	IBI/AS
		➤ <b>Centralize Stakeholder Consultation</b>		IBI/AS
	13:00 – 14:00	➤ <b>Lunch</b>	MS	IBI/AS
	14:00 – 16:00	➤ <b>Continue document review</b> <ul style="list-style-type: none"> <li>• Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul>	MS	IBI/AS
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 1.	MS	IBI/AS

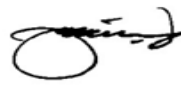




<b>AGENDA</b>				
<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>Lead Auditor</b>	<b>Auditor</b>
26 <sup>th</sup> March 2019	08:00 – 13:00	<b>Mamahat POM</b> <ul style="list-style-type: none"> <li>➤ <b>Document Audit:</b> <ul style="list-style-type: none"> <li>• Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul> </li> </ul>	MS	IBI/AS
	10:30 – 12:30	<ul style="list-style-type: none"> <li>➤ <b>Mill inspection:</b> <ul style="list-style-type: none"> <li>• Workshop, Laboratory, Environment, OHS, Chemical Stores, Workers Welfare and Interview, Clinic, Landfill, Mill Housing, Schedule Waste, POME and etc.</li> </ul> </li> </ul>	MS	IBI/AS
	13:00 – 14:00	<ul style="list-style-type: none"> <li>➤ <b>Lunch</b></li> </ul>	MS	IBI/AS
	14:00 – 15:30	<ul style="list-style-type: none"> <li>➤ <b>Continue document review</b> <ul style="list-style-type: none"> <li>• Public documents, SOPs, Policies, Internal audit, Production &amp; Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc.</li> </ul> </li> </ul>	MS	IBI/AS
	15:30 – 16:00	<ul style="list-style-type: none"> <li>➤ Verify any outstanding issues and auditor discussion</li> </ul>	MS	IBI/AS
	16:00 – 17:00	<ul style="list-style-type: none"> <li>➤ <b>Centralize Closing Meeting at Mamahat POM:</b> <ul style="list-style-type: none"> <li>➤ Chaired by the audit Lead Auditor</li> <li>• Welcome and introduction by the Lead Auditor</li> <li>• Presentation of findings by the audit team</li> <li>• Questions &amp; answers and Final summary by Lead Auditor</li> </ul> </li> <li>➤ <b>End of assessment</b></li> </ul>	MS	IBI/AS

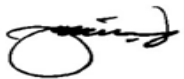

## Appendix B : Non-Conformity details

Non-Conformities Identified During This Audit			
<b>Major Nonconformities:</b>		The following NC's were raised for this audit.	
<b>Company Name</b>		TH Plantations Berhad	
<b>Stage of Audit</b>		Initial Stage 1	<input type="checkbox"/>
		Surveillance	<input type="checkbox"/>
<b>Audited Standard</b>		Initial Stage 2	<input checked="" type="checkbox"/>
		Recertification	<input type="checkbox"/>
<b>Client Number</b>		GGC-D4-MSPO-2019	
<b>NC No. / Ref.</b>	D4/MSPO/MAJOR/01	<b>Date Detected</b>	26 <sup>th</sup> March 2019
<b>Site(s) concern</b>	Kilang Sawit Ladang Mamahat	<b>Target Completion</b>	90 Days
<b>Normative Reference and Requirement</b>	4.3.1.1 Major  All operations shall be in compliance with applicable local, national and ratified international laws and regulations.		
<b>NC Type</b>	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Area of Concern		
<b>Description of Non-Conformity</b>	1) Sighted the work permit of mill's foreign worker is under different employer. 2) Incompliance to condition No. 9 of the Permit Barang Kawalan Berjadual. 3) No evidence the new chemicals being reviewed in the CHRA report. 4) Incompliance to Section 104 (1) (c) of Labour Ordinance (Sabah Cap.67).		
<b>NC Objective Evidence:</b>			
1) Syahriani Binti Lapping, Passport No. AT892882, Nationality: Indonesia, employed as Pemungut Kelapa Sawit with THP Sabaco Sdn Bhd at Sungai Koyah, Tenegang, Jalan Segama, Locked bag No. 6, Sabah. 2) Late renewal of Permit Barang Kawalan Berjadual which has expired on 27.07.2018. Submission date for license renewal was done twice i.e. 30.10.2018 (rejected by agency) and 22.03.2019 (status processing). 3) 12 types of chemicals have not been included in the list of chemicals used (Table 07) of the CHRA report 2014 dated 22.02.2014 4) Overtime payment of 14 hours per day has been granted to Mr. Resman Bin Nayoh, Employee's Code KHB029 for the works done on 04.02.2019.			
<b>Lead Auditor Signature:</b>		<b>Client Signature:</b>	
			

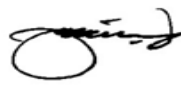
<b>Root cause Analysis (to be filled by client):</b>	
<ol style="list-style-type: none"> <li>1) Work permit of foreign worker is under oil palm plantation sector</li> <li>2) Late renewal of permit.</li> <li>3) Miss understanding of documentation for chemicals used by the mill.</li> <li>4) Overpaid overtime to workers.</li> </ol>	
<b>Corrective action planned (to be filled by client):</b>	
<ol style="list-style-type: none"> <li>1) The worker will be transferred to work in estates.</li> <li>2) The mill has been applied the permit renewal on 09/05/2019.</li> <li>3) The mill has been renewed the CHRA report</li> <li>4) The mill management followed the section for the said above.</li> </ol>	
<b>Preventive Action (to be filled by client):</b>	
<ol style="list-style-type: none"> <li>1) The mill will only hire the permitted foreign workers for the mill sector soon (if any).</li> <li>2) Continuous monitoring of expiry date for the immediate renewal of permit.</li> <li>3) Continuous monitoring of recommendation stated in the CHRA report.</li> <li>4) Continuous monitoring of workers overtimes due to the compliance of Labour Ordinance (Sabah Cap.67).</li> </ol>	
<b>Review of corrective/preventive action (to be filled by Lead Auditor)</b>	
All the evidence submitted were found adequate and therefore this major non-compliance is closed.	
<b>NC Closed:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Site verification:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date Verified:</b> 23 <sup>rd</sup> May 2019	<b>Lead Auditor Signature:</b> 

<b>Company Name</b>	TH Plantations Berhad			
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
<b>Audited Standard</b>	Part 4: General Principles for Palm Oil Mills			
<b>Client Number</b>	GGC-D4-MSPO-2019			
<b>NC No. / Ref.</b>	D4/MSPO/MAJOR/02	<b>Date Detected</b>	26 <sup>th</sup> March 2019	
<b>Site(s) concern</b>	Kilang Sawit Ladang Mamahat	<b>Target Completion</b>	90 Days	




<b>Normative Reference and Requirement</b>	<p>4.4.4.2 Major</p> <ul style="list-style-type: none"> <li>b. The risks of all operations shall be assessed and documented.</li> <li>d. The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>g. The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</li> </ul>
<b>NC Type</b>	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Area of Concern
<b>Description of Non-Conformity</b>	<p>No evidence sighted during the audit</p>
<p><b>NC Objective Evidence:</b></p> <ul style="list-style-type: none"> <li>b. Inadequate HIRARC being assessed and documented particularly on CPO Despatch.</li> <li>d. No evidence an audiometry test being conducted to all employees who worked in the area or work process as stipulated under Factories And Machinery (Noise Exposure) Regulations 1989. Part VI Audiometric Testing Programme, Regulation 20 - General.             <ul style="list-style-type: none"> <li>(2) An occupier shall establish and maintain an audiometric testing programme for all employees exposed to noise level at or above the action level.</li> </ul> </li> <li>g. Evidence the interval of meeting being conducted in- consistently and against the Occupational Safety and Health (Safety and Health Committee) Regulation 1996, Part IV Meetings of Safety and Health Committee, Regulation 21 - Frequency of meetings of committee.             <ul style="list-style-type: none"> <li>(2) A safety and health committee shall meet as often as may be necessary commensurate with the risks attendant on the nature of work at the place of work but shall not meet less than once in three months.</li> </ul> </li> </ul> <p>Sample taken as follows:-</p> <ul style="list-style-type: none"> <li>e. 28<sup>th</sup> May 2018</li> <li>f. 24<sup>th</sup> October 2018</li> <li>g. 13<sup>th</sup> December 2018</li> <li>h. yet to be conducted as at 26<sup>th</sup> March 2019</li> </ul>	
<p><b>Lead Auditor Signature:</b></p> 	<p><b>Client Signature:</b></p> 
<p><b>Root cause Analysis (to be filled by client):</b></p>	



<ul style="list-style-type: none"> <li>b) Lack of understanding on identification of HIRARC at the workplace.</li> <li>d) Lack of understanding on legal requirement of Part VI Audiometric Testing Programme, Regulation 20 - General</li> <li>g) Lack of understanding on legal requirement of Part IV Meetings of Safety and Health Committee, Regulation 21</li> </ul>	
<b>Corrective action planned (to be filled by client):</b>	
<ul style="list-style-type: none"> <li>b) Mill management has been updated the HIRARC of CPO Despatch.</li> <li>d) Mill has sent 61 workers to undergo Audiometric Testing Programme on 21-22 April 2019.</li> <li>g) Mill has conducted the OSH Meeting within interval of 90 days.</li> </ul>	
<b>Preventive Action (to be filled by client):</b>	
<ul style="list-style-type: none"> <li>b) Continuous monitoring and keep updating of HIRARC for all activities and workplaces in the mill.</li> <li>d) The mill will ensure the operation to comply with Factory &amp; Machinery Act (FMA) 1967; Regulations 1989.</li> <li>g) The mill will ensure the operation to comply with Occupational Safety and Health (Safety and Health Committee) Regulation 1996.</li> </ul>	
<b>Review of corrective/preventive action (to be filled by Lead Auditor)</b>	
All the evidence submitted were found adequate and therefore this major non-compliance is closed.	
<b>NC Closed:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Site verification:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date Verified:</b> 23 <sup>rd</sup> May 2019	<b>Lead Auditor Signature:</b> 



<b>Minor Nonconformities:</b>	The following NC's was raised for this audit.
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<b>Company Name</b>	TH Plantations Berhad			
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
<b>Audited Standard</b>	Part 4: General Principles for Palm Oil Mills			
<b>Client Number</b>	GGC-D4-MSPO-2019			
<b>NC No. / Ref.</b>	D4/MSPO/MINOR/01	<b>Date Detected</b>	26 <sup>th</sup> March 2019	
<b>Site(s) concern</b>	Kilang Sawit Ladang Mamahat	<b>Target Completion</b>	Next Surveillance Audit	
<b>Normative Reference and Requirement</b>	4.2.1.1 Minor The management shall communicate adequate information to other stakeholders on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.			
<b>NC Type</b>	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
<b>Description of Non-Conformity</b>	Lack of awareness among internal stakeholders.			
<b>NC Objective Evidence:</b>  Sighted training and briefing being conducted to all internal stakeholders. However, in the interview session with internal stakeholders during site visit, they are still lack of awareness on MSPO compliance.				
<b>Lead Auditor Signature:</b> 		<b>Client Signature:</b> 		
<b>Root cause Analysis (to be filled by client):</b>				
<b>Corrective action planned (to be filled by client):</b>				
<b>Preventive Action (to be filled by client):</b>				
<b>Review of corrective/preventive action (to be filled by Lead Auditor)</b>				
<b>NC Closed:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>Site verification:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		

<b>Date Verified:</b>	<b>Lead Auditor Signature:</b>
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<b>Area of Concern:</b>	Nil
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## Appendix C: List of Stakeholders Contacted

### Attendance List

#### Internal Stakeholders

- 1) Kilang Sawit Ladang Mamahat management team and staff
- 2) Gender Committee Representatives
- 3) Male and Female workers
- 4) Workers Representatives
- 5) Foreign Workers Representatives

#### External Stakeholders

- 1) Mr. Alexlius Seprus – Perhutanan Beluran
- 2) Mr. Ahmad Jimadi – Perhutanan Beluran
- 3) Mr. Markus Salutan – Perhutanan Beluran
- 4) Mr. Mohd Salteh Enting – Perhutanan Beluran
- 5) Mr. Mohd Husin Rahim – Perhutanan Beluran
- 6) Mr. Hassan Pane – Perhutanan Beluran
- 7) Mr. Mohd Hatta Abdullah – Perhutanan Beluran
- 8) Mr. Sakka bin Mallorong – Perhutanan Beluran
- 9) Inspector Nazrin Shah Zuhakim – PGA Mamahat
- 10) Mr. Mohd Rashedi Jaafar – Majlis Daerah Beluran
- 11) Mr. Nur Rahman Syafiq Abu Bakar – Majlis Daerah Beluran
- 12) Mr. Khairul Hizad Mohamad Saleh – Edaran
- 13) Mr. Juraidin bin Ranis – Field Conductor Meridian Plantation
- 14) Mr. Sylvester Jii – Assistant Manager Meridian Plantation
- 15) Mr. Desmian Nayoh – Independent Smallholders
- 16) Mr. Tarakoi Posion – Independent Smallholders
- 17) Mr. Mohd Tahang bin Muhammad Ali – Suppliers
- 18) Mr. Mustani Nubih – Shop
- 19) Mr. Adikuniwan bin Gamang – Shop
- 20) Mr. Amran bin Hakim - Independent Smallholders
- 21) Mr. Ardi Ballado – Suppliers
- 22) Mr. Abdul Hafiz bin Abdul Majid – Shop
- 23) Mr. Amirul Amiruddin – Contractor
- 24) Mr. Mustamin bin Mustafa – Shop
- 25) Mr. Alias bin Candeng – Contractor
- 26) Mr. Mohd Shahrizan bin Indra Sapri – Contractors Workers
- 27) Dr. Mansor Osir – Safety Contractor
- 28) Mr. Kassim Koh – Kg. Obah
- 29) Mr. Nurun Amat – Kg. Obah
- 30) Mr. Puteng Tangkawan – Kg. Obah
- 31) Mr. Malak bin Jalil – Kg. Obah
- 32) Mr. Olang Amat – Kg. Obah
- 33) Mr. Sudin bin Otah – Kg. Obah
- 34) Mr. Nicholas – Kg. Obah
- 35) Mr. Johnaidi bin Otoh – Kg. Obah
- 36) Mr. Richard b. Valintinus – Sales Executives



- 37) Mr. Wilrezza b Chong William – Sales
- 38) Mr. Roseman Lolol – Kg. Obah

