GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)

CERTIFICATION AUDIT REPORT

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

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

-Group Certification-

MAIN ASSESSMENT AUDIT 19th June 2019 – 20th June 2019

Revis	Revision History					
Rev	Date	Description	Performed by	Role	Signature	
Α	27/06/19	Issued as Draft Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	()	
Α	09/07/19	Peer Review 1 Comments	Muhammad Sufyan bin Azmi	Peer Reviewer 1	15	
Α	09/07/19	Peer Review 2 Comments	Mohamad Fitri bin Mustafa	Peer Reviewer 2	Sur.	
В	10/07/19	Issued as Final Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	()	
В	11/07/19	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	Jump.	

Ackn	Acknowledgment by HSYR & CGSB						
Rev	Date	Description	Management Representative	Role	Signature		
В	11/07/19	Acceptance of the contents	Mr. Tan Lay Guan	Estate Manager	1		

Declaration

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

WITH INTEGRITY WE SERVE



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

SECTION I: PUBLIC SUMMARY REPORT

1.1 **Certification Scope**

Global Gateway Certifications Sdn. Bhd. (GGC) has conducted the Certification Assessment of **Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB).** During this **Main Assessment Audit (Stage 2)**, the audit team were briefed by Estate Manager, of the supply base disposition. The estate consists K'lapa Bali Estate and Sungei Chinoh Estate.

This assessment was conducted onsite on 19th June 2019 – 20th June 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	Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB)
Business Address	Tingkat 4, 1-E, Lebuh Penang, 10200 George Town, Pulau Pinang
Contact Person	Mr. Lim Ban Aik
Office Telephone	+604-262 6431
E-Mail	hsyrpenang@gmail.com

1.3 **Certification Unit**

Name of the Certification Unit

No	Name of the	Site Address	GPS Reference	of the site office
	Certification Unit		Longitude	Latitude
1.	K'lapa Bali Estate	35800 Slim River, Perak, Malaysia.	E 101°21′28″	N 3°50′56″
2.	Sungei Chinoh Estate	35700 Trolak, Perak, Malaysia.	E 101°22′30″	N 3°51′14″

MPOB License Information

No	Name of the Site	LICENCE NUMBER	EXPIRY DATE	SCOPE ACTIVITY



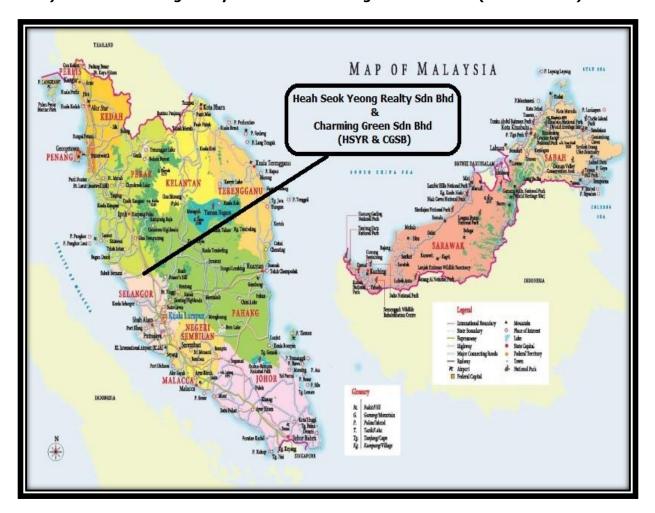
1.	K'lapa Bali Estate	503428302000	30/11/2019	"Menjual dan FFB"	Mengalih
2.	Sungei Chinoh Estate	617224002000	29/02/2019	"Menjual dan FFB"	Mengalih

Others Sustainability Certification

No	Name Of The Site	Others Sustainability Certifications
1.	K'lapa Bali Estate	NIL
2.	Sungei Chinoh Estate	NIL

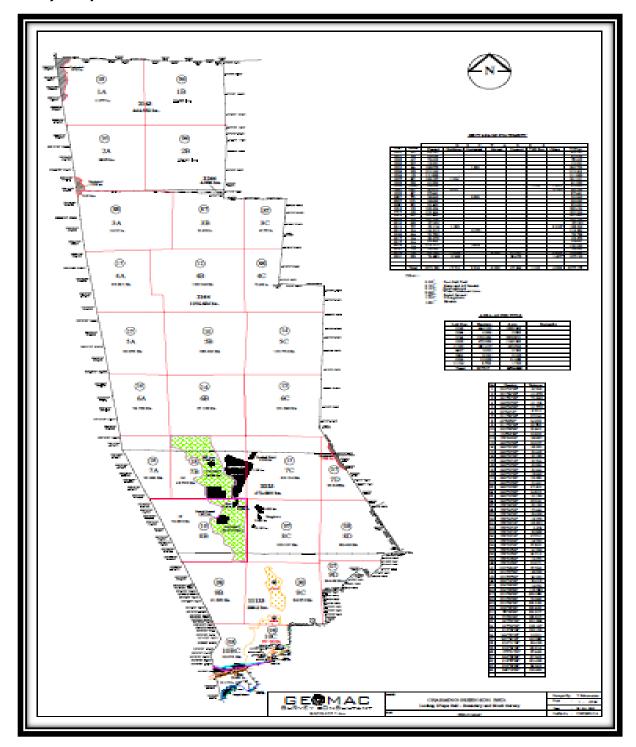
1.4 Map Showing Geographical Location

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

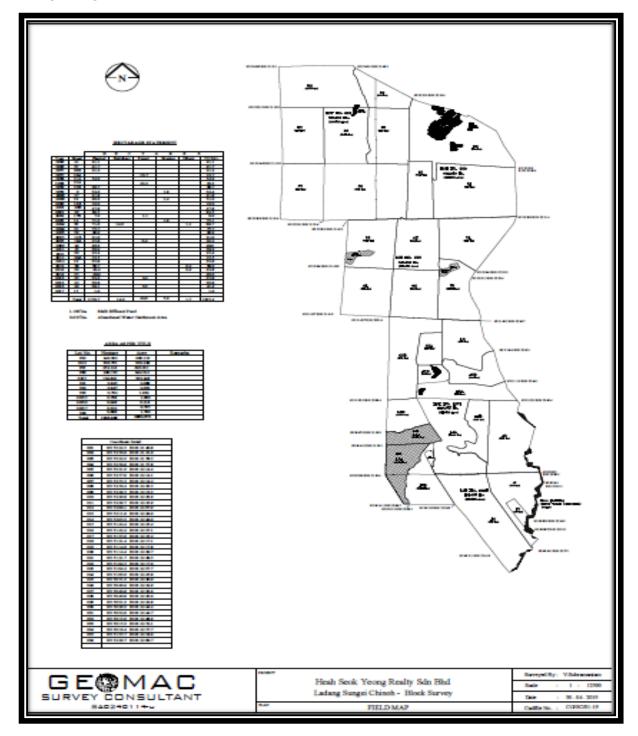




2) K'lapa Bali Estate



3) Sungei Chinoh Estate



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

Name of the Certification	Area Summary (HA)			
Unit	Certified Area (per Land Title)	Planted	Mature	
K'lapa Bali Estate	2,377	2,272	1,679	
Sungei Chinoh Estate	1,235	1,170	1,057	
Total	3,612	3,442	2,736	

Name Of The Supply	Area Summary (HA)			
Base	Conservation Area	HCV	Others	
K'lapa Bali Estate	0.2	32.56	-	
Sungei Chinoh Estate	0.8	3.78	-	
Total	1.0	36.34	-	

Name of the Certification Unit	FFB Summary (MT)			
	Projected from last audit	Actual Production for 12 Months [Jun 2018-May 2019]	Projected Production for next 12 Months [Jun 2019-May 2020]	
K'lapa Bali Estate	NIL	22,239	32,300	
Sungei Chinoh Estate	NIL	17,241	20,200	
Total	NIL	39,480	52,500	

1.6 **Certificate Details**

Certification body	Global Gateway Certifications Sdn. Bhd.,
	No. 10 Jalan Rasmi 7, Taman Rasmi Java,

68000 Ampang,

Selangor Darul Ehsan, Malaysia.

Tel.: +603 4256 2689; Fax: +603 4256 2687

Website: www.ggc.my

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

Certificate number GGC-KBSC001-MSPO-00-2019

Initial certificate issued date 11th July 2019

Certificate expiry date 10th July 2024

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Stage 1 assessment date

03rd May 2019

Stage 2 / Main Assessment

19th June 2019 – 20th June 2019

Annual Surveillance 1 [ASA 1]

April 2020

Annual Surveillance 3 [ASA 3] April 2022

Annual Surveillance 2 [ASA 2]

Annual Surveillance 4 [ASA 4] April 2023

1.7 Qualification of the Lead Assessor and Assessment Team

April 2021

Lead Auditor

Name: Muhammad Syafiq bin Abd Razak

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

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

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



Auditor

Name: Tn. Hj. Ahmad bin Sukiman

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

During this assessment, he assessed on the aspect of Legal, Employment Condition and Environment. Able to speak and understand Bahasa Malaysia and English.

Auditor

Name: Wan Mohd Azlan bin Wan Ngah

He is graduated from Open University Malaysia with a Bachelor's Degree in Business Administration with more than 30 years working experience in various plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Involved in MSPO assessment since 2018. Completed and certified MSPO Auditor course in 2017 held by SIRIM STS Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. Member of GGC MSPO audit team. Able to speak and understand Bahasa Malaysia and English.

During this assessment, he assessed on the aspect of Management commitment & responsibilities, Stakeholder's Consultation, Workers Welfare and Best Practices. Able to speak and understand Bahasa Malaysia and English.

1.8 Audit Methodology

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

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	19 th June 2019 – 20 th June 2019	
Name of cital c) Vicitad	 K'lapa Bali Estate Sungei Chinoh Estate 	
Total number of man-days spent	6 man-days	

1.10 Audit Result Summary Findings

Category	Numbers	Status (Closed/Open/Not Applicable/No Action Requires)
Major Nonconformities	0	No Action Required
Minor Nonconformities	0	No Action Required
Area of Concern	2	No Action Required
Noteworthy /Positive Comments	5	No Action Required

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 10^{th} May 2019 and as to accommodate a stakeholders' consultation meeting for mill and estate. Therefore, it was conducted on 19^{th} June 2019 – 20^{th} June 2019 in Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB) 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 is as per table below:



No	Stakeholders Name	Subject raised / Identified Risk	Company response and proposed action to be taken. [What we did]	Assessment team findings [Outcome]
1.	Stakeholders A (Sprayers Gang)	 MSPO awareness, company policy and SOP are briefed among workers during muster call. Personal Protective Equipment are distributed free of charged by management. They have good understanding about complaint and grievance mechanism. 	No action required	Positive findings
2.	Stakeholders B (Harvesting Gang)	 Complaints and grievances from workers were solved completely internally. Briefing of PPE awareness will be done very morning during muster ground. 	No action required	Positive findings
3.	Stakeholders C (Female Workers)	 They have good understanding about MSPO. They have good understanding about complaint and grievance mechanism. PPE given by company – free. They reported that no sexual harassment and violence case was happened in the workplace. They were treated equally with no discrimination based on gender. 	No action required	Positive findings
4.	Stakeholders D (Estate Contractors)	 The company has good relation with supplier and there is no issue with company's performance. He is clear that if he employs a worker, he has to officially inform estate management. He also knows the working hours, minimum salary, Socso & EPF (for local workers) that has to be paid 	No action required	Positive findings

		 as he has been briefed in the Stakeholders meeting. Payment was done in timely manner to the contractors/suppliers. No other issues raised. 		
5.	Stakeholder E (Neighbouring Estate)	 They have good relationship with the management. There is no conflict ever happened with mill & estate. 	No action required	Positive findings
6.	Stakeholders F (Government Agencies)	 They have good relationship with the management. The management will provide assistance whenever they requested No big case or issues reported to them. Department satisfied with the Management. There was No Illegal Logging and encroachment to the Jungle Reserve 	No action required	Positive findings

1.12 Recommendation

The company has established sustainability policy, objectives and procedures that define an effective system for the administration and control of sustainability management system throughout all operation activities of Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB). Estate Manager is in charge and ensures that facility and his subordinates comply with the requirements and procedures stated in this manual.

The management is committed to comply with MSPO system by giving awareness training to all personnel involved in this standard to make them understand the procedures and implementation of the standard. The employees are aware of the requirements of MSPO. There was no complaint or feedback received during this 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 and minor non-conformities have been raised to the facility that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted was no major non-conformity findings. Therefore, the Lead Auditor recommends a certificate of compliance "MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders" is awarded to Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB).



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
СоР	Code of Practise
CSPO	Certified Sustainable Palm Oil
СРО	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** Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB) has established the Sustainability Policy. Date: 1st June 2019. Approved by Mr. Lim Ban Aik (Director). Communication and consultation process are also communicated through training programs and the records with attendance lists was sighted. As evidence in K'lapa Bali Estate, sighted the latest Stakeholders Meeting on 08th March 2019. Attended by 49 participants. **In Compliance** \boxtimes Yes No Not Applicable Indicator 2 The policy shall also emphasize commitment to continual improvement. Summary Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB) has established the Sustainability Policy. Date: 1st June 2019. Approved by Mr. Lim Ban Aik (Director). Stated in the Sustainability Policy: "Company is committed to ensuring that its products are produced in a sustainable manner. This is realised through continuous balanced assessment and development of its operations while simultaneously conserving and improving the natural environment, uplifting the socio-economic conditions and respecting the human rights of its employees and local communities. These important aspects are incorporated not only in its daily operations but also in decision making processes". 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. As per interviewed with Estate Manager, the frequency of internal audit is performed Summary once a year. Sighted the internal audit programme planned by Internal Audit team from Head Quarters. ⊠ Yes In Compliance 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	Company has established Standard Operating Procedures No.21 Sustainability Internal Audit. Date Revised on $02^{\rm nd}$ Jan 2019.			
	As evidence in Sungei Chinoh Estate, the Internal Audit was conducted on 04 th April 2019 - 05 th April 2019 by Internal Auditors (Mr. Tan Kee Chong, Ms. Demi Koi, Mr. Fabian Lim and Mr. Tee Aun Seng). There are 6 Non Conformities has been raised by Internal Audit Team for year 2019 audit.			
	In Compliance	⊠ Yes	☐ No	☐ Not Applicable
Indicator 3	Report shall be mad	le available to the m	anagement for their	review.
Summary	_	ternal audit was res lle for Management		te Management timely and
	In Compliance	⊠ Yes	☐ No	☐ Not Applicable
Criterion 3	Management revi			
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	For K'lapa Bali Estate and Sungei Chinoh Estate, management review done on $11^{\rm th}$ April 2019. Attended by 10 participants.			
	In Compliance	⊠ Yes	☐ No	☐ Not Applicable
Criterion 4 Indicator 1	•			n consideration of the main ompany.
Summary	The Management had established Action Plan for Continual Improvement For Year 2019. Dated 10.01.2019 signed by Mr. Tan Lay Guan (Estate Manager) on the Following Aspect:			
	Klapa Bali Estate:			
	 OSH Annual Medical Surveillance - Done 21st March 2019 CHRA - Done 27th March 2019 Social & Welfare Formation of Guest Workers Welfare Committee - Done 17th January 2019 To establish Gender Committee. Done 15th January 2019. 			
	- 10			January 20151



- > Environment-Riparian and Biodiversity
 - To promote IPM-Started 1st January 2019 On going
 - Incomplete marking of riparian area. Done 31st March 2019

Sungei Chinoh Estate:

- ➤ OSH
 - To implement from January 2019 to May 2019.
- Social and Welfare
 - To implement from January 2019 to August 2019
- Environment, Riparian, Biodiversity
 - To implement from March 2019 to August 2019

n Compliance	\boxtimes					
		Yes		No		Not Applicable
and techniques or	new	industry star	-	•		
period. The currer evidence in K'lapa 1) From whee 2) Mechanica There is no new a	nt pra Bali E el bar I spre applica Chinol	ctices conting state: row to infield ader. ation of new in Estate. The	ued and collectio technology	guide by Mr. n system. ogy implemer	Lim I	Ban Aik (Director). As uring the certification
new techniques o			•			•
Trainings were conducted for the introduction and implementation of any new information or technology that is feasible and applicable to the company. As evidence, sighted the training conducted for the implementation of new technique at Sunge Chinoh Estate; 1) Safe Driving Technique training on 25 th April 2019. Conducted by Mr. Mazuki. In Compliance Yes No No Not Applicable						
	chere is a new a period. The current evidence in K'lapa 1) From whee 2) Mechanica There is no new a period for Sungei (Ban Aik (Director). In Compliance on action plan to present the compliance of the complian	ind techniques or new available and feasible for there is a new application. The current practice in K'lapa Bali E 1) From wheel barr 2) Mechanical spression for Sungei Chinol Ban Aik (Director). In Compliance In action plan to provide the techniques or new instablished. Trainings were conducting the conduction or technological state; 1) Safe Driving Technological state; 1) Safe Driving Technological states and formation or technological states; 1) Safe Driving Technological states and formation or technological states; 1) Safe Driving Technological states and formation or technological states; 1) Safe Driving Technological states and formation or technological states are states are states are states are states and formation or technological states are states are states and formation or technological states are stat	ind techniques or new industry star available and feasible for adoption There is a new application of new period. The current practices continuously in the current practices and in the current practices. There is no new application of new period for Sungei Chinoh Estate. The current practices in the current practices of the current practices of the current practices. The current practices continuously in the current practices of the cur	Ind techniques or new industry standards are available and feasible for adoption There is a new application of new technological state. The current practices continued and evidence in K'lapa Bali Estate: 1) From wheel barrow to infield collection 2) Mechanical spreader. There is no new application of new technological for Sungei Chinoh Estate. The current Ban Aik (Director). In Compliance Yes In action plan to provide the necessary resources techniques or new industry standard or established. Trainings were conducted for the introduction of the training conducted for the implementation or technology that is feasible and ighted the training conducted for the implementation of the proving Technique training on 25	Ind techniques or new industry standards and technology available and feasible for adoption There is a new application of new technology implementation. The current practices continued and guide by Mr. Evidence in K'lapa Bali Estate: 1) From wheel barrow to infield collection system. 2) Mechanical spreader. There is no new application of new technology implementation for Sungei Chinoh Estate. The current practices continued for Sungei Chinoh Estate. The current practices continued for Sungei Chinoh Estate. The current practices continued for Sungei Chinoh Estate including the standard or technology instablished. Trainings were conducted for the introduction and imprormation or technology that is feasible and applicable to ighted the training conducted for the implementation of thinoh Estate; 1) Safe Driving Technique training on 25th April 2019.	There is a new application of new technology implemented diversion. The current practices continued and guide by Mr. Lim I evidence in K'lapa Bali Estate: 1) From wheel barrow to infield collection system. 2) Mechanical spreader. There is no new application of new technology implemented diversion of the current practices continued and Aik (Director). The Compliance Yes No No Compliance Yes No Compliance No Complian

2.2 Principle 2 : Transparency

Criterion 1 Transparency of information and documents relevant to MSPO requirements

Indicator 1 The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by



commercial confidentiality or disclosure that could result in negative environmental or social outcomes.

Summary

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

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

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

Sighted, latest meeting with the external stakeholders was held on 8th March 2019 attended by 49 external stakeholders and conducted by Mr. Tan Lay Guan (Estate Manager). The meeting is collaboration with Sungei Chinoh Estate.

Estate had the training to their workers on 07th May 2019. Conducted by Mr. Fabian Lim Chin Wen (Estate Assistant Manager). Attended by 71 participants.

In Compliance \boxtimes Yes \square	No \square	Not Applicable
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Indicator 2

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

Summary

As per interviewed with Mr. Tan Lay Guan (Estate Manager), some of the documents publicly available and some of the documents need to get permission from HQ level. Sighted the "Master List of Sustainability Documents"; Date 15th May 2019: Version 1.0.

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

In Compliance	oxtimes Yes	☐ No	☐ Not Applicable
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Criterion 2 Transparent method of communication and consultation

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

Summary

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

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

CLO

	=			the relevant stakeholders and neighboring communit	_
	In Compliance	⊠ Yes	□ No	☐ Not Applicable	
Indicator 2	A management off Indicator 1 at each		ominated to be re	esponsible for issues relate	ed to
Summary				ation in K'lapa Bali Estate i ed by Mr. Tan Lay Guan (E	
				nsultation and communicati I by Mr. Tan Lay Guan (E	
	In Compliance	⊠ Yes	□ No	☐ Not Applicable	
Indicator 3				communication and record ould be properly maintained	
Summary	Sighted the list of 2019.	stakeholders prep	ared by Mr. Fabia	in Lim Chin Wen dated 1 st	April
	- MF - DC - JTI - KP - DC - De - De	DNKK	onment		
	- Na - M <i>A</i>	•	Staff Union (AMES antation Workers (ce Sdn Bhd		
	- Ka - Ka - Sg - Lin - Bu - Tg	ng Community/Pla mpung Kuala Slim mpung Jaya Chinoh Estate na Blas Estate kit Basaout Estate . Malim POM arikat Cahaya Mud			



- **Estate Community**
 - **NUPW Chairman**
 - Women's committee chairman
 - Surau Committee
 - **Temple Committee**

Meeting with the stakeholders was held on 08th March 2019. It involved 49 participants from external stakeholders. All discussion details sighted in "Stakeholders Meeting Minutes for Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB)". ⊠ Yes Not Applicable In Compliance No **Traceability** Criterion 3 The management shall establish, implement and maintain a standard operating **Indicator 1** procedure to comply with the requirements for traceability of the relevant product(s). Summary Sighted the Standard Operating Procedure of FFB Traceability under No 17 with an objective all FFB are traceable and transparent to the respective harvesting fields. The SOP dated 01st June 2013 and revised on 2nd January 2019. Sighted all records done by estate management. From field to the mill. Estate will record all the bunch that harvest by the harvester using "KP Form". Then the record will transfer to Crop Book and Crop Summary by Estate Staffs. Then salary will be generated by estate system (Lintaramax). ⊠ Yes In Compliance Not Applicable **Indicator 2** The management shall conduct regular inspections on compliance with the established traceability system. Summary The management team on harvesting holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Director, Agronomist and Internal Auditors visit. The effectiveness of the monitoring will evidence in the internal audit and visit report findings. During estate visit, sighted the weighbridge operator able to demonstrate on how the system tracks the FFB input. In Compliance Not Applicable Indicator 3 The management should identify and assign suitable employees to implement and maintain the traceability system. The person in charge for traceability in K'lapa Bali Estate is Mr. Inthiran Anamalai dated **Summary** 2nd January 2019. Approved by Mr. Tan Lay Guan (Estate Manager). For Sungei Chinoh



Estate, the person in charge for traceability is Mr. K. Muniandy dated 2nd January 2019.

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	Approved by Mr. Tan Lay Guan (Estate Manager). Both of them were trained by HQ team to maintained all the requirements.			
	In Compliance $oxtimes$ Yes $oxtimes$ No $oxtimes$ Not Applicable			
Indicator 4	Records of sales, delivery or transportation of FFB shall be maintained.			
Summary	FFB being sell to Tanjung Malim POM and Syarikat Cahaya Muda Perak (Oil Mill) Sdr Bhd. Decision being made by Purchasing Department.			
	Sighted all records done by estate management. From field to the mill. Estate will record all the bunch that harvest by the harvester using "KP Form". Then from field, the FFB will weight by weighbridge operator and will key in the data as per procedure. The weighbridge operator will print the weighbridge ticket and give to the driver. The FFB arrives in a mill in trucks or trailers.			
	Sighted the records of delivery or transportation of FFB. This record will be maintained. The documents are kept by the both site (estate and mill).			
	As evidence in Klapa Bali Estate,			
	 FFB Records: Syarikat Cahaya Muda Perak POM Weighbridge Ticket: 0727114 Vehicle No: AGY9229 Date: 15th June 2019 Quantity: 30,110 kg Transporter: TMK601 – Tan Man Kong Transport Sdn Bhd 			
	As evidence in Sungei Chinoh Estate,			
	 ▶ FFB Records: KL Tg. Malim POM Weighbridge Ticket: A223119 Vehicle No: AJH9009/T/A5774 Date: 13th June 2019 Quantity: 29,640 kg Transporter: TMK601 – Tan Man Kong Lorry Transport Sdn Bhd 			
	In Compliance ☐ Yes ☐ No ☐ Not Applicable			

2.3 Principle 3 : Compliance to legal requirements

Criterion 1 Regulatory requirements

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



Summary

The company has established and updated list of applicable laws and regulations that are applicable for the estate as per List of Summary of Applicable Laws and Regulations signed by the Estate Manager, Mr. Tan Lay Guan on 19.04.2019.

Sighted permits/licenses being monitored and updated by the Assistant Manager and verified by the Estate Manager dated 31.01.2019.

- 1. Permit Barang kawalan berjadual No Permit A017416 (8,000 liters) expires 19.09.2019.
- 2. Permit Barang kawalan berjadual No Permit A017433 (10,000 liters) for Heah Seok Yeong Realty Sdn Bhd expires 01.10.2019.
- 3. Lesen MPOB (menjual dan mengalih FFB) for Charming Green Sdn Bhd (2,376.52ha). No lesen 503428302000 expires 30.11.2019.
- 4. Lesen MPOB (menjual dan mengalih FFB) for Heah Seok Yeong Realty Sdn Bhd (1,155ha). No lesen 617224002000 expires 29.02.2020.
- 5. SPAN license, Class Licence No. SPAN/JKSP/PT/800-4(1)/10/17 for a period 22.05.2017 to 21.05.2020.
- 6. Perakuan Penentuan Timbang dan Sukat No. Siri Alat : 123650591 expires 28.08.2019
- 7. Perakuan Penentuan Timbang dan Sukat No. Siri Alat: 154950124 for Heah Seok Yeong Realty Sdn Bhd expires 29.05.2020
- 8. Pump Gun License No. L1280148, L1276922, L1276904 and BL30860A14 kept in K'lapa Bali Estate office.
- 9. Pump Gun License No. L33248E and L14908E kept in Sungei Chinoh Estate office.
- 10. Slip Perakuan Pendaftaran for Visiting Medical Officer, Mr Vigneswaran a/l Sithamparapillai, I.C. No. 490529-06-5141 for a period 29.08.2018 to 28.08.2021.
- 11. Sijil Pendaftaran No. Q2051, Hospital Assistant (Gred Tiga), Mr Inthirakumar a/l Balakrishnan.
- 12. Sighted List of Fire Extinguisher (29 unit) expiry 25.06.2019 Office Complex (11units), Staff Complex (11unit), Linesite (7unit)
- 13. Sighted List of Fire Extinguisher (18 unit) for Heah Seok Yeong Realty Sdn Bhd expiry 05.03.2020 & 07.04.2020 Office Complex (10units), Staff Complex (7unit), Linesite (1unit)
- 14. Letter to Ketua Pengarah Tenaga Kerja dated 10.06.2019 related to "Permohonan Permit untuk membuat potongan gaji pekerja" for "penggunaan elektrik yang dibekalkan terus dari Tenaga National Berhad (TNB).
- 15. Letter from Heah Seok Yeong Realty Sdn Bhd to Ketua Pengarah Tenaga Kerja Tapah dated 07.06.2019 related to "Permohonan Permit untuk membuat potongan gaji pekerja" for "penggunaan elektrik yang dibekalkan terus dari Tenaga National Berhad (TNB).

One area of concern has been raised to both estates. As per interviewed with MPOB Officers, the MPOB Licence should be declared with the planted hectare. As evidence, sighted:



Estate	Ha as per MPOB License	Planted Ha
K'lapa Bali Estate	2,376.52	2,272.00
Sungei Chinoh Estate	1,155.00	1,170.00

In Compliance	oxtimes Yes	☐ No	☐ Not Applicable
---------------	-------------	------	------------------

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

Summary

The list covers the detail requirements that related to MSPO compliance. These documents include information on title of documents, regulatory authority/summary, requirements, current status and remarks.

All 40 documents are in compliance with the applicable local, state, national and ratified international laws and regulations includes;

- 1. Environmental Quality Act 1974 (Act 127)
- 2. Environmental Quality Act (Scheduled Waste Regulations) 2005
- 3. Environmental Quality (Sewage) Regulations 2009
- 4. OSHA Act 1994 (Act 514)
- OSH (Classification, Labelling and safety Data Sheet of Hazardous Chemicals) Regulations 2013
- 6. OSH (Control of Industrial Major Accident Hazards) Regulations 1996
- 7. OSH Regulations (Safety & Health Committee) 1996
- 8. OSH (NADOPOD) Regulations 2004
- 9. OSH (USECHH) Regulations 2000
- 10. Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446)

Sighted HA (Mr. Inthira Kumar) visit, 4 times in May 2019 for both estates. As evidence:

No.	K'lapa Bali Estate	Sungei Chinoh
		Estate
1	07.05.2019	04.05.2019
2	15.05.2019	13.05.2019
3	21.05.2019	20.05.2019
4	29.05.2019	30.05.2019

In Compliance	oxtimes Yes	☐ No	☐ Not Applicable

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

Summary

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

- HQ Department
- Communication with law/enforcement officers
- Website



	In Compliance	⊠ Yes	□ No	☐ Not Applicable
Indicator 4	The management strack and update the	•		e to monitor compliance and to
Summary		en (Assistant Man		for the responsible person, Mr. by Mr. Tan Lay Guan (Estate
				oerson is Mr. Gopi Balakrishnar Estate Manager) on 02.01.2019.
	In Compliance	⊠ Yes	□ No	☐ Not Applicable
Criterion 2	Land use rights			
Indicator 1	The management s		eir oil palm cultiv	vation activities do not diminish

Summary

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

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

Total as per title = 2,382.53ha

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

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

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

Sighted evidence of annual payment of quit rent for 2019 paid to Kerajaan Negeri Perak – Bil Cukai Tanah dan Parit/ Tali Air amounted to RM306,599.00.



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

Lot No	Hectare	Syarat- syarat
		Nyata
992	248.5778	Pertanian
1021	342.9705	Pertanian
991	252.1238	Dusun
986	263.6523	Dusun
3235	134.8613	Dusun
301	0.8448	Getah
302	0.8473	Getah
303	0.7942	Getah
16915	0.7685	Getah
16916	0.0484	Getah
16917	0.3223	Getah
306	0.688	Getah
Total Land Title	1,246.4992	

Sighted "Borang Permohonan Tukar Syarat sebanyak 7 permohonan kepada kelapa sawit" addressed to Pejabat Tanah Batang Padang, Sungkai, Perak Ref No. PTBP (D) 27/3007 (A&B) dated 06.03.2019. Sighted also "Borang Permohonan Tukar Syarat sebanyak 3 permohonan kepada kelapa sawit" addresed to Pejabat Tanah Batang Padang, Sungkai, Perak Ref No. PTBP (D) 27/3013 dated 10.04.2019.

Sighted evidence of annual payment of quit rent for 2019 paid to Kerajaan Negeri Perak – Bil Cukai Tanah dan Parit/ Tali Air amounted to RM120,564.00.

		•		•	
	In Compliance	⊠ Yes	□ No	□ No	t Applicable
Indicator 2	The management of land tenure and		ocuments showing I of the land.	egal ownership	o or lease, history
Summary	the land. The cop	of land titles ar	ownership of their la e kept in the both e vernment is availabl	states office. E	vidence of annual
	In Compliance	⊠ Yes	□ No	r	Not Applicable
Indicator 3	Legal perimeter maintained on the	. - .	cers should be cloracticable.	learly demarc	ated and visibly
Summary	Sighted estate ma	p demarcated w	rith Boundary and B	lock Survey. A	s evidence in,
	K'lapa Ba	i Estate (132 GP	S Coordinates). Sig	hted during the	e site:;
	Bounda	ry Markers No	Longitude		Latitude
_		Dans 24 of C7			

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	E	N
Stone No. 1 Block 8B	101°21′05.4″	03°49′18.06″
Stone No.7 Block 10C	101°21′51.05″	03°48′38.2″

> Sungei Chinoh Estate (26 GPS Coordinates). Sighted during the site:;

Boundary Markers No	Longitude E	Latitude N
Stone No. 8 Block 21	101°12′50.76″	03°30′51.47″
Stone No.17 Block 12	101°13′32.52″	03°29′43.44″

	In Compliance	\boxtimes	Yes		No]	Not Applicable
Indicator 4	title and fair compe	nsation	on that l	have been on the able and the	or are	being made to	pr	al acquisition of land revious owners and been accepted with
Summary								e is no violence in clear procedure for
	During interview wi with indigenous per							al customary rights reported.
	In Compliance	\boxtimes	Yes		No]	Not Applicable
Criterion 3	Customary right	:S						
	Where lands are en that these rights are							
•	There is no customa disputes or claims in the land ownership.							
	In Compliance		Yes		No]	Not Applicable
	Maps of an appropria made available.	ate sc	cale sho	wing extent	of rec	cognized custo	ma	ry rights shall be
	There is no customadisputes or claims in the land ownership.	volvir There	ng both efore, no	estates. The	e com ecogn	pany has prop	er y ri	legal land tile for ghts is available.
	In Compliance	\boxtimes	Yes		No	L	j	Not Applicable
	Negotiation and FP should be made ava			ecorded an	d cop	ies of negotia	ted	agreements





There is no customary land in or surrounding both estates. There are also no land Summary disputes or claims involving both estates. The company has proper legal land tile for the land ownership. ⊠ Yes Nο Not Applicable In Compliance 2.4 Principle 4: Social responsibility, health, safety and employment condition Criterion 1 Social impact assessment (SIA) Social impacts should be identified and plans are implemented to mitigate the negative Indicator 1 impacts and promote the positive ones. Sighted latest SIA done by K'lapa Bali Estate on March 2019. Survey was conducted Summary with 30 randomly selected respondents. The respondents randomly choose among workers and other stakeholders in estate. The SIA is prepared by Mr. Ravindaran Subramaniam (Estate Assistant Manager) and approved by Mr. Tan Lay Guan (Estate Manager) on 28th March 2019. For Sungei Chinoh Estate, sighted latest SIA done on March 2019. Survey was conducted with 8 randomly selected respondents. The respondents randomly choose among workers and other stakeholders in estate. The SIA is prepared by Mr. Tee Aun Seng (Estate Assistant Manager) and approved by Mr. Tan Lay Guan (Estate Manager) on 29th March 2019. The purpose of this study is to measure and to understand both positive and negative social impacts resulting from "Internal SIA Questionnaire" prepared by estate management. Management had developed management plan to promote positive impacts and mitigate negative impacts resulting from the changes. Seen, mitigation action and response is well recorded in SIA Report. The questionable is in Bahasa Malaysia which is easier for workers to understand. Estate reviewed the Internal SIA in March 2019. Covered for: Section A: Access and use rights Section B: Economic Livelihoods and Working Conditions Section C: Cultural and Religious Value Section D: Health and Education Facilities In Compliance No Not Applicable Criterion 2 Complaints and grievances A system for dealing with complaints and grievances shall be established and **Indicator 1** documented. Sustainability Manual has been established by Headquarters under SOP No. 16: Summary Stakeholders Management; Dated 01st June 2013 revised on 2nd January 2019 as the

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SOP has outlined the



consultation and communication procedures to relevant stakeholders.

•	request	&	response,
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- consultation & communication

	• complaint 8	x grievance		
	external stakeholde	ers). All the com		akeholders (both internal and es were handled by the Estate the office.
	In Compliance	⊠ Yes	□ No	☐ Not Applicable
Indicator 2	The system shall be manner that is access			ective, timely and appropriate
Summary	consultation & com	munication and	complaint & grievan	ddress any request & response, ces. Sighted, all the complaint appropriate manner.
	In Compliance	⊠ Yes	□ No	☐ Not Applicable
Indicator 3	A complaint form saffected stakeholde			emises, where employees and
Summary				deliver their complaints and the complaints form at estate
	In Compliance	⊠ Yes	□ No	☐ Not Applicable
Indicator 4	Employees and the or suggestions can			e made aware that complaints
Summary	attended by 49 extended Manager. The mee	ernal stakeholde eting is collabor	rs and conducted by	was held on 8 th March 2019 Mr. Tan Lay Guan, The Estate Chinoh Estate. Sighted in the
	minutes of meeting	the "Transpare		implaints and Grievances".
	For K'lapa Bali Est	ate, estate had	ncy – Stakeholder Co the training to thei	r workers on 07 th May 2019; ant Manager). Attended by 71
	For K'lapa Bali Est Conducted by Mr. participants.	ate, estate had Fabian Lim Chin gei Chinoh Estat	the training to thei Wen (Estate Assista	r workers on 07 th May 2019;
	For K'lapa Bali Est Conducted by Mr. participants. Meanwhile for Sung February 2019; Cor	ate, estate had Fabian Lim Chin gei Chinoh Estat	the training to thei Wen (Estate Assista	r workers on 07 th May 2019; ant Manager). Attended by 71 aining to their workers on 12 th



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Summary	Sighted all internal complaints filled and responded and records maintained. No evidence of external complaints from stakeholders using complaints forms. No major negative impacts given during Stakeholders Meeting.
	As this is $1^{\rm st}$ year implementation of MSPO, no negative complaints made by internal and external stakeholders since the system introduce in year 2018.

Criterion 3 Commitment to contribute to local sustainable development

⊠ Yes

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

Summary

Both estates are committed and have contributed to local development. The contribution made to the internal and external stakeholders.

The estates have maintained all corporate social responsibility (CSR) for the development of local communities. In general the CSR performed by the company consist of the following:

- a) Contribution for the local communities programme
- b) Contribution for the school programme
- c) Contribution for the stakeholders

As evidence in K'lapa Bali Estate, sighted, a letter on

- "Memohon Sumbangan Sukan Tahunan SK Kuala Slim kali ke 22, 2019 from Guru Besar, SK Kuala Slim dated 9th April 2019 amounting RM100.00".
- "Memohon bantuan Membaiki dan Menceriakan Kawasan Sekolah".

Sighted todate cost of CSR done by estate management in year 2018. Total is RM 3,100.00

For Sungei Chinoh Estate, sighted todate cost of CSR done by estate management in year 2018. Total is RM 32,850.00.

In Compliance \square Yes \square No \square Not Applicable

Criterion 4 Employees safety and health

In Compliance

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

Summary

Sighted, Occupational Safety and Health Policy of Charming Green Sdn Bhd dated 24th February 2017 signed by Director, Mr. Lim Ban Aik.

2019 OSH Plan sighted with specific objective. Sighted Occupational Safety and Health (OSH) Training Programme Year 2019 for K'lapa Bali Estate and Sungei Chinoh Estate. Training covered as per below:

- Harvesting and Collection Operations
- Integrated Pest Management



Not Applicable

- Premix and Waste Management
- Manuring
- Safe Driving Techniques
- Rat Baiting

Indicator 2

- Important of PPE
- Emergency Response (ERP)
- Company Policy
- First Aid Training

In K'lapa Bali Estate, sighted latest training for First Aid Training on 15^{th} June 2019. Conducted by Mr. Inthirakumar A/L Balakrishnan (HA) and attended by 126 participants.

For Sungei Chinoh Estate, sighted latest training for Emergency Response Procedure (Fire Drill) Training on 15th May 2019. Conducted by Mr. Tee Aun Seng (Estate Assistant Manager) and attended by 11 participants.

During field visit, sighted the workers have been trained with safety and the workers wear the PPE required by his/her works.

wear the PPE requir	ed by fils/fier wo	JIKS.		
In Compliance	⊠ Yes	□ No	☐ Not Applicable	
The occupational s	safety and healt	th plan shall cover	r the following:	
employees exposed	perations shall be d training progra l to pesticides:	e assessed and doo mme which include		
ii) all precau d) The managemen (PPE) at the place of	t shall provide that of work to cover a and control suc	e appropriate perso all potentially hazar	properly observed and apponal protective equipment dous operations as identification, Risk Assessment a	ed in
e) The management chemicals to ensure Occupational Safety and Occupational Hazardous f) The management The appointed personal regulations and colled g) The management employees	t shall establish a proper and safe to Health (Classifi Safety Health to shall appoint reson(s) of trust muective agreement shall conductions.	e handling and stord cation Packaging a (Use and Standa Health) sponsible person(s) st have knowledge its. uct regular two-w	g Procedure for handling of age in accordance to and Labeling) Regulation 19 and of Exposure of Checked Regulation 20 for workers' safety and he and access to latest nation and communication with see's health, safety and we	997 mical 2000. ealth. nal

are discussed openly. Records from such meetings are kept and the concerns of the

h) Accident and emergency procedures shall exist and instructions shall be clearly

actions

taken

are



any

and

employees



recorded.

remedial

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

Sighted, Occupational Safety and Health Policy of Charming Green Sdn Bhd dated 24th February 2017 signed by Director, Mr. Lim Ban Aik.

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

HIRARC sighted for the followings work operation:-

- 1. P&D Census
- 2. Tall Palm Census
- 3. Trunk Injection
- 4. P&D Spraying
- 5. FFB Infield Collection
- 6. Driver
- 7. Cutting and Collection
- 8. Manuring

The estates have a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training records file for each staffs and workers.

- Harvesting and Collection Operations
- Integrated Pest Management
- Premix and Waste Management
- Manuring
- Safe Driving Techniques
- Rat Baiting
- Important of PPE
- Emergency Response (ERP)
- Company Policy
- First Aid Training

Both estates have provided appropriate PPE for all workers in their operations. PPE Issuance and replacement record. Sighted for:-

- Staff
- Harvesters
- Field Workers
- General Workers

Sighted, the Standard Operating Procedure No 13 for handling of chemicals to ensure chemicals are mixed and ready to be used and to ensure all chemicals are handled in a proper way.



CHRA report dated 27th March 2019 by Ganesraoo a/l Nagarajoo (JKKP HIE 127/171-2(357). The CHRA will be expired on 26th February 2024.

In K'lapa Bali Estate, medical Surveillance was conducted for 10 workers on 4th April 2019 by Dr Vigneswaran A/L Sithamparapillai; Occupational Health Doctor; JKKP KES HQ/08/DOC/00/311.

For Sungei Chinoh Estate, medical Surveillance was conducted for 8 workers on 03rd April 2019 by Dr Vigneswaran A/L Sithamparapillai; Occupational Health Doctor; JKKP KES HQ/08/DOC/00/311.

Person incharge of OSH is Mr. Tan Lay Guan, The Manager dated $1^{\rm st}$ January 2019 signed by the Director.

OSH Meeting is conducted quarterly in 2018/2019. Notice of meeting, minutes of meeting and attendance for the meeting are available in the file. As evidence in K'lapa Bali Estate, the committee meeting has been conducted as follows:-

- a. 12/03/2019 16 Participants
- b. 10/06/2019 16 Participants

For Sungei Chinoh Estate, the committee meeting has been conducted as follows:-

- a. 18/03/2019 12 Participants
- b. 18/06/2019 12 Participants

Sighted the Emergency Procedure for the Estate Emergency response plan available in local language (Malay and English). Emergency response plan include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point in file and pasted on notice board.

In K'lapa Bali Estate, ERP Chart 2019 indicates En Inthira as First Aider for Estate. Sighted, the distribution list of First Aid Kits for 2018/2019 to the person in-charge of 23 workplaces. Sighted latest training for First Aid Training on 15th June 2019. Conducted by Mr. Inthirakumar A/L Balakrishnan (HA) and attended by 126 participants.

For Sungei Chinoh Estate, ERP Chart 2019 indicates Mr. Inthirakumar A/L Balakrishnan (HA) as First Aider for Estate. Sighted, the distribution list of First Aid Kits for 2018/2019 to the person in-charge of 10 workplaces. Sighted latest training for First Aid Training on 15th June 2019. Conducted by Mr. Inthirakumar A/L Balakrishnan (HA) and attended by 7 participants.

Both estates have sent JKKP 8 (I & II)/(IV) on annually basis to the DOSH. LTA calculation based on local interpretation from DOSH. Sighted the latest JKKP 8 was sent on 16^{th} January 2018.

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

Sighted in the Sustainability Policy signed by Director, Lim Ban Aik dated 1st June 2019 under 2.2 Respect and Recognise the Rights of all employees.

Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB) is committed to ensuring that the rights of all employees, including contract, temporary and migrant workers, are respected according to local, national and ratified international laws and that international best practices are adopted where legal frameworks are not yet in place.

The Good Social Practices covering:-

- 1. No forced or bonded labour
- 2. No Child Labour
- 3. Occupational safety and health
- 4. Employment Contracts
- 5. Freedom of Association and Right to Collective Bargaining
- 6. Minimum Income Standards
- 7. Working Hours
- 8. Record Keeping
- 9. Equal Employment Opportunities
- 10. Access to Education
- 11. Harassment and Violence
- 12. Whistle- blowing
- 13. Business Integrity
- 14. Grievance Redress Procedure

∇ v₂

In Compliance	⊠ Yes	□ No	☐ Not Applica	ble
•	~ ~ ~	• •	criminatory practices of race, colour, sex	
	•		istinguishing characte	, ,

Summary

Indicator 2

Sighted in the Sustainability Policy signed by Director, Lim Ban Aik dated 1st June 2019 under 2. Drive Positive Socio – Economic Impact for people and communities.

Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB) respects, supports and uphold fundamental human rights, and does not engage in discrimination based on race, religion and gender. Reproductive rights in line with the country's law shall also be respected.

All workers enjoy the same scale of pay and provided with equal housing and work facilities. This was confirmed though interview with workers at estate and also through verification of contracts of service and pay slips of workers.



Document No.:	MSPO-PART3-Q1-MAS2-AUDRPTFIN-ms-RB						
	No evidence of discrimination based on race, skin color, religion, gender, national origin, ancestry, disability, marital status, and sexual orientation was found in the estate.						
	During interviews, it is clearly stated no forced labour at estate. Each employee has an employment contract either local or foreigner.						
	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 or minimum wage.						
Summary	Pay and conditions are documented in the appointment letter of the staff and workers Interview with both estate staff and workers and with both male and female confirmed that they understand the terms and conditions of their employment. No confinement history and no illegal or forced deduction as per this audit period.						
	The salary is according to 'Guidelines on the Implementation on the Minimum Wages Order 2018'. National Wages Consultative Council Act 2011 (Act 732) Malaysian minimum salary is RM1,100 as stated in the guidelines.						
	Salary slips clearly shows the calculations of gross salary, all deductions and net salar of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.						
	As evidence in Sungei Chinoh Estate, sampled of worker salary taken:						
	 1) Biswas Biswajit (L9216170) General Worker May 2019 - RM 1,620.81 Apr 2019 - RM 1,511.03 Mar 2019 - RM 1,145.82 						
	 2) Mahto Ninod (N9597160) Harvester May 2019 - RM 1,432.23 Apr 2019 - RM 1,386.44 Mar 2019 - RM 1,100.00 						
	3) Roy Nirmal (R4887240) • Sprayer						

☐ No



☐ Not Applicable

In Compliance

May 2019 - RM 1,627.88 Apr 2019 - RM 1,492.72 Mar 2019 - RM 1,084.95

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 is according to 'Guidelines on the Implementation on the Minimum Wages Order 2018'. National Wages Consultative Council Act 2011 (Act 732) Malaysian minimum salary is RM1,100 as stated in the guidelines.							
	Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made.							
	As evidence in K'lapa Bali Estate, seen contract Yue Tractor Earth Works and his workers: • Muniandy A/L Selvaraj • Muniandy A/L Selian • Rajasingam A/L Ramalingam							
	For Sungei Chinoh Estate, seen contract Tang Man Kong Lorry Transport Sdn Bhd and his workers: • Subramaniam A/L Chengodan • Chan Kam Choon							
	Base on the records of Contract Agreement with Contractor and his worker, the contractor is adhering the law in the payment to his workers.							
	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	Sighted, in the estate System (Lintramax) the details of the workers biodata. The records contain full names, date of birth, date joined, $1^{\rm st}$ work date, marriage status, nationality, gender, race, salary type, date of birth, passport/NRIC.							
	In Compliance ☐ Yes ☐ No ☐ Not Applicable							
Indicator 6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.							
Summary	Employment contract stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc. The contract is in Malay/English/Hindi/Bangladesh as it is easy to be understood by workers. This contract							



is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of local, Indonesian, India and Bangladesh.

	All workers enjoy the same scale of pay and provided with equal housing and work facilities. This was confirmed though interview with workers from the estate and also through verification of contracts of service and pay slips of workers.						
	No evidence of discrimination based on race, skin color, religion, gender, national origin, ancestry, disability, marriage status, and sexual orientation was found in both estates.						
	In Compliance	\boxtimes	Yes		o [Not Applicable	
Indicator 7	The management and overtime trans					at makes working hours	•
Summary	208 hours. The oversite visit, sighted al	ertime oove (e maximum i data displaye	is 104 houred at notice	rs according to board. During	nonthly working hours is Malaysian Law. During site visit, sighted above the workers attendance) e
	In Compliance	\boxtimes	Yes		o 🗆	Not Applicable	
Indicator 8	records shall comp	ly wit I and	h legal regul shall always	ations and be compe	collective agre	as indicated in the time eements. Overtime shal ate applicable and shal	l
Summary		ertime	e maximum i	s 104 hours	s according to	onthly working hours is Malaysian Law. Sighted	
	Verified with Mr. Fabian Lim Chin Wen (Estate Assistant Manager) during interview on working hours and overtime. His workers are clear with 8 hours working and above is overtime with a maximum of 104 hours per month.						
	In Compliance		Yes		o [Not Applicable	
Indicator 9	Wages and overtin regulations and col				the pay slips s	hall be in line with lega	
Summary	of a worker. Worke	ers in	terviewed co	onfirmed th	at they are be	eductions and net salary ing paid more than the ductions being made.	
	In Compliance		Yes		o 🗆	Not Applicable	
Indicator 10		ommu	inity such as	s incentives	s for good wo	oyer to employees, their performance, bonus provisions.	



Summary	All workers have been provided with medical and accident insurance. Tune Protect Malaysia. is appointed as insurance provider to foreign workers							
	With regards to local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations.							
	For Foreign workers, will be covered under SOCSO upon expiring the Foreign Workers Compensation Scheme.							
	In Compliance	\boxtimes	Yes		No		Not Applica	able
Indicator 11	In cases where on and have basic a Standards Housin legislation.	meni	ties and	facilities in	comp	liance with th	ne Workers	' Minimum
Summary	All workers are profree and electricity by Estate. Welfare	is b	orne by t	he workers	. Sanit	ary and wast	e disposal is	
	In Compliance	\boxtimes	Yes		No		Not Applica	able
Indicator 12	The management of sexual harassm					•	es to prever	it all forms
Summary	Sighted in the Sustainability Policy signed by Director, Lim Ban Aik dated 1 st June 2019 under 2.,X1 Harassment and violence. The policy stated Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB) and its suppliers/ contractors shall not tolerate any type of harassment or violence.							
	In Compliance		Yes		No		Not Applica	able
Indicator 13	The management and allow worke accordance with freedom to join a collective bargaini work conditions. E or suffer repercuss	rs o applic trade ng. E mplo	wn representation remains which was also the contraction of the contra	esentative(some service) elevant to the shall have	s) to ulation ne indo e the r	facilitate col ns. Employee ustry or to or ight to organi	lective barges shall be ganize them ze and nego	gaining in given the selves for otiate their
Summary	Sighted in the Sust under 2.,vi Freedo							June 2019
	Heah Seok Yeong suppliers/ contract join trade unions legislation.	ors s	hall reco	gnize and re	espect	the right of e	mployees to	form and
	Local or foreign wo worker union for							



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	management.					
	In Compliance	⊠ Yes	;	No	☐ Not Appli	cable
Indicator 14	Children and your shall comply with persons is accep interfering with th conditions.	local, sta table on	te and nationa family farms,	I legislation. Wunder adult s	ork by children supervision, and	and young
Summary	As per "Social and estate and this wa clear that no one Tan Lay Guan (Experson are employ There are no child through checking years old should be	s proven to below 18 state Marked. dren below the list of	hrough checking years old shout ager), the mater was ages of 18 was ages. The mater is a second to the control of the control	ng the list of er Id be employed nagement ens vorking in the	nployees. The w d. As per intervi ure no children estate and this	orkers were ew with Mr. and young was proven
	In Compliance	⊠ Yes	. 🗆	No	☐ Not Appli	cable
Criterion 6 Indicator 1	All employees, contraining programme assessment of training kept.	ntractors e (appropr	ate to the scal	e of the organi	zation) that inclu	udes regular
Summary	Both estates a com was sighted in the for 2019 was sighted	training re				
	Trainings conducted attendance records			_		npleted with
	 Harvesting Integrated Premix and Manuring Safe Driving Rat Baiting Important of Emergency Company P First Aid Trans 	Pest Mana Waste Mana g Techniq of PPE Response	anagement ues	as		
	In Compliance	⊠ Yes	;	No	☐ Not Appli	cable

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Indicator 2	implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.
Summary	All workers involved in the operations have been adequately trained in safe working practice. As evidence, sighted the training needs prepared by the Estate Assistant Manager for each individual worker.
	In Compliance ☐ Yes ☐ No ☐ Not Applicable
Indicator 3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.
Summary	All workers involved in the operations have been adequately trained in safe working practice. Both estates have a comprehensive annual training plan for its staffs and workers and this was sighted in the training records file for each staffs and workers. The training plan for 2019 was sighted.
	Trainings conducted were recorded in the various trainings record and completed with
	attendance records, training materials and photographs of the training.
2.5 Princip	attendance records, training materials and photographs of the training.
2.5 Princip Criterion 1	attendance records, training materials and photographs of the training. In Compliance ☑ Yes ☐ No ☐ Not Applicable
	attendance records, training materials and photographs of the training. In Compliance Yes
Criterion 1	attendance records, training materials and photographs of the training. In Compliance Yes No Not Applicable le 5 : Environment, natural resources, biodiversity, and ecosystem services Environmental management plan An environmental policy and management plan which shall be in line with the relevant country and state environmental laws shall be established, effectively communicated
Criterion 1 Indicator 1	attendance records, training materials and photographs of the training. In Compliance Yes No Not Applicable le 5 : Environment, natural resources, biodiversity, and ecosystem services Environmental management plan 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. Company has established Environmental Policy signed by Mr. Lim Ban Aik, Director on



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	In Compliance	\boxtimes	Yes		No		Not Applicable
Indicator 2	The environmental a) An environmental b) The aspects and	al poli	icy and objectiv	es;		ving:	
Summary	in year 2019. As ev are recorded in do	ideno cum	ce in K'lapa Bali ent titled "Envi	Estat ronm	te, the environ ental Risk Ass	ment sessm	RA) for all its' activities al assessment findings ent" prepared by Mr. e Estate Manager on
	elements of work a	activit oroba	ty, environment bility), assessm	tal im ent (npacts, enviror	nmen	he plantation covering tal impact assessment e, mitigation measure
	Wen (Assistant M operations such as: Nursery (pl Nursery (w) replanting (expending (sexpending (sexpe	anag antin aterir (land (trans prayi ched atting ation ng (p ns (co ins, b agem & col vaste ccom	er), approved g & transplanting) preparation) splanting) ng with chemica uled waste – ch & stacking of p (racking of deb blacement of EF bonstruction and boundaries (upk ment (application lection (harvest lection (transpo	by als) emicalm ris) B) mair eep) of p ting)	Estate Manageseedlings) al container) fronds) atenance) esticides, FFB)		y Mr. Fabian Lim Chin 5.03.2019 covers 19
	In Compliance	\boxtimes	Yes		No		Not Applicable
Indicator 3	An environmental in the positive ones, s						npacts and to promote ed.
Summary	The environmental environmental risk of K'lapa Bali Estate:						t was incorporated in dence in:



- Work activity: Scheduled waste programme chemical containers.
- Environmental impacts: Soil contamination
- Mitigation measures: Used chemical containers should be triple rinsed and punctured to render them neutral/safe and send to waste managers.

Sungei Chinoh Estate:

- Work activity: Application of pesticides.
- Environmental impacts: Potential soil and water contamination and disposal of used pesticide containers
- Mitigation measures: Washing from spraying equipment should not be discharge into drains. Schedule waste on disposal of used pesticide containers by triple rinsing and punctured to render it neutral and safe.

	In Complianc	e 🛛	Yes			No] Not /	Applica	ble
Indicator 4	A programme improvement p	•	te the	positive	impac	ts should	be in	ncluded	in the	continua

Summary

The programme to promote the positive impacts on environmental (continuous improvement plan) includes;

Issue	Mitigation /Action Plan
Reduce chemicals use	Establish beneficial plants along roads and
	boundaries
Marking of riparian zone	Marking with barricade tape or red paint
Potential Erosion at river and	To plant soil holding plants such as vertiver grass at
edges	drain edges and river edges.
Increase biodiversity	Empty land to be planted with trees or flowers apart
,	from oil palm.
Spillage of fertilizer at	To apply for budget to upgrade fertilizer store or to
fertilizer store to nearby water	construct new store.
course	

In Compliance	extstyle ext	☐ No	☐ Not Applicable
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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

Sighted the environmental training programme for year 2019. It includes;

- 1) Linesite/office cleaning (SOP) office staff
- 2) Premix and waste management (SOP premix/store keepers)
- 3) MSPO awareness all staff & workers
- 4) Highly toxic chemicals chemical handlers
- 5) Company policy all staff & workers
- 6) Manuring (SOP) manurers



7) Riparian zone – all workers except harvesters

Sighted training implementation as below;

	K'lapa Bali	Sungei Chinoh
Programme	Estate	Estate
	Date done	Date done
	(Attendees)	(Attendees)
Linesite/office	07.02.2019	13.02.2019
cleaning (SOP)	(4psn)	(1psn)
	08.04.2019	,
	(4psn)	
MSPO awareness	06.05.2019	
	(26psn)	14.01.2019
	08.05.2019	(66psn)
	(41psn)	, , ,
	14.05.2019	
	(11psn)	
Premix and waste	13.03.2019	18.03.2019
management (SOP)	(2psn)	(1psn)
Riparian zone	16.03.2019	22.03.2019
awareness	(9psn)	(26psn)
Manuring (SOP)	21.01.2019	22.03.2019
	(15psn)	(5psn)
Highly Toxic	01.04.2019	·
Chemicals	(6psn)	07.05.2019
	02.04.2019	(51psn)
	(7psn)	
	04.04.2019	
	(5psn)	

In Compliance	⊠ Yes	□ No	Not Applicable
zii compilance			 1 to c / tppiicabic

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

Summary

In K'lapa Bali Estate, sighted " 2^{nd} Welfare and environmental committee meeting minute 2019" held on 03.04.2019 attended by 3 executives, 2 staffs and 6 workers representatives discussed the following;

- 1) Open burning is not allowed, including slash and burn at green book area and burning of rubbish.
- 2) No spraying is allowed at drain edges and rivers as well as designated riparian zone.

Meanwhile in Sungei Chinoh Estate, sighted "Minit Mesyuarat Kebajikan dan Alam Sekitar 02/2019" held on 22.04.2019 attended by 2 executives, 3 staffs and 8 workers representatives discussed the following;





- 1) Syarat-syarat MSPO secara ringkas termasuk kebersihan di kawasan perumahan pekerja.
- 2) Latihan yang telah dijalankan pada bulan Februari dan March 2019 meliputi SOP, menyembur racun, menabur baja, pembersihan di kawasan perumahan dan pejabat.

In Compliance ☐ Yes ☐ No ☐ Not Application	cable
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Criterion 2 Efficiency of energy use and use of renewable energy

Indicator 1

Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.

Summary

Estate has maintained record of Diesel Monitoring for a period of 2016 - 2018. In K'lapa Bali Estate, sighted histogram chart of diesel consumption per ton FFB (2018) with baseline value of 1.88 litres/ton FFB. For the year 2019, the diesel consumption as follow;

Month	Litre	FFB
January	2,622	1,887
Feb	2,885	1,606
Mar	1,787	1,693
Apr	3,263	2,149
May	2,624	1,768
Total	13,181	9,106

Estate has maintained record of Electricity Consumption per FFB (MT) for a period of 2016 - 2018. Sighted histogram chart of electricity consumption per FFB (MT) (2018) with baseline value of 4.50 kWH/ton FFB.

For the year 2019, the electricity usage (kWH) as follow;

Month	kWH	FFB
January	8,107	1,887
Feb	7,834	1,606
Mar	7,975	1,693
Apr	8,368	2,149
May	8,830	1,768
Total	41,114	9,106

Sighted Energy Usage Reduction Plan 2019 prepared by Mr. Fabian Lim Chin Wen (Assistant Manager), approved by Estate Manager covers 8 methods of reduction plan, includes;

- 1. Conversion of florescent lighting to energy saving bulbs or LED bulb.
- 2. Conversion of street lamps to LED light bulbs
- 3. Utilize fan and minimize the use of air conditioners



- 4. Reduce vampire power by unplugging all electrical appliances
- 5. Electricity appliance are switch off when not in used
- 6. Rain water harvesting at bungalow
- 7. Silt pit to harvest rain water in field
- 8. Machineries and vehicle to maintain and service periodically.

In Sungei Chinoh Estate, the diesel consumption for 2019 as follow;

Month	Litre	FFB
January	3,195	1,585.94
Feb	3,281	1,518.03
Mar	4,406	1,571.19
Apr	3,880	1,569.40
May	2,235	1,227.16
Total	16,997	7,471.72

Total Litre/mt FFB is 2.27

The electricity usage for 2019 as follow;

Month	kWH	FFB
January	3,375	1,585.94
Feb	2,999	1,518.03
Mar	3,861	1,571.19
Apr	3,744	1,569.40
May	4,319	1,227.16
Total	18,298	7,471.72

Total kWH/mt FFB is 2.45

In Compliance	oxtimes Yes	□ No	☐ Not Applicable
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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 annual estimate of non-renewable energy being established for the year 2019 as follow;

Estate	Estimated diesel usage	Estimated FFB	Fuel Efficiency
	(Liter)	(MT)	(Liter/MT FFB)
K'lapa Bali	132,383	30,000	4.41
Sg Chinoh	49,200	20,000	2.46

Sighted annual estimate of electricity usage being established for the year 2019 as follow;



Estate	Estimated Electricity Usage (kWH)	Estimated FFB (MT)	Electricity Efficiency (kWH/MT FFB)
K'lapa Bali	96,541	30,000	3.22
Sg Chinoh	76,800	20,000	3.84

In Compliance	oxtimes Yes	☐ No		Not Applicable
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Titalicator 5 The acc of followable offergy effects applied whole pecching	Indicator 3	The use of renewable	energy should be	e applied where	e possible.
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Summary

There was no opportunity to use renewable energy in estate. Operation of vehicle is fully dependent on fossil fuel.

In Compliance	oxtimes Yes	☐ No	☐ Not Applicable
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Criterion 3 Waste management and disposal

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

Summary

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

Sighted Identification of Waste consist of batteries, spent lubricant, used PPEs, lubricant containers – metal, lubricant containers – plastic, clinical waste, chemical containers – plastic, chemical containers – metal and fertilizer bags.

Sighted inventory of scheduled waste established by K'lapa Bali Estate;

Code	Source	Date of 1st generated	Balance as at
			17.06.2019
SW409	Fertiliser bag	18.03.2019	6,000pcs
SW409	Herbicide	Disposed to G-Planter	0pcs
	containers 20L	290pcs on13.06.2019	
SW409	Herbicide	Disposed to G-Planter	0pcs
	containers 4L	43pcs on 13.06.2019	
SW410	PPEs	Disposed to G-Planter	0pcs
		4.2kg on 13.06.2019	
SW404	Used Syringe &	02.01.2019	45pcs
	Needles		

Sighted the G-Planter UPPCR Collection Form dated 13.06.2019 for 290pcs of 20L plastic pesticide containers, 43pcs of 4L metal drum and 4.2kg used PPEs but has yet reported to e-swis due to system failure (as informed by Mr. Fabian Lim Chin Wen (Assistant Manager)



Sighted inventory of scheduled waste established by Sungei Chinoh Estate;

Code	Source	Date of 1 st generated	Balance as at 12.06.2019
SW409	Fertiliser bag	04.06.2019	606pcs
SW409	Herbicide	Disposed to G-Planter	0pcs
	containers 20L	103pcs on 13.06.2019	
SW409	Herbicide	Disposed to G-Planter	0pcs
	containers 4L	125pcs on 13.06.2019	
SW409	Herbicide	Disposed to G-Planter	0pcs
	containers 250g	420pcs on 13.06.2019	
SW410	PPEs – Apron,	Disposed to G-Planter	0pcs
	nitrile glove,	2kg on 13.06.2019	
	face masks N95		
SW404	Used Syringe &	07.01.2019	23pcs
	Needles		

Sighted the G-Planter UPPCR Collection Form dated 13.06.2019 for 103pcs of 20L plastic pesticide containers, 125pcs of 4L PVC containers, 420pcs containers (250g) and 2kg used PPEs but has yet reported to e-swis.

	In Compliance		Yes	□ No		Not Applicable	
Indicator 2	pollution. The wast a) Identifying and n	e ma nonito fficie	nageme oring soo ncy and	Il be developed and im nt plan should include nurces of waste and pollu recycling potential of	neasures ution.	s for:	

Summary

Sighted a waste management plan established on the following;

- Clinical waste syringe, needle, swab
- Batteries
- Lubricant containers plastic
- Lubricant containers metal
- Fertilizer bags
- Spent lubricants/ oil filter
- Chemical containers plastic
- Chemical containers metal
- Used PPE apron, respirator, nitrile glove

The estate management also promoting a recycle program among the employees and encouraged them to do so. Sighted the recycle bins were placed at the main location such as main line site.

In Compliance	⊠ Yes	☐ No	Not Applicable
in Compliance	△ Yes	□ INO	Not Applicab

Indicator 3 The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled



Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.

Summary

Charming Green Sdn Bhd and Heah Seok Yeong Realty Sdn Bhd has established Standard Operating Procedure No. 12.0 on Pre-mix and Chemical Handling dated 01.01.2013, revised and approved by Estate Manager on 02.01.2019 with the purpose to ensure chemicals are mixed and ready to be used and all chemicals are handled in a proper way.

Estate has also maintained record of Monitoring Pesticide Usage for a period of 2019 i.e. Chemical Store Record includes:

- 1) Monocrotophos
- 2) Glyphosate
- 3) Contest (Cypermethrin)
- 4) Surfactant
- 5) Rat bait
- 6) Amine
- 7) Garlon
- 8) activator
- 9) Metsulfuron methyl
- 10) Furadan
- 11) Aluminium sulphate
- 12) Soda Ash
- 13) Tricel
- 14) Foxil
- 15) Snap
- 16) Mitac
- 17) Basagran

In Compliance	oxtimes Yes	☐ No		Not Applicable
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Indicator 4

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

Summary

The establishment of Standard Operating Procedure No. 12.0 on Pre-mix and Chemical Handling is to ensure chemicals are mixed at designated area with access to clean water and appropriate tools for measuring.

After mixing the chemicals,

- 1. All tools, measuring cups, measuring jugs, containers, and chemical drums are washed thoroughly.
- 2. All tools, measuring cups, measuring jugs and containers are dried and kept at designated area.
- 3. Grey water from the sump is recycled into empty jerry cans/premix drums for next premix session.
- 4. All PPEs are rinsed and hang to dry before keeping into designated area.



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			containers are e sending to SW		and triple rins	ed to render as
	In Complian	nce 🛚 Y	es [□ No	☐ Not	Applicable
Indicator 5	Domestic was		•	uch to minim	ise the risk of	contamination of
Summary	disposed at la	andfill located		- ,		nestic wastes are Bali and Block 31
	In Complian	nce 🛭 Y	es [□ No	☐ Not	Applicable
Criterion 4	Reduction of	f pollution ar	nd emission in	cluding gree	enhouse gas	
Indicator 1						greenhouse gas stes and effluent
Summary	The assessment of polluting activities are identified and documented in the environmental impact assessment and management plan. From the EIA, it will be evaluated for the impact and any impact will be included in the management plan. Sighted the GHG Emission assessment was conducted by the estate dated for year 2018.					e EIA, it will be gement plan.
	Estate K'lapa Bali Chinoh	Planted Ha 1,664 1,042	FFB (MT) 21,232.64 15,567.48	tCO ₂ 4,497.79 4,099.23	tCO ₂ /mt FFB 0.212 0.263	
	In Complian	nce 🛭 Y	es [□ No	□ Not	Applicable
Indicator 2	An action pleestablished a			nificant pollu	itants and em	issions shall be
Summary	objective to re the plan was Estate Manag 1) Imple 2) Calibi	educe signification prepared by later on 15.04.2 ementation of cKS	ant pollutant an Mr. Fabian Lim 2019 include; calibrated ferti	d emission. A Chin Wen (A lizer bowl	As evidence in k ssistant Manag	or 2019 with the ('lapa Bali Estate er), approved by n required

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In Compliance



Not Applicable

☐ No

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

Company has established the MSPO Procedure; Title: Water Management Plan Procedure dated 01.09.2018.

For K'lapa Bali Estate, sighted identification of water source;

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

Sighted record of monitoring of water consumption per capita for 2018 and current year 2019.

Year	Volume (cum)	No of Head	Cubic meter Per
			Day
2018	21,679	190	59.39
2019	9,836	166	59.25
(Todate May)			

Sighted location points of taking water samples from river – Sg Telau, upstream and downstream. Sighted certificate of analysis for water sampling taken at designated points (incoming & outgoing). Analysis done by Kuala Lumpur Kepong Berhad, Kota Damansara, Petaling Jaya. Sighted Certificate of Analysis for incoming and outgoing water samples from sampling points of KBE A and KBE B. The result that was reported on 02.04.2019 indicated the following;

ĺ	Parameter	KBE A	KBE B	Compliance Limits
		(incoming)	(outgoing)	(Class IIB Standards)
	COD (mg/L)	25	26	25
	BOD (5days @			
	20°C) (mg/L)	6	5	3



Sighted Certificate of Analysis from Jabatan Kimia Malaysia for treated water samples taken in 06.08.2018;

Parameter	Treatment	Labour
	tank	line
Total Coliform	< 1	< 1
Count		

Sighted map of riparian zone at K'lapa bali Estate (map & signage) for Sg. Telau. Observed Riparian Zone Awareness Training conducted on 16.03.2019 attended by 9 executives/staff.

For Sungei Chinoh Estate, Lembaga Air Perak has been identified as a water source for consumption. Sighted record of monitoring of water consumption per capita for 2018 and current year 2019.

Year	Volume (cum)	No of Head	Cubic meter Per
			Day
2018	8,878	77	115.30
2019	3,780	92	41.09
(Todate May)			

Sighted Certificate of Analysis for incoming and outgoing water samples from sampling points of Sample A and Sample B. The result that was reported on 02.04.2019 indicated the following;

Parameter	Sample A (incoming)	Sample B (outgoing)	Compliance Limits (Class IIB Standards)
COD (mg/L)	24	26	25
BOD (5days @ 20°C) (mg/L)	7	7	3

	20°C) (mg/L)	7	7	3	
	In Compliance	⊠ Yes	□ No	☐ Not Applic	able
Indicator 2	No construction of b through an estate.	unds, weirs and	dams across	main rivers or waterwa	ys passing
Summary	•	oss the river of	Sg Telau (pass	stant Manager), no bur ing through K'lapa Bali	
	In Compliance	⊠ Yes	□ No	☐ Not App	olicable
Indicator 3			•	I (e.g. water from road- and various natural red	
Summary	Based on interview	with Estate As	sistant Manag	er, there were road	side drains

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constructed along the main road.



Based on interview with Mr. Fabian Lim Chin Wen (Assistant Manager), there were road side drains constructed along the main road and also silt pit at hilly area (Block 5B,5C and 8D). Site visit confirms the road side drain has been implemented in the estate compound. ⊠ Yes □ No **In Compliance** Not Applicable Criterion 6 Status of rare, threatened, or endangered species and high biodiversity value Information shall be collated that includes both the planted area itself and relevant wider Indicator 1 landscape-level considerations (such as wildlife corridors). This information should 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 Sighted Biodiversity Report resulted from the survey conducted by K'lapa Bali Estate dated 10.04.2019 which was carried out by 10 respondents. Sighted "Borang Soal Selidik – Senarai Semak Pemantauan Fauna). Sighted fauna and flora observed by the assessor from Perhilitan Daerah Tapah; 1. Fauna – wild boar, oriental pied hornbill, common kingfisher, peregrine falcon, red jungle fowl, monitor lizard, little egret, python, long-tailed macague. 2. Flora – brazil nut, pokok ara sungai, betel nut palm. For Sungei Chinoh Estate, sighted Biodiversity Report, verified by the Estate manager on 09.04.2019, resulted from the survey conducted by the estate dated 27 & 28.03.2019 which was carried out by 8 respondents. Sighted "Borang Soal Selidik -Senarai Semak Pemantauan Fauna). Sighted fauna and flora observed by the assessor from Perhilitan Daerah Tapah; 1. Fauna – wild boar, oriental pied hornbill, common kingfisher, peregrine falcon, red jungle fowl, monitor lizard, little egret, python, long-tailed macaque. Flora – brazil nut, pokok ara sungai, betel nut palm ⊠ Yes □ No Not Applicable In Compliance If rare, threatened or endangered species, or high biodiversity value, are present, Indicator 2 appropriate measures for management planning and operations should include: a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities and developing responsible measures to resolve human-wildlife conflicts. Summary In K'lapa Bali Estate, HCV evaluation plan has been established for planted area along the jungle boundary (Gunung Besout) and along the Sq Telau buffer zones even though no RTEs being identified during the survey processes.

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For Sungei Chinoh Estate, HCV evaluation plan has been established for planted area at 3 hot spots;

- 1. Abandoned water catchment pond
- 2. Along the boundary of Sg Trolak (incoming spot)
- 3. Along the boundary of Sg Trolak (outgoing spot)

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

In Compliance oximes Yes oximes No oximes Not Applicable

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

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

- 1. Immediate Action Plan
 - a. To mark out the river inlet and outlet point in map.
 - b. To identify buffer zone in map.
 - c. To educate workers & staffs on the important of riparian zone.
 - d. To identify the forest reserve boundary and estate.
 - e. Mark out the boundary between forest reserve and estate in map.
 - f. Spraying and manuring will not be done at any riparian zone.
 - g. Drains edges are not allowed to be sprayed.
- 2. Medium Term Action Plan
 - a. To put up signage at river inlet & outlet point and mark physical for workers to identify the riparian.
 - b. To notify authority on illegal activities affecting river riparian zone.
 - c. Put up signage for no hunting nearby forest boundary.
 - d. File report to authority on illegal hunting.
 - e. To continuous monitor the species between boundary and highlight any RTEs species found.
 - f. Barn owl boxes are to be place at strategic areas to promote barn owl population in the estate.
 - g. Rat baits are only use after census with rat damage indicates more than 9%.
 - h. Drains edges are not allowed to be sprayed.
- 3. Long term action plan
 - a. Set up SOP on management of riparian zone.
 - b. Train workers on management of riparian zone like to no chemical spraying inside buffer zone.
 - c. To set up buffer zone between estate and forest reserve.
 - d. To put up signage of buffer zone.
 - e. Paraquat and it derivatives shall not be used in the estate.



	includes	keeping of any ra	are and endangered	n the estate. This also I species of flora and fauna place at strategic areas.	
	In Compliance	⊠ Yes	□ No	☐ Not Applicable	
Criterion 7	Zero burning prac	tices			
Indicator 1				il palm cultivation or replant ed in regional best practice.	
Summary	implementing the follImplement zThe replanting their economic	owing practices of ero burning on a ng technique dea ic life, which are	on environment: Il estates practices. Ils with oil palms w	n Bhd are committed towa hich have reached the end with excavators, shredded a ng rows.	l of
	Sighted signage on z	ero burning bein	g erected by the es	tate at the strategic location	ns.
	Interview with group company's zero burn		hows that they are	e aware and understand t	the
	In Compliance	⊠ Yes	□ No	☐ Not Applicable	
Indicator 2		ly diseased and		pe sought in areas where to unificant risk of disease spre	
Summary		seased palm was	reported. No repla	on SOP 2.0: Replanting. anting programme for Sun conomic life.	
	In Compliance	⊠ Yes	□ No	☐ Not Applicable	
Indicator 3				ed out as prescribed by urning) Order 2003 or otl	
Summary		All replanting act		r), no special approval need e felling method. The pract	
	In Compliance	⊠ Yes	□ No	☐ Not Applicable	
Indicator 4	Previous crops shou pulverized or plough			d and shredded, windrowed	l or
Summary				ger), old standing palms are uprooted. The felled pa	



Document No.:	MSPO-PART3-Q1-MA	S2-AUDRPTFIN-ms	s-RB		
			nredded to pieces ab r the entire planting		shredded and
	In Compliance	⊠ Yes	□ No	□ No	ot Applicable
2.6 Princip	ole 6 : Best practice	S			
Cuitanian 1	C:4				
Criterion 1 Indicator 1		procedures shall	be appropriately do	cumented a	nd consistently
Summary			Agriculture Practice at and also interviewi		
	Estate have 2 types	of Manuals-			
	 Roads & Pat Upkeep Drai Boundaries Oil Palm Pes Manuring In Harvesting a Loading/Tra Upkeep Office 	erations ure/Immature Oil l ths ins st Management nmature and Mature and Collection nsporting FFB ce/Linesite/Housin	Palm re Oil Palm g		
	 Shoot Drend Rat Baiting Termite (White Leaf Pest Foil Strip Spraying Spot Spraying 	ore ion Against Bagwo ching Against Rhino nite Ant) Treatmen liar Spraying ng ng uring Application	orm/Nettle Caterpillar oceros Beetle		
	Regular inspection a	and supervision are	e conducted by Mano	dore, Supervi	sor, Executives

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as well as HQ Department.

In Compliance



Not Applicable

☐ No

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 Company has established the Standard Operating Procedure 2.0; Replanting. Date revised on 02nd Jan 2019.

- 2.4.9 Terracing
- "Where the terrain ranges from rolling hilly to steep with gradient from 6 degrees to 20 degrees should be constructed at an average horizontal interval of 7.9 meters."

In Compliance	\bowtie	Yes	∐ N	No L	Not	Applicable
---------------	-----------	-----	-----	------	-----	------------

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

Summary

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

Block: 23Ha: 33

Year of Planting: 2016Clone: Felda Yangambi

In Compliance Y Yes No Not Applicable

Criterion 2 Economic and financial viability plan

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

Summary

Both estates had an annual budget for the financial year 2019-2021. The estate budget includes the projected FFB, OER, PK and etc production which projected for three years from 2019 until 2021.

It also incorporated item such as general charges, estate maintenance, general services, fixed assets and etc. Sighted documented Business and Management Plan prepared by Mr. Tan Lay Guan (Estate Manager).

K'lapa Bali Estate

FY	2019	2020	2021
На	1,849	1,941	1,948
Total crop	30,000	33,000	33,000
Estimate OER %	20.00	20.00	20.00
KER	5.00	5.00	5.00





Ex-Estate Cost/Mt	251	260	260
FFB Price	411	450	450

Sungei Chinoh Estate

FY	2019	2020	2021
На	1,153	1,173	1,093
Total crop	20,000	33,000	33,000
Estimate OER %	2100	2300	2300
KER	5.00	5.00	5.00
Ex-Estate Cost/Mt	222	230	230
FFB Price	420	460	460

In Compliance \square Yes \square No \square Not A	pplicable
--	-----------

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

There is replanting programme available for year 2018 -2023 for K'lapa Bali Estate. Data as per below:

Financial	Year	Total	Progeny/Clone
Year		На	proposed
2018	1993	209	DXP
	1989		AA Hybrida
	1990		1&2
2019	1987	85	DXP
			AA Hybrida
			1&2
2020	1991	75	DXP
			AA Hybrida
			1&2
2021	1995	101	DXP
			AA Hybrida
			1&2
2022	1996	115	DXP
			AA Hybrida
			1&2
2023	1996	111	DXP
			AA Hybrida
			1&2

	In Compliance	oxtimes Yes	□ No	☐ Not Applicable
--	---------------	-------------	------	------------------

Indicator 3 The business or management plan may contain:

- a) Attention to quality of planting materials and FFB.
- b) Crop projection: site yield potential, age profile, FFB yield trends.



c) (Cost of	production:	cost per	tonne	of FFB.
------	---------	-------------	----------	-------	---------

- d) Price forecast.
- e) Financial indicators: cost benefit, discounted cash flow, return on investment.

Summary

Both estates had an annual budget for the financial year 2019-2021. The estate budget includes the projected FFB, OER, PK and etc production which projected for three years from 2019 until 2021.

It also incorporated item such as general charges, estate maintenance, general services, fixed assets and etc. Sighted documented Business and Management Plan prepared by Mr. Tan Lay Guan (Estate Manager).

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FFB Price	420	460	460

	In Compliance	⊠ Yes	☐ No	☐ Not A	pplicable
Indicator 4	The management pla goals and objective documented.				
Summary	The estates performa actual vs budget i.e. shown therein. Monito	Upkeep mainte	nance, FFB Pro	duction, capital	expenditure are
	In Compliance	⊠ Yes	□ No	☐ Not A	pplicable

effectively implemented.

Indicator 1

Criterion 3 Transparent and fair price dealing



Pricing mechanisms for the products and other services shall be documented and

Summary	The pricing mechanisher before negotiation de	•		led by the management iers.	team
	The company will transportation, repla			for other services lik	e ffb
	with Tang Man Kon remain in force for 2 1st January 2019 unt	ng Lorry Transport 2 Years (as per clau til 31 st December 20	Sdn Bhd (FFB Tr se 2 of per the Ag 021. Stamp Duty	en Sdn Bhd) K'lapa Bali E ransport). The contract greement) commencing of this Agreement was I SECOND SCHEDULE o	shall from made
	In Compliance	⊠ Yes	□ No	☐ Not Applicable	
Indicator 2	All contracts shall be timely manner.	e fair, legal and trans	sparent and agree	ed payments shall be ma	de in
Summary	the Contract Agreem	nent between estate led on 01.01.2019.	with Tang Man K	in K'lapa Bali Estate, sig long Lorry Transport Sdr paid 30 days after the e	Bhd
	the contractors withi	in 30 days after the out in work order bet	contractors send t	tate. Estate has been pa heir invoices. However, t their contractors for dur	there
	In Compliance	⊠ Yes	□ No	☐ Not Applicable	
Criterion 4	Contractor				
Indicator 1	Where contractors a shall provide the req			the MSPO requirements	and
Summary	contractor has been	n informed by estat dence, sighted the la	e management to	under MSPO. Therefore o follow the MSPO star Meeting on 08 th March 2	ndard
	In Compliance	⊠ Yes	□ No	☐ Not Applicable	
Indicator 2	The management sh	nall provide evidence	e of agreed contra	acts with the contractor.	
Summary	the Contract Agreem	nent between estate led on 01.01.2019.	with Tang Man K	in K'lapa Bali Estate, sig ong Lorry Transport Sdr paid 30 days after the e	Bhd



	In Compliance	\boxtimes	Yes			No			Not Applica	ble
Indicator 3	The management s a physical inspection				pprov	ed auc	litors to	verify	assessment	ts through
Summary	Both estates were 19 th June 2019 - 20 which have been a qualified MSPO aud verify through a ph) th Jun ccepte litor. <i>I</i>	ne 2019 ed addi As per a	. Sighte ress to N agreed,	d aud 1r. Lir the co	it plan n Ban ompan	dated 1 Aik, (Di y accept	11 th Ju irecto t the (une 2019 (3 rd r). All the au GGC MSPO A	d Revised) ditors are
	In Compliance	\boxtimes	Yes			No			Not Applica	ble
Indicator 4	The management s to the tasks perforr contractor for each	ned by	y the co	ontracto	r, by c	heckin				
Summary	Estate verified the contractors. Estate during site visit, the wear the PPE during the state of the present the pr	also ne wo	inspect	the co	ntract ith OS	or's w	orkers. uiremer	As pe	er interviewe	d and also
	In Compliance	\boxtimes	Yes			No			Not Applica	able
2.7 Principl	le 7 : Developmen	t of n	ew pla	anting						
Criterion 1 Indicator 1	Oil palm shall not be in compliance with	e plar	nted on	land wit	th higl	h biodi	versity v	value	unless it is c	arried out
Summary	There were no new it is not applicable (HSYR & CGSB).									
	In Compliance		Yes			No			Not Appli	cable
Indicator 2	No conversion of E Peninsular Malaysia Unit under the Saba new planting or rep 500ha but above 1	a's Na ah For olantir	tional F est Ma ng of ar	Physical nageme n area 5	Plan (nt Lice 00ha	(NPP) a ense A or mor	and the greeme e requi	Saba nt. Fo res ar	h Forest Mar or Sabah and o EIA. For are	nagement Sarawak, eas below
Summary	There were no new it is not applicable (HSYR & CGSB).									
	In Compliance	[☐ Ye	S		No			Not Appli	cable
		_	= 0 6							

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Criterion 2 Indicator 1	Peat land New planting and repl MPOB guidelines on p							er
Summary	At this moment, there applicable for Heah Sec CGSB).			•	_		•	
	In Compliance		Yes		No		Not Applicable	
Criterion 3	Social and Environn	nenta	l Impac	t Assess	ment (SEIA)		
Indicator 1	A comprehensive and be conducted prior to e						act assessment sha	dl
Summary	There were no new plait is not applicable for (HSYR & CGSB).							
	In Compliance		Yes		No		Not Applicable	
Indicator 2	SEIAs shall include pr as per national and s external stakeholders.							
Summary	There were no new plait is not applicable for (HSYR & CGSB).							
	In Compliance		Yes		No		Not Applicable	
Indicator 3	The results of the SEIA operational procedures							nd
Summary	There were no new plait is not applicable for (HSYR & CGSB).							
	In Compliance		Yes		No		Not Applicable	
Indicator 4	Where the development estates, the impacts a managed should be implemented, monitored	and in docur	nplication nented a	s of how and a pla	v each	scheme or	small estate is to b	ре
Summary	There were no new plait is not applicable Hea & CGSB).	_		_				-
	In Compliance		Yes		No	\boxtimes	Not Applicable	

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Criterion 4	Soil and topograph	nic info	ormatio	n					
Indicator 1	Information on soil ty land for oil palm cultive	•	all be a	dequate to	estab	lish the long	-term suital	oility of the	
Summary	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB).								
	In Compliance		Yes		No		Not App	icable	
Indicator 2	Topographic informa programmes, drainag								
Summary	There were no new Thus, it is not applica Sdn Bhd (HSYR & CG	able for							
	In Compliance		Yes		No		Not App	licable	
Criterion 5 Indicator 1	Planting on steep to Extensive planting or permitted by local, st	n steep	terrain,	marginal			all be avoid	ded unless	
Summary	There were no new pit is not applicable for (HSYR & CGSB).								
	In Compliance		Yes		No		Not App	icable	
Indicator 2	Where planting on fra implemented to prote significantly increase	ect ther	m and t	o minimiz	e adve	rse impacts	(e.g. hydro		
Summary	There were no new pit is not applicable for (HSYR & CGSB).								
	In Compliance		Yes		No	\boxtimes	Not Appli	cable	
Indicator 3	Marginal and fragile identified prior to con			ng excess	sive gra	adients and	peat soils	, shall be	
Summary	There were no new pit is not applicable for (HSYR & CGSB).	_		_			-		
	In Compliance		Yes		No		Not Appl	icable	



Criterion 6 Indicator 1	Customary land 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 Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB).								
	In Compliance	Yes	☐ No						
Indicator 2	Where new plantings of plans and operations sl			are acceptable, management					
Summary				nd with high biodiversity. dn Bhd & Charming Green Sdn					
	In Compliance	Yes	☐ No						
Indicator 3		the transfer of	rights and of pa	Is have been taken-over, the ayment or provision of agreed					
Summary				nd with high biodiversity. dn Bhd & Charming Green Sdn					
	In Compliance	Yes	☐ No	$oxed{oxed}$ Not Applicable					
Indicator 4		uishment of rig		npensated for any agreed land eir free prior informed consent					
Summary	•			nd with high biodiversity. Thus, hd & Charming Green Sdn Bhd					
	In Compliance	Yes	☐ No	$oxed{oxed}$ Not Applicable					
Indicator 5	Identification and assed	essment of leg	gal and recognis	sed customary rights shall be					
Summary	-			nd with high biodiversity. dn Bhd & Charming Green Sdn					
	In Compliance	Yes	☐ No	Not Applicable					

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Indicator 6	A system for identif distributing fair compo			ntion and for calculating and nplemented.					
Summary	There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB).								
	In Compliance	Yes	☐ No						
Indicator 7	The process and outo publicly available.	come of any comp	ensation claims s	hall be documented and made					
Summary				d with high biodiversity. Thus, d & Charming Green Sdn Bhd					
	In Compliance	Yes	☐ No	Not Applicable					
Indicator 8	Communities that ha be given opportunitie			r plantation expansion should elopment.					
Summary	•			d with high biodiversity. Thus, d & Charming Green Sdn Bhd					
	In Compliance	Yes	☐ No						
2.8 Detail	•	☐ Yes	□ No	Not Applicable					
2.8 Detail	In Compliance s of Audit Findings	☐ Yes	□ No	⊠ Not Applicable					
2.8 Detail Details Non-C	s of Audit Findings	☐ Yes	□ No	Not Applicable					
	s of Audit Findings onformity	☐ Yes	□ No	Not Applicable					
Details Non-C - See Append	s of Audit Findings onformity ix B -	☐ Yes	□ No	Not Applicable					
Details Non-C - See Append Details of Are	s of Audit Findings Conformity ix B -	☐ Yes	□ No	Not Applicable					
Details Non-C - See Append	s of Audit Findings Conformity ix B -	☐ Yes	□ No	Not Applicable					
Details Non-C - See Append Details of Are - See Append	s of Audit Findings Conformity ix B - a of Concern ix B -		□ No	Not Applicable					
Details Non-C - See Append Details of Are - See Append Details of Not	s of Audit Findings conformity ix B - a of Concern ix B -	ngs							
Details Non-Co-See Append Details of Are - See Append Details of Not 1) The I	s of Audit Findings conformity ix B - a of Concern ix B - eworthy / Positive Finding	ngs		Not Applicable ystem by adopting continuous					
Details Non-C - See Append Details of Are - See Append Details of Not 1) The r impro 2) The 6	s of Audit Findings conformity ix B - a of Concern ix B - eworthy / Positive Finding management is highly every by the second of	ngs committed to col	mply the MSPO so	ystem by adopting continuous ring the entire audit process.					
Details Non-Co-See Append Details of Are - See Append Details of Not 1) The rimpro 2) The e 3) Signa	s of Audit Findings conformity ix B - a of Concern ix B - eworthy / Positive Finding management is highly every programs. estate management has ges throughout office,	ngs committed to condemonstrated ful chemical area a	mply the MSPO so	ystem by adopting continuous					
Details Non-Co - See Append Details of Are - See Append Details of Not 1) The re impro 2) The e 3) Signa appro 4) Good	s of Audit Findings conformity ix B - a of Concern ix B - eworthy / Positive Finding management is highly every by the second of	ngs committed to condemonstrated full chemical area and the process. Intained with surro	mply the MSPO soly commitment dund in the field situnding smallholde	ystem by adopting continuous ring the entire audit process. es, effectively maintained and rs and villages.					

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Appendix A: Audit Plan

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
18 th June 2019	TBA	Travelling from Ampang, Selangor to Slim River, Perak.	MS	AS/WMA
19 th June 2019	08:00 - 09:00	 Centralize Opening Meeting at Ladang K'lapa Bali Estate: Presentation by the manager/coordinator Presentation by Lead Auditor Confirmation of assessment scope and finalize Audit plan 	MS	AS/WMA
	09:00 – 13:00	 ▶ Document Audit: • 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. 	MS	AS/WMA
	10:30 – 12:30	 Estate inspection: Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MS	AS/WMA
	13:00 - 14:00	> Lunch/Rest	MS	AS/WMA
	14:00 – 16:00	 Continue document review Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	AS/WMA
	16:00 - 17:00	Verify any outstanding issues, auditor discussion and end of audit for day.	MS	AS/WMA

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
20 th June 2019	09:00 – 13:00	 Sungei Chinoh Estate ➤ Document Audit: • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and 	MS	AS/WMA

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		records, payment records, complaint records, workers records, training records, permits, CIP, etc.		
	10:30 - 12:30	 Estate inspection: Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MS	AS/WMA
		Centralize Stakeholder Consultation	MS	AS/WMA
	13:00 – 14:00	> Lunch/Rest	MS	AS/WMA
	14:00 – 15:00	 Continue document review Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	AS/WMA
	15:00 – 16:00	Verify any outstanding issues and auditor discussion.	MS	AS/WMA
	16:00 – 17:00	 Centralize Closing Meeting at Sungei Chinoh Estate: Chaired by the audit Lead Auditor Welcome and introduction by the Lead Auditor Presentation of findings by the audit team Questions & answers and Final summary by Lead Auditor End of assessment 	MS	AS/WMA
21 st June 2019	TBA	 Travelling back from Slim River, Perak to Ampang, Selangor. 	MS	AS/WMA

Appendix B: Non-Conformity details

Non-Conformities Identified During This Audit							
Major Nonconformities: Non-was raised during this audit.							
.,							
Minor Nonconfor	mities:	Non-was	raised dur	ng this a	udit.		
Area of Concern:		The follow	wing NC's	were rais	ed for this	audit.	
		Heah Seok Ye	ong Realty	Sdn Bhd	& Charm	ing Green Sdn Bho	d
Company Name		(HSYR & CGSE	3)				
Stage of Audit		Initial Stage 1			Initial S	tage 2	
Stage of Addit		Surveillance			Recertifi		
		Part 3: Gene	eral Princi	oles for	Oil Paln	n Plantations and	d Organized
Audited Standard		Smallholders			· · · · · · · · · · · · · · · · · · ·		. o.g
Client Number		GGC-Q1-MSPC	0-2019				
NC No. / Ref.	Q1/MSPO/A	OC/01	Date Det	ected		20 th June 2019	
Site(s) concern	K'lapa Bali Estate & Tar Sungei Chinoh Estate			ompleti	on	-	
Normative	4.3.1.1 Area	a of Concern	I			<u>I</u>	
Reference and							
Requirement		ns are in comp Il laws and regu		n the app	olicable lo	cal, state, nationa	I and ratified
NC Type	☐ Major	Minor	. 🖂 А	rea of Co	ncern		
	Мајог			ica oi cc	, icciii		
Description of Non-Conformity	Hectare sta	ted on MPOB Li	icense diffe	erent tha	n the plan	ted hectare	
NC Objective Evid	ence:						
As per interviewed v	with MPOR C	Officers the MD	OR Licence	should	ho doclare	ad with the planter	d hectare As
evidence, sighted:	With thi OD C	meers, the m	OD LICCIIC	. Srioulu	be acciaire	sa with the plantet	a ficetare. As
Es	Ha as per MF	a as per MPOB License Planted Ha					
K'lapa Bali Estate					,272.00		
Sungei Ch	1,155	5.00	1	,170.00			
Lead Auditor Sign	ature:		Cli	ent Sign	ature:		
·				1	_		
()				7/			





Company Name		Heah Seok Yeong Realty Sdn Bhd & Charming Green Sdn Bhd (HSYR & CGSB)						
Stage of Audit		Initial Stage 1				Initial S	tage 2	
		Surveillance				Recertifi	cation	
Audited Standard		Part 3: Gene Smallholders	art 3: General Principles for Oil Palm Plantations and Organize mallholders					
Client Number		GGC-Q1-MSPC)-2019					
NC No. / Ref.	Q1/MSPO/A	AOC/02	Date De	tecte	ed		20 th June	2019
Site(s) concern	Sungei Chir	noh Estate	Target C	Comp	letio	on	-	
Normative Reference and Requirement	4.6.3.2 Area of Concern All contracts shall be fair, legal and transparent and agreed payments shall be made timely manner.						all be made in	
NC Type	☐ Major	Minor		Area d	of Co	ncern		
Description of Non-Conformity	No evidence is available during th			udit.				
NC Objective Evidence:								
Estate has been paid to the contractors within 30 days after the contractors send their invoices. However, there is no clear statement in work order between estate and their contractors for duration of payment after completion of work.								
Lead Auditor Signature:			Cli	ent S	Sign	ature:		
Com.				Ŋ		-		



Appendix C: List of Stakeholders Contacted

Attendance List

Internal Stakeholders

- 1) K'lapa Bali Estate and Sungei Chinoh Estate management team and staff
- 2) Gender Committee Representatives
- 3) Male and Female workers
- 4) Workers Representatives
- 5) Foreign Workers Representatives

External Stakeholders

- 1) Mr. Kanasan A/L Sellamuthu LKB
- 2) Mr. Ellengsewaran A/L Gopal LSC
- 3) Mr. Anbualagan A/L Subramaniam Temple
- 4) Mr. Karanjit Signh Randana Syarikat Cahaya Muda
- 5) Mr. Mohd Radzi bin Shamsul LHDN
- 6) Mrs. Aina Farini binti Abdan LHDN
- 7) Mr. Nasarudin bin Abd Hamid JPJ
- 8) Ms. Maizura binti Amat Kaulan Jabatan Hutan
- 9) Mr. Gopi A/L Balakrishnan Kg. Baru Trolak
- 10) Mr. Mohd Syukri MPOB
- 11) Mr. Mohamad Azizul MPOB
- 12) Mrs. Ong Poh Hoon LKB Shop
- 13) Mr. C. Ramakrishnan BRB
- 14) Mr. Yue Chee Seong YUE
- 15) Mr. Too Chee Wei KLK Tg. Malim POM

