

GLOBAL GATEWAY CERTIFICATIONS

MALAYSIAN SUSTAINABLE PALM OIL (MSPO)

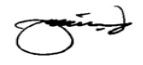


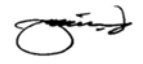

CERTIFICATION AUDIT REPORT

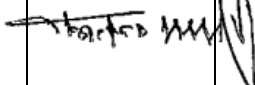
Part 3 : General Principles for Oil Palm Plantations and Organized Smallholders

Raub Mining & Development Co. Sdn Bhd

-Group Certification-

MAIN ASSESSMENT AUDIT 18th March 2019

Revision History					
Rev	Date	Description	Performed by	Role	Signature
A	17/04/19	Issued as Draft Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
A	26/04/19	Peer Review 1 Comments	Remi bin Rasidi	Peer Reviewer 1	
A	26/04/19	Peer Review 2 Comments	Mohd Zuhaili bin Mukri	Peer Reviewer 2	
B	27/04/19	Issued as Final Report	Muhammad Syafiq bin Abd Razak	Lead Auditor	
B	30/04/19	Final Report Approved	Muhd Jamalul Arif bin Hamid	Certifier	

Acknowledgment by Raub Mining & Development Co. Sdn Bhd					
Rev	Date	Description	Management Representative	Role	Signature
B	30/04/19	Acceptance of the contents	K.S.K Lachumenan	Estate Manager	

Declaration

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

WITH INTEGRITY WE SERVE



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Table of Contents

SECTION I : PUBLIC SUMMARY REPORT	3
1.1 Certification Scope	3
1.2 Company details and Contact information.....	3
1.3 Certification Unit.....	3
1.4 Map Showing Geographical Location	4
1.5 Production Area, Actual and Projected FFB Production (MT)	5
1.6 Certificate Details.....	6
1.7 Qualification of the Lead Assessor and Assessment Team.....	7
1.8 Audit Methodology	8
1.9 Audit Plan Information	8
1.10 Audit Result Summary Findings	8
1.11 Stakeholder Consultation.....	9
1.12 Recommendation	12
1.13 Date of Next Surveillance Audit.....	12
1.14 Confidentiality	12
1.15 Abbreviations Used	12
SECTION II : ASSESSMENT FINDINGS BY PRINCIPLES AND CRITERIA.....	14
2.1 Principle 1 : Management commitment and responsibility.....	14
2.2 Principle 2 : Transparency	16
2.3 Principle 3 : Compliance to legal requirements.....	19
2.4 Principle 4 : Social responsibility, health, safety and employment condition	22
2.5 Principle 5 : Environment, natural resources, biodiversity, and ecosystem services	33
2.6 Principle 6 : Best practices.....	41
2.7 Principle 7 : Development of new planting.....	46
2.8 Details of Audit Findings.....	50

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 **Raub Mining & Development Co. Sdn Bhd.** During this **Main Assessment Audit (Stage 2)**, the audit team were briefed by Estate Manager, of the supply base disposition. The estate consists only Raub Mining & Development Co. Sdn Bhd.

This assessment was conducted onsite on **18th March 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	Raub Mining & Development Co. Sdn Bhd
Business Address	Bukit Koman, P.S.12, 27600 Raub, Pahang.
Contact Person	Mr. K.S.K Lachumenan
Office Telephone	+603 355 1200/+603 355 2200
E-Mail	romsb_raub@yahoo.com

1.3 Certification Unit

Name of the Certification Unit

No	Name of the Certification Unit	Site Address	GPS Reference of the site office	
			Longitude	Latitude
1.	Raub Mining & Development Co. Sdn Bhd	Bukit Koman, P.S.12, 27600 Raub, Pahang.	E 101° 51' 15.42"	N 3° 50' 37.20"

MPOB License Information

No	Name of the Site	LICENCE NUMBER	EXPIRY DATE	SCOPE ACTIVITY
1.	Raub Mining & Development Co. Sdn Bhd	501308102000	31.03.2020	Menjual & Mengalih FFB



Others Sustainability Certification

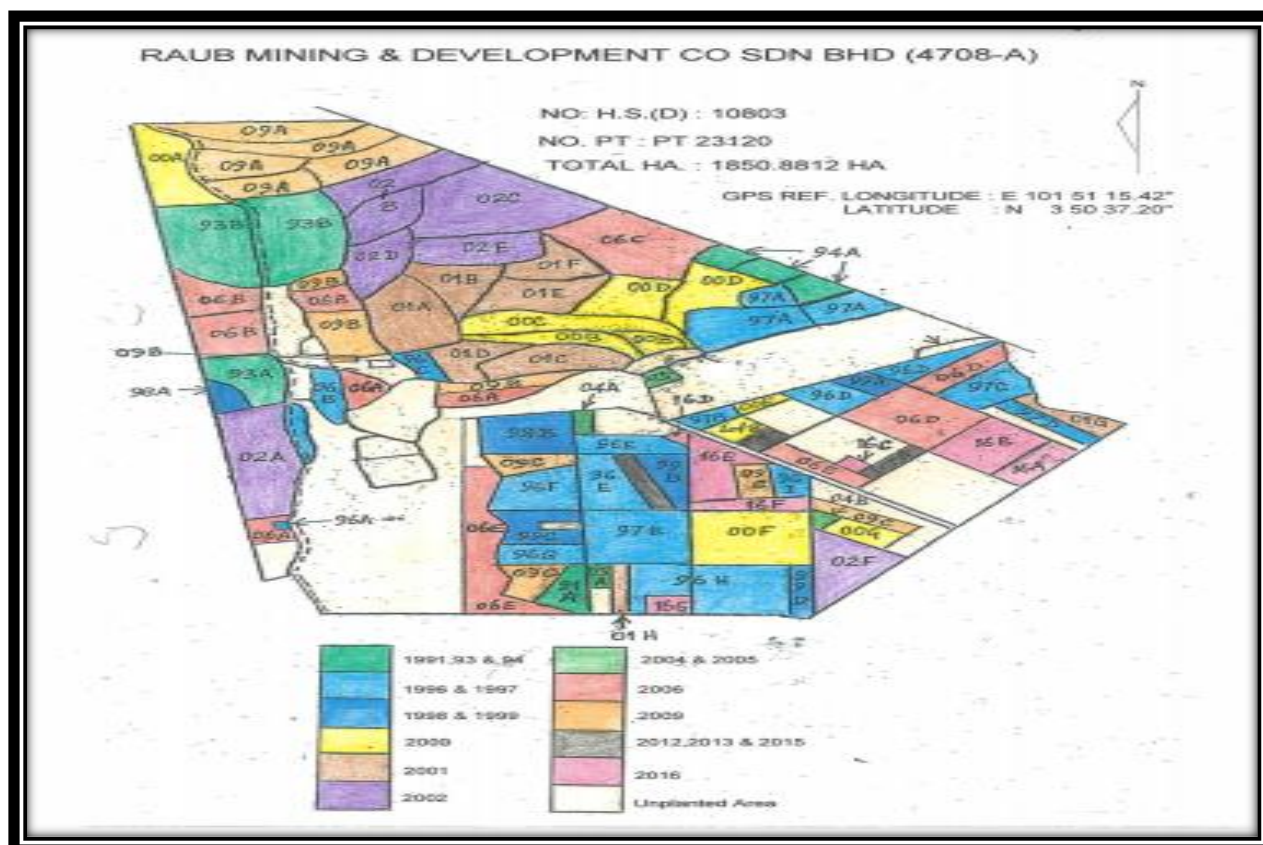
No	Name Of The Site	Others Sustainability Certifications
1.	Raub Mining & Development Co. Sdn Bhd	NIL

1.4 Map Showing Geographical Location

1) Raub Mining & Development Co. Sdn Bhd



2) Raub Mining & Development Co. Sdn Bhd



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

Name of the Certification Unit	Area Summary (HA)		
	Certified Area (per Land Title)	Planted	Mature
Raub Mining & Development Co. Sdn Bhd	1,850.88	1,550.93	1,550.93
Total	1,850.88	1,550.93	1,550.93

Name Of The Supply Base	Area Summary (HA)		
	Conservation Area	HCV	Others
G Raub Mining & Development Co. Sdn Bhd	-	-	-
Total	-	-	-

Name of the Certification Unit	FFB Summary (MT)		
	Projected from last audit	Actual Production for 12 Months [Jan 2018-Oct 2018]	Projected Production for next 12 Months [Oct 2018-Sept 2019]
Raub Mining & Development Co. Sdn Bhd	NIL	19,969.37	21,000.00
Total	NIL	19,969.37	21,000.00

1.6 Certificate Details

Certification body	Global Gateway Certifications Sdn. Bhd., No. 10 Jalan Rasmi 7, Taman Rasmi Jaya, 68000 Ampang, Selangor Darul Ehsan, Malaysia. Tel.: +603 4256 2689; Fax: +603 4256 2687 Website: www.ggc.my
Assessment standard	(MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders
Certificate number	GGC-RMD001-MSPO-00-2019
Initial certificate issued date	30 th April 2019
Certificate expiry date	29 th April 2024
Stage 1 assessment date	18 th January 2019
Stage 2 / Main Assessment	18 th March 2019
Annual Surveillance 1 [ASA 1]	January 2020
Annual Surveillance 2 [ASA 2]	January 2021
Annual Surveillance 3 [ASA 3]	January 2022
Annual Surveillance 4 [ASA 4]	January 2023

1.7 Qualification of the Lead Assessor and Assessment Team

Lead Auditor

Name: **Muhammad Syafiq bin Abd Razak**

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

He is graduated from University of Abertay Dundee, Scotland, UK majoring in PgDip/ MSc Oil and Gas Accounting and also graduated from Universiti Tenaga Nasional, Malaysia with a Bachelor's Degree in Accounting. Prior to joining Shell Business Operation as a Senior Cash Management Executive, he worked with Crowe Horwath as Senior Associate Auditor. He is equipped with experience in audit field, lecturing and accounting. Fully trained in Malaysian Sustainable Palm Oil (MSPO2530), Roundtable Sustainable Palm Oil (RSPO), ISO9001:2015 and ISO37001:2016. Completed and certified MSPO auditor course in year 2018 held by SGS Academy and ISO9001:2015 auditor course in year 2017 by TOMC.

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

Auditor

Name: **Mohamad Fitri bin Mustafa**

Graduate in degree of agribusiness with more than 8 years working experience in various plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Involved in ISCC and MSPO auditing since September 2017. Qualified as Lead Auditor/Auditor for MSPO, RSPO and ISO 9001. Completed and certified MSPO Auditor course in 2018 held by SGS (M) Sdn Bhd. Member of GGC MSPO audit team.

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

1.8 Audit Methodology

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

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	18 th March 2019
Name of site(s) visited	Raub Mining & Development Co. Sdn Bhd
Total number of man-days spent	3 man-days

1.10 Audit Result Summary Findings

Category	Numbers	Status (Closed/Open/Not Applicable/No Action Requires)
Major Nonconformities	0	No action requires
Minor Nonconformities	2	Open (Next Surveillance Audit)
Area of Concern	1	No action requires
Noteworthy /Positive Comments	6	No action requires

1.11 Stakeholder Consultation

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

GGC has published the public notification on 15th February 2019 and as to accommodate a stakeholders' consultation meeting for mill and estate. Therefore, it was conducted on 18/03/2019-19/03/2019 in Raub Mining & Development Co. Sdn Bhd and Raub Oil Mill Sdn Bhd 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.	All stakeholders	<ul style="list-style-type: none"> They aware and have good understanding about MSPO. They have good relationship with the management. 	No action requires	Positive findings
2.	Stakeholders A (Government Agency)	<ul style="list-style-type: none"> They are always invited by company to participate in stakeholder meeting annually. They have good understanding about MSPO. They have good understanding about complaint and grievance mechanism. 	No action requires	Positive findings
2.	Stakeholders B (Contractors)	<ul style="list-style-type: none"> They have good understanding about MSPO. He is clear that if he employs a worker, he has to officially inform estate 	No action requires	Positive findings

		<p>management. He also knows the working hours, minimum salary, Socso & EPF (for local workers) that has to be paid as he has been briefed in the Stakeholders meeting.</p> <ul style="list-style-type: none"> • They informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work. • They were aware that any complaints or suggestions could be forwarded to the mill/estate management. • He is very happy with the management and hopes to continue his contract for a long time. • The company has good relation with supplier and there is no issue with company's performance. 		
3	Stakeholders C (Supplier)	<ul style="list-style-type: none"> • Informed that the payment was made promptly. • The contract agreement with the management is fair and transparent. • The company has good relation with supplier and there is no issue with company's performance • He has good understanding about complaint and grievance mechanism. 	No action requires	Positive findings
4.	Stakeholder D (Neighbouring Estate)	<ul style="list-style-type: none"> • They have good relationship with the management. • There is no conflict ever happened with mill & estate. 	No action requires	Positive findings
5.	Stakeholders E (Estate - Gender Committee Representatives)	<ul style="list-style-type: none"> • There was no discrimination, sexual harassment or violence case reported thus far. • The Management is quite supportive on the Committee activities. 	No action requires	Positive findings



6.	Stakeholders F (Sprayers Gang)	<ul style="list-style-type: none"> • They have good understanding about MSPO. • They have good understanding about complaint and grievance mechanism. • PPE given by company – free. • They were treated equally with no discrimination based on gender. • They claimed that the management provides good living quarters with proper domestic waste collection and promptly attend to quarters repairs. • They confirmed wages are being paid more than the Minimum Wage Order 2018 of RM1, 100.00 per month and understand all the deductions being made. 	No action requires	Positive findings
7.	Stakeholders G (Harvesting Gang)	<ul style="list-style-type: none"> • Good understanding about MSPO. • They are very happy with the management and hopes to extend their contract. • They have good understanding about complaint and grievance mechanism. • PPE given by company – free. • They claimed that the management provides good living quarters with proper domestic waste collection and promptly attend to quarters repairs. • They confirmed wages are being paid more than the Minimum Wage Order 2018 of RM1, 100.00 per month and no issue on wages received as well as the deductions made. 	No action requires	Positive findings

1.12 Recommendation

The company has established sustainability policy, objectives and procedures that define an effective system for the administration and control of sustainability management system throughout all operation activities of Raub Mining and Development Co. Sdn Bhd. 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 2 minor non-conformities and 1 area of concern has been raised to the facility that being audited.

Since the audit objectives as mentioned in the audit plan have been achieved and assessment resulted 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 Raub Mining & Development Co. Sdn Bhd.

1.13 Date of Next Surveillance Audit

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

1.14 Confidentiality

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

1.15 Abbreviations Used

BOD	Biological Oxygen Demand
CHRA	Chemical Health & Risk Assessment
CIP	Continuous Improvement Plan
COD	Chemical Oxygen Demand
CoP	Code of Practise
CSPO	Certified Sustainable Palm Oil
CPO	Crude Palm Oil
CSPK	Certified Sustainable Palm Kernel
DOE	Department of Environmental
DOSH	Department of Occupational Safety and Health Malaysia
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
FFB	Fresh Fruit Bunch
FGS	Finished Good Stock

GAP	Good Agriculture Practise
GHG	Greenhouse Gas
GGC	Global Gateway Certifications Sdn Bhd
HIRARC	Hazard Identification, Risk Assessment and Risk Control
ISCC	International Sustainability & Carbon Certification
IPM	Integrated Pest Management
MPOB	Malaysian Palm Oil Board
MPOCC	Malaysian Palm Oil Certification Council
MSPO	Malaysian Sustainable Palm Oil
NCR	Non-Conformance Report
NGO	Non-Government Organization
OHS	Occupational Health & Safety
OHSAS	Occupational Health and Safety Assessment Series
PK	Palm Kernel
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
SEIA	Social Environmental Impact Assessment
SOP	Standard Operating
SPO	Sludge Palm Oil



SECTION II : ASSESSMENT FINDINGS BY PRINCIPLES AND CRITERIA

2.1 Principle 1 : Management commitment and responsibility

Criterion 1 Malaysian Sustainable Palm Oil (MSPO) Policy

Indicator 1 A policy for the implementation of MSPO shall be established.

Summary Company has established MSPO Policy signed and approved by Mr. Tai Swe Chong (General Manager) date on 1st August 2018.

As evidence, sighted latest MSPO Policy Training on 11th March 2019 at RMDC Office. Conducted by Mr. Nathan Gunasekaran (Estate Assistant Manager) and attended by 80 participants.

During interview with the staff and workers, they are aware regarding the MSPO Policy and the implementation of the MSPO and able to answer the interviewer's question.

In Compliance **Yes** No Not Applicable

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

Summary Company has established MSPO Policy signed and approved by Mr. Tai Swe Chong (General Manager) date on 1st August 2018.

Stated on the MSPO Policy; "To continuously improve our operations in line with social, environmental and economic aspects".

In Compliance **Yes** No Not Applicable

Criterion 2 Internal audit

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

Summary Internal audit will be conducted once in a year as per stated on MSPO Procedure; Internal Audit; Doc No. MSPO-01; Rev: 1.0, dated 08th January 2019.

Internal audit procedure was made available Flowchart of internal audit were available [pg. 3 of 4].

Sighted the RMDC Internal Audit plan for year 2018 prepared by Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

In Compliance **Yes** No Not Applicable

Indicator 2 The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.

Summary Company has established MSPO Procedure; Internal Audit; Doc No. MSPO-01; Rev: 1.0, dated 08th January 2019. Prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager).

Latest internal audit conducted on 03rd January 2019 – 05th January 2019 by Mr. Naavin A/L Muthu Krishnan (Mill Engineer) and Mr. Uma Shankar A/L Balakrishnan (Mill Manager).

Internal audit report was prepared by Mr. Naavin A/L Muthu Krishnan (Mill Engineer) and Mr. Uma Shankar A/L Balakrishnan (Mill Manager). 13 Minor NC were identified, all root cause was available and documented, sighted in audit checklist.

In Compliance **Yes** No Not Applicable

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

Summary The internal audit conducted by Mr Naavin A/L Muthu Krishnan (Mill Engineer) and Mr. Uma Shankar A/L Balakrishnan (Mill Manager). The findings were documented in the Internal Audit Findings Summary.

The internal audit report was documented and made available for management review. As evidence, all findings of the internal audit have been covered in management review. The status of the correction and preventive actions are being discuss and reviewed.

In Compliance **Yes** No Not Applicable

Criterion 3 Management review

Indicator 1 The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.

Summary Management review meeting was conducted on 10th January 2019. Management review meeting (MRM) report were made available prepared by Mr. Nathan Gunasekaran and approved by Mr. K.S.K Lachumenan.

Conducted at Raub Oil Mill Meeting Room. Attended by All RMDC Management (Manager, Asst. Manager, Office Admin and Field Staff. Sighted attendance record and photographs, and attended by 7 respective staffs.

In Compliance **Yes** No Not Applicable

Criterion 4 Continual improvement

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

Summary Continuous plan for year 2019 was verified by Mr. K.S.K Lachumenan, Estate Manager and approved by Mr Tai Swe Chong, General Manager on 10th January 2019.



As evidence, on social:

- Issues: Housing repairs for staffs & workers
- Objective: To ensure workers have comfortable accommodation and clean environment.
- Improvement Plan: To carry out repairs stage by stage according estate budget
- Monitoring: Line site monitoring checklist
- PIC: Estate Manager/Assistant Manager/Supervisor

In Compliance **Yes** No Not Applicable

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

Summary There is no new application of new technology implemented during the certification period. The current practices continued and guide by Mr. Tai Swe Chong (General Manager).

In Compliance **Yes** No Not Applicable

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

Summary Trainings were conducted for the introduction and implementation of any new information or technology that is feasible and applicable to the company.

In Compliance **Yes** No Not Applicable

2.2 Principle 2 : Transparency

Criterion 1 Transparency of information and documents relevant to MSPO requirements

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

Summary Company has established the Stakeholder Communication & Consultation Procedure. Ref No: MSPO-03; Rev 1.0; Date 01/12/2018.

The purpose of this procedure is to outline the arrangements for consultation and communication by Raub Mining & Development Co. Sdn Bhd with its relevant stakeholders and how their concerns and views are addressed.

Sighted stakeholders' meeting with:

- Dated on 29th November 2018. Briefing to Government Agency and Suppliers. Attended by 16 participants.

In Compliance **Yes** No Not Applicable

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

Summary As per interviewed with Mr. K.S.K Lachumenan (Estate Manager), some of the documents publicly available and some of the documents need to get permission from HQ level.

In Compliance **Yes** No Not Applicable

Criterion 2 Transparent method of communication and consultation

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

Summary Company has established the Stakeholder Communication & Consultation Procedure. Ref No: MSPO-03; Rev 1.0; Date 01/12/2018.

The purpose of this procedure is to outline the arrangements for consultation and communication by Raub Mining & Development Co. Sdn Bhd with its relevant stakeholders and how their concerns and views are addressed.

Stakeholder meeting was conducted together with the mill management on 29.11.2018. The meeting was chaired by the Mill Manager and attended by 24 participants.

In Compliance **Yes** No Not Applicable

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

Summary Sighted an appointment letter of Mr. Dayanidi A/L Maciappan (Staffs) as person in charge for stakeholder matters. The letter dated 01st November 2018, signed by Mr. K.S.K Lachumenan (Estate Manager).

In Compliance **Yes** No Not Applicable

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

Summary Sighted latest list of stakeholders on 02nd January 2019. Prepared by Ms. Chiew Yan Fern (Admin Assistant), Reviewed by by Mr. Nathan Gunasegaran (Estate Assistant Manager) and Approved by Mr. K.S.K Lachumenan (Estate Manager).

In Compliance **Yes** No Not Applicable

Criterion 3 Traceability

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



Summary Company has established the Traceability Procedure. Ref No: MSPO-06; Rev 1.0; Date 01/11/2018, prepared by Mr. Nathan Gunasekaran, approved by Mr. K.S.K Lachumenan.

- 1) Harvesting:
Field: Lot 20A
Mandore: Borhan Bin Osman
Checked: JR Kalai
Verified: Nathan Gunasekaran
- 2) Transport to Mill:
Verified: Jegan Shanmugan (AM)
Driver: Isnani
Tractor: WGM781
- 3) Weighbridge:
WB Tick: P555752
Date: 18/03/2019
Vehicle: WGM781
DO No: 00190
Nett WT: 6120 kg

In Compliance **Yes** No Not Applicable

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

Summary Infield collection recorded on daily basis. Sighted the daily bunch record, delivery notes to the mill, grading chit, and weighbridge ticket were prepared, checked and verified by the respective person in charge. As evidence:

- 1) Harvesting:
Field: Lot 20A
Mandore: Borhan Bin Osman
Checked: JR Kalai
Verified: Nathan Gunasekaran

In Compliance **Yes** No Not Applicable

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

Summary Estate management has assigned 1 personnel as person in charge to maintain and implement traceability system, Mr. Nathan Gunasekaran (Estate Assistant Manager). Sighted the appointment letter for him dated on 01st November 2018 which was signed by Mr. K.S.K Lachumenan (Estate Manager).

In Compliance **Yes** No Not Applicable

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

Summary All delivery or transportation of FFB's was properly maintained by the estate management.

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. The legal register is prepared by Mr. Nathan Gunasekaran, Asst Manager Estate.

Updated list of applicable laws and regulations that are applicable for Raub Mining Co. Dev Sdn Bhd. Summary of list of amendments

Legal Register Sighted – Acts updated are as follows:

- Minimum Wage Order (Amendment) 2018
- EPF Act 1991, Sec 43(1A) Min Statutory Rate for employees above 60 yrs old
- Employees Social Security Act 1969 - EIS

Sighted lists of permits/licenses which has been monitored and updated periodically includes:

1. MPOB licenses No. 501308102000 expiry 31.03.2020 [1,550.93 Ha].
2. Permit Barang Kawalan Berjadual - "Diesel – Bekalan daripada pemborong berlesen" – 9,100 Liters. Permit No C015416. KPDNKK REF: KPDNKK.PHG.RUB.600-5/4/151. [Valid till 30th May 2019].
3. Akta Levi Keuntungan Luar Biasa 1998, Certificate of Registration [No. 000477] effective from 15th July 2008.
4. Fire Extinguisher, expires on 6th June 2019 & 23rd October 2019.
5. Medical Surveillance (Clinic Chung) – expires on Dec'19.
6. CHRA (by Occumed Consultancy & Services S/B) – expires on 20th August 2023.

However, one minor non-conformity has been raised to the estate. As per site visit, no signage was displayed on the diesel tank as per "Panduan Permohonan Permit Untuk Membeli Barang-Barang Kawalan Berjadual Di Bawah Peraturan-Peraturan Kawalan Bekalan 1974".

In Compliance Yes **No** Not Applicable

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

Summary Sighted updated list of applicable laws and regulations that are applicable for the estate. The list is fully covered the requirements that related to MSPO compliance. These documents include information on legal requirements, environmental, general and other requirements.

In Compliance **Yes** No Not Applicable

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

Summary As per interviewed with Mr. Nathan, RMDC Asst Manager, he will update any new amendments or any regulations once received through the communication with internal department, legal register, communication with law/enforcement officers.

In Compliance **Yes** No Not Applicable

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

Summary Seen appointment letter of Mr. Nathan Gunasegaran, MSPO Legalistic Liaison Cum OSHA Officer, dated 1st November 2018, approved by Mr. K.S.K Lachumenan, Estate Manager.

In Compliance **Yes** No Not Applicable

Criterion 2 Land use rights

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

Summary Estate has a valid land title indicating correct land title terms which specifies the purpose of the planting of the oil in the respective land. As sighted, the Raub Mining & Development Co. Sdn Bhd is planted only for "Tanaman Kelapa Sawit Sahaja".

In Compliance **Yes** No Not Applicable

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

Summary Estate demonstrated legal ownership of their land by having legal land titles to the land. The copy of land titles are kept in the estate office. Evidence of annual payment of quit rent the state government is available in the form of receipts.

In Compliance **Yes** No Not Applicable

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

Summary No legal perimeter boundary markers were available and maintained. However, management has taken initiative by engaging with surveyor [Vintech Geomatics]. Sighted letter of contract memorandum form. Commencement date: 15th January 2019 and completion date: 31st July 2019, signed by Sr. lai F.L. Mervin and agreed by Mr. Nathan Gunasekaran and Mr. K.S.K Lachumenan. Seen quotation dated 12th January 2019 [Ref: VG/31152/Q1].

As per interview with Mr. Nathan, Asst Manager, they have engaged Vintech Geomatics to perform perimeter boundary work, and seen the contract agreement between Vintech Geomatics and Raub Mining Development Co. Sdn Bhd dated 15th January 2019.

During Stage 2 audit, seen Draft Map of perimeter boundary by Kemas CSJJ Sdn Bhd. Expected to complete by 31st July 2019.

In Compliance **Yes** No Not Applicable

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

Summary Seen Negotiation Procedure Free, Prior and Informed Consent (FPIC) in file P4. Grievance Procedure for Land Owner Issue is made available by the management. No disputes have been recorded in estate area.

There is no evidence of conflict present in this estate. There is no violence in instigated violence in maintaining peace because company has a clear procedure for land conflict.

During interview with stakeholders, no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported.

In Compliance **Yes** No Not Applicable

Criterion 3 Customary rights

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

Summary There is no customary land in or surrounding the estate. There are also no land disputes or claims involving this estate. The company has proper legal land tile for the land ownership.

In Compliance **Yes** No Not Applicable

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



Summary There is no customary land in or surrounding the estate. There are also no land disputes or claims involving this estate. The company has proper legal land tile for the land ownership. Therefore, no maps for recognized customary rights is available.

In Compliance **Yes** No Not Applicable

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

Summary There is no customary land in or surrounding the estate. There are also no land disputes or claims involving this estate. The company has proper legal land tile for the land ownership.

In Compliance **Yes** No Not Applicable

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

Criterion 1 Social impact assessment (SIA)

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

Summary SIA report dated 4th December 2018, prepared by Mr. K.S.K Lachumenan and approved by Mr. Tai Swe Chong.

Social Impact Assessment (SIA) have been identified and external stakeholders meeting conducted dated 29th November 2018 at Bilik Mesyuarat Raub Oil Mill. Seen photograph as evidenced.

13 questionnaires sighted by external stakeholders. Notice to limit speeding has been displayed notice board and briefed to lorry drivers. Seen notice dated 20th August 2018, approved by Mill Manager.

Seen SIA questionnaire, referring to the assessment conducted on 29th November 2018 as below:

- Housing facilities, economic livelihood, religious facilities, health services, educational facilities, communication facilities, transportation, safety, working hours and equal opportunity.

Most satisfied and happy with the factors acknowledge by RMDC, as commented RMDC will maintain the best practices as normal.

In Compliance **Yes** No Not Applicable

Criterion 2 Complaints and grievances

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

Summary Seen complaint procedure, SOP "Prosedur Aduan dan Rungutan", made available in file P4. The form is available at Main Office – "Sudut Aduan", and for housing repair issue is documented in Complaints & Grievances Book.

In Compliance **Yes** No Not Applicable

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

Summary Complaint Form and Complaint Book is made available during the audit. Most complaints refer to housing repairs which action will be taken by estate management.

As sampled:

Complainant: Pn. Valliyammah – Rumah No. 43

Complaint: - Door repair, lamp and sink repair required.

Dated: – 9th February 2019

Action taken: Repair completed and solved on 24th February 2019.

Verified by Estate Manager.

Complainant: Samad – Rumah No. 8, 40, 45 ,46 & 48

Complaint: - Door repair, lock, sink, mirror and ceiling repair required.

Dated: – 9th February 2019

Action taken: Repair completed and solved on 24th February 2019.

Verified by Estate Manager.

In Compliance **Yes** No Not Applicable

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

Summary Complaint Book seen for External and Internal Stakeholders. As per interview with Mr. K.S.K Lachumenan, Estate Manager, complaint and grievances book are available at 'Sudut Aduan' located at RDMC Office.

In Compliance **Yes** No Not Applicable

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

Summary Sighted minute of meeting for external estate stakeholders and also training for the workers.

One area of concern has been raised to the estate. During stakeholders meeting (combine with Raub Oil Mill Sdn Bhd) on 18th March 2019 conducted by Global Gateway Certifications Sdn Bhd, it was observed the stakeholders were not aware that any complaints or suggestions could be forwarded to the estate management.

In Compliance **Yes** No Not Applicable

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

Summary Complaints form and "buku aduan" is made available. Issues is attended and has been resolved in timely manner. All complaints are attended by the Asst. Manager, Clerk and other respective person in charge. All complaint is documented and will be maintained.

In Compliance **Yes** No Not Applicable

Criterion 3 Commitment to contribute to local sustainable development

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

Summary Sighted Corporate Social Responsibilities file and record for Internal and External stakeholders, [CSR Records].

File 4.3: Commitment to contribute to local sustainable development (CSR Records).

- RMDC committed and donated RM450.00 to RMDC and Raub Oil Mill, Muslim workers for Majlis Bacaan Doa Selamat [PV: P16/2-19].
- RMDC committed and donated RM100.00 to PDK, for Sambutan Hari Deepavali Bersama Yogenthiran & Anak-anak Istimewa PDK 2018 [Receipt No. 71709] dated 30th October 2018.

In Compliance **Yes** No Not Applicable

Criterion 4 Employees safety and health

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

Summary Seen OSH Policy "Occupational Health and Safety Policy" approved by the General Manager, Mr. Tai Swe Chong dated 1st August 2018. In file MSPO P1. OSH Plan sighted with specific objective for the Financial Year.

In Compliance **Yes** No Not Applicable

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

- a) A safety and health policy, which is communicated and implemented.
- b) The risks of all operations shall be assessed and documented.
- c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:
 - i) all employees involved shall be adequately trained on safe working practices; and
 - ii) all precautions attached to products shall be properly observed and applied.
- d) The management shall provide the appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).
- e) The management shall establish Standard Operating Procedure for handling of



chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.

f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.

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

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

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

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

Summary

Seen OSH Policy "Occupational Health and Safety Policy" approved by the General Manager, Mr. Tai Swe Chong dated 1st August 2018.

HIRARC file seen and to verify the risks of all operations in Stage 2 Audit. No. of HIRARC listed is 38.

Estate has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training 2018 file. Annual Safety and Health Program for the year 2019 was made available.

Training	Date	Remarks (Evidence)
Safety and Health Committee Meeting	8/1/19 & 9/1/19	Photographs and Attendance list Sighted
Workplace Inspection	17/1/19	Photographs and Attendance list Sighted
"Prosedur Kerja Selamat Penuaian Buah Sawit	11/3/19	Photographs and Attendance list sighted (20 staff/workers participated)
Prosedur Kerja Selamat Pengendalian & Penyelenggaraan PPE	30/1/19	Conducted at Kongsi RMDC Photographs and Attendance list sighted (20 staff/workers participated)

PPE issuance and replacement record seen. Training "Prosedur Kerja Selamat Pemakaian PPE Secara Betul", dated 13th October 2018. Sighted PPE issuance and replacement record for the year 2019. Each worker requires to sign the Borang Pemberian Alat Pelindung Diri (Individu) to confirm on the acceptance of receiving PPE. PPE training conducted on 30th January 2019 by Mr. Nathan & Mr. Jegan, Asst Manager RMDC.



SOP Chemical Handling is available [Estate Safe Operating Procedures] Rev.: 1.0 dated 1st November 2018. Latihan Prosedur Kerja Selamat Penyembur Racun. Dated 26th February 2019 at Kongsi RMDC & F4. Sighted photographs of training conducted. Attendance record made available (involved by sprayers, assistant, conductor, mandora, tractor driver – 26 workers participated). Materials of training is available and relevant to the safety procedures of the related training,

CHRA were made available during audit. CHRA were made available during audit dated 21st August 2018 and next CHRA will be on 21st August 2023 by OCCUMED Consultancy & Services Sdn Bhd, Dr. Yazriza Bin Yahaya MD.Pg Doh [JKKP IH 127/171-2(08)]. Verified Form F, no assessment done prior to this. Form F: No assessment made prior to this.

Safety officer (Appointment letter). The person in charge Mr. K.S.K Lachumenan, AJK of OSH Committee approved by Mr. Tai Swee Chong. Letter of appointment dated 5th September 2018. Latest OSH Meeting 13th February 2019.

ERP (Emergency response plan) include the emergency contact number, Emergency Respond Plan Procedure and exit routes in file and notice board is available. Housing quarters, workshops, chemical store, post-guards, schedule waste store. Seen Emergency Response Team Chart headed by Mr. K.S. Lachumenan. Pelan Tindakan Kecemasan (PTK) sighted for Chemical Sprayers, General Workers and supervisor – last updated on 1st November 2018.

First aid kit (Training) were sighted in annual training programme year 2018. First Aid, CPR & AED Training dated 8 & 9th January 2019 by CERT ACADEMY. Sighted attendance record, attended by 22 participants.

Estate has sent JKKP 8 (I & II)/(IV) on annually basis to the DOSH. LTA calculation based on local interpretation from DOSH.

However, one minor non conformity has been raised to the estate. Details as per below:

1. During site visit, one of the workers did not wear the proper PPE provided by the management.
2. RMDC registered under MyKKP on 18th January 2019 via <http://mykkp.dosh.gov.my>. As details of Registration No.: PH/19/04/133659. Application was submitted on 7th January 2019. However, no submission has been made prior to this application. As per Guidelines on Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease) Regulations 2004. [NADOPOD]
[CHART 1: WHAT AN EMPLOYER MUST DO IN THE CASE OF AN ACCIDENT, DANGEROUS OCCURRENCE, OCCUPATIONAL POISONING OR OCCUPATIONAL DISEASE] – Submit this register to DOSH HQ before 31st January of each year.

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 Seen policy "Polisi Kemasyarakatan dan Hak Asasi Manusia" dated 1st August 2018 approved by Mr. Tai Swe Chong.

In Compliance **Yes** No Not Applicable

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

Summary The documented social policy as specified above outlined the company's commitment to provide fair treatment to the workers without any discrimination in term of race, gender, nationality and position.

All workers enjoy the same scale of pay and provided with equal housing and work facilities. This was confirmed though interview with workers/staff from the Estate. Also, through verification of contracts of service and pay slips of workers.

In Compliance **Yes** No Not Applicable

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

Summary 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 National Wages Consultative Council Act 2011 (Act 732), 'Minimum Wages Order 2018'. Malaysian minimum salary is RM1, 100 (peninsular) as stated in the guidelines.

In Compliance **Yes** No Not Applicable

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

Summary RMDC maintains all contractors' documents including contract agreement, workers payslips is made available during audit. As sighted:

- Anandhan Enterprise – Contract Harvesting & EFB Transport
 - Contract dated: 1st January 2019



- Form D dated 26th September 2017
- Employee name: Navasilan a/l Muniandy (810130-02-5789)

February 2019		
Gaji	22 days	RM1,881.00
		RM1,881.00
<u>Deduction:</u>		
KWSP		RM207.00
PERKESO		RM9.25
SIP		RM3.70
Net Salary		RM1,661.05

- Employee name: Devlius Fahik, Indonesia (AT923080)

February 2019		
Gaji	21 days	RM1,200.00
		RM1,200.00
<u>Deduction:</u>		
		-
Net Salary		RM1,200.00

Woon Yee Kem – Contract harvesting

- Contract dated: 1st January 2019
- Employee name: Bambang, Indonesia (CO970565)

February 2019		
Gaji	42.8 ton	RM1,284.00
		RM1,284.00
<u>Deduction:</u>		
		-
Net Salary		RM1,284.00

In Compliance **Yes** No Not Applicable

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

Summary Personal file of employees was sighted. Registration Card of each workers sighted, consist of details of employee particulars.

Contract agreement sighted and made available during audit. All details (name, gender, date of birth, date of entry, job description, wage and period of employment information available as evidence of individual existence.

Sighted contract agreement as below:

1. Mangin [Passport No.: AU041634]



Period of employment: 2 years
Dated: 1st January 2019

2. Rahman Jaelani [Passport No.: B2591875]
Period of employment: 2 years
Dated: 1st January 2019
3. Ahmad Zumaidi Bin Mursiah [980326-06-5135]
Period of employment: 2 years
Dated: 2nd January 2019

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 All workers enjoy the same scale of pay and provided with equal housing and work facilities. Seen contract of employment, signed by the employee and employer.

Each employee is provided with the copy of contract agreement, and as per interview with Ms. Chew all staff/workers required to sign acknowledgment form upon receipt.

In Compliance **Yes** No Not Applicable

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

Summary Working hours is 8 hours (7.30 am – 2.30 pm). From Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law. Checkroll is used to record the attendance of workers. Mandore will take the attendance during on site and report to office before and after working hours.

Sighted checkroll for spraying (w.e.f: Jan 2017 – March 2019), Harvesting (w.e.f: Dec 2018 – March 2019)

Harvesting activity have Daily Infield Collection Report to record the working period start and end on daily basis. Infosys System is used to record the attendance and publish the payslips for staff/workers.

In Compliance **Yes** No Not Applicable

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



Summary Sighted gazette public holidays 2018 displayed on notice board. Working hours is 8 hours (7.30 am – 2.30 pm). From Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law. Seen working hours sign board displayed in Main Office entrance.

In Compliance **Yes** No Not Applicable

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

Summary Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker.

Salary slips was made available, shows the deduction of workers as per the contract agreement signed by employee and employers. All deduction was made based on the agreed terms with the rate and hours worked. Sighted salary slips of:

- Nasrudin [Passport No.: AU382397], February 2019
- Sabandi [Passport No.: AU442150], February 2019

In Compliance **Yes** No Not Applicable

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

Summary All workers have been provided with medical and accident insurance. With regards to local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations.

Workers provided with accommodation with basic amenities. Workers provided with benefits of:

- Free medical provided by RMDC through Public Hospital and selected panel doctor.
- Upon completion of 2 years working, employer will bare the cost of travelling back to country of origin.
- Free housing with no any deduction

With regards to local workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations.

In Compliance **Yes** No Not Applicable

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

Summary All workers are provided with housing facilities at workers linesite. Seen linesite inspection checklist monitored by Mr. Nathan Gunasekaran on weekly basis. Checklist linesite was made available at Konsi A&B. Last linesite visit was done on 25th February 2019, 5th March 2019, 12th March 2019.



As sampled:

- Action taken – emergency assembly signboard displayed at both Kongsii, zero burning and genset only applicable at Kongsii B only.

In Compliance **Yes** No Not Applicable

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

Summary Seen Social and Human Rights Policy, approved by Mr. Tai Swe Chong, General Manager dated 1st August 2018. Sighted "Prosedur Aduan Gangguan Seksual".

Seen appointment letter of AJK Gender Committee (Women), Ms. Chiew Yan Fern, dated 20th September 2018 approved by Mr. Uma Shankar B., Mill Manager. Combined together with Mill Management.

As interviewed staff (Ms. Nabilah – Lab attendant) attends meeting 6 months once and discussed issue more on sexual harassment, issues in workplace area and working condition. Seen organizational chart of gender committee, last date review: 1st September 2019.

Meeting minutes is made available, (Last meeting conducted on 19th September 2018 at Conference Room (attended by 12 staff/worker). Meeting minutes is made available as discussing on MSPO requirements, ways of protection from sexual harassment, prepared by Pn. Vanitha and approved by Mr. Uma Shankar. Photographs sighted in File No.33 [Sexual Harrassment]. Procedure "Aduan Gangguan Seksual" is available. Sighted Aktiviti Hari Keluarga ANjuran Jawatankuasa Perundingan Wanita dated 21st October 2018, photographs available.

In Compliance **Yes** No Not Applicable

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

Summary Seen policy on "Polisi Kemasyarakatan dan Hak Asasi Manusia" dated 1st August 2018, approved by Mr. Tai Swe Chong, General Manager. The gender committee is formed in Estate management.

Workers are given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions.

In Compliance **Yes** No Not Applicable



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

Summary As per "Social and Human Rights Policy", no children below ages of 18 working in the Estate and this was proven through checking the list of employees. The workers were clear that no one below 18 years old should be employed. As per interview with Mr. K.S. Latchumanan, Estate Manager, the management ensure no children and young person are employed.

In Compliance **Yes** No Not Applicable

Criterion 6 Training and competency

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

Summary As per SOP "Training & Competency Procedure, Doc. No: MSPO-10, Rev. No: 1.0, dated 1st November 2018. Training programme for the year 2018 & 2019 were sighted in File 4.4 Employees Health and Safety Records.

Training	Date	Remarks (Evidence)
Safety and Health Committee Meeting	8/1/19 & 9/1/19	Photographs and Attendance list Sighted
Workplace Inspection	17/1/19	Photographs and Attendance list Sighted
"Prosedur Kerja Selamat Penuaian Buah Sawit	11/3/19	Photographs and Attendance list sighted (20 staff/workers participated)
Prosedur Kerja Selamat Pengendalian & Penyelenggaraan PPE	30/1/19	Conducted at Kongsi RMDC Photographs and Attendance list sighted (20 staff/workers participated)
MSPO Policy Training	11/3/19	Conducted at RMDC office, seen photographs and attendance record.
Complaint & Grievance Procedure Training	11/3/19	Conducted at RMDC office, seen photographs and attendance record.
SOP – Emergency Response Plan training	13/3/19	Conducted at Kongsi Pekerja B, seen photographs and attendance record.

In Compliance **Yes** No Not Applicable



Indicator 2 Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.

Summary Training needs and training plan for the staff and workers. The estate has a comprehensive annual training plan for the Staffs and Workers and this was sighted in File 4.6 Training and Competency file.

Seen training need analysis (TNA) for the year 2019, prepared by Mr. S. Jegan dated on 2nd January 2019 for all staff/workers in RMDC. In total training needs has been scheduled for 109 workers (including contract workers).

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. The estate has a comprehensive Training Needs Analysis for staffs and workers and this was sighted in the training records file.

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

In Compliance **Yes** No Not Applicable

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

Criterion 1 Environmental management plan

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

Summary Sighted the "Environmental Policy". Established on 1st August 2018 which was approved by Mr. Tai Swe Chong (General Manager). The policy is written in Bahasa and English language. The policy has been communicated to all workers.

Company has established the Environmental Management Plan (EMP) Procedure. Ref No: MSPO-06; Rev 1.0; Date 01/11/2018.

The estate environmental impact assessment and management plan year 2018 has covered processes such as site clearing, construction of roads and establishment of base camp, domestic waste from workers line site and office site, oil leakage from tractors/lorries.

As evidence, sighted environmental policy training on 22nd November 2018 for spraying gang. Attended by 18 participants. Conducted by Mr. Nathan Gunasekaran.



In Compliance **Yes** No Not Applicable

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

Summary Sighted the "Environmental Policy". Established on 1st August 2018 which was approved by Mr Tai Swe Chong (General Manager). The policy is written in Bahasa and English language. The policy has been communicated to all workers.

Company has established the Environmental Management Plan (EMP) Procedure. Ref No: MSPO-06; Rev 1.0; Date 01/11/2018.

The estate environmental impact assessment and management plan year 2018 has covered processes such as site clearing, construction of roads and establishment of base camp, domestic waste from workers line site and office site, oil leakage from tractors/lorries.

In Compliance **Yes** No Not Applicable

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

Summary Company has established the Environmental Management Plan (EMP) Procedure. Ref No: MSPO-06; Rev 1.0; Date 01/11/2018.

Sighted the Environmental Management Plan (EMP) for estate. Dated on 1st November 2018. Prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager).

In Compliance **Yes** No Not Applicable

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

Summary The estate has a program to identify all activities / aspects of the estate that have impact to the environment. The document was prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager).

In Compliance **Yes** No Not Applicable

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

Summary Sighted the training program and records for all workers on MSPO requirement prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager).

In Compliance **Yes** No Not Applicable

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

Summary The estate has conducted regular meeting with their staffs and workers to discuss issues related to environment. Sighted the meeting was conducted on 21st November 2018. Attended by 14 participants.

In Compliance **Yes** No Not Applicable

Criterion 2 Efficiency of energy use and use of renewable energy

Indicator 1 Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.

Summary A monthly record on energy consumption for both renewable and non-renewable sources were also maintained documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel.

In Compliance **Yes** No Not Applicable

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

Summary The projection consumption of diesel for all estates visited has been documented on annual basis based on the financial year with the latest available is for year 2018. The estate also was compiled the contractor diesel consumption for 2018 and 2019.

It was monitored to optimize use of renewable energy. Data was compiled for comparison and control for future improvement.

In Compliance **Yes** No Not Applicable

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

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

In Compliance **Yes** No Not Applicable

Criterion 3 Waste management and disposal

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

Summary Company has established the Waste Management Procedure. Ref No: MSPO-05; Rev 1.0; Date 01/11/2018. The estate has established the list of waste identified 1st November 2018 by Mr. Nathan Gunasekaran (Estate Assistant Manager). The items described as below:

- a. Spent lubricant oil
- b. Spent lubricant oil with water mixture.
- c. Used batteries.
- d. Chemical contaminated sundry items.
- e. Used plastics, old glass bottles, old newspapers, cigarette butts & cigarette packets.
- f. Scrap irons and metals
- g. Etc

In Compliance **Yes** No Not Applicable

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

Summary Sighted the Environmental Management Plan (EMP) for estate. Dated on 1st November 2018. Prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager).

Waste has been identified and monitoring plan has been established to reduce pollution to the environment.

Type of waste: Domestic Waste

Item description: Used plastics, old glass bottles, old newspapers, cigarette butts & cigarette packets.

Location: Workers line-site and office.

Action to be taken:

- Established a systematic collection of garbage/domestic waste
- Create awareness on hygiene
- Monitoring of workers line-site and office site via Line-site Inspection Checklist

Sighted the record of FFB application used by the estate management. As for January 2019, the estate has applied up to 128.98 mt of EFB.

In Compliance **Yes** No Not Applicable

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



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

Summary Company has established the Prosedur Kerja Selamat Operasi Perladangan, for Chemical Handling, dated on 01.11.2018, prepared by Mr. Nathan Gunasekaran, verified by Mr. K.S.K Lachumenan, and approved by Mr. Tai Swee Chong. Stated on SOP No 5 – No 10.

- No. 5 Penyimpanan dan Pengurusan Stor Bahan Kimia
- No 6 Pembancuh Bahan Kimia
- No 7 Pengangkutan Bahan Kimia
- No 8 Penyemburan Racun
- No 9 Pengurusan Bekas Bahan Kimia Kosong
- No 10 Mengutip Tong Bahan Kimia Kosong

Sighted a document, Inventory of Scheduled Wastes, which was submitted by the estate management to DOE, for month of February 2019.

File Ref No : AS:C11/123/000/132
Inventory No : 2018122115L4BBIF22019
Premise : Raub Mining & Development Co. Sdn Bhd.
Month : February
Waste : SW102 Used Battery
SW305 Used Lubricant
SW410 Contaminated PPE & Filters.

In Compliance **Yes** No Not Applicable

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

Summary As per interviewed, the chemical containers were been triple rinsed and punctured to prevent contamination of water source or to human health.

The other empty containers generated from estate are send to G-Planter for disposed. Scheduled waste was disposed in accordance with scheduled waste requirements and regulation. As per interviewed, others SW are disposed by DOE approved contractor.

In Compliance **Yes** No Not Applicable

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

Summary Domestic waste for housing area and office site is managed by a contractor, Mido Recycle. Sighted the contract agreement between the contractor and estate management. According to the contract agreement, Mido Recycle provides the big bin for housing area. As per schedule, the contractor agreed to collect the waste twice a month.

In Compliance **Yes** No Not Applicable

Criterion 4 Reduction of pollution and emission including greenhouse gas

Indicator 1 An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.

Summary The assessment of polluting activities is 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 Calculation for Raub Mining & Development Co. Sdn Bhd year 2018 using GHG Emissions Calculation Methods, ISCC 11-01-14, v1.16.

In Compliance **Yes** No Not Applicable

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

Summary The action plan to reduce identified significant pollutants and emissions are included in the environmental management plan. The action plans include:
 a. To follow agronomist recommendation on fertilizer application.
 b. To ensure regular maintenance (changing exhaust filter of the vehicle involved).

In Compliance **Yes** No Not Applicable

Criterion 5 Natural water resources

Indicator 1 The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:
 a) Assessment of water usage and sources of supply.
 b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.
 c) Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).
 d) Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.
 e) Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.
 f) Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.



Summary The water source for Raub Mining & Development Co. Sdn Bhd is from Pengurusan Air Pahang Berhad. Sighted thru the site visit, the Sungai Bukit Koman crossing the estate compound.

As per stated in the Water Management Plan, the water analyses will be conducted on quarterly basis. Latest water sampling was done on 13.02.2019.

Estate has monitored the water consumption on monthly basis. Sighted the application of EFB in the estate for the month of January 2019. The estate has used EFB up to 128.98 mt.

Buffer zone has been implemented alongside the Sungai Bukit Koman. The natural vegetation within and along the riparian areas were adequately monitored. Sighted the signage and vegetation at the side.

In Compliance **Yes** No Not Applicable

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

Summary During site visit, no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.

In Compliance **Yes** No Not Applicable

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

Summary Water harvesting is implemented in various ways such as retention of water in the field such as road side drains.

In Compliance **Yes** No Not Applicable

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

Indicator 1 Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:
 a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.
 b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.

Summary Company has established the Rare, Threatened, Endangered & High Biodiversity Management Procedure. Ref No: MSPO-07; Rev 1.0; Date 01/11/2018.



3 high biodiversity value habitats have been identified by the estate management, which are:

- Sungai Bukit Koman
- Surau & Indian Temple.
- Rare, threatened and endangered species.

Sighted the High Biodiversity Monitoring Sheet which will be updated on incident basis. Latest update was done on 24 – 27/02/2019.

During the site assessment, the HCV signage are observed. The signage is deemed sufficiently displaced to inform workers/stakeholders regarding the protected areas.

In Compliance **Yes** No Not Applicable

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

Summary The estate has established the HBV management, dated on 01.11.2018, prepared by Mr. Gunasekaran and approved by Mr. K.S.K Lachimenan. The plant covers as follows:

- Discourage all wild life hunting within the estate compound.
- To conduct training and educate the workers on the importance of wildlife conservation, good agriculture practices and safe work handling.

The estate management has committed to comply with the regulations set up by the authorities. As per interview with the workers, they are understood with the employer's instruction to not hunting the wildlife.

In Compliance **Yes** No Not Applicable

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

Summary The Management Plan for HCVs identified within the unit covering the scope, programme, timeframe, management plan as well as person in-charge to execute the plan is available and has been verified during the audit. The plan is also found to be approved by the estate manager.

The estate management has conducted the training for the sprayer gang, dated on 26.02.2019, at Kongsu RMDC & F4. The training was delivered by Mr. Daya, field conductor.

In Compliance **Yes** No Not Applicable

Criterion 7 Zero burning practices

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

Summary Sighted the "Environmental Policy". Established on 1st August 2018 which was approved by Mr. Tai Swe Chong (General Manager). The policy is written in Bahasa and English language. Stated to practice Zero Burning Policy on new planting, replanting except in specific situation.

In Compliance **Yes** No Not Applicable

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

Summary As per interview with Mr. K.S.K Lachumenan (Estate Manager), no special approval needed to do open burning. All replanting activities are using the felling method. The practice is observed during field assessment.

In Compliance **Yes** No Not Applicable

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

Summary As per interview with Mr. K.S.K Lachumenan (Estate Manager), no special approval needed to do open burning. All replanting activities are using the felling method. The practice is observed during field assessment.

In Compliance **Yes** No Not Applicable

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

Summary Open burning in relation to new planting, re-planting or other development is not allowed and this was communicated to all employee and stakeholder. During replanting process, the old palm to be felled, chipped and pulverized and been remained in the field for self-composed.

In Compliance **Yes** No Not Applicable

2.6 Principle 6 : Best practices

Criterion 1 Site management

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

Summary The estate has implemented Good Agriculture Practice (GAP) as seen from visit to the estate and seen from the document and also interviewing the workers.

Estate have 3 types of Manuals-

- 1) Estate Standard Operating Procedure (Best Practice)
- 2) Estate Safe Operating Procedure (Prosedur Kerja Selamat Operasi Perladangan)
- 3) MSPO Procedure (8)

The document was well maintained and implemented.

- 1) Estate Standard Operating Procedure (Best Practice) (19) includes:
 - i. SOP 1 – Land Preparation For Replanting
 - ii. SOP 2 – Replanting
 - iii. SOP 3 – Mechanical Felling, Chipping and Stacking
 - iv. SOP 4 – Lining
 - v. SOP 5 – Planting Density
- 2) Estate Standard Operating Procedure Prosedur Kerja Selamat Operasi Perladangan) (22) includes:
 - i. SOP 1 – Keselamatan di Pejabat
 - ii. SOP 2 – Tingkah Laku Umum Semasa Bekerja
 - iii. SOP 3 – Penunggang Motosikal
 - iv. SOP 4 – Penuaian dan Mengutip Buah Sawit
 - v. SOP 5 – Penyimpanan dan Pengurusan Stor Bahan Kimia
 - vi. SOP 6 – Pembancuh Bahan Kimia
 - vii. SOP 7 – Pengangkutan Bahan Kimia
 - viii. SOP 8 – Penyemburan Racun
 - ix. SOP 9 – Pengurusan Bekas Bahan Kimia Kosong
 - x. SOP 10 – Mengutip Tong Bahan Kimia Kosong
- 3) MSPO Procedure (8) includes:
 - i. SOP 1 – Internal Audit
 - ii. SOP 2 – FFB Traceability
 - iii. SOP 3 – Stakeholders Communication & Consultation

As evidence, sighted the training for

- Penerangan tentang Polisi Syarikat
- Prosedur Kerja Selamat Penuaian Buah Sawit
- Prosedur Kerja Selamat Tingkah Laku Bekerja Secara Umum
- Penerangan Tentang Prosedur Aduan dan Rungutan

on 11th March 2019. Conducted by Mr. Jegan A/L Shanmugam (Estate Assistant Manager). Attended by 80 workers.

In Compliance **Yes** No Not Applicable

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

Summary Sighted Estate Standard Operating Procedure (Best Practice); SOP NO. 10 dated on January 2019 for "Conservation".

Where the terrain is 25 degrees or steeper, oil palm planting not recommended for this area. Estate management only practice and maintain procedure for oil palm planting for the terrains below 25 degrees.

In Compliance **Yes** No Not Applicable

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

Summary The estate has a visual reference system to identify each field or block. Each field has the signboard with block number, year of planting, progeny, number of palms and acre only.

In Compliance **Yes** No Not Applicable

Criterion 2 Economic and financial viability plan

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

Summary Estate had an annual budget for the financial year 2018/2019 – 2020/2021. The estate budget includes the projected FFB, OER, PK and etc production which projected for three years from 2018/2019 until 2020/2021. Sighted documented Business and Management Plan prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager).

In Compliance **Yes** No Not Applicable

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

Summary Sighted replanting programme for the next 3 years as follow for estate;

- Year 2019 = Nil ha
- Year 2020 = Nil ha
- Year 2021 = 349 acres @ 141 ha

In Compliance **Yes** No Not Applicable

Indicator 3 The business or management plan may contain:

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

Summary Estate had an annual budget for the financial year 2018/2019 – 2020/2021. The estate budget includes the projected FFB, OER, PK and etc production which projected for three years from 2018/2019 until 2020/2021.

It also incorporated item such as general charges, estate maintenance, process shift labour, general services, processing cost, fixed assets and etc. Sighted documented Business and Management Plan prepared by Mr. Nathan Gunasekaran (Estate Assistant Manager) and approved by Mr. K.S.K Lachumenan (Estate Manager). As evidence in,

FY	2018/19	2019/20	2020/21
FFB	26,059.00	27,361.95	25,993.85
OER %	19.50	20.00	20.50
KER %	5.00	5.00	5.00
FFB Price	501.66	520.00	540.00

In Compliance **Yes** No Not Applicable

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

Summary The estate performance is recorded in the monthly "Oil Palm Revenue Expenditure" to headquarters. Details on the actual vs budget i.e. Upkeep maintenance, FFB Production, capital expenditure are shown therein.

In Compliance **Yes** No Not Applicable

Criterion 3 Transparent and fair price dealing

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

Summary There is no existing mechanism of determining FFB pricing for the estate as the crops being processed by its own Mill. The company will make an announcement for tender for other services like harvesting, EFB Transport, Tining, Uproot and etc,

For others, pricing mechanism is set thru open tender process. Announcement will be made available to all contractors and they will deliver their quotation to the estate. The contractors have signed an agreement with the estate to provide services. The agreement has detailed the pricing mechanism for the service offered.

In Compliance **Yes** No Not Applicable

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

Summary All contracts are kept in estate office. Sighted the contract Agreement signed by contractor and Raub Mining & Development Co. Sdn Bhd. As evidence, sampled:

- Sighted the Contract Agreement between estate with Woon Yee Kem (Harvesting Contractor) sealed on 01.01.2019
- Sighted the Contract Agreement between estate with All Season Motor (Workshop-Forman) sealed on 01.01.2019
- Sighted the Contract Agreement between estate with Teng Yap Keong (Hire of Back Hoe) sealed on 01.01.2019
- Sighted the Contract Agreement between estate with Mido Recycle (Domestic Waste) sealed on 01.01.2019

Monthly contract payment shall be paid on or before seventh (7) day of the following month.

In Compliance **Yes** No Not Applicable

Criterion 4 Contractor

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

Summary All the contractors are aware that estate will be certified under MSPO. Therefore, the contractor has been informed by estate management to follow the MSPO standard requirement.

In Compliance **Yes** No Not Applicable

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

Summary Sighted all contract includes an agreement signed by contractor and estate manager with term and condition which includes:

- The contractor must understand Raub Mining & Development Co. Sdn Bhd's company policies and adhere to all MSPO requirements that are adopted by the company.
- Monthly contract payment shall be paid on or before seventh (7) day of the following month.

In Compliance **Yes** No Not Applicable

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

Summary The estate was audited by Global Gateway Certifications Sdn Bhd MSPO auditor on 19th March 2019. Sighted audit plan dated 15th March 2019 (2nd Revision) which have been accepted address to Mr. K.S.K Lachumenan (Estate Manager). All the auditors are qualified MSPO auditor. As per agreed, the company accept the GGC MSPO Auditors to verify through a physical inspection if required for audit purposed.



In Compliance **Yes** No Not Applicable

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

Summary Estate verified the work done by the contractors before all the payment paid to the contractors. Estate also inspect the contractor's workers. As per interviewed and also during site visit, the workers aware with OSH requirement. As example, the workers wear the PPE during the work task that given to them.

In Compliance **Yes** No Not Applicable

2.7 Principle 7 : Development of new planting

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

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

Criterion 2 Peat land

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

Summary At this moment, there were no new plantings involving peat area. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

Criterion 3 Social and Environmental Impact Assessment (SEIA)

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

Criterion 4 Soil and topographic information

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

Criterion 5 Planting on steep terrain, marginal and fragile soils

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

Criterion 6 Customary land

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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



Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd..

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

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

Summary There were no new plantings involving forest land or land with high biodiversity. Thus, it is not applicable for Raub Mining & Development Co. Sdn Bhd.

In Compliance Yes No **Not Applicable**

2.8 Details of Audit Findings

Details Non-Conformity

- See Appendix B -

Details of Area of Concern

- See Appendix B -

Details of Noteworthy / Positive Findings

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

Appendix A: Audit Plan

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
17 th March 2019	TBA	➤ Travelling from Ampang, Selangor – Raub, Pahang.	MS	SP/MF
18 th March 2019	08:00 – 09:00	➤ Centralize Opening Meeting at Raub Oil Mill Sdn Bhd: <ul style="list-style-type: none"> • Presentation by the manager/coordinator • Presentation by Lead Auditor. ➤ Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation – where applicable).	MS	SP/MF
	09:00 – 13:00	Raub Oil Mill Sdn Bhd [Mill] <ul style="list-style-type: none"> ➤ Document Audit: <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	SP/MF
	10:30 – 12:30	➤ Centralize Stakeholder Consultation	MS	SP/MF
	13:00 – 14:00	➤ Lunch	MS	SP/MF
	14:00 – 16:00	➤ Continue document review <ul style="list-style-type: none"> • Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. ➤ Mill inspection: <ul style="list-style-type: none"> • Workshop, Laboratory, Environment, OHS, Chemical Stores, Workers Welfare and Interview, Clinic, Landfill, Mill Housing, Schedule Waste, POME and etc. 	MS	SP/MF
	16:00 – 17:00	➤ Verify any outstanding issues, auditor discussion and end of audit for day 1.	MS	SP/MF

AGENDA				
Date	Time	Subjects	Lead Auditor	Auditor
19 th March 2019	08:00 – 13:00	Raub Mining & Development Co. Sdn. Bhd [Estate] <ul style="list-style-type: none"> ➤ Document Audit: 	MS	SP/MF




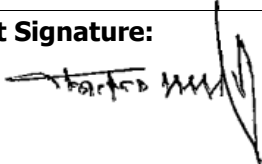
		<ul style="list-style-type: none"> Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 		
	10:30 – 12:30	<ul style="list-style-type: none"> ➤ Estate inspection: Field inspection, boundary inspection, fertilizer application, field spraying, harvesting, workers interview, buffer zone, conservation area, office, workshop, agriculture best practices, chemical store, and pre-mixing, etc. 	MS	SP/MF
	13:00 – 14:00	<ul style="list-style-type: none"> ➤ Lunch 	MS	SP/MF
	14:00 – 15:30	<ul style="list-style-type: none"> ➤ Continue document review Public documents, SOPs, Policies, Internal audit, Production & Supply chain records, FFB pricing, Review on SEIA documents and records, payment records, complaint records, workers records, training records, permits, CIP, etc. 	MS	SP/MF
	15:30 – 16:30	<ul style="list-style-type: none"> ➤ Verify any outstanding issues, auditor discussion and end of audit for day 2. 	MS	SP/MF
	16:30 – 17:30	<ul style="list-style-type: none"> ➤ Centralize Closing Meeting at Raub Mining & Development Co. Sdn. Bhd [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	SP/MF
20 th March 2019	TBA	<ul style="list-style-type: none"> ➤ Travelling back from Raub, Pahang to Ampang, Selangor. 	MS	SP/MF


Appendix B : Non-Conformity details

Non-Conformities Identified During This Audit

Major Nonconformities:	Non-were raised during this audit.
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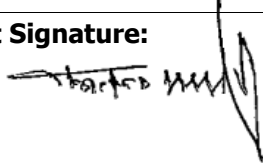
Minor Nonconformities:	The following NC's were raised for this audit.
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Company Name	Raub Mining & Development Co. Sdn Bhd			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC-K1-MSPO-2018			
NC No. / Ref.	K1/MSPO/MINOR/01	Date Detected	19 th March 2019	
Site(s) concern	Raub Mining & Development Co. Sdn Bhd	Target Completion	Next Surveillance Audit	
Normative Reference and Requirement	4.3.1.1 Minor All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			
Description of Non-Conformity	No signage displayed during site visit			
NC Objective Evidence:				
As per site visit, no signage was displayed on the diesel tank as per "Panduan Permohonan Permit Untuk Membeli Barang-Barang Kawalan Berjadual Di Bawah Peraturan-Peraturan Kawalan Bekalan 1974".				
Lead Auditor Signature:		Client Signature:		
				
Root cause Analysis (to be filled by client):				
MSPO Principles is still in progress of learning and implementation especially display signages for diesel tank.				
Corrective action planned (to be filled by client):				

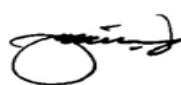
To display signage physically at RMDC diesel tank.	
Preventive Action (to be filled by client):	
Included in the next surveillance audit whether the signage is displayed and practiced effectively.	
Review of corrective/preventive action (to be filled by Lead Auditor)	
The auditor took note the corrective action evidences provided by the company. However, the audit team is off the view that there is a need to further verify the close-out evidences provided during the subsequent audit to confirm the effectiveness of the corrective action that has been implemented for the above non-conformance. The Minor NCR is remained open to be verified during the next visit.	
NC Closed: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site verification: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date Verified: 17 th April 2019	Lead Auditor Signature: 

Company Name	Raub Mining & Development Co. Sdn Bhd			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC/K1/MSPO/2019			
NC No. / Ref.	K1/MSPO/MINOR/02	Date Detected	19 th March 2019	
Site(s) concern	Raub Mining & Development Co. Sdn Bhd	Target Completion	Next Surveillance Audit	
Normative Reference and Requirement	<p>4.4.4.2 Minor</p> <p>The occupational safety and health plan shall cover the following:</p> <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p>			
NC Type	<input type="checkbox"/> Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/> Area of Concern			



Description of Non-Conformity	No submission has been made.
NC Objective Evidence:	
<p>d) PPE issuance and replacement record seen. Training "Prosedur Kerja Selamat Pemakaian PPE Secara Betul", dated 13th October 2018. During site visit, one of the workers did not wear the proper PPE provided by the management.</p> <p>j) RMDC registered under MyKKP on 18th January 2019 via http://mykkp.dosh.gov.my. As details of Registration No.: PH/19/04/133659. Application was submitted on 7th January 2019. However, no submission has been made prior to this application. As per Guidelines on Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease) Regulations 2004. [NADOPOD]</p> <p>- [CHART 1: WHAT AN EMPLOYER MUST DO IN THE CASE OF AN ACCIDENT, DANGEROUS OCCURRENCE, OCCUPATIONAL POISONING OR OCCUPATIONAL DISEASE] – Submit this register to DOSH HQ before 31st January of each year.</p>	
Lead Auditor Signature: 	Client Signature: 
Root cause Analysis (to be filled by client):	
MSPO documentation is still in the process of learning and implementation, specific measures will be implemented for "PPE Usage and maintenance training" and yearly basis NADOPOD submission.	
Corrective action planned (to be filled by client):	
The document the activities into related MSPO Principles files.	
Preventive Action (to be filled by client):	
Included in the next surveillance audit activity weather the documentation is implemented and practised effectively.	
Review of corrective/preventive action (to be filled by Lead Auditor)	
The auditor took note the corrective action evidences provided by the company. However, the audit team is off the view that there is a need to further verify the close-out evidences provided during the subsequent audit to confirm the effectiveness of the corrective action that has been implemented for the above non-conformance. The Minor NCR is remained open to be verified during the next visit.	
NC Closed: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site verification: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



Date Verified: 17 th April 2019	Lead Auditor Signature: 
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Area of Concern:	The following area of concern were raised for this audit.
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Company Name	Raub Mining & Development Co. Sdn Bhd			
Stage of Audit	Initial Stage 1	<input type="checkbox"/>	Initial Stage 2	<input checked="" type="checkbox"/>
	Surveillance	<input type="checkbox"/>	Recertification	<input type="checkbox"/>
Audited Standard	MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders			
Client Number	GGC/K1/MSPO/2019			
NC No. / Ref.	K1/MSPO/AOC/01	Date Detected	19 th March 2019	
Site(s) concern	Raub Mining & Development Co. Sdn Bhd	Target Completion	NIL	
Normative Reference and Requirement	4.4.2.4 Area of Concern Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.			
NC Type	<input type="checkbox"/> Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Area of Concern			
Description of Non-Conformity	Stakeholders and workers still not aware of complaints or suggestion procedure			
NC Objective Evidence: Sighted minute of meeting for external estate stakeholders and also training for the workers. However, during stakeholders meeting (combine with Raub Oil Mill Sdn Bhd) on 18 th March 2019 conducted by Global Gateway Certifications Sdn Bhd, it was observed the stakeholders were not aware that any complaints or suggestions could be forwarded to the estate management.				
Lead Auditor Signature: 		Client Signature: 		

Appendix C : List of Stakeholders Contacted

Attendance List

Internal Stakeholders

- 1) Raub Mining & Development Co. Sdn Bhd management team and staff
- 2) Gender Committee Representatives
- 3) Male and Female workers
- 4) Workers Representatives
- 5) Foreign Workers Representatives
- 6) NUPW

External Stakeholders

- 1) Mr. Chang Tong Chuan - Min Onn Lorry Transport
- 2) Mr. Bendik Luntak – PDRM
- 3) En Andi Awang Mohamad – Perkeso
- 4) En. Muhammad Syuwari Khalid – Perkeso
- 5) En. Ab. Majid bin Abdul Manaf – Security
- 6) En. Muhamad Asyraf bin Azmi – MPOB
- 7) En. Mohamad bin Othman – MIDO
- 8) Mr. K Sugumaran – Contractor
- 9) Mr. Ashok Dewai – Contractor
- 10) En. Mohiuddin Sumon – Contractor
- 11) Mr. Lee Kian Aik – Contractor
- 12) Mr. Teoh Chiou Long – Contractor