

GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)





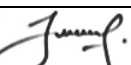
CERTIFICATION AUDIT REPORT

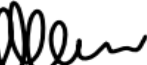
Part 3: General Principles for Oil Palm Plantations and Organized Smallholders

Kamunting Plantation Berhad
Kamunting Estate

-Individual Certification-

MAIN ASSESSMENT AUDIT
14th October 2019 – 15th October 2019

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	16/12/2019	Issued as Draft Report	Surenthiran Panneerselvam	Lead Auditor	
A	26/12/2019	Peer Review 1 Comments	Mohd Zuhaili bin Mukri	Peer Reviewer 1	
A	26/12/2019	Peer Review 2 Comments	Nzri bin Rasidi	Peer Reviewer 2	
B	28/12/2019	Issued as Final Report	Surenthiran Panneerselvam	Lead Auditor	
B	30/12/2019	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	

Acknowledgment by Kamunting Plantation Berhad					
Rev	Date	Description	Management Representative	Role	Signature
B	30/12/2019	Acceptance of the contents	Mr. Chan Eng Kong	Director	

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 Kamunting Plantation Bhd. During this Main Assessment Audit (Stage 2), the audit team were briefed by Estate Manager, of the supply base disposition. The estate consists only Kamunting Estate.

This assessment was conducted onsite on 14th October 2019 – 15th October 2019 to assess the compliance of the certification unit against the "MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholder". The scope of certification is "Management of Sustainable Oil Palm Plantations from Cultivation, Planting and Production of Fresh Fruit Bunches".

1.2 Company details and Contact information

Company Name	Kamunting Plantation Berhad
Business Address	Lot 4878, Jalan Raja Musa, 36000 Teluk Intan, Perak Darul Ridzuan.
Contact Person	Mr. Chan Eng Kong
Office Telephone	+05-6228611 / +05-6225611 (F)
E-Mail	kamunting2019@gmail.com

1.3 Certification Unit

Name of the Certification Unit

No	Name of the Certification Unit	Site Address	GPS Reference of the site office	
			Longitude	Latitude
1.	Kamunting Estate	Sg Kroh New Village, 31920 Kampar, Perak Darul Ridzuan	E 101° 6' 16.7"	N 4° 13' 17.47"

MPOB License Information

No	Name of the Site	Licence Number	Expiry Date	Scope Activity
1.	Kamunting Estate	501693502000	31.01.2020	Menjual & Mengalih FFB
2.	Kamunting Estate	506768811000	31.01.2020	Menghasilkan, menjual & mengalih SLGBIJI & menyimpan

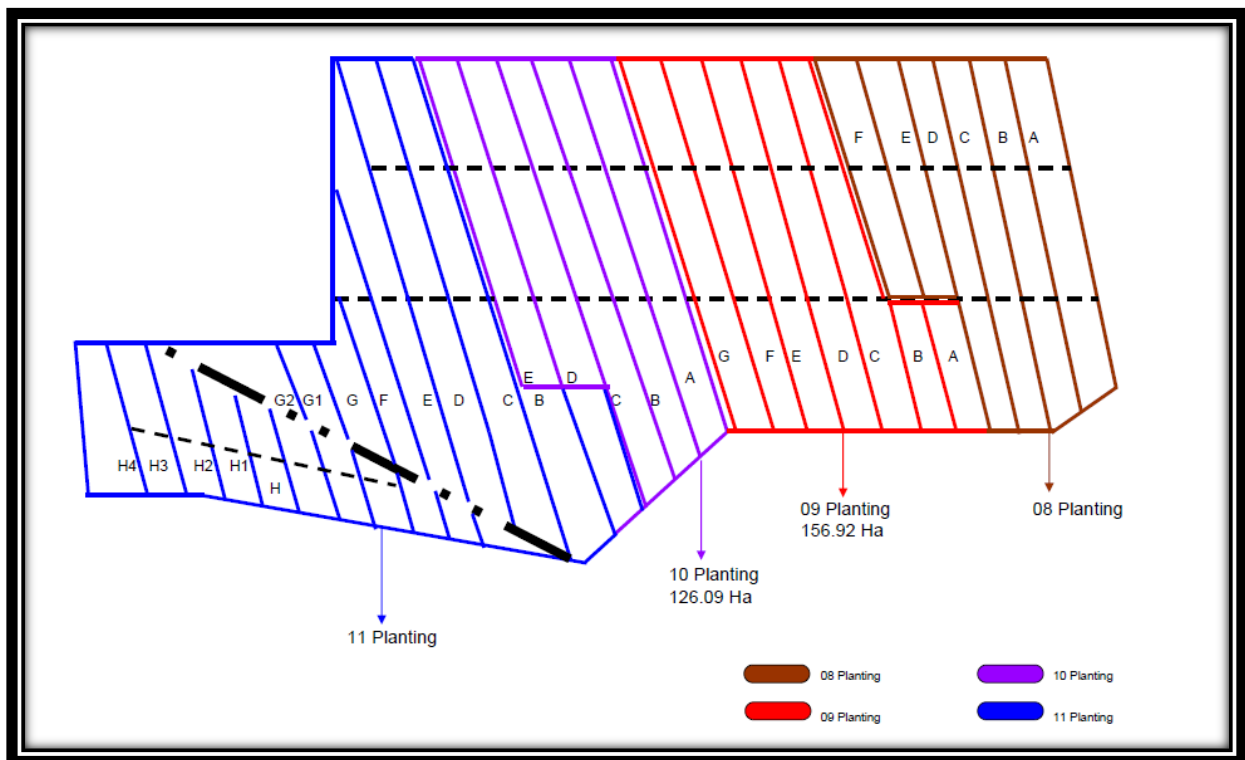


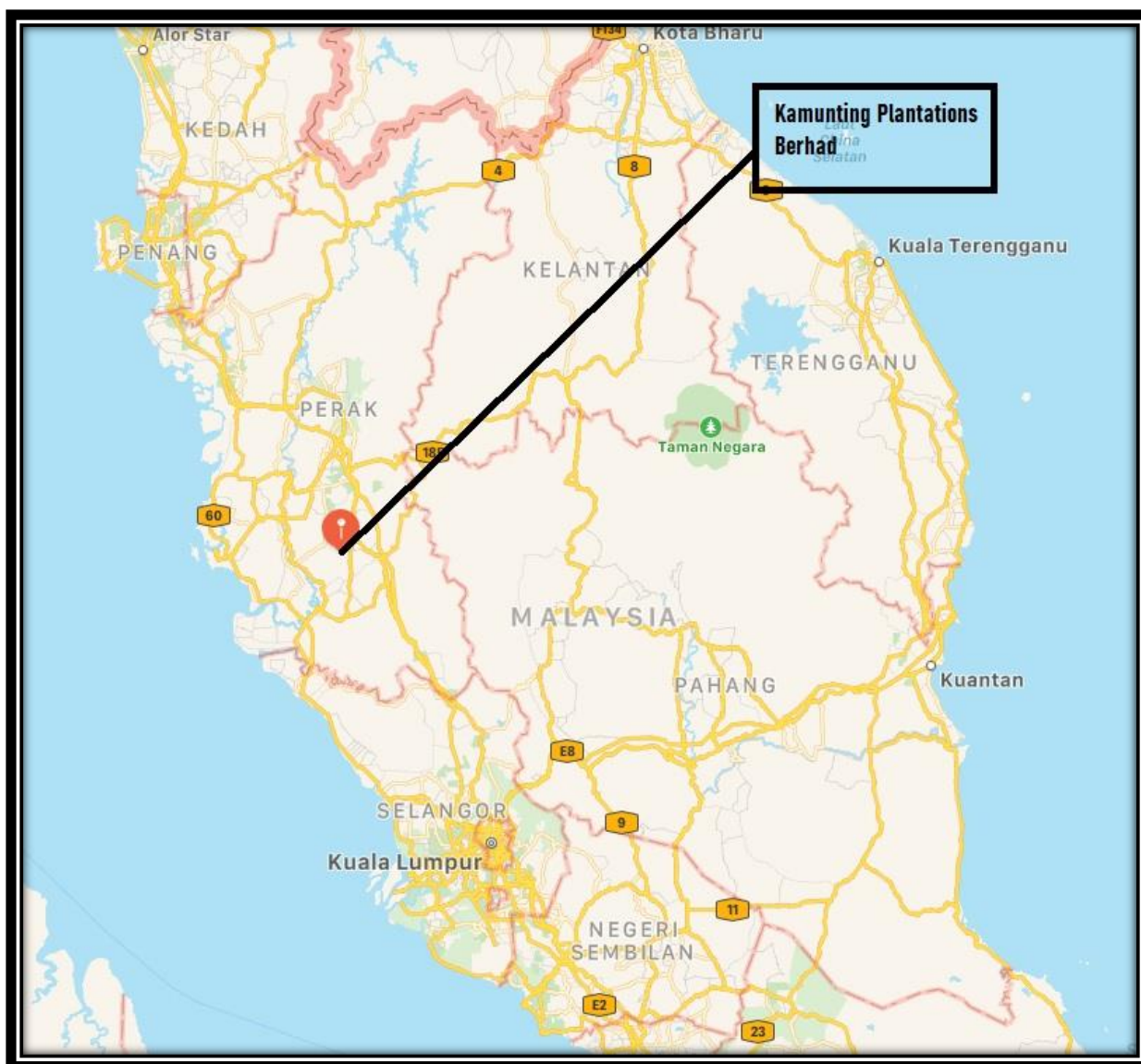
Others Sustainability Certification

No	Name of The Site	Others Sustainability Certifications
1.	Kamunting Estate	NIL

1.4 Map Showing Geographical Location

Kamunting Estate





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

Name of the Certification Unit	Area Summary (HA)		
	Certified Area (per Land Title)	Planted	Mature
Kamunting Estate	638.92	594.43	594.43
Total	638.92	594.43	594.43

Name Of The Supply Base	Area Summary (HA)		
	Conservation Area	HCV	Others
Kamunting Estate	-	-	44.49
Total	-	-	44.49

Name of the Certification Unit	FFB Summary (MT)		
	Projected from last audit	Actual Production for 12 Months [Oct 2018 - Sep 2019]	Projected Production for next 12 Months [Oct 2019 - Sep 2020]
Kamunting Estate	NIL	17,542.28	18,620.00
Total	NIL	17,542.28	18,620.00

1.6 Certificate Details

Certification body	Global Gateway Certifications Sdn. Bhd., No. 10 Jalan Rasmi 7, Taman Rasmi Jaya, 68000 Ampang, Selangor Darul Ehsan, Malaysia. Tel.: +603 4256 2689; Fax: +603 4256 2687 Website: www.ggc.my
Assessment standard	(MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders
Certificate number	GGC-KPB001-MSPO-00-2019
Initial certificate issued date	30 th December 2019
Certificate expiry date	29 th December 2024
Stage 1 assessment date	19 th September 2019
Stage 2 / Main Assessment	14 th October 2019 – 15 th October 2019
Annual Surveillance 1 [ASA 1]	October 2020
Annual Surveillance 2 [ASA 2]	October 2021
Annual Surveillance 3 [ASA 3]	October 2022
Annual Surveillance 4 [ASA 4]	October 2023

1.7 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: Surenthiran Panneerselvam

Graduate in PgDip/MSc Oil and Gas Accounting from University of Abertay Dundee, Scotland, UK. Equipped with experience in sustainability audit field and with more than 6 years working experience. Involved in MSPO Assessment since 2017. Fully trained in audit certification such as MSPO, RSPO, ISO9001:2015, ISO37001: 2016. Able to communicate in both Bahasa Malaysia and English (written and spoken).

During this assessment, he assessed on the aspect of legal compliance, safety and health, stakeholder's consultation and etc. Able to speak and understand Bahasa Malaysia and English.

Auditor

Name: Nanang Kualib

Graduated in Degree on Forestry from Bogor Agricultural Institute (IBP), Indonesia. He worked in Forest Company in 2000 –2004 as a technical assistant of Sustainable Forest Management Implementation, Joint program with Forest Faculty Bogor Agriculture Institute and WWF Indonesia in 2006 – 2010. As a professional, he was involved in HCV social study of Sustainable Forest Management, HCV Identification in 3 palm oil plantations in Indonesia. Currently, he works as professional HCV assessor. Involved in audits conducted in Malaysia and Indonesia. Member of GGC RSPO audit team.

During this assessment, she assessed on the aspect of Transparency, environmental, stakeholder's consultation, traceability and etc. Able to speak and understand Bahasa Malaysia and English.

1.8 Audit Methodology

The audit was conducted based on sampling following the method as specified in the MSPO requirements (MSPO-Questionnaire Self-Assessment – RA). In the case of this certification unit, sampling calculation was not applied as there is only one estate namely "Kamunting Estate". 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

Audit Date	14 th October 2019 – 15 th October 2019
Name of site(s) visited	Kamunting Estate
Total number of man-days spent	3 man-days

1.10 Audit Result Summary Findings

Category	Numbers	Status (Closed/Open/Not Applicable/No Action Requires)
Major Nonconformities	0	No action requires
Minor Nonconformities	3	Open (Next Surveillance Audit)
Area of Concern	0	No action requires
Noteworthy /Positive Comments	4	No action requires

1.11 Stakeholder Consultation

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

GGC has published the public notification on 10th September 2019 and as to accommodate a stakeholders' consultation meeting for estate. Therefore, stakeholder consultation was conducted on 14th – 15th October 2019 in Kamunting Estate to gather information from the local communities in accordance to Certification Scheme and Stakeholder Consultation requirements. During this Main Assessment (Stage 2) audit, the audit team has conducted stakeholder consultations involving both internal and external stakeholders as to understand the practices in relation to environmental, social performance and their performance with respect to the MSPO requirements. The meeting was conducted without the present of estate management.

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

No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken. [What we did]	Assessment team findings [Outcome]
1.	All stakeholders	<ul style="list-style-type: none"> Stakeholders who attended the meeting are aware about what is MSPO. Clear knowledge on the existence of a complaints/grievance mechanism. 	<ul style="list-style-type: none"> Management will continue briefing to all stakeholders on MSPO awareness Management will continue briefing to all stakeholders on MSPO's complaint and grievance mechanism available in their company 	Will review by next surveillance audit
2.	Stakeholders B (Government Authority)	<ul style="list-style-type: none"> Good communication and cooperation with the estate. Suggest the estate management to make aware on the activities that could affect the environment. No criminal cases reported as to date surrounded the estate. 	<ul style="list-style-type: none"> No action required 	Positive comments and suggestion
3.	Stakeholders C (Local communities)	<ul style="list-style-type: none"> Good communication and cooperation with the estate. Receive electric and water supply from the estate. No issues on the usage of route. 	<ul style="list-style-type: none"> No action required 	Positive comments and suggestions
4.	Stakeholders D (Contractors and suppliers)	<ul style="list-style-type: none"> Good communication and cooperation with the estate. No issues on payment and agreement. Understand the requirement of MSPO compliance. 	<ul style="list-style-type: none"> No action required 	Positive comments

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 Kamunting Estate. Estate Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual.

The management is committed to comply with MSPO system by giving awareness training to all personnel involved in this standard to make them understand the procedures and implementation of the standard. The employees are aware of the requirements of MSPO. There was no complaint or feedback received during this Main Assessment (Stage 2) Audit.

This report will be internally reviewed prior to certification decision by GGC and externally peer reviewed by independents panel reviewers (qualified and trained by MPOCC). During this Main Assessment (Stage 2) Audit, based on MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO)] Part 3: General Principles for Oil Palm Plantations and Organized Smallholders), there were no major, 3 minor non-conformities and no area of concern has been raised to the facility that being audited.

As highlighted in the audit plan, the audit objectives have been achieved and assessment resulted was no major non-conformity findings. Therefore, the Lead Auditor recommends a certificate of compliance "MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders" is awarded to Kamunting Estate.

1.13 Date of Next Surveillance Audit

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

1.14 Confidentiality

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

1.15 Abbreviations Used

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



POM	Palm Oil Mill
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 A policy for the implementation of MSPO shall be established.

Summary Kamunting Pantation Bhd has an MSPO Policy (Polisi Malaysian Sustainable Palm Oil) signed by Management on 1st February 2019. Based on the document verification, the policy socialization was carried out through public consultation activities documented in the "Training Book", for example the public consultation on 2nd February 2019 which was attended by workers and contractors.

The company also disseminates MSPO policies by posting the policy documents on the notice board at the Estate Office. Based on interviews with workers and contractors, it confirms that they understand MSPO policies.

In Compliance **Yes** No Not Applicable

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

Summary The policy emphasizes on top management commitment towards sustainable production of palm oil, continuous improvement and compliance to legal requirements. The company has also prepared a Continuous Improvement Plan related to MSPO as outlined in the "Continuous Improvement Plan" document consisting of:

- Environment Management Plan (Doc. No. KPB-CIP-04, Rev 0, dated 17th June 2019).
- Waste Management Plan (Doc. No. KPB-CIP-07, Rev 0, dated 17th June 2019).
- Safety and Health Plan (Doc. No. KPB-CIP-01, Rev 0, dated 17th June 2019).
- Social Plan (Doc. No. KPB-CIP-02, Rev 02, Dated 17th June 2019).
- Biodiversity Plan (Doc. No. KPB-CIP-05, Rev 0, Dated 17th June 2019).
- Water Management Plan (Doc. No. KPB-CIP-06, Rev 0, Dated 17th June 2019).
- Quality Plan (Doc. No. KPB-CIP-03, Rev 0, Dated 17th June 2019).

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 Kamunting Plantation Bhd already has an Internal Audit SOP (Document No. KPB-SOP-01) signed by Management on 17th June 2019 which contains a flowchart; auditors' qualifications requirements, audit team selection, audit process and audit findings. Minutes of internal mspo audits committee meeting / auditors briefing held on 12th July 2019 conducted by Mr. Rajasegaran, Ms. Norlita, Ms. Kalaiyarasi, Ms. Rahimah, Mdm Elisabeth, Mr. Baltasar. Audit findings are outlined in the Kamunting Plantation Bhd

internal audit program form, MSPO reference 2530-3-2013 and non-compliance note form.

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 Based on verification of the Internal Audit Document SOP document No. KPB-SOP-01 signed by Management on 17th June 2019. The company has appointed officers responsible for conducting MSPO Internal Audit through the Estate Manager Memorandum. Based on the verification of the internal audit document of the ST1 MSPO Audit results show that Kamunting Plantation Bhd has made improvements which in turn outlines the root causes of the findings.

MINOR NC:

Based on the document verification of SOP Internal Audit (Doc No. KPB-SOP-01 – Clause 4.1), internal auditor is required to attend MSPO Auditor Training. However, no evidence of internal auditor attended MSPO training.

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

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

Summary Kamunting Plantation Bhd conducted a management review on 22nd September 2019 attended by Mr Rajasegaran, Mr Thangarajoo (Estate), Ms Norlita (Gender), Ms Kalaiyarasi (Admin), Baltasar (Mandor) and Husain (G. Worker). The results of the management review are presented in the minutes of the MSPO Management Review Committee.

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 Kamunting Plantation Bhd conducted a Management review on 22nd September 2019 attended by Mr Rajasegaran, Mr Thangarajoo (Estate), Ms Norlita (Gender), Ms Kalaiyarasi (Admin), Baltasar (Mandor) and Husain (G. Worker). The results of the Management Review are presented in the Minutes of The MSPO Management Review Committee. Decision on management action is listed in Management Review Meeting minutes, as the issues. Meeting minutes was made available, as management action has been documented and time frame is updated with stating the status of the process.

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



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

Summary Kamunting Plantation Berhad has established Continual Improvement Plan (CIP). As sampled, it is available for environment (KPB-CIP-04) dated 17th June 2019 consists of:

- To build scheduled waste Store
- Install emergency eye wash and emergency shower
- To build chemical mixing
- To install lap water

Continuous Improvement Plan (Biodiversity Plan) consists of;

- Install "No Hunting "Signage

Continuous Improvement Plan (Water Management Plan) consist of;

- Install water from LAP
- Assess current water uses and cost

In Compliance **Yes** No Not Applicable

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

Summary The company disseminate the new information and techniques or new industry standards and technologies through the training.

In Compliance **Yes** No Not Applicable

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

Summary The company disseminate the new information and techniques or new industry standards and technologies through the training. Trainings were conducted for the introduction and implementation of any new information or technology that is feasible and applicable to the company.

In Compliance **Yes** No Not Applicable

2.2 Principle 2 : Transparency

Criterion 1 Transparency of information and documents relevant to MSPO requirements

Indicator 1 The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.



Summary Kamunting Estate has established list of stakeholders dated 26th August 2019, prepared by Mr Thangarajoo, Field Supervisor and approved by Mr. Rajasegaran, Estate Manager. Latest stakeholder meeting minutes sighted dated 11th March 2019 at Bilik Mesyuarat Ladang Kamunting. Seen internal memo published dated on 1st March 2019. The meeting is to inform the stakeholders regarding estate information in terms of requesting documents, information from the estate. Issue discussed:

- MSPO policies, importance of stakeholders, estate provide job opportunities, "system perparitan yang bagus bagi ladang bersebelahan".
- Provide facilities and goods for daily usage to estate
- Managing estate with good practices
- Complaint procedure.

The estate manager confirmed information will be shared upon request and information disseminating through stakeholder meeting and display in notice board.

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 Estate have evidence to demonstrate it has set a mechanism to disclose the documents or record that has to be publicly available. List of publicly available management document is made available during the audit and communicated to stakeholders where they know that these documents are publicly available. As per interview with Mr. Thangarajoo, Field Supervisor. If external stakeholder request for confidential information, they have to seek approval from manager. Company Policies are publicly displayed at site, Procedures document, contract agreement and financial budget is confidential documents, was made available.

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 Estate has established the Stakeholder Communication & Consultation Procedure. KPB-SOP-02, dated 17th June 2019, signed by Mr. Thangarajoo, and approved by Mr Rajasegaran, Estate Manager. The Standard Operating Procedure has identified mechanism for consultation and communication with the relevant stakeholders. During stakeholder consultation, stakeholder aware on the stakeholder consultation and communication procedures.

In Compliance **Yes** No Not Applicable

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

Summary Appointment letter for the management representative responsible for consultation and communication is available and the person in charge is En.Rajasegaran A/I Sivaraman dated 1st February 2019, approved by Mr Chan Eng Kong, Director.

In Compliance **Yes** No Not Applicable

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

Summary List of stakeholders is available with document Project no: KPB-01-57K, Document no:000. Evidence for stakeholder communication record was made available during audit. The stakeholders are aware of the procedure and commitment to be implanted. List as below:

- Government authority
- Villagers/Local Community
- Suppliers
- Transporters

Interviewed with the stakeholder and confirmed that they have been informed and keep updated during stakeholder meeting.

In Compliance **Yes** No Not Applicable

Criterion 3 Traceability

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

Summary Kamunting Estate has established SOP on Traceability, it is made available as referred to: KPB-SOP-03 dated 17th June 2019 as prepared by Mr Thangarajoo, Asst Manager and approved by Mr S. Rajasegaran, Estate Manager. The MSPO procedure on Traceability and Supply Chain and was made available at the time of audit to establish suitable identification and traceability of FFB traceable from the plantation activities to the mill. Estate supervisor will conduct regular inspection.

In Compliance **Yes** No Not Applicable

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

Summary Regular inspection has been done during internal audit. Record for Internal Audit is made available during audit. Internal audit conducted on 12th July 2019, as verified no findings for traceability system were found.

In Compliance **Yes** No Not Applicable

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



Summary Person in charge on Traceability is En. S. Rajasegaran A/I Sivaraman appointed on 1st Feb 2019 and approved by Mr Chan Eng Kong, Director. The person in charge responsible to maintain and implement the traceability system as sighted the appointment letter [Ref: KE06/04/2019] dated 22nd April 2019.

In Compliance **Yes** No Not Applicable

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

Summary Sighted the records of sales, delivery or transportation of FFB. This record being maintained and the documents are kept by the estate. Kamunting Estate has established the procedure on Traceability and Supply Chain is made available at the time of audit. Weighbridge ticket information are recorded in log book "Internal Transporting FFB" as included with lorry no. block no., transporter, product, delivery order no, harvesting geng detail, destination, time, quantity, etc recorded in the log book. As sampled:

- Internal transporter FFB dated 8th October 2019
Total FFB weight = 65,100 mt (as to date)
- Loading ramp (Weighbridge ticket – Kamunting Estate) - Ticket no: 002598
- FFB Delivery Advice - No ticket: B39639
- Mill ticket, dated on 9th October 2019 - Ticket: 1261351

In Compliance **Yes** No Not Applicable

2.3 Principle 3: Compliance to legal requirements

Criterion 1 Regulatory requirements

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

Summary Kamunting Plantation Berhad has established and updated list of applicable laws and regulations that are applicable for the estate. The legal register is available as listed below. Sighted permits/licenses being monitored and updated by the estates as follow;

1. MPOB License: 501693502000 Menjual & Mengalih (FFB) – 1st February 2019 till 31st January 2020. [Keluasan estet: 638.92 Ha]
2. MPOB License (Nursery). 506768811000 Menghasilkan, menjual/mengalih & menyimpan (SLGBIJI) for nursery – valid 1st February 2019 till 31st January 2020.
3. Permit Khas Barang Kawalan Berjadual - Diesel storage – Permit serial number: A 000008-TPH for 11,000 litre valid from 1st February 2019 till 31st January 2020.
4. Kebenaran Pembelian Racun Makhluk Perosak Amat Berbisa/ Terhad – Lembaga Racun Makhluk Perosak [No: PRK/2018/MONO/023(GL)], dated 3rd June 2019.
5. Perakuan Penentuan Timbang dan Sukat – Akta Timbang dan Sukat 1972 [B 1510885], No siri alat: A16200453. Inspected by Metrology Corporation Malaysia Sdn Bhd, dated 8th August 2019.

The licenses are reviewed and confirmed the document is updated within the validity period.

In Compliance **Yes** No Not Applicable

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

Summary List of all laws applicable to estate operations sighted during the audit. The list of laws applicable to the estate covers the detail requirements that related to MSPO compliance, last updated on 26th August 2019 prepared by Mr. Thangarajoo. There is set of Legal Requirements been divided into 4 types:

- a. Employment
- b. Environmental
- c. Occupational Safety and Health
- d. General & Other requirements

As verified, compliance with the applicable local, state, national and ratified international laws and regulations are as follows:

- OSHA Act 1994 (Act 514)
- Factories and Machinery Act 1967
- Fire services Act 1984
- Uniform Building By Laws 1986
- Electricity Regulations 1994
- Pesticides (Labelling) Regulations, 1984
- Petroleum (Safety Measures) Act 1984
- Food Act 1983
- Environmental Quality Act 1974 (Act 127)
- Local Government Act 1976
- Employees Provident Fund 1991 (Act 452)
- Employees' Social Security Act 1969 Act 1965 (Revised 1990)
- Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446)
- National Wages Consultative Council Act 2011 (Act 732), Minimum Wages Order (Amendment) 2018
- MPOB Act 1998 (Act 582)
- Industrial Relations Act 1967 (Act 177)

In Compliance **Yes** No Not Applicable

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

Summary Based on interview with Mr Rajasegaran (Estate Manager), responsible to update as at when any new amendments or any regulations once received through the following manner:

- Communication with law/enforcement officers
- 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 Kamunting Plantation Berhad assigned the responsible person to monitor compliance and to track and update the changes in regulatory requirements is Mr. Thangarajoo.

In Compliance **Yes** No Not Applicable

Criterion 2 Land use rights

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

Summary Kamunting Estate land title is available and well maintained. The estate has the following land title and its Ownership. There is 2 land titles are registered under name Kamunting Plantation Berhad for total 638.92 Ha.

- 64.52 Ha (Use of land – Tanaman Komersial – Kelapa Sawit)
- 574.4 Ha (Use of land – Tanaman Komersial – Kelapa Sawit)

The copy of land title is maintained in estate office. There is clearly stated "Syarat - Syarat Nyata" is for Oil Palm only. There is no land issue raised during stakeholder meeting conducted on 14th October 2019 and no grievance reported.

In Compliance **Yes** No Not Applicable

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

Summary Estate demonstrated legal ownership of their land by having legal land titles to the land. The copy of land titles is kept in the estate office. Sighted 2 copies of land titles kept by the estate. There are 2 land titles registered under name Kamunting Plantation Berhad for total 638.92 Ha. The copy of land title is maintained in estate office. There is clearly stated "Syarat - Syarat Nyata" is for Oil Palm only.

In Compliance **Yes** No Not Applicable

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

Summary During site observation, boundary stone was made available. The boundary was clearly demarcated and visibly maintained. Sighted some samples of boundary stones during field visit. Boundary stone sighted with the GPS coordinates taken during field visits is crosscheck with the land title and map.

In Compliance **Yes** No Not Applicable

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

Summary There is no evidence of conflict present in this estate. There is no violence in instigated violence in maintaining peace. During interview with stakeholders, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported. No disputes have been recorded in the estate area. The land title has been legally acquired by the estate.

In Compliance **Yes** No Not Applicable

Criterion 3 Customary rights

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

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

In Compliance **Yes** No Not Applicable

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

Summary There is no customary land in or surrounding the estates. There are also no land disputes or claims involving these estates. The estate has proper legal land titles for the land ownership. Thus, no maps for recognized customary rights.

In Compliance **Yes** No Not Applicable

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

Summary There is no customary land in or surrounding the estates. There are also no land disputes or claims involving the estates. The company has proper legal land titles for the land ownership. No disputes or grievances has been reported during stakeholder meeting.

In Compliance **Yes** No Not Applicable

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

Criterion 1 Social impact assessment (SIA)

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



Summary Social Impact Assessment (SIA) named "Penilaian Impak Sosial Dan Alam Sekitar" conducted by Mr Thangarajoo, Asst Manager dated 11th March 2019. Management explains about the MSPO Policies, SIA Assessments, EIA Assessment, replanting issue, land disputes, boundary markers and continual improvement. Action plan has made available to address the improvement and to mitigate the risk or issue raised by the stakeholders during stakeholder meeting. Seen "Soal Selidik & Penyelesaian", Kamunting Plantation Berhad. As sampled:

Issue raised:
"Tiada pengetahuan mengenai MSPO"

Action plan:

- Provide training/ briefing on MSPO to all stakeholders and employees.
- Displaying signboard "membuat papan tanda mengenai MSPO".

MINOR:
Social Impact Assessment (SIA) is made available at the time of audit. However, SIA samples and data collections for internal stakeholders was not included in the assessment.

In Compliance Yes **No** Not Applicable

Criterion 2 Complaints and grievances

Indicator 1 A system for dealing with complaints and grievances shall be established and documented.

Summary Kamunting Plantation Berhad has established complaint procedure (KPB-SOP-04) dated on 1st February 2019 in dealing with complaints and grievances, prepared by Mr Thangarajoo, Asst Manager and approved by Mr Rajasegaran, Estate Manager. 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. Complaint form is available at the publicly accessible area such as in the front door of the main office. The SOP available included with:

- Objective
- Definition
- Workflow and chart – Within 7 days to do verification on complaint.

In Compliance **Yes** No Not Applicable

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

Summary Complaint will be verified by management within 7 days. In complaint form, there is acknowledgement column for complainant express their feedback on the action taken by management. Briefing on "Mengenai cara-cara membuat aduan, permintaan dan keluhan kepada Ladang Kamunting" during stakeholder meeting. Memo released by estate management on 2nd January 2019. The briefing has been conducted to all internal and external stakeholders.



In Compliance **Yes** No Not Applicable

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

Summary Complaint form seen for all stakeholders. All internal employee and external stakeholders' can deliver their complaints and grievances directly to the management through filling the complaints form and place into the Drop Box outside the Office which are easily assessible. Complaint form is made available at Kamunting Estate main office.

In Compliance **Yes** No Not Applicable

Indicator 4 Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.

Summary Communication on SOP is being made during morning muster call. Employees and the surrounding communities were made aware that complaints or suggestions can be made any time vide internal and external stakeholders meeting. During the interview with workers and their dependents able to demonstrate their understanding on complaint procedure. Records of training/briefing on complaint/suggestion procedures available to the workers and stakeholders. During stakeholder meeting, interviewed the contractors and workers and verified that they have made aware on MSPO related requirements.

In Compliance **Yes** No Not Applicable

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

Summary Kamunting Plantation Berhad has established complaint procedure (KPB-SOP-04) dated on 1st February 2019 in dealing with complaints and grievances. Complaint record for the year 2019 are made available and well maintained. Complaint as evidence:

Complaint 1:

Description: Request for job opportunity in estate.

Date: 18th September 2019

Management responded on 19th September 2019.

Complaint 2:

Description: Nilai beg baja melebihi kemampuan, diminta agar dikurangkan beg baja.

Date: 5th July 2019

Management responded and agreed on the request.

In Compliance **Yes** No Not Applicable

Criterion 3 Commitment to contribute to local sustainable development

Indicator 1 Growers should contribute to local development in consultation with the local communities.

Summary Kamunting Plantation Berhad has provide job opportunities to local communities and provided fund donation. Sighted evidence of that the management has contributed to local sustainable development, as sampled sports event dated 12th November 2018. Seen evidence of payment dated 14th November 2019.

In Compliance **Yes** No Not Applicable

Criterion 4 Employees safety and health

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

Summary Occupational Safety and Health Policy, "Polisi Keselamatan dan Kesihatan Pekerjaan" available signed by company director, Mr Chan Eng Kong on 1st Feb 2019. Operational Safety and Health (OSH) policy sighted displayed in the main office. The policy contains:

- To ensure all requirements/laws/code of conduct OSH is being implemented.
- To reduce and eliminate the work risk by following appropriate SOP and SaOP.
- To always provide training and consultation to all workers.

Record of "Training Book" was made available, as all workers was briefed during "morning muster call", dated 3rd February 2019.

In Compliance **Yes** No Not Applicable

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

- a) A safety and health policy, which is communicated and implemented.
- b) The risks of all operations shall be assessed and documented.
- c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:
 - i) all employees involved shall be adequately trained on safe working practices; and
 - ii) all precautions attached to products shall be properly observed and applied.
- d) The management shall provide the appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).
- e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.
- f) The management shall appoint responsible person(s) for workers' safety and health.



The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.

g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meetings are kept and the concerns of the employees and any remedial actions taken are recorded.

h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.

i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.

j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.

Summary

Occupational Safety and Health Policy, "Polisi Keselamatan dan Kesihatan Pekerjaan" available signed by company director, Mr Chan Eng Kong on 1st Feb 2019. OSH Policy was communicated to all employees during mustercall session, as seen policies briefed during "morning muster call", dated 3rd February 2019.

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). "Penilaian Risiko Tempat Kerja", - Garis Panduan Bagi Mengenal Pasit Hazard, Menilai Risiko dan Mengawal Risiko. Latest HIRARC documents was made available as sampled below:

- Menuai buah sawit
- Menolak kereta sorong
- Nursery
- Stor simpanan PPE
- Chemical store
- Spraying
- Bengkel
- Menabur baja

Last reviewed date of HIRARC dated on 1st April 2019, prepared by Mr. Thangarajoo, Field Supervisor and approved by Mr Rajasegaran. CHRA is outdated on April 2014, however estate has accepted quotation from KenEp Resources (Asia) Sdn Bhd dated 14th September 2019. Assessment will be conducted on 16th October 2019, seen evidence of date confirmation.

Estate has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training file – Safety and Health Programme for the year 2019. Training programme available including harvesting, manuring, spraying and loading activities. Training for chemical application is according to the product label. As sampled

- Training for sprayer – kawalan perosak dan penyakit dated on 29th December 2019

- Training on pengendalian mesin rumput dated on 2nd January 2019
- Training on keselamatan dan kesihatan sewaktu bekerja dated on 3rd January 2019

SDS is made available at point of use example chemical store, fertilizer store. Store arrangement was in good condition following the best practice. Proper fertilizer and chemical placement, labelling was sighted signage of awareness warning and hazard are in place.

PPE issuance and replacement record "PPE Matrix" is made available based on job task. List of allocation of PPE to estate personnel year 2019 sighted in PPE issuance file. List of provided PPE to the workers in the are available in the "PPE Issue Book".

SOP available title "Pengurusan Bahan Kimia (Chemical Handling)" doc. No KPB-SOP-10 date on 17th June 2019 available. Sprayers attended medical surveillance seen Baseline Medical Surveillance Report sighted, examination dated on 12th February 2019 by Dr Tan Kim Soon [HQ/08/DOC/00/660].

Estate Manager is the appointed by company director as responsible person for workers safety and health. Letter of appointment was made available.

OSH committee meeting is conducted every 3 months. Last minutes sighted on 14th Feb 2019. Inconsistency on scheduling OSH Meeting. As verified during audit, found out that inconsistency on scheduling the OSH Meeting.

MINOR:

As verified during audit, OSH meeting was last conducted on 14th February 2019. However, found out that inconsistency on scheduling the OSH Meeting.

Emergency Response Procedure (ERP) sighted and the ERP has clearly justified procedures when dealing with chemical spillage, accident and others. Emergency response plan include the emergency contact number, Emergency Respond Plan Procedure and exit routes in file and notice board.

First Aid Training conducted, referred as "Latihan dan demo pertolongan cemas" was conducted on 26th September 2019. Attended by 15 workers, as attendance record, photographs and meeting minutes available.

Estate has sent JKKP 8 report has been submitted to JKKP on 19th January 2018 and Accidents and Investigation records is verified.

In Compliance Yes **No** Not Applicable

Criterion 5	Employment conditions
Indicator 1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.
Summary	Kamunting Plantation Bhd has established policy in title "Dasar Hak Kemanusiaan" signed by company director, Mr Chan Eng Kong dated on 1 st February 2019. As



highlighted, "Ladang Kamunting sangat menitikberatkan dasar kemanusiaan untuk melindungi para pekerja di sini dan berkomitmen untuk perlindungan dan kemajuan hak asasi manusia". The policy has been communicated during "muster call". Seen the record "Training Book", as all workers was briefed during "morning muster call", dated 3rd January 2019. The policy being displayed at notice boards outside the office.

In Compliance **Yes** No Not Applicable

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

Summary Policy available title "Dasar Hak Kemanusiaan" signed by company director, Mr Chan Eng Kong dated on 1st February 2019. As stated in the policy, "Kami memastikan peluang yang sama diberikan kepada semua kakitangan. Proses pengambilan, promosi dan imbuhan semata-mata berdasarkan kualifikasi dan prestasi individu tanpa mengira agama, bangsa, umur, jantina, kewarganegaraan atau ketidakupayaan fizikal". The policy being displayed at notice boards outside the office.

In Compliance **Yes** No Not Applicable

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

Summary The salary is according to 'Guidelines on the Implementation on the Minimum Wages'. National Wages Consultative Council Act 2011 (Act 732), Minimum wage order 2018. Malaysian minimum salary is RM1,100.00 as stated in the guidelines. Pay and conditions are documented in the workers' Contract Agreement and wage payment records / pay slip. Interview with both Estate staff and workers and with both male and female confirmed that they understand the terms and conditions of their employment.

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 The salary of contractor workers is according to "Guidelines on the Implementation on the Minimum Wages". National Wages Consultative Council Act (Act 732). Malaysian Minimum salary is RM1,000 or RM42.31/hour as stated in guidelines. Interviewed the contractors /suppliers during the audit and has verified on the MSPO implementation. Verbal agreement between the contractor and the worker based on an agreed percentage of the contract rate between the company and contractor.

In Compliance **Yes** No Not Applicable

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

Summary Personal file of employees was sighted. Registration Card of each workers sighted, consist of details of employee particulars. Contract agreement sighted and made available during audit. All details (name, gender, date of birth, date of entry, job description, wage and period of employment information available as evidence of individual existence.

In Compliance **Yes** No Not Applicable

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

Summary The Agreement stated all the term and conditions according to Malaysian Law. This contract is signed by both employee and employer and accompanied with respective witnesses. All workers enjoy the same scale of pay and provided with equal housing and work facilities. Seen contract of employment, signed by the employee and employer. Each employee is provided with the copy of contract agreement, and as per interview with Ms. Chew all staff/workers required to sign acknowledgment form upon receipt. During field visit, workers has been interviewed and confirmed they are aware of the deduction and copy of employment contract is given.

In Compliance **Yes** No Not Applicable

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

Summary Working hours is 8 hours. From Saturday to Thursday. The overtime maximum is 104 hours according to Malaysian Law. Daily attendance recorded during muster call. Time recording is based on attendance book – Employee Attendance listed as below:

Working hours is 8 hours (7.00 am – 4.00 pm). From Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law. Checkroll is used to record the attendance of workers. Clerk will update in checkroll book in timely manner for workers.

In Compliance **Yes** No Not Applicable

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

Summary The working hour and break time have been clearly stated in the Employment Contract. Sighted in the Contract Agreement the rate of overtime which agreed by both parties. The working hours and break time are displayed on notice board and



clearly stated in contract employment of employees. There is no complaint received regarding payment or are forced to work overtime during field visit.

Management/Staff

7.00am – 4.00pm

12.00pm – 1.00pm (Lunch Break)

Workers including foreign workers

7.00am – 3.00pm

12.00pm (Lunch Break)

During interview session with workers, they understand and aware of the working hours and confirmed they are paid according to legal requirement.

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 Pay Slip and Employment Contracts of each workers sighted. Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Based on the interview with the workers, they confirmed that they are being paid more than the stipulated minimum wage and understand all the deductions being made.

Documented payslip was distributed to individual workers on the day of payment. Payment being made through bank and seen the letter of consent from workers to the Management. Wages paid as tasks of piece rate are based on the agreed rate with the estate management. In case the job task is lower than the minimum wage, the management will add by assigning duties and pay them in accordance to minimum wage scale.

In Compliance **Yes** No Not Applicable

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

Summary All workers have been provided with medical and accident insurance. With regards to local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations. Workers provided with accommodation with basic amenities. Other forms of social benefits offered are as (bonus, housing facilities, electricity, water, medical benefits).

In Compliance **Yes** No Not Applicable

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



Summary All workers are provided with housing facilities at workers linesite. Housing provided by company to workers. Sighted weekly inspection report on workers quarters. As interviewed, Ms Kalaiarassi, she is responsible on linesite inspection on weekly basis. Last inspection was done on 10th October 2019, as evidence doc [KPB-H-01, Rev 01]. During site observation, linesite have basic amenities and sufficient space for the workers.

In Compliance **Yes** No Not Applicable

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

Summary Sexual Harassment Policy named "Dasar Seksual dan Keganasan Di Tempat Kerja", dated 1st February 2019 and approved by Mr Chan Eng Kong, Director. The policy has been displayed on notice board outside the main office building. Briefing has been conducted regarding the policy during internal and external stakeholder meetings.

In Compliance **Yes** No Not Applicable

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

Summary Kamunting Plantation Berhad established Trade Union Policy named "Dasar Kebebasan Persatuan" dated 1st February 2019 and approved by Mr Chan Eng Kong, Director. No evidence to show that the company is restricting the employees from joining any Trade Union.

The policy has been displayed on notice board outside the main office building. Briefing has been conducted regarding the policy during internal and external stakeholder meetings.

In Compliance **Yes** No Not Applicable

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

Summary Kamunting Plantation Bhd established "Dasar Pekerja Kanak-Kanak dan Orang Muda" dated 1st February 2019 and approved by Mr Chan Eng Kong, Director. As per "Social and Human Rights Policy", no children below ages of 18 working in the



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

In Compliance **Yes** No Not Applicable

Criterion 6 Training and competency

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

Summary Training need analysis, training programme or training records which include the MSPO related, working SOP, social and environmental element for employee and contractors are made available at the time of audit in the "Training File". "Training Programme C/W/Contractor Workers Training Matrix Year 2019". Below are the listed training programme listed:

- Training "Penggunaan Traktor dengan selamat" dated on 22nd November 2018 [Sighted photographs, training materials and meeting minutes as evidence].
- Training "Penuaian buah sawit", dated on 23rd December 2018 [Sighted photographs, training materials and meeting minutes as evidence].
- Training for sprayer – "Kawalan perosak dan penyakit", dated on 29th December 2019.
- Training on "Pengendalian mesin rumput", dated on 2nd January 2019
- Training for "Keselamatan dan kesihatan sewaktu bekerja", dated on 3rd January 2019.
- Training "Mengangkat dan menabur baja", dated on 17th January 2019.
- Training on "Latihan Pemadam Api", dated on 14th January 2019.
- Latihan dan demo pertolongan cemas dated on 26th September 2019.

Estate management has "Training Evaluation Form" [Doc No: KPB-TR-03 dated 17th June 2019]. Every training conducted, each employee will be undergone self-evaluation which is commented by trainee and trainer.

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. Training needs and training plan for the staff and workers. Estate has conducted training as per job scope. Training need analysis of all workers, staffs and Management which are based on their competencies and job description prepared by Mr. Thangarajoo and approved by Mr. Gunasegaran, Estate Manager dated 12th September 2019.

In Compliance **Yes** No Not Applicable



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

Summary Kamunting Plantation Berhad has established annual training plan for the year 2019. Comprehensive training plan has been scheduled in accordance to job scope. Training programme on environment, social, safety and health related is available in the Safety and Health training programme for the year 2019.

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 Kamunting Plantation Bhd has established Environment Policy signed by management on 2nd February 2019. Environmental Policy & Biological Diversity signed by Management on 2nd February 2019 consists of 5 types of commitments, namely:

- Recovery and fire prevention activities will support conservation efforts and natural habitats in the estate.
- Establish, maintain and continually improve the external and internal plantation management system.
- Comply with all applicable legal, Kanun and environmental law and biodiversity stakeholders.
- Educate and raise awareness of stakeholders on the environment and biodiversity through courses and training.
- Eliminate the negative effects of plantation activities on the environment and biodiversity.

Policies have been communicated on 3rd February 2019 at 10.00 am. Attended by 33 workers out of 45 workers (Attended by the contractors, harvesters, sprayers and estate workers and estate management. Records are available in the "KPB 01-PPE/TRAINING" file (Training record book). Kamunting Plantation Bhd has prepared a document "Identification & Evaluation of Environmental Aspects & Impacts" signed by Management on 21th June 2019 for each Station/ Area in operation, for example;

- a. Weeding
- b. Upkeeping
- c. Manuring
- d. Harvesting

Kamunting Plantation Bhd has compiled an Environmental, Pollution and Greenhouse Gas Management Plan dated 16th June 2019, Document No: KPB-CIP-04. The document explains the Management Plan for each area/ activity. During field visits, it was found



that no river flow was found that crossed the estate so there was no riparian buffer. Interviewed sprayers and fertilizers workers, they have a good understanding of fertilization and spraying techniques and received training from the company.

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 Kamunting Plantation Bhd has established Environment Policy signed by management on 2nd February 2019 stating that the company is committed to;

- Meet environmental compliance obligations
- Prevents pollution in the fields
- Continuous improvement of the environmental management system to improve environmental performance.
- Protect biodiversity and ecosystems in plantation activities.

Kamunting Plantation Bhd has compiled an Environmental, Pollution and Greenhouse Gas Management Plan dated 16th June 2019 (Document No: KPB-CIP-04). The document explains the Management Plan for each area/ activity.

In Compliance **Yes** No Not Applicable

Indicator 3 An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.

Summary The environmental improvement plan to mitigate the negative impact was incorporated in the environment management plan. Environmental, Pollution and Greenhouse Gas Management Plan dated 16th June 2019 (Document No: KPB-CIP-04). The document explains the Management Plan for each area/ activity. As evidence:

- During field visit at chemical storage, Kamunting Plantation Bhd has built chemical and fertilizer storage facilities with good specifications, air ventilation is quite good, equipped with water trapping, MSDS, Symbols of hazardous and toxic chemicals according to its type, first aid box, PPE and emergency facilities (eyes wash, siren, light fire extinguisher).
- Washing facility for Used chemical containers (used fertilizer bags, used herbicide containers and used pesticide containers), a rinse for sprayers and chemical workers' clothing (distinguished between female workers' bathrooms and male workers' bathrooms complete with water storage facilities used for re-use).

In Compliance **Yes** No Not Applicable

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

Summary

The programme to promote the positive impacts on environmental was incorporated in the environment management plan. Kamunting Plantation Bhd has compiled a Continuous Improvement Plan document signed by management on 17th June 2019. Verified from file no. 3. The Continual Improvement Plan consists of:

Doc No: KPB-CIP-01-Safety and health Plan. The document explains the 2019 Safety and Health Plan aimed at;

- BOFA training.
- Chemical training, Kamunting Plantation Bhd has conducted training for employees related to " Lifting and Sowing Fertilizers " on 17st January 2019, Training "Manually spraying chemicals and machines" on 9th May 2019, Training "Fertilizer Sowing" on 11th April 2019.

Doc No: KPB-CIP-02-Social Plan. The document explains that the Social Management plan in 2019 is focused on;

- Repair drainage system, based on site visits to employee housing, shows that drainage conditions are good and repairs have been carried out in several damaged locations.

Doc No: KPB-CIP-03-Quality Plan

Doc No: KPB-CIP-04-Environment Management Plan

Doc No: KPB-CIP-05-Biodiversity Plan.

Doc No: KPB-CIP-06-Water Management Plan.

Doc No: KPB-CIP-07-Waste Management Plan

In Compliance **Yes** No Not Applicable

Indicator 5 An awareness and training programme shall be established and implemented to ensure that all employees understand the policy, objectives of the environmental management and improvement management plans and are working towards achieving the objectives.

Summary

Kamunting Plantation Bhd has conducted environmental policy socialization to employees and contractors. Policies have been communicated on 2nd February 2019 at 10:00 am. Attended by the contractors, Harvesters, Sprayers and Estate workers) and Estate management. Records are available in the "CDE 01-PPE / TRAINING" File (Training record book). As sampled training:

- Fertilizing training conducted on 11th April 2019
- Training on manual and machine spraying was carried out on 9th May 2019
- Schedule Waste & e-SWIS Training conducted on 27th September 2019.

Based on interviews with sprayers and fertilizers it shows that they have a good understanding of the fertilization and spraying techniques.

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 Environmental meeting is combined with the OSH meeting as sighted OSH meeting minutes there is environmental issue has been discussed. Training/ Meeting conducted at Kamunting Estate, the Environment Issue Training”, explaining about content policy. Sighted training implementation, attendance records and photographs are made available attended by staff and workers. Kamunting Plantation Bhd had a meeting with workers and contractors at the Stakeholder Meeting on 2nd February 2019 which was attended by 33 participants. Records of the meeting are documented in the Minutes of Meeting and attendances list.

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 Diesel consumption is closely monitored by daily and monthly record as sighted. The company has consistently documented the use of non-renewable energy every month into: "Annual Electric Usage Record, Doc No: KPB-02 and Annual Diesel Usage Record, Doc No: KPB-01". Based on verification of the document, it shows that the consumption of diesel fuel in the period of May 2019 was 4,682 liters while the usage in July 2019 was 2,949 liters. The electricity usage for the period of April 2019 was RM 2,756.75 while in August 2019 it was RM 3,028.25.

In Compliance **Yes** No Not Applicable

Indicator 2 The oil palm premises shall estimate the direct usage of nonrenewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.

Summary Sighted the projection consumption of diesel for Kamunting Estate visited has been documented on annual basis based on the financial year. Seen annual estimate of non-renewable energy being established for the year 2019/2020. The company has consistently documented the use of non-renewable energy every month into: "Annual Electric Usage Record, Doc No: KPB-02 and Annual Diesel Usage Record, Doc No: KPB-01". Based on verification of the document, it shows that the consumption of diesel fuel in the period of May 2019 and July 2019. The electricity usage for the period of April 2019 till August 2019.

In Compliance **Yes** No Not Applicable

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



Summary There is no renewable energy is being use by the estate at the moment.

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 Kamunting Plantation Bhd already has a Waste Management Plan consisting of Waste Management Plan (Doc No: KPB-CIP-07) which outlines the waste management plan for the 2019 period focused on types and source of pollutions was made available, and sighted type and source of pollutions such as;

- Reuse of empty chemical containers
- Re-Use Fertilizer bags
- Used Fertilizer Bags
- Stacking of Fronds for conserving soil and water in the oil palm plantation
- 3R: Reduce, Reuse, Recycle

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 Waste Management Action Plan for the year 2019 of Kamunting Estate is seen and made available. Environment Management Plan (Doc No: KPB-CIP-04). The document explains the environmental management plan in 2019 for;

- Install emergency eye wash and emergency shower, progress to date is the emergency eye wash and emergency shower facility is ready for use.
- To the built chemical mixing area, the progress to date is that the chemical mixing area facility is ready for use.
- To install lap water. The progress up to now is that Lap Water is ready to be used.

Waste Management Plan is available as referred to: "Domestic Time Management" dated 17th June 2019, Document No: KPB-SOP-05. List items to be identified as a waste schedule is located during the audit. Published in File no: 22 verified. During site observation, the company has provided Hazardous waste management facilities at the store including providing Chemical Mixed, schedule waste with trapping, storage tray for heavy equipment and others.

In Compliance **Yes** No Not Applicable



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

Summary Kamunting Plantation Bhd already has a SOP on handling used chemicals referred to: KPB-SOP-10 "Handling of Chemicals" dated 17th June 2019. The SOP explained the flowchart of Hazardous waste management. Based on visits to the store, the company has provided Hazardous waste management facilities including:

- Estate has built a warehouse facility to store "Schedule Waste" and Used Fertilizer Bags.
- Utilizes organic fertilizer (compost) applied to the field.
- Block 08E it shows that the application of chemist (Spraying) is done by selective weeding method

In Compliance **Yes** No Not Applicable

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

Summary The company has implemented efforts to reduce environmental pollution due to the use of pesticides into water as outlined in Doc No: KPB-CIP-07-Waste Management Plan and Doc No: KPB-CIP-06-Water Management Plan including:

- Use (partial re-use) of used chemical containers as a container for mixing chemicals.
- Provision of chemical mixing areas, rinsing spray equipment and used chemical containers.
- Completing the chemical store, workshops, schedule waste with trapping if there are spills.
- Water used for rinsing spray equipment and used chemical containers is re-used to mix chemicals.

In Compliance **Yes** No Not Applicable

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

Summary Domestic waste at linesite area is well managed by the estate management. Based on field visits in Field C 11, it shows that Kamunting Plantation has provided a landfill which is located quite far from the housing of workers. During site observation, the company has provided dustbin for each house and the company has arranged a schedule for domestic waste disposal.

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 Kamunting Plantation Bhd has compiled an Environmental, Pollution and Greenhouse Gas Management Plan dated 16th June 2019, Document No: KPB-CIP-04. The document explains the Management Plan for each area/ activity. Kamunting Plantation has compiled a 2019 Environmental, Pollution and Greenhouse Gas Management Plan document in which it explains the Greenhouse management plan. As sampled:

Emission of Greenhouse Gasses from chemical usage

Impact Type: Global warming

Management Control/ Mitigation Plan: To ensure dosage of chemicals are adhered to.

Smoke emission of vehicle/ heavy machineries (tractor, backhoe).

Type Impact: Air Pollution

Management Control/ Mitigation Plan: To perform regular maintenance (Changing exhaust filter) of the vehicle / heavy machineries involved.

Emission of Greenhouse Gasses from diesel engines

Impact Type: Global warming

Management Control/ Mitigation Plan: To ensure regular maintenance (repair of leaking tractors) of heavy machinery/ vehicles (Road graders, compactors, tractors).

In Compliance **Yes** No Not Applicable

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

Summary Kamunting Plantation Bhd established "Environmental, Pollution and Greenhouse Gas Management Plan" documented for the year 2019. The identification of sources of pollutants and greenhouse management/ mitigation plans are made available. The estate has recommended additional monitoring & develop action plan on water pollution due to spraying activities and fertilizers application activities.

In Compliance **Yes** No Not Applicable

Criterion 5 Natural water resources

Indicator 1 The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water).
The water management plan may include:
a) Assessment of water usage and sources of supply.
b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.
c) Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).
d) Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural



waterways within the estate.

e) Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.

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

Summary Kamunting Estate has established Water Management Plan. Estate utilizes treated tap water from " Lembaga Air Perak/LAP" and no other water sources were used by estate. Kamunting Plantation Bhd has prepared a Water Management Plan (Doc No: KPB-CIP-06). The document explains the Water Management plan in 2019 aimed at;

- Install water from LAP, based on field visits in employee housing.
- Assess current water uses and costs, the company documented usage of clean water on monthly basis which available at workers linesite.

To minimize the impact on water quality, Kamunting Plantation has prepared the "Environmental, Pollution and Greenhouse Gas Management Plan" for the 2019 management year period, explains the identification of pollutant sources and Greenhouse management/ mitigation plans.

During site observation, no river flow was found within the estate, however there were drainage drain as an effort for water management. As interviewed the sprayers, shows good understanding of fertilization and spraying techniques where it was forbidden to spray at the edge of the drain. Spray workers trained on 9th May 2019.

In Compliance **Yes** No Not Applicable

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

Summary Areas were verified during the site assessment. There is no HBV area identified within the estate vicinity.

In Compliance **Yes** No Not Applicable

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

Summary During site visit, there were road side drains constructed along the main roads to divert and conserve water at designated points.

In Compliance **Yes** No Not Applicable

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

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

a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.



b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.

Summary Kamunting Plantation Bhd has compiled a Wildlife Data Base document that contains the types of animals that might exist around the estate area consisting of

- 20 species of birds such as the Pacific Kite (*Hirundo tahitica*), Black Shoulder (*Elanus caeruleus*), Crested Lang (*Spilornis cheela*), Red Lang (*Haliastur indus*), Forest Chicken (*Gallus gallus*) etc.
- 4 types of mammals such as wild boar (*Sus scrofa*), long-tailed macaques (*Macaca fascicularis*), Weasel Pulut (*Paradoxurus hermaphroditus*) and Hedgehog (*Hystrix brachyura*).
- 4 types of Reptiles such as King Cobra (*Ophiophagus hannah*), Snake Senduk (*Naja kaouthia*), Sular Sawa (*Python reticulatus*) and water lizards (*Varanus salvator*).

Kamunting Plantation has conducted field monitoring of the species of animals that exist in the estate where the results are outlined in the "Senarai Binatang Dijumpai di Ladang", the document has been completed with protection status based on the IUCN Redlist and the CITES Appendix.

In Compliance **Yes** No Not Applicable

Indicator 2 If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:
 a) Ensuring that any legal requirements relating to the protection of the species are met.
 b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities and developing responsible measures to resolve human-wildlife conflicts.

Summary The Continual Improvement Plan/ Biodiversity Plan is available during the audit. Verified Doc No: KPB-CIP-05 and sighted one of the actions "Install No Hunting signage" to restrict any illegal or inappropriate hunting, collecting activities or any developing responsible measures to resolve human-wildlife conflicts. Based on verification of documents on the results of animal monitoring in 2019, it shows that no species of animals included in the IUCN Redlist or CITES.

In Compliance **Yes** No Not Applicable

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

Summary Estate established the Continual Improvement Plan/ Biodiversity Plan is available during the audit, verified doc no: KPB-CIP-05. The company has carried out policy socialization through direct meetings with employees and other stakeholders in stakeholder meetings as well as the installation of signboards prohibiting animal hunting in locations that are accessible to the public such as the main road entering the estate. During visit to linesite,



there were no indications of workers storing equipment for hunting wildlife or confined wildlife.

In Compliance **Yes** No Not Applicable

Criterion 7 Zero burning practices

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

Summary Kamunting Plantation Bhd has established Zero Burning policy as outlined in "Environmental Policy & Biodiversity" Point 1 signed by top management on 1st February 2019 states that "Recovery and fire prevention activities will support conservation efforts and habitat in all areas of the Estate ". The prohibition of open burning is also contained in the SOP for Domestic Residual Management (Doc No.: KPB-SOP-05, Rev. 0, dated 17th June 2019) in point 4.2.2.1 stated that "To protect the environment, open burning of domestic waste is prohibited".

In Compliance **Yes** No Not Applicable

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

Summary As verified during documentation audit and field visits, there is no planting or replanting activity at Kamunting Plantation Bhd. Plant age ranges from 8-11 years. There were no indications of the use of fire in controlling pests and plant diseases. No special approval required from the relevant authorities.

In Compliance **Yes** No Not Applicable

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

Summary The prohibition of open burning is also contained in the SOP for Domestic Residual Management (Doc No.: KPB-SOP-05, Rev. 0, dated 17th June 2019) in point 4.2.2.1 stated that "To protect the environment, open burning of domestic waste is prohibited". no special approval needed to do open burning. All replanting activities are using the felling method.

In Compliance **Yes** No Not Applicable

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

Summary Open burning in relation to new planting, re-planting or other development is not allowed and this was communicated to all employee and stakeholder. The following practices has been implemented by the management during replanting.



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

2.6 Principle 6: Best practices

Criterion 1 Site management

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

Summary Operational development of oil palm plantations refers to the Kamunting Plantation Berhad Field Management Manual document. The document regulates starting from land preparation, planting, Nursery, Manuring, Harvesting to Replanting. Based on verification of documents showing that Kamunting Estate already has a Standard Operating Procedure (SOP) for Best Management Practices consisting of:

No.	SOP
1	SOP Menuai Buah Tandan Segar (Harvesting); Document No. KPB-SOP-07 signed by management on 17 th June 2019.
2	SOP Meracun Rumput (Spraying) Document No. KPB-SOP-08 signed by management on 17 th June 2019.
3	SOP Membaja (Fertilizing), Document No. KPB-SOP-09 which was signed by management on 1 st February 2019.
4	SOP Kerja-Kerja Mengangkut FFB (FFB Loading), Document No. KPB-SOP-11 signed by management on 17 th June 2019.
5	SOP Drive the Vehicle, Document No. KPB-SOP-13 signed by management on 17 th June 2019.
6	SOP Store Management, Document No. KPB-SOP-14
7	Safety SOP, Document No. The KPB-SOP-12
8	SOP Chemical Handling, Document No. KPB-SOP-14
9	SOP Domestic Waste Management, Document No. KPB-SOP-05
10	SOP Scheduled Waste Management, Document No. KPB-SOP-06

Based on interviews with manuring, harvesting and spraying workers stated that before work they had received training organized by the company, for example;

- Harvester Training on 16th February 2019 (13 harvesters).
- Fertilizer training was organized by management on 11th April 2019 (6 fertilizer workers).
- Training on how to properly lift fruit on 13th June 2019 (5 harvesters).
- FFB Harvest Training was held on 22nd December 2018 (14 harvesters).
- Training The operation of the lawn machine was conducted on 2nd January 2019 (4 operators).

During field visits, the entire area of Kamunting Estate is a land that has a relatively flat contour so that do not need a terrace. To reduce the impact of soil erosion, the company has applied the frond stacking along the "Inter Raw" and no spraying activity on the "Inter Raw" so that Nephrolepis plants can flourish. Road conditions are in good

condition where road repairs are carried out at each damaged point. Roads are hardened with stones. Road ditches are made on each side of the road.

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

Indicator 2 Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.

Summary Based on field visits, it was found that the entire Kamunting Estate area was flat, no land that had a slope above 8% was found. Most of it is mineral soil (Clay) and partly lowland and peat land (very thin <25 cm). Oil palm plantations were carried out in the period 2008 - 2011, there were no planting or replanting activities. The company is quite good at implementing the preparation of fronds carried out on the Inter Palm (Lorong Susun Pelelah). Spraying is carried out on the Inter Palm (Lorong angkut buah) while for Inter Row neprolepis plant species are retained to regulate soil moisture.

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

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

Summary Maps are made available showing separation of estates. The estate has a map showing separation of block/field. During the site observation, it shows that each block has been installed Identity block. In the block stone there is information in the form of Block Name, Planting Year and Block Size.

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 Kamunting Estate has compiled a "5-years expansion plan" document which outlines plans and estimated profits from 2019-2024. Kamunting Estate has compiled the document "Crop Production 2018 - 2022 (Estimate vs Actual)" which explains the production plan until 2022 and its realization until September 2019.

Kamunting Estate has compiled "Estimate Operation Cost" documents every year from 2018 until 2022. The document explains the estimated operational costs budgeted by the company for 16 types of costs ranging from plant maintenance, pest control and plant diseases, harvesting, and assessment, etc.

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



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

Summary Replanting program for estate is not available since the oldest Palm is 11 years old. Based on document verification and field visits show that all oil palm plants are young plants with a starting age of 8 years (planted in 2011) to 11 years (planted in 2008). Therefore, the company does not need to develop a replanting plan.

In Compliance **Yes** No Not Applicable

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

Summary Estate had an annual budget for the financial year 2019. The budget includes the projected FFB production, general charges, upkeep & cultivation, Collection and Immature areas. Sighted in annual budget year 2019, there is estimated expenditure for the year 2019 made available. Sighted analysis of expenditure for the year 2019, as sampled below:

- "5 Years Expansion Plan" document which outlines plans and estimated profits from 2019-2024.
- "Crop Production 2018 - 2022 (Estimate Vs Actual)" which explains the production plan until 2022 and its realization until September 2019.
- "Estimate Operation Cost" documents every year from 2018 until 2022. The document explains the estimated operational costs budgeted by the company for 16 types of costs ranging from plant maintenance, pest control and plant diseases, harvesting, and assessment, etc.

In Compliance **Yes** No Not Applicable

Indicator 4 The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.

Summary Estate performance is recorded on monthly basis and Kamunting Estate budget final year 2019 is made available. The monitoring to achieved the target is effectively implemented such field monitoring and enforcement of all SOP. Monthly account is made available to record the budgeted and actual production on monthly basis. Details on the actual vs budget i.e: FFB production, capital expenditure, production cost and profit & loss account are shown therein.

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 Sale and purchase of oil palm fresh fruit bunches (FFB) Agreement between Kamunting Plantation Behad and suppliers/buyers are made available. Based on the document verification of the FFB sale and purchase contract documents shows that the determination of FFB prices and the method of payment have been regulated in article 1, article 2 and 7

In Compliance **Yes** No Not Applicable

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

Summary All contracts are kept in estate office. Sighted the contract Agreement signed by contractor and Kamunting Estate. Records of contracts between estate and contractors are well documented by Kamunting Estate. As seen, agreement is made on 31st December 2014 between Kamunting Plantation Berhad and its contractor. The Contractor hereby agrees with the Company to do the work detailed upon the terms and subject to the conditions mentioned. Sampled contract taken in relation to:

- Supply of FFB Lorry
- Supply of Heavy Machinery

In Compliance **Yes** No Not Applicable

Criterion 4 Contractor

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

Summary All the contractors are aware that estate will be certified under MSPO. Therefore, the contractor has been informed by estate management to follow the MSPO standard requirement. Based on document verification and interviews with the contractor stated that Kamunting Estate held a meeting with the contractor on 2nd February 2019 which was attended by 33 participants consisting of contractors working with the Kamunting Estate. During the meeting also conveyed the plan to implement the MSPO requirements.

In Compliance **Yes** No Not Applicable

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

Summary Records of agreed contract agreement with contractors are well documented by Kamunting Estate. As verified, in contract documents Kamunting Estate has included an MSPO Requirement clause in each contract with the contractor contained in "Special Condition" point 4.

In Compliance **Yes** No Not Applicable



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

Summary The estate was audited by Global Gateway Certifications Sdn Bhd MSPO auditor, sighted audit plan which have been accepted address to Mr. Chan Eng Kong (Director). All the auditors are qualified MSPO auditor. As agreed, the company accept the GGC MSPO Auditors to verify through a physical inspection if required for audit purposed. Verified in contract documents Kamunting Estate has included an MSPO Requirement clause in each contract with the contractor contained in "Special Condition" point 4.

In Compliance **Yes** No Not Applicable

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

Summary Estate verified the work done by the contractors before all the payment paid to the contractors. Estate also inspect the contractor's workers. As per interviewed and also during site visit, the workers aware with OSH requirement. As example, the workers wear the PPE during the work task that given to them. Field supervisor will physically check the work done at the site based on the invoiced (Job carried out) to verify on work performed to release payment to contractor.

In Compliance **Yes** No Not Applicable

2.7 Principle 7: Development of new planting

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

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

Criterion 2 Peat land

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

Summary At this moment, there were no new plantings involving peat area. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

Criterion 3 Social and Environmental Impact Assessment (SEIA)

Indicator 1 A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

Indicator 2 SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

Indicator 3 The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

Indicator 4 Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable Kamunting Estate.

In Compliance Yes No **Not Applicable**

Criterion 4 Soil and topographic information

Indicator 1 Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.



Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

Indicator 2 Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

Criterion 5 Planting on steep terrain, marginal and fragile soils

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

Criterion 6 Customary land

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Kamunting Estate.

In Compliance Yes No **Not Applicable**

2.8 Details of Audit Findings

Details Non-Conformity

- See Appendix B -

Details of Area of Concern

- See Appendix B -

Details of Noteworthy / Positive Findings

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

Appendix A: Audit Plan

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
13 th October 2019	TBA	Travelling from Kuala Lumpur – Slim River, Perak.	SP	NM
14 th October 2019	08:00 – 09:00	Centralize Opening Meeting at Kamunting Estate: <ul style="list-style-type: none"> • Presentation by the manager/coordinator • Presentation by Lead Auditor. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable). 	SP	NM
	09:00 – 13:00	Kamunting Estate <ul style="list-style-type: none"> ➤ Document Audit: <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	SP	NM
	10:30 – 12:30	<ul style="list-style-type: none"> ➤ Estate inspection: <ul style="list-style-type: none"> • Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	SP	NM
		Centralize Stakeholder Consultation (Kamunting Estate - Office)	SP	NM
	13:00 – 14:00	➤ Lunch	SP	NM
	14:00 – 15:30	<ul style="list-style-type: none"> ➤ Continue document review <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	SP	NM
	15:30 – 16:00	➤ Verify any outstanding issues and auditor discussion day 1.	SP	NM



AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
15 th October 2019	09:00 – 13:00	Kamunting Estate ➤ Field visit/ Interview: <ul style="list-style-type: none"> • Fertilizer application, field spraying, harvesting, buffer zone, conservation area, and agriculture best practices etc. • Interview Stakeholders. 	SP	NM
	13:00 – 14:00	➤ Lunch	SP	NM
	14:00 – 15:00	➤ Verify any outstanding issues and auditor discussion.	SP	NM
	15:00– 16:00	Centralize Closing Meeting at Kamunting Estate ➤ Chaired by the audit Lead Auditor <ul style="list-style-type: none"> • Welcome and introduction by the Lead Auditor • Presentation of findings by the audit team • Questions & answers and Final summary by Lead Auditor ➤ End of assessment	SP	NM



Appendix B: Non-Conformity details

Non-Conformities Identified During This Audit
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Major Nonconformities:	Non-was raised during this audit.
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Minor Nonconformities:	The following NC's were raised for this audit.
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Company Name	Kamunting Estate Sdn Bhd			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-AG1-MSPO-2019			

NC No. / Ref.	AG1/MSPO/MINOR/01	Date Detected	15 th October 2019
Site(s) concern	Kamunting Estate	Target Completion	Next Surveillance audit



Normative Reference and Requirement	4.1.2.2 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.
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NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern
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Description of Non-Conformity	No evidence sighted during document audit.
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NC Objective Evidence:

Based on the document verification of SOP Internal Audit (Doc No. KPB-SOP-01 – Clause 4.1), internal auditor is required to attend MSPO Auditor Training. However, no evidence of internal auditor attended MSPO training.

Lead Auditor Signature: 	Client Signature: 
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Root cause Analysis (to be filled by client):

Corrective action planned (to be filled by client):


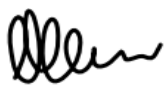
Preventive Action (to be filled by client):



Review of corrective/preventive action (to be filled by Lead Auditor)	
NC Closed: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input type="checkbox"/> No
Date Verified:	Lead Auditor Signature:

Company Name	Kamunting Estate Sdn Bhd			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-AG1-MSPO-2019			
NC No. / Ref.	AG1/MSPO/MINOR/02	Date Detected	15 th October 2019	
Site(s) concern	Kamunting Estate	Target Completion	Next Surveillance audit	
Normative Reference and Requirement	4.4.1.1 Social impact should be identified, and plans are implemented to mitigate the negative impacts and promote the positive ones.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	SIA was not conducted for internal stakeholders.			
NC Objective Evidence:				
Social Impact Assessment (SIA) is made available at the time of audit. However, SIA samples and data collections for internal stakeholders was not included in the assessment.				
Lead Auditor Signature:		Client Signature:		
				
Root cause Analysis (to be filled by client):				
Corrective action planned (to be filled by client):				

Preventive Action (to be filled by client):	
Review of corrective/preventive action (to be filled by Lead Auditor)	
NC Closed: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input type="checkbox"/> No
Date Verified:	Lead Auditor Signature:

Company Name	Kamunting Estate Sdn Bhd			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	Part 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-AG1-MSPO-2019			
NC No. / Ref.	AG1/MSPO/MINOR/03	Date Detected	15 th October 2019	
Site(s) concern	Kamunting Estate	Target Completion	Next Surveillance audit	
Normative Reference and Requirement	4.4.4.2 The occupational safety and health plan shall cover the following: g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	Inconsistency on scheduling OSH Meeting.			
NC Objective Evidence: As verified during audit, OSH meeting was last conducted on 14 th February 2019. However, found out that inconsistency on scheduling the OSH Meeting.				
Lead Auditor Signature: 		Client Signature: 		
Root cause Analysis (to be filled by client):				

Corrective action planned (to be filled by client):	
Preventive Action (to be filled by client):	
Review of corrective/preventive action (to be filled by Lead Auditor)	
NC Closed: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site verification: <input type="checkbox"/> Yes <input type="checkbox"/> No
Date Verified:	Lead Auditor Signature:

Area of Concern:	No area of concern was raised for this audit.
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Appendix C: List of Stakeholders Contacted

Attendance List

Internal Stakeholders

- 1) Kamunting Estate management team and staff
- 2) Gender Committee Representatives
- 3) Male and Female workers
- 4) Workers Representatives
- 5) Foreign Workers Representatives

External Stakeholders

- 1) External contractors
- 2) Foreign workers – Indonesia
- 3) Foreign workers – India
- 4) Foreign workers – Bangladesh
- 5) FFB Transporter
- 6) Temple representative
- 7) Smallholders
- 8) Suppliers
- 9) Local Communities
- 10) Villagers