

# GLOBAL GATEWAY CERTIFICATIONS

## MALAYSIAN SUSTAINABLE PALM OIL (MSPO)



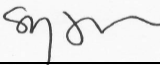


### CERTIFICATION AUDIT REPORT


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

TH Plantations Berhad  
Pusa Complex [Mill]

-Group Certification-

MAIN ASSESSMENT AUDIT  
18<sup>th</sup> May 2019

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	10/06/19	Issued as Draft Report	Ismadi bin Ismail	Lead Auditor	
A	22/06/19	Peer Review 1 Comments	Nzri bin Rasidi	Peer Reviewer 1	
A	22/06/19	Peer Review 2 Comments	Muhammad Syafiq bin Abu Bakar	Peer Reviewer 2	
B	23/06/19	Issued as Final Report	Ismadi bin Ismail	Lead Auditor	
B	24/06/19	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	

Acknowledgment by TH Plantations Berhad					
Rev	Date	Description	Management Representative	Role	Signature
B	24/06/19	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, Pusa Complex [Mill & Estates]**. During this **Main Assessment (Stage 2) Audit**, the audit team were briefed by Mill Manager, of the supply base disposition. The source of FFB supplies to Raja Udang POM (Palm Oil Mill) are from their own estates Kenyalang Estate, Raja Udang Estate, Enggang Estate, Merbok Estate, Tanjung Lili Estate, Semarang Estate.

This assessment was conducted onsite on **18<sup>th</sup> May 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 Raja Udang	
<b>Mill Capacity (MT/HR)</b>	60	
<b>Site Address</b>	Blok 3, Lot No 44-45, Sablor Land District, 94950 Pusa, Sarawak.	
<b>GPS Reference of the site office</b>	<b>Longitude</b>	E 111°12'6.27"
	<b>Latitude</b>	N 1°40'11.21"
<b>MPOB License Information</b>	<b>License No.</b>	573965004000

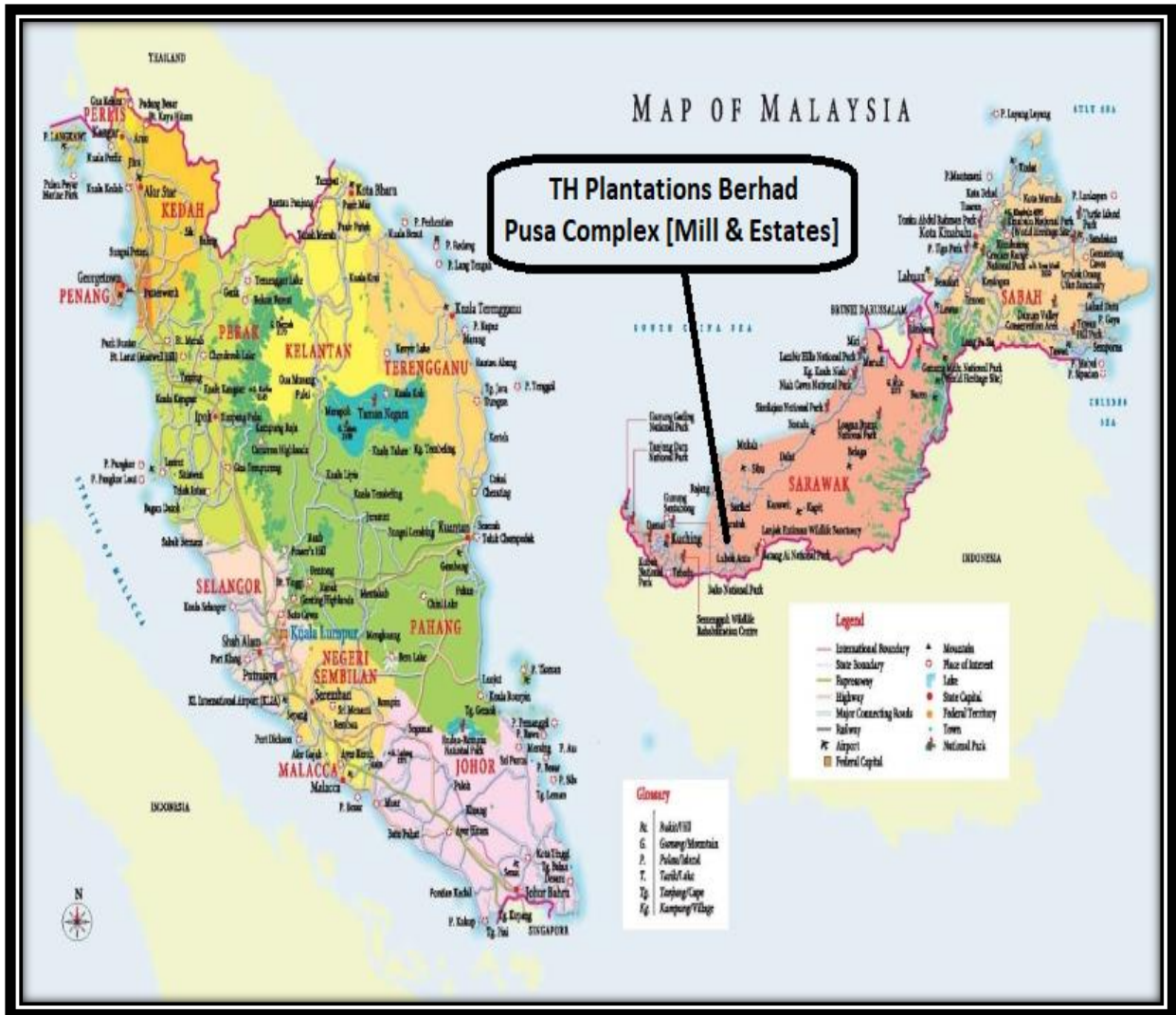
<b>Scope of Activity</b>	<ol style="list-style-type: none"> <li>1. Sell and transport FFB, PK, CPO, SPO</li> <li>2. Buy and transport FFB, PK, CPO</li> <li>3. Storage of CPO, PK, SPO</li> <li>4. Processing of FFB</li> </ol>
<b>Expiry Date</b>	30/06/2020

**Others Sustainability Certification**

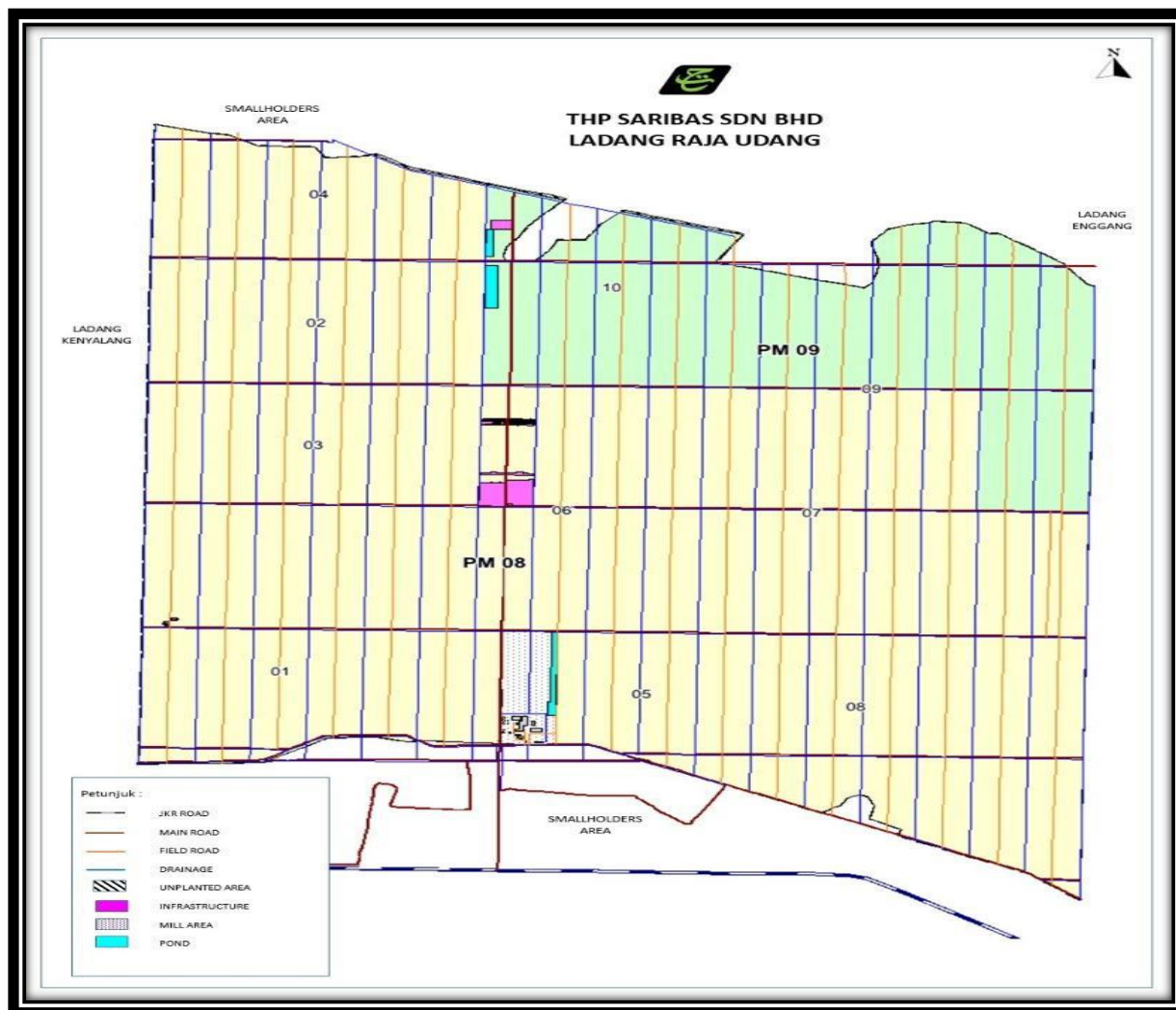
No	Name of the Site	Others Sustainability Certification
1.	Kilang Sawit Ladang Raja Udang	NIL

**1.4 Map Showing Geographical Location**

**a) TH Plantations Berhad – Pusa Complex [Estates]**



**b) Kilang Sawit Ladang Raja Udang (Share with Ladang Raja Udang Land Title)**



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

**Production for Certified Unit**

KILANG SAWIT LADANG RAJA UDANG	Projected from last audit	Actual Production for 12 Months [May 2018-Apr 2019]	Projected Production for next 12 Months [May 2019-Apr 2020]
FFB Summary (MT)	NIL	245,034.01	268,000
CPO Summary (MT)	NIL	46,668.31	50,920
PK Summary (MT)	NIL	7,261.31	8,710

# FFB's Own Estates

**Production for Uncertified Unit**

KILANG SAWIT LADANG RAJA UDANG	Projected from last audit	Actual Production for 12 Months [May 2018-Apr 2019]	Projected Production for next 12 Months [May 2019-Apr 2020]
FFB Summary (MT)	NIL	245,034.01	NIL
CPO Summary (MT)	NIL	46,668.31	NIL
PK Summary (MT)	NIL	7,261.31	NIL

**1.6 Certificate Details****Certification body**

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

**Assessment standard**

(MSPO) Part 4: General principles for palm oil mills

**Certificate number**

GGC-THPB011-MSPO-00-2019

**Initial certificate issued date**

24<sup>th</sup> June 2019

**Certificate expiry date**

23<sup>rd</sup> June 2024

**Stage 1 assessment date**

19<sup>th</sup> February 2019

**Stage 2 / Main Assessment**

18<sup>th</sup> May 2019

**Annual Surveillance 1 [ASA 1]**

March 2020

**Annual Surveillance 2 [ASA 2]**

March 2021

**Annual Surveillance 3 [ASA 3]**

March 2022

**Annual Surveillance 4 [ASA 4]**

March 2023

## 1.7 Qualification of the Lead Assessor and Assessment Team

### Lead 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:** **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, Arab Saudi and Ivory Coast. Completed and certified MSPO Auditor course in 2014 (3rd Batch) held by MPOB. Member of GGC MSPO audit team.

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

During this assessment, he assessed on the aspect of Management Commitment & 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:** **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 Raja Udang**”.

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>	18 <sup>th</sup> May 2019
<b>Name of site(s) visited</b>	Kilang Sawit Ladang Raja Udang
<b>Total number of man-days spent</b>	3 man-days

## 1.10 Audit Result Summary Findings

Findings category		
Category	Numbers	Status (Closed/Open/Not Applicable/No Action Requires)
Major Nonconformities	0	No action requires
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, the stakeholder consultation shall be carried out in stage 2 and recertification audit cycle 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 05<sup>th</sup> April 2019 and as to accommodate a stakeholders' consultation meeting for mill and estate. Therefore, it was conducted on 13<sup>th</sup> May 2019 - 19<sup>th</sup> May 2019 in TH Plantations Berhad, Pusa Complex [Mill & Estates] 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 Estate and Mill Management.

The aim of stakeholder consultation is to ensure that the MSPO requirements are continuously implemented and adhere to, as well as others aspects that they considered could be improved. However, in surveillance audit, the consultation may be limited to those stakeholders who have raised concerns, complaints or disputes prior to the audit. The auditor begin consultation with brief explained on the purpose of the audit, interviewed and record comments made by the stakeholders. The comments were verified with the mill management before incorporating into the assessment findings. The participants were represented of internal and external stakeholder namely from local communities, government agencies, workers and etc.

Generally, no complaint or negative feedback received during the consultation besides many remarks of significant improvements in the aspect of environment, social and safety. There were also positive statements made by the participants on the effect of MSPO implementation to the society. Salary for all workers are in accordance to minimum wages as stipulated in the Employment Act.

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.	CPO & PK Transporter	Requested the Raja Udang Palm Oil Mill to supply their drivers with PPEs free of charge	Management may consider the suggestion in order to enhance the Safety and Health aspects of Stakeholders	Will review by next surveillance audit
2.	Stakeholders A (Mill Workers)	<ul style="list-style-type: none"> <li>Company well managing the welfare, health and safety of their workers.</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

3.	Stakeholder D (Mill Gender 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
4.	Spare parts Supplier & Vehicle Service Maintenance	<ul style="list-style-type: none"> <li>Suggested the Mill's management to hire his Company to supply spare parts as well as carry out service maintenance at the same time in ensuring the originality of supplied parts.</li> </ul>	Management may consider the suggestions in line with the Continuous Improvement Plan	Will review by next surveillance audit

### 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, Kilang Kelapa Sawit Ladang Raja Udang. The Senior Mill Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual. The mill also being assisted by TH Plantations Berhad, Sustainability and Investor Relations Department.

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 was 1 minor non-conformity has been raised to the facility that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted with no major non-conformity findings. Hereby, the Lead Auditor recommends to award the certificate "**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for palm oil mills**" to Kilang Kelapa Sawit Ladang Raja Udang.

### 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
THP	Tabung Haji Plantation
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.

Stakeholder Meeting was conducted on 24<sup>th</sup> January 2019 by Tn. Hj Mohd Fadzley bin Mohd Nazri, Mill Senior Manager attended by 142 stakeholders. The meeting was collaborated among Pusa Complex (Mill & Estates)

MSPO Awareness for Internal Stakeholder was conducted on:

1. 27<sup>th</sup> April 2019 by Tn. Hj Mohd Fadzley bin Mohd Nazri (Mill Sr. Manager), attended by 107 participants.
2. 11<sup>th</sup> May 2019 by Tn. Hj Mohd Fadzley bin Mohd Nazri (Mill Sr. Manager), attended by 107 participants.

**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.

1. 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.

Sighted the internal audit programme - “Annual THP MSPO Certification Program 2019” planned by Sustainability & Investor Relations Department. Prepared by En Mohd Uzair bin Rozali and approved by Miss Aisyatul Aizzura Salha Abdul Rahim (Head Sustainability and Investor Relations).

**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** H 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. Muhamad Sukri bin Nor Hamidi, Abang Audy Azwy bin Abang Matasan and En. Rafiyudin bin Abd Rashid on 26<sup>th</sup> November 2018. 12 major and 2 minor Non – conformities being raised during audit.

The Non – conformities being closed on 03<sup>rd</sup> January 2019 within the stipulated period by the Internal Auditor of 30 days from date audit report issued (08<sup>th</sup> December 2018).

**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. Muhamad Sukri bin Nor Hamidi, Abang Audy Azwy bin Abang Matasan and En. Rafiyudin bin Abd Rashid on 26<sup>th</sup> November 2018. 12 major and 2 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 "Minit Mesyuarat Semakan Pengurusan Kilang Sawit Ladang Raja Udang Bil 01/2019" on 06<sup>th</sup> March 2019. Prepared by Pn. Aida Anak Lingga (Admin Executive) and approved by Tn. Hj Mohd Fadzley bin Mohd Nazri (Mill Sr. Manager).

As per stated in the procedure, the Mill Senior 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 requirements (include positive feedback as well complaints). Review customer delivery performance.
5. Review summary and status of non-conformities.
6. Review any changes or requirements that might affect the QMS, e.g. revisions to the MSPO standard, legal & regulatory issues or new processes.
7. Review resource issues such as:
  - Human – current adequacy and future needs, competency, training, organization chart and job descriptions (responsibility, authority and communication);
  - Facility – adequacy, suitability and maintenance of buildings, work environment and services (e.g. communications).
8. Any other business or quality planning. (e.g financial, social, environmental, statutory, regulatory, marketing, etc)

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

**Criterion 4 Continual improvement**

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

**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”.

TH Plantations Berhad also has established the Management Review Procedure. MSPO-TH-02; Rev 0; Date 10/01/2018, Appendix 2: Continuous Improvement Plan. As evidence, sighted continuous improvement plan for Kilang Sawit Ladang Raja Udang. Sample taken:

- a. Environment:
  1. 1 Unit Electrostatic Precipitator (ESP)
  2. 1 Unit Scrubber
  3. 1 Unit Continuous Emissions Monitoring System (CEMS).
  4. 1 Unit Biogas
- b. Social:
  1. Construct new road
  2. Fixing fencing/gate at staff quarters area
  3. Construct 6 blocks – new staff quarters
  4. 1 Unit Van

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



**Indicator 2** The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.

**Summary** There are a few new technologies implemented during the certification period. Among the new technologies are:

1. Continuous Desludging - "Tencate Geotube System".
2. 1-unit Vacuum Dearator Pump c/w Motor.
3. 3 Units Heater for Nut Silo.
4. Installation of THP Weighbridge System (THPMILL).

Others current practices continued and guide by Mill Advisor and Engineering Department.

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

## 2.2 Principle 2 : Transparency

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

**Indicator 1** The management shall communicate 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 23/04/2019. (third release).

Stakeholder Meeting was conducted on 24<sup>th</sup> January 2019 by En. Mohd Fadzley bin Mohd Nazri, The Mill Senior Manager attended by 105 stakeholders. The meeting was collaborated between Ladang Kenyalang, Ladang Tg Lilin, Ladang Raja Udang, Ladang Enggang, Ladang Merbok, Ladang Semarang and Raja Udang Palm Oil Mill.

**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 mill office. Requests for official documents through the mill office will have to go through the mill senior 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 23<sup>RD</sup> April 2019 (THIRd 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 En. Mohamad Faizal bin Sajali appointed on 15<sup>th</sup> November 2018 by the Mill Senior Manager, En. Mohd Fadzley bin Mohd Nazri.

**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> November 2018. The stakeholders list was updated by En. Mohd Hazree bin Haron.





	<b>No of stakeholders</b>
Government	27
Suppliers / Contractors /Local Communities/ Mill & Estate	77
Total	104

Stakeholder Meeting was conducted on 24<sup>th</sup> January 2019 by En. Mohd Fadzley bin Mohd Nazri, The Mill Senior Manager attended by 105 stakeholders. The meeting was collaborated between Ladang Kenyalang, Ladang Tg Lilin, Ladang Raja Udang, Ladang Enggang, Ladang Merbok, Ladang Semarang and Raja Udang Palm Oil Mill.

**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 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 with following information:-

- 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.

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



<b>Indicator 2</b>	The management shall conduct regular inspections on compliance with the established traceability system.
<b>Summary</b>	<p>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.</p> <p>The effectiveness of the monitoring will evidence in the internal audit and visit report findings.</p> <p><b>In Compliance</b>    <input checked="" type="checkbox"/> <b>Yes</b>                      <input type="checkbox"/> No                      <input type="checkbox"/> Not Applicable</p>
<b>Indicator 3</b>	The management shall identify and assign suitable employees to implement and maintain the traceability system.
<b>Summary</b>	<p>The person in charge for traceability agenda is En. Mohamad Faizal bin Sajali appointed on 15<sup>th</sup> November 2018 by the Mill Senior Manager, En. Mohd Fadzley bin Mohd Nazri.</p> <p><b>In Compliance</b>    <input checked="" type="checkbox"/> <b>Yes</b>                      <input type="checkbox"/> No                      <input type="checkbox"/> Not Applicable</p>
<b>Indicator 4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.
<b>Summary</b>	<p>Purchases and sales will base on demand and has agreeable documentation with the supplier.</p> <p>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).</p> <p><b>In Compliance</b>    <input checked="" type="checkbox"/> <b>Yes</b>                      <input type="checkbox"/> No                      <input type="checkbox"/> Not Applicable</p>

**2.3 Principle 3 : Compliance to legal requirements**

**Criterion 1 Regulatory requirements**

<b>Indicator 1</b>	All operations shall be in compliance with applicable local, national and ratified international laws and regulations.
<b>Summary</b>	<p>The company has established and updated list of applicable laws and regulations that are applicable for the estate as per "Plantation Quality Management System (PQMS) – Summary Compliance. The legal register is prepared by SIR Department.</p> <p>The list covers 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. Sighted the updated Summary of Compliance includes the following:</p> <ol style="list-style-type: none"> <li>1. Occupational Safety and Health Act 1994 (Act 514)</li> <li>2. Factories and Machinery Act, 1967 (Act 139)</li> <li>3. Uniform Building By Law, 1986 (Act 133)</li> <li>4. Petroleum (Safety Measures) Act, 1984 (Act 302)</li> </ol>



5. Electricity Supply Act, 1990 (Act 447)
6. Fire Service Act, 1984 (Act 341)
7. Code of practice for safe working in a confined space, 2001
8. Environmental Quality Act 1974 (Act 127)
9. Local Government Act, 1976 (Act 172)
10. Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446)
11. Akta Kerja 1955 (Act 265)
12. Employee Provident Fund Act 1991 (Act 452)
13. Employees Social Security Act 1969 (Act 4)
14. Akta Kesatuan Sekerja, 1959 (Act 262)
15. Minimum Retirement Age Act, 2012 (Act 753)
16. National Wage Consultative Council Act 2011, Minimum Wages Order (Amendment) 2018 (Act 732)
17. Weights and Measures Regulations 1981.(Act 71)
18. Sarawak Labour Ordinance, 1952 (Act A1237)
19. Jadual Pematuhan, Department of Environment
20. MPOB, 1998 (Act 582)
21. Pejabat Daerah Kecil Pusa

#### **Non-Conformity – Minor**

The work permit of mill foreign worker is under different employer. Evidence, 7 out of 10 mill foreign workers being employed under different employer. Sample taken on;

1. Mulyadin – passport No. AU047249
2. Yadi – passport No. AU196139
3. Oktavianus Menate – passport No. AT595094
4. Yunus Yahya Abdullah – passport No. AU457639
5. Tursin – passport No. A5635029
6. Chong Amir – passport No. AT731978
7. Mohd Fadhli Bin Talla – passport No. AU047248

**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 "Senarai Lesen, Permit dan Serfikat" being monitored and updated by Cik Siti Aishah Binti Yakop, General Clerk. Sighted list of permits/licenses being monitored and updated such as;

1. MPOB License No. 573965004000 valid till 30.06.2020
2. Sighted trading license No. A 589602 valid till 16.04.2020.
3. Perakuan Penentuan Timbang dan Sukat, No Siri Alat: B220943925 (40mt) last inspected by Metrology Corporation Malaysia Sdn Bhd on 05.06.2018.
4. Perakuan Penentuan Timbang dan Sukat, No Siri Alat: B247548416 (40mt) last inspected by Metrology Corporation Malaysia Sdn Bhd on 05.06.2018.
5. Perakuan Penentuan Timbang dan Sukat, No Siri Alat: B223997426 (80mt) last inspected by Metrology Corporation Malaysia Sdn Bhd on 05.06.2018.
6. Perakuan Penentuan Timbang dan Sukat, No Siri Alat: B225040766 (80mt) last inspected by Metrology Corporation Malaysia Sdn Bhd on 05.06.2018.

7. Jadual Pematuhan, Department of Environment (for THP Saribas Sdn Bhd No Lesen:004915 for Kilang Sawit Ladang Raja Udang (60mt/hour), BOD limit 50mg/L, validity 01.07.2018 to 30.06.2019)
8. Permit Barang Kawalan Berjadual No Siri Q002166 No Rujukan : PPDNKK.SA.37(SK) for 20,000 liters Diesel expiry 17.12.2019.
9. Permit to Purchase, Store and Use of Sodium Hydroxide No. 001386 for the purchase of 9,000kg of Sodium Hydroxide (pH Booster for Boiler) Reg No: QC0076/2019 expiry 31.12.2019
10. Fire Certificate valid from 16.05.2019 till 15.05.2020.
11. Lesen Jabatan Alam Sekitar under Seksyen 18(1), Akta Kualiti Alam Sekeliling 1974 for "Menduduki atau menggunakan premis yang ditetapkan" expiry 30.06.2019.
12. Perakuan Kelayakan Dandang, The Factories and Machineries Act, 1967 No. Perakuan: PMD-SW/19 32641 for Tube Boiler, 3,500 kilo pascal expiry 18.06.2019.
13. Perakuan Kelayakan Pengandung Tekanan Tak Berapi, The Factories and Machineries Act, 1967 No. Perakuan: PMT-SW/19 32611 for Air Receiver, 1,130kilo pascal expiry 18.06.2020.
14. Perakuan Kelayakan Pengandung Tekanan Tak Berapi, The Factories and Machineries Act, 1967 No. Perakuan: PMT-SW/19 32630 for Air Receiver, 990kilo pascal expiry 18.06.2020.
15. Perakuan Kelayakan Pengandung Tekanan Tak Berapi, The Factories and Machineries Act, 1967 No. Perakuan: PMT-SW/19 32627 for Vacuum Deaerator Vessel expiry 18.06.2020.
16. Perakuan Kelayakan Pengandung Tekanan Tak Berapi, The Factories and Machineries Act, 1967 No. Perakuan: PMT-SW/19 32629 for Back Pressure Vessel expiry 18.06.2020
17. Perakuan Kebolehan, Peraturan 5(2), No Perakuan 071/2008 for Mr Mohd fadzley Bin Mohd Nazri (Jurutera Stim Gred Satu) effective 23.05.2008.
18. Perakuan Kebolehan, Peraturan 5(2), No Perakuan SW/15/EIS/01/19 for Mr Musa Bin Omar Mahidi, I.C No. 870610-52-6173 (Dandang Stim dan Enjin-Enjin Stim Gred Satu) effective 28.04.2015.
19. Perakuan Kebolehan, Peraturan 5(2), No Perakuan JKPP/SW/DE/04/(024) for Mr Liap anak Lugom, I.C No. K0365791 (Enjin Pembakaran Dalam Gred Dua) effective 10.03.2004.
20. Perakuan Kebolehan, Peraturan 5(2), No Perakuan JKPP/SW/DE/04/(025) for Mr Awang Aswandy Bin Awang Putit, I.C No. 731004-13-5789 (Dandang Stim dan Enjin-Enjin Stim Gred Satu) effective 10.03.2004.
21. Sighted "Senarai Alat Pemadam Api" – 46 unit for the Mill premise, 8 unit for staff housing and 8 unit for workers housing areas expiry 06.05.2020, 12.04.2020, 14.11.2019 & 16.04.2020.
22. Permit Bekerja Melebihi Had Kerja Lebih Masa di bawah Seksyen 105(7) Ordinan Buruh (Sarawak Bab 76) - had maksima 120 jam, pekerja tidak boleh dibenarkan bekerja lebih 12 jam sehari dan pekerja tidak boleh dibenarkan untuk bekerja melebihi 5 jam berturut-turut dalam sehari tanpa waktu rehat sekurang-kurangnya 30 minit) effective 12.11.2015.
23. Sighted Permit Potongan Daripada Gaji Pekerja di bawah Seksyen 114, Ordinan Buruh (Sarawak Bab 76), No Siri JTKSWK/PG/113/19/(Betong) effective 26.03.2019 for "membuat potongan daripada gaji pekerja bagi tujuan simpanan

Tabung Haji - surat persetujuan yang ditandatangani oleh pekerja yang membenarkan potongan gaji".Sighted persetujuan pemotongan gaji pekerja yang terlibat dalam permohonan untuk caruman Tabung haji di Kilang Sawit Ladang Raja Udang.

Weekly workers quarters site inspection visited by Hospital Assistant, Mr Christopher anak Allap on 17.01.2019

**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** As per interviewed with Cik Aishah Binti Yakop, General Clerk, any new amendments or any regulations once received through the following manner:

1. HQ Department
2. Communication with law/enforcement officers
3. Enquiring the laws books publisher
4. 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, Cik Aishah Binti Yakop (General Clerk) signed by Mr Mohd Fadzley Bin Mohd Nazri (Mill Senior Manager) dated 15.11.2018.

**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 was built inside the Land Title Lot 45 under Raja Udang Estate with approximate area of 15.09ha. Sighted a copy of land title kept in the mill office.

Evidence, the annual payment of quit rent being paid by Raja Udang Estate.

**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 for Land Title Lot 45 under Raja Udang Estate belongs to THP Saribas Sdn Bhd. The Mill was built within the Raja Udang 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** Sighted Key Plan of project Title: 60mt/hr palm oil mill at Ladang Raja Udang, Pusa, Sarawak. Drawing No. PUSA/M/GA/05 Rev 0, Sheet 1/1. No legal parameter boundary markers being determined yet.

Sighted letter addressed to Penolong Pengurus Besar (Agronomi & Inovasi) with regard to "Permohonan bagi Kerja-kerja pengukuran sempadan kawasan Kilang Sawit Ladang Raja Udang" dated 14.02.2019. The mill is located at GPS coordinate N1°43'26.96", E111°7'52.43"

**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 Raja Udang Estate, no disputes have been recorded in mill area. There is no evidence of conflict present in this Mill. There is no violence in instigated violence in maintaining peace because company has a clear procedure for land conflict.

**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 Raja Udang 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

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

**Summary** Sighted map being drawn up indicating the location of the Mill. Refer to Key Plan of project Title : 60mt/hr palm oil mill at Ladang Raja Udang, Pusa, Sarawak. Drawing No. PUSA/M/GA/05 Rev 0, Sheet 1/1.

**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 14TH November 2018. The purpose of Social Impact Assessment is to measure and assessing on "Kerja-kerja pembuangan sarang tebuan di jalan hadapan kilang".

The SIA being established base on the complaint from En Shafiq Ja'afar bin Haji Halaidin dated 12<sup>th</sup> November 2018. 36 respondents was involved in the assessment.

Sighted 3 questionnaires in the assessment conducted and 2 responded positive.

Seen in the review report, the mitigation plan, targeted date for completion and Person in-charge. Post assessment was conducted on 17<sup>th</sup> November 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 third Release on 23<sup>rd</sup> April 2019 has been established and documented. Sample of Grievance Form and Process Flow as per Appendix 3 & 4

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** 3 complaints being recorded in 2018 and one in 2019 to date. Complaints forms seen and being responded by the Management.

Seen samples of complaints dated 25/2/19 by Mr. Denan bin Dadi on "Kekurangan kemudahan pengangkutan untuk pelajar sekolah". Issue was solved on 1<sup>st</sup> March 2019 by providing additional van to cater the high number of school children.

**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. This complaint form/method is clearly explained during MSPO Awareness Briefing for both internal employee (from time to time) and external stakeholders (during Stakeholder Consultation Meeting).

**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 24<sup>th</sup> January 2019 by En. Mohd Fadzley bin Mohd Nazri, The Mill Senior Manager attended by 105 stakeholders. The meeting was collaborated between Ladang Kenyalang, Ladang Tg Lilin, Ladang Raja Udang, Ladang Enggang, Ladang Merbok, Ladang Semarang and Raja Udang Palm Oil Mill

MSPO Awareness for Internal Stakeholder was conducted on 3<sup>rd</sup> 8<sup>th</sup> ,18<sup>th</sup> ,21<sup>st</sup> and 31<sup>st</sup> January 2019 by En. Mohamad Faizal bin Sajali, The Assistant Manager attended by 104 Internal stakeholders.

**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** Sighted all internal complaints filled and responded and records maintained. No evidence of external complaints from stakeholders using Stakeholder Logbook forms. No major negative impacts given during Stakeholders Meeting. Merely, four complaints being recorded since 2018

**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** Sighted, a Corporate Social Responsibility contribution on 21<sup>st</sup> December 2018 for En. Rapeja bin Zulkifli on " Derma Kilat untuk Tragedi Kebakaran Rumah Pekerja pada 10<sup>th</sup> December 2018.

**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. The policy is written in Bahasa and English language.

The policy being displayed at the Notice Board and awareness programme being conducted to all internal and external Stakeholders.

OSH Plan 2019 is available with an objective zero accidents.

**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 1st March 2019 which was approved by En. Muzmi bin Mohamed. The policy is written in Bahasa and English language

Adequate HIRARC being assessed and documented. Risk assessment was conducted through HIRARC based on the severity and the likelihood.



HIRARC is consist of hazard identification (type of work activity, hazard & effect), Risk analysis (Existing risk control, likelihood, severity & risk) & Risk Control (Recommended control measures & PIC appointed are Staff or Executive). HIRARC being reviewed on 31<sup>st</sup> Dec 2018. HIRARC sighted for the followings work operation :-

1. Weighbridge
2. Sterilization
3. Oil room
4. Press station
5. Laboratory sampling
6. CPO Despatch Bay
7. Etc.

The mill has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training matrix for each staffs and workers. Seen, OSH Training Programme for Kilang Kelapa Sawit Ladang Raja Udang as follows :

NO	TOPIC	MONTH PROGRAMME	STATUS
1	Sistem LOTO	February & August	4/2/19
2	Pengendalian Bahan Kimia	March & September	13/3/19
3	Fire Drill	March	11/3/19
4	Penjagaan dan Pemuliharaan Pendengaran	April	18/4/19
5	PPE	May & October	2/5/19
6	Penjagaan Hos BOMBA	May	
7	First Aid	June	
8	Angin Termampat Boleh Membunuh	July	
9	Emergency Shutdown	August & November	
10	Emergency Response Plan	August & December	

Training records for PPE Training was sighted on 2<sup>nd</sup> May 2019 conducted by Mill Executives attended by 107 staff and workers.

Mill has provided appropriate PPE for all workers in their operations. Person in-charge of in issuing PPE is En Helmi bin Seruji, 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. During mill visit, sighted the workers have been trained with safety and the workers wear the PPE required by his/her works.

CHRA was conducted in 11<sup>TH</sup> November 2014 to 22<sup>nd</sup> November 2014 by Hajah Noormahani Harun, JKKP HIE 217/171-2 (154). Seen, the Manager's response on the recommendation by Assessor dated 27<sup>th</sup> November 2018.

Seen, 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.

Sighted the Audiometry Test being conducted in December 2018 and yet to obtain the results. Reference is made to a letter by Global Green OSH Services Sdn Bhd. Evidence, the noise monitoring map available at mill.

Medical Surveillance was conducted for 31 staff and workers for storekeeper, crèche ayah, foreman, workshop, Laboratory, kernel plant and water pump personnel on 27<sup>th</sup> November 2018

Person in- charge of Occupational Safety and Health is En. Mohd Fadzley bin Mohd Nazri the Senior Manager of the Mill dated 15<sup>th</sup> July 2019

Occupational Safety and Health Committee Chart 2019 sighted. Seen, Letter of appointment for committee members dated 13<sup>th</sup> March 2019. The committee meeting has been conducted as follows :-

1. 28<sup>th</sup> February 2019
2. 1<sup>st</sup> December 2018
3. 3<sup>rd</sup> September 2018

To discuss all issues regarding worker's safety and health, Occupational Safety and Health Matters, Accident Report and etc.

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 available in local language (Malay and English). The ERP has been explained to all workers and staffs during training which has been conducted. Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board.

ERP Chart 2019 indicates En. Azhar bin Sidi as First Aider for Kilang Sawit Ladang Raja Udang.

Sighted, JKKP 8 being submitted on 7<sup>th</sup> January 2019 (I & II)/(IV) on annually basis to the DOSH. LTA calculation based on local interpretation from DOSH.

Merely 1 major accident occurred in 2018 on En Mohd Fadhli bin Talla- AU 0472481 at Steriliser Station.

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



<b>Criterion 5 Employment conditions</b>	
<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. The policy is written in Bahasa and English language. This policy covers :-

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

The Policy being displayed at notice boards outside the office. Seen, communication of all the policies to workforce is through meeting conducted on 11<sup>th</sup> May 2019 attended by 107 staffs and workers.

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

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

No evidence of discrimination based on race, skin color, religion, gender, national origin, ancestry, disability, marital status, and sexual orientation was found in the mill. During interviews, it is clearly stated no forced labour at mill

**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** Sighted in the Social Policy on Payment of the minimum salary as gazette by law. Established on 1<sup>st</sup> March 2019 which was approved by En. Muzmi bin Mohamed. The policy is written in Bahasa and English language. 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 RM1100.00 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. Sampled of worker salary taken as evidence in Mill;

- Nora Shawati bt Mohamad – 930426-13-5588 - April 2019

Basic Salary	RM 1,015.44
Holiday Pay	RM 42.31
Overtime	RM 448.27
Deduction	
KWSP	RM 117.00
PERKESO	RM 7.75
SIP	RM 3.10
Lembaga Tabung Haji	RM 50.00
Net Salary	RM 1,328.20

Salary payment being made through bank with evidence of consent letter.

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

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

**Summary** Sighted, an Agreement, Contract No THPSSB/KSLRU/LOJ/54/1(13) between THP Saribas Sdn Bhd, Kilang Kelapa Sawit Ladang Raja Udang and V and S Engineering on Kerja-kerja perkhidmatan menyediakan jentera dan pengangkutan untuk mengalihkan tandan kosong dari tapak pembuangan tandan kosong ke kawasan landscaping di Kilang Sawit Ladang Raja Udang, Pusa, Sarawak bagi tahun 2018.



The agreement valid from 1<sup>st</sup> August 2018 until 31<sup>st</sup> December 2018. Seen, the Agreement between V and S Engineering and his workers, En. Hasrullah bin Mohamad – 860608-13-5589 dated 28<sup>TH</sup> December 2017.

Payment voucher and workers identification were also attached in the file.

**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, in the Checkroll Employee Profile stated the Employee Code, Name, Date of Birth, Nationality, Race, Sex, Marital Status, EPF No, SOCSO No and Date Joined. Sample taken on Nora Shawati bt Mohamad – 930426-13-5588 and Adi – A 1902092.

**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 Saribas Kilang Sawit Ladang Raja Udang 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 En Morni Matsyah – A 8823535, Muhamad Zulkarnain bin Abdullah 951213-13-5675 and Adi – A 1902092.

**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. Mill has used punch card as a working time recording system. During site visit, sighted above data displayed at notice board.

**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 has 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 payslip was distributed to individual workers on the day of payment. Payment being made through bank.

**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.

For Indonesian workers, will be covered under SOCSO upon expiring the Foreign Workers Compensation Scheme.

**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, shop 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. 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. 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. 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 Mill and this was proven through checking the list of employees. The workers were clear that no one below.

**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**

The Mill has a comprehensive annual training plan for its staff and workers and this was sighted in the training records file for each staffs and workers. The training plan for 2019 was sighted as follow:-

NO	TOPIC	MONTH PROGRAMME	STATUS
<b>OCCUPATIONAL SAFETY AND HEALTH</b>			
1	Sistem LOTO	February & August	4/2/19
2	Pengendalian Bahan Kimia	March & September	13/3/19
3	Fire Drill	March	11/3/19
4	Penjagaan dan Pemuliharaan Pendengaran	April	18/4/19
5	PPE	May & October	2/5/19
6	Penjagaan Hos BOMBA	May	In progress
7	First Aid	June	In progress
8	Angin Termampat Boleh Membunuh	July	In progress
9	Emergency Shutdown	August & November	In progress
10	Emergency Response Plan	August & December	In progress
<b>ENVIRONMENTAL</b>			
1	Pengenalan Operasi Tangki Penghadaman Anaerobik	February	11/2/19
2	Kesedaran perlindungan alam sekitar	April	16/4/19
3	Pengendalian Tumpahan Bahan Buangan	August	In progress
4	Kesedaran Pengendalian Bahan Buangan	October	In progress
5	Kesan pencemaran udara kepada kesihatan	December	In progress
6	Pengurusan kitar semula	December	In progress

Training records for Fire Drill was sighted on 1<sup>st</sup> April 2019 conducted by Mill Executives attended by 107 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

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

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

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

**Criterion 1 Environmental management plan**

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

**Summary** TH Plantations Berhad has established Environmental Policy signed by Mr Muzmi Bin Mohamed; Chief Executive Officer dated 01.03.2019. TH Plantations Berhad is committed towards implementing the following practices:

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

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

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

**Summary** The Mill has conducted environmental aspect and impact assessment for all its' activities. The environmental assessment findings are recorded in document titled "Penilaian Aspek Impak Alam Sekitar (EIA) last updated by Mr Firdaus Bin Julaihi (Assistant Manager) and approved by the Senior Manager, Mr Mohd Fadzley Bin Mohd Nazri on 13.05.2019.

The environmental aspect impact assessment has been identified for 21 location/area/station, covers 136 Activities of the environmental aspects. Sighted MSPO Procedure Title: Environmental Management Plan (EMP) Ref No.: MSPO-TH-06 Rev. 0 dated 01.11.2017 revised 10.01.2018 prepared by SIR Department.



The environmental aspect impact assessment (annually reviewed) has covered 21 main operations that related to environmental aspects such as;

1. Penerimaan
2. Penyucihama
3. Peleraian dan tandan Kosong
4. Pemerahan
5. Peleraian gentian sabut
6. Pemerolehan isirong sawit
7. Bilik minyak (oil room)
8. Dandang stim
9. Bilik enjin
10. Makmal dan penyimpanan produk
11. Loji rawatan air
12. SPEKKS
13. Kawalan keselamatn
14. Pengurusan stor
15. Pejabat
16. Workshop
17. Kantin
18. Surau
19. Tandas
20. Penegndalian kenderaan
21. Kerja-kerja am

**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** Sighted Continuous Improvement Plan on environment prepared by Aida anak Lingga (Admin. Executive) on 06.03.2019 as follow;

	Action Plan	Plan date
1	Pemasangan satu (1) unit Electrostatic Precipitator (ESP), system penapisan asap di bahagian boiler sejajar dengan arahan Jabatan Alam sekitar di bawah Seksyen 31, Akta Kualiti Alam Sekitar (Udara Bersih) 2014 yang akan berkuatkuasa mulai Jun 2019. Budgetted amount RM1,500,000.00.	26.10.2019
2	Pemasangan Scrubber untuk menghilangkan bahan kimia dalam gas kebakaran incinerator dan dapat mengurangkan tandan kosong serta meminimumkan kos pengangkutan tandan kosong sejajar dengan arahan Jabatan Alam sekitar di bawah Seksyen 31, Akta Kualiti Alam Sekitar (Udara Bersih) 2014. Budgetted amount RM600,000.00	01.09.2019
3	Pemasangan system pemantauan incinerator "Continuous Emissions Monitoring System (CEMS)"	01.10.2019



sejajar dengan arahan Jabatan Alam Sekitar (JAS). Budgetted amount RM60,000.00	
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**In Compliance**  **Yes**  No  Not Applicable

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

#### Summary

The mill identifies all activities /aspects of the palm oil mill that have impact to the environment. Sighted Continual Improvement Plan with a title of Continuous Improvement on Pollution Prevention & Environmental Plan approved by the Senior Manager, Mr Mohd Fadzley Bin Mohd Nazri on 13.05.2019 includes;

	Task	Plan date
1	Pelepasan asap hitam dari operasi dandang	05.06.2020
2	Pelepasan asap dari operasi incinerator	To be announced
3	Pelepasan asap dari pengendalian jentera berat kenderaan	Weekly
4	Penghasilan bunyi bising dari operasi mesin di dalam kilang	Quarterly
5	Tumpahan minyak sawit mentah	Monthly
6	Tumpahan buangan terjadual	Monthly
7	Sisa buangan dari perumahan pekrja	Monthly
8	Pembuangan besi terpakai	Monthly

**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	Pengenalan Operasi Tangki Penghadaman Anaerobik	February	11/2/19
2	Kesedaran perlindungan alam sekitar	April	16/4/19
3	Pengendalian Tumpahan Bahan Buangan	August	In progress
4	Kesedaran Pengendalian Bahan Buangan	October	In progress
5	Kesan pencemaran udara kepada kesihatan	December	In progress
6	Pengurusan kitar semula		In progress

		December	
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**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 4 reports of briefing/training/meeting on environmental aspects involving all level of workforce.

Sighted latest report of training on "Kesedaran Perlindungan Alam Sekitar" attended by 107 participants inclusive executives, staff and workers on 16.04.2019.

**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** Sighted record of diesel consumption per Mt FFB, todate Jan-April 2019 is 1.76 liter/mt FFB against baseline value of 1.36liter diesel per mt FFB processed.

The high usage due to energy generation purpose during annual mill inspection from 01.03.2019 till 11.03.2019.

- Sighted energy optimization plan as follow;
1. Turn off the diesel generating set while steam turbine is running
  2. Do shovel/tractor maintenance frequently (change engine oil)
  3. Workers are constantly informed to optimize the usage of diesel

Evidence, record and usage of non-renewable energy / renewable energy for electricity generation prepared for Genset and Turbine. Todate electricity generation from Jan-April 2019 is 0.22 kWh/mt FFB against baseline value of 0.19 kWh/per mt FFB processed.

**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** Sighted estimate of direct usage of non-renewable energy for 2019. Diesel estimate per MT FFB for 2019 with a total of 297,000litres versus FFB to be processed of 268,000mt or 1.11 litres/ton FFB.



Electricity Generation per MT FFB for 2019 with a total of 67,000 kWh versus FFB to be processed of 268,000mt or 0.25kWh/ton FFB.

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

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

**Summary** Fiber and shell were used as a source of renewable energy for boiler operations. Sighted record of production of fiber and shell as a source of renewable energy for their operations since 2016.

For todate Jan-Apr 2019, the mill has generated 23,838kWh from the re-utilisation of biomass residue produced. Biomass production by the Mill;

	Description	Total production Jan-Apr 2019 (Mt)	Total Utilized (Mt)	Location of use
1	Shell	8,018.01	8,018.01	Boiler
2	Fiber	9,009.00	9,009.00	Boiler
3	Empty Fruit Bunch (EFB)	16,549.64	16,549.64	Incinerator, bund wall for effluent treatment ponds

EFB record up to April 2019;

	Description	Mt
1	B/F	48,232.15
2	EFB production	16,549.64
3	EFB for Incinerator	6,619.86
4	EFB for landscape	21,402.77
5	Balance of Stockpile	36,759.16

High balance of EFB sighted within the mill's premises which is matched with the EFB balance record as at time of visit. Sighted letter from Jabatan Alam Sekitar in respect to "Permohonan kebenaran untuk mengalihkan tandan kosong bagi kegunaan "Landscaping" kilang.

Bunch Ash record up to April 2019;

	Description	Mt
1	B/F	59.92
2	Bunch Ash Production	198.60

3	Estate application	255.31
4	Balance of Stockpile	3.21
5	B/F	59.92

The Bunch Ash is collected and sent to Raja Udang Estate as a source of fertilizer replacing chemical fertilizer of Muriate of Potash.

**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, revised 10.01.2018. The MSPO Procedure describes the following implementation;

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

Sighted Inventory of Scheduled Wastes (E-swiss) for the month of April 2019.

Sighted inventory of scheduled waste established by the mill;

Code	Source	Date of 1 <sup>st</sup> generated	Balance as at 02.05.2019
SW305	Spent lubricant oil	Not yet generated after disposal on 02.05.2019	0
SW306	Spent hydraulic oil		0
SW410	Cotton waste/ Handglove		0
SW410	Used filter		0
SW102	Used batteries		0

**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. Sighted List of Waste for the following ;

1. Sisa Buangan Domestik
2. Sisa Pepejal
3. Sisa Kumbahan
4. Sisa Buangan Kilang
5. Bahan Buangan Terjadual



Sighted consignment note of scheduled waste and permit of licensed contractor, DNS Waste Management Sdn Bhd for the following disposal (dated 02.05.2019);

Code	Source	Mt
SW305	Spent lubricant oil	1.9700
SW306	Spent hydraulic oil	0.2598
SW410	Cotton waste/ Handglove	0.0134
SW410	Used filter	0.0081
SW102	Used batteries	0.0400

**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 Register of Chemicals Hazardous to health listed 64 names of chemical substances.

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

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

**Summary** Mill dispose of Domestic waste to minimize the risk of contamination of the environment and watercourse.

Domestic waste for linesite area are disposed through the appointed contractor M/S John Enterprise. Sighted contract agreement "Mengangkut sampah dari tempat pengumpulan sampah Ladang Raja Udang ke tapak pelupusan sampah (PUSA).

**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 Mill activities. Sighted Continuous Improvement on Pollution Prevention & Environmental Plan covering 4 types of pollution, includes

1. Pencemaran Udara
2. Pencemaran bunyi
3. Pencemaran air
4. Pencemaran tanah

Sighted Assessment Report of GHG Calculation of Ladang Raja Udang POM covering crops from THP Saribas Sdn Bhd and TH Pelita Maludam Sdn Bhd for 2018 as follow;

1. FFB produced: 243,219.68mt
2. POME produced : 180,226.60mt
3. Methane emitted : 2,360.97mt
4. Diesel usage : 367,806.36liters
5. Mill CO<sub>2</sub> emission : 1,145.06mt

**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 developed its own action plan to reduce identified significant pollutants and emissions includes;

1. Memasang sistem kawalan pencemaran udara (SKPU) pada sistem pelepasan udara dandang "Electrostatic Precipitator System (ESP)
2. Memasang sistem kawalan pencemaran udara (SKPU) pada sistem pelepasan udara incinerator.
3. Melaksanakan penyelenggaraan berkala untuk jentera berat kenderaan dan environmental work instruction (diesel engines)
4. Melaksanakan latihan kesedaran kesan bunyi bising dan membuat "Noise boundary" dan "Noise Mapping".
5. Membuat takungan bagi menghalang minyak masuk ke dalam sistem aliran dan mengadakan "anti spill kit" bagi mengelakkan tumpahan.
6. Membuat takungan bagi menghalang buangan terjadual masuk ke dalam system saliran dan mengadakan "anti spill kit" bagi mengelakkan tumpahan.
7. Menyediakan tempat khas untuk pembuangan sampah dan melantik kontraktor untuk mengangkut sampah.
8. Pastikan semua besi terpakai, sisa kimpalan, sisa kisaran, minyak terpakai, kain buruk terpakai, penapis minyak terpakai dan lain-lain dilupuskan sewajarnya dan mematuhi kehendak perundangan

**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** DOE limits for final discharge to Alur Air – 50mg/L. Sighted effluent analysis report, analysed by M/S Evo Chemical Analysis & Consultancy dated 16.05.2019 for final discharge recorded 12.0mg/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 water sampling map and its location dated 15.11.2018. Also, water consumption record of FFB processing for a period of Jan-Apr 2019 i.e. 169,356m<sup>3</sup> on 66,198.55mt or 2.56 liter/Mt FFB.

Sighted test report on raw water sample of Ladang Raja Udang Palm Oil Mill for drinking water, analysed by M/S Chemsain Konsultant Sdn Bhd on 10.05.2019 as tabulated below;

No	Parameter	Results	Parameter Limit
1	Total Coliform Count	1.1	Must not be detected in any 100mL sample
2	E. coli Count	1.1	Absent in 100mL sample

Sighted test report on treated water sample of Ladang Raja Udang Palm Oil Mill for drinking water, analysed by M/S Chemsain Konsultant Sdn Bhd on 10.05.2019 as shown below;

No	Parameter	Results	Parameter Limit
1	Total Coliform Count	Nil	Must not be detected in any 100mL sample
2	E. coli Count	Nil	Absent in 100mL sample

The test report on POME (Upstream & Downstream) as tabulated below;

1. Upstream

No	Parameter	Results
1	pH value	7.1 @30.3°C
2	BOD (3days@30°C),mg/L	9.5



3	COD, mg/L	224
4	Amm-N (NH <sub>3</sub> -N),mg/L	31.36
5	Total N, mg/L	47.02
6	Oil & Grease, mg/L	2.0
7	Total Suspended solids, mg/L	34
8	Total Dissolved solids, mg/L	1.254

## 2. Downstream

No	Parameter	Results
1	pH value	7.14 @30.2°C
2	BOD (3days@30°C),mg/L	9.0
3	COD, mg/L	218
4	Amm-N (NH <sub>3</sub> -N),mg/L	31.08
5	Total N, mg/L	46.90
6	Oil & Grease, mg/L	2.0
7	Total Suspended solids, mg/L	26
8	Total Dissolved solids, mg/L	1.248

**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 at Tertiary Plant which is located 10 km from the Mill is discharged to "Alur Air" and then it will flow to Sungai Geruyu. The BOD is below approved limit of 50mg/L. Sighted Quarterly Production Data on Effluent Discharge into Watercourse/Effluent Discharge on Land submitted to DOE using OER (online environmental reporting)

Sighted DOE approval for Effluent Disposal Method using "Alur Air" stated as per "Syarat-syarat Pengurusan/Kawalan Efluen (POME)" in the Jadual Pematuhan. Effluent final discharged location has been determined based on "Pelan SPEKKS dan Lokasi Pengambilan SPEKKS" for Kilang Sawit Ladang Raja Udang dated 01.01.2017

**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 60 MT/Hr – Continuous Sterilization. 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) "Panduan Operasi Kerja Selamat" – Kilang Sawit Ladang Raja Undang
- 6) TH Plantations Berhad - MSPO Procedure

Regular inspection and supervision are conducted by Station Operator, Supervisor, Executives as well as HQ Department.

Engineering Department is responsible to monitor overall mill performance on a monthly basis. The assessment will be reported in:

- 1) Process and Quality Report – Twice a year
- 2) Mill Advisor Report – Twice a year

**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 Sarawak JPKKS\_Kuching/2018/004915A; License No: 004915 valid until 30.06.2019 and all the Standard Operating Procedures.

Effluent was discharge to watercourse accordance to Jadual Pematuhan – Syarat-Syarat Lesen Premis Minyak Kelapa Sawit Mentah, Jabatan Alam Sekitar Negeri Sarawak.

The effluent flowchart as per below:

2 Units of Anaerobic → 2 Units of Aerobic → 1-unit Facultive Pond → 2 Units Aerobic Reactor Tank → 1-unit Contact Aeration → 1 Unit Ultra Filtration System → Sg. Geruyu

Sighted the latest test analysis results conducted on 08th May 2019 by Evo Chemical Analysis & Consultancy; Certificate Lab Number: EVOCAC/0654/19.

Test Parameter	Test results
pH Value	7.45
COD	305
BOD	12
TSS	16
TDS	516
AN	1.54
TN	7.20
Oil & Grease	<2

**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 18 years business plan for the Mill.

FY	2019	2020	2021
FFB	268,000	277,396	284,794
Estimate OER %	19.00	19.00	19.00
KER	3.25	3.25	3.25
CPO	50,920	52,705	54,111
PK	8,710	9,015	9,256
FFB/MT	351.43	351.43	351.43
CPO/MT	2,300	2,300	2,300
PK/MT	1,725	1,725	1,725
Cost/MT	71.08	69.82	68.36

**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** Sighted the signage of FFB pricing at the weighbridge station. Currently, the mill received all crop by his own estates and the prices of FFB paid to the estate is in accordance with the prices set by the Malaysian Oil palm Board (MPOB) and circular by TH Plantations Berhad as evidence in "FFB Monthly Price" for April 2019.

The pricing of CPO and PK is based on the tender price by Procurement/Marketing Department at HQ.

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** All contracts are kept in mill office. Sighted the contract Agreement signed by contractor and Kilang Sawit Ladang Raja Udang. As evidence, sampled:

- Sighted the Contract Agreement between mill with Rosnah Enterprise (EFB Contractor) sealed on 01<sup>st</sup> March 2019.

Payment will be paid 90 days after the mill received the invoice from contractors. As evidence sighted the invoice send by Rosnah Enterprise (EFB Contractor) to mill on 03<sup>rd</sup> May 2019. Mill paid to the contractor on 06<sup>th</sup> May 2019; Voucher No: BV0520190005; Cheque no: CIMB No 003225; RM 38,525.82.

**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** All the contractors are aware that mill will be certified under MSPO. Therefore, the contractor has been informed by mill management to follow the MSPO standard requirement. Evidence, MSPO clause for contractor in Contract Agreement between mill with Rosnah Enterprise (EFB Contractor) sealed on 01<sup>st</sup> March 2019.

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

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

**Summary** All contracts are kept in mill office. Sighted the contract Agreement signed by contractor and Kilang Sawit Ladang Raja Udang. As evidence, sample on the Contract Agreement between Mill with Rosnah Enterprise (EFB Contractor) sealed on 01<sup>st</sup> March 2019.

**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 18<sup>th</sup> May 2019. Sighted audit plan dated 25<sup>th</sup> April 2019 (4<sup>th</sup> Revised) 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) Proactive and highly committed by THP Berhad Top Management in establishing directions for the middle and upper management in complying with the MSPO certification.
- 2) Signages throughout office, chemical area and in the field sites, effectively maintained and appropriate to the needs of the process.
- 3) Good cooperation and commitment from the management and staff
- 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>
18 <sup>th</sup> May 2019	08:00 – 13:00	<b>Kilang Sawit Ladang Raja Udang</b> ➤ <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>	IBI	MS/AS
	10:30 – 12:30	➤ <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>	IBI	MS/AS
	13:00 – 14:00	➤ <b>Lunch</b>	IBI	MS/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>	IBI	MS/AS
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 6.	IBI	MS/AS

❖ Stakeholders meeting collaborated with the Estates on 16<sup>th</sup> May 2019.



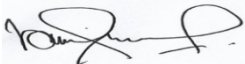


## Appendix B: Non-Conformity details

### Non-Conformities Identified During This Audit

<b>Major Nonconformities:</b>	Non-were raised during this audit.
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<b>Minor Nonconformities:</b>	The following NC's was raised for this audit.
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<b>Company Name</b>		TH Plantations Bhd	
<b>Stage of Audit</b>	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2
	Surveillance	<input type="checkbox"/>	Recertification
<b>Audited Standard</b>		Part 4: General Principles for Palm Oil Mills	
<b>Client Number</b>		GGC-D7-MSPO-2019	
<b>NC No. / Ref.</b>	D7/MSPO/MINOR/01	<b>Date Detected</b>	19 <sup>th</sup> May 2019
<b>Site(s) concern</b>	Kilang Sawit Ladang Raja Udang	<b>Target Completion</b>	Next Surveillance Audit
<b>Normative Reference and Requirement</b>	4.3.1.1 Minor All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.		
<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>	The work permit of mill foreign worker is under different employer.		
<b>NC Objective Evidence:</b>			
Evidence, 7 out of 10 mill foreign workers being employed under different employer. Sample taken on :-			
<ol style="list-style-type: none"> <li>1. Mulyadin                            - AU 047249</li> <li>2. Yadi                                    - AU 196139</li> <li>3. Oktavianus Menate               - AT 595094</li> <li>4. Yunus Yahya Abdullah           - AU 457639</li> <li>5. Tursin                                 - A 5635029</li> <li>6. Chong Amir                        - AT 731978</li> <li>7. Mohd Fadhli bin Talla           - AU 047248</li> </ol>			
<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"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>	<b>Site verification:</b> <input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>Date Verified:</b>	<b>Lead Auditor Signature:</b>

<b>Area of Concern:</b>	Non-were raised during this audit.
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## Appendix C: List of Stakeholders Contacted

### Internal Stakeholders

- 1) TH Plantation Pusa Complex [Mill] Management team and staff
- 2) Gender Committee Representatives
- 3) Local Workers Representatives
- 4) Foreign Workers Representatives

### External Stakeholders

- 1) Mathew Kana, Jabatan Tenaga Kerja, Betong
- 2) Mike Tomson Victive, MPOB, Betong
- 3) Serit Adeng, PMSB
- 4) Patrick Wong Keng Huat, Manager
- 5) Malisa bt Wahab, Manager
- 6) Danny Chua, Salesman
- 7) Peter Cha, Salesman
- 8) Muhammad Bakri bin Ahiing, Salesman
- 9) Jimmy Abdi ak Dunga, Great Eastern Trading
- 10) Veen Wo Kiols – Salesan
- 11) Rahim bin Saidoh, FFB Transport Contractor
- 12) Hassan Aleng, FFB Transport Contractor
- 13) Ahmad Fauzi Wahab, FFB Transport Contractor
- 14) Anand, MPOB Betong
- 15) Haji Sobil bin Daud, Local Community
- 16) Rengan ak Bunyat, NCR Representative
- 17) Haji Hassan bin Aman, ADC
- 18) Na'ali bin Are, NCR Representative
- 19) Hassan bin Aleng, Local Community
- 20) Rahim bin Saidoh, Local Community
- 21) Ahmad Fauzi bin Wahab Local Community
- 22) TR Lakon ak Aji, NCR Representative
- 23) TR Anau ak Chuqa, NCR Representative
- 24) Kendawang ak Among, NCR Representative
- 25) TR Christopher ak Nampe, NCR Representative
- 26) TR Jawi ak Gan, NCR Representative
- 27) Kiprawi bin Hamsani, Local Community
- 28) Sahari bin Jawi, NCR Representative
- 29) K. Nael Tom Tuton, NCR Representative
- 30) TR Bajing Lambang, NCR Representative
- 31) Peter Bajing, NCR Representative
- 32) TR Siti ak Blanda, NCR Representative
- 33) Fauziah bt Rosli, Local Community