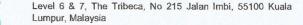


Audit Summary Report

6th Dec 2019

Company name	Garisanemas Plantation Sdn Bhd		
Company Registration Number	223140-M		
Address	Estate:		
	PTD 3327 Batu 26 Sungai Semberong Mukim Kahang, 86700 Kluang Johor.		
	Office:		
	33 Jalan Mutiara Emas, 7/6 Taman Mount Austin,81100 Johor Bahru, Johor.		
Report no	MR3/GEPSB/012/2019		
Standard	MS253O:2013 Part 3 (MSPO)		
Audit type	Main Assessment		
Audit Scope	Cultivation of Oil Palm Fresh Fruit Bunch in Compliance to MSPO MS2530-3:2013		
Number of Mill	-		
Mill Capacity	-		
Number of Estate	1		
Certified Area (Ha)	883.28 Ha		
Telephone	07-351 1692 / 012-7045597		
E-mail	gepsb@yahoo.com		
Fax	07-351 2450		
Website	-		

.







We are proud to be selected as your business partner and thankful for your cooperation and hospitality throughout the assessment. The purpose of this report is to contain all findings captured during the assessment including strengths, opportunities, and weaknesses of your organization to assist you in maintaining best practices and carrying out future improvements. For your acknowledgement, the assessment was done based on sampling method where your records, documentations and practices were subjected to. Therefore, certain areas or processes may not be verified on its compliance against the audit standard. However, we ensure that all necessary actions have been taken to provide assurance on the accuracy of report. This report was prepared in compliance to the ISO 17021:2011 requirements.

To ensure the next assessment will be carried out in compliance to the ISO 17021:2011, kindly immediately notify MR3 Certification International of any significant changes made relevant to your organization as it may impact the validity of your certification. Such circumstances include, changes relating to applicable legal, commercial, organizational status or ownership, organization and management (e.g. key managerial, decision making or technical staff), contact address and sites, scope of operations under the certified management system, and major changes to the management system and processes. Together we will ensure the smoothness of the upcoming assessment. Thank you for your endless support and we look forward to continuing our partnership for many years to come.

	Prepared By	Client's Acceptance
Sign	ON.	Jae -
Name	Afiq Othman	Company Stamp
Date	6/12/2019	GARISANEMAS PLANTATION SDN BHD
Email	afiq@mr3cert.com	(CO. NO. 223140-M) NO. 33, JALAN MUTIARA EMAS 7/6, TAMAN MOUNT AUSTIN, 81100 JOHOR BAHRU, JOHOR. TEL: 07-351 1692 FAX: 07-351 2450



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Section AGeneral Information

General	
Audit objectives	To verify that the system initial implementation is in accordance to requirements of the standard adopted.
	To verify that the system implementation is continuously in accordance to the requirements of the standards adopted.
	To verify that the system implementation is continuously after and in third years of implementation is in accordance to the standards adopted.
	Other, (please specify)
Integrate Assessment	No
Issue of certificate	Yes

Scope of Certification	
Scope of certification in English	Cultivation of Oil Palm Fresh Fruit Bunch in Compliance to MSPO MS2530-3:2013
Requirement not being applicable	Principle 7 of MS2530-3:2013
Justification	The company does not have new planting in place
Other language than above	NA
Changes from Previous registration	No
Extension/changes of scope date	NA

Contact Details	
Management Representative	Mr Tan ChiakLuang
Alternate contacts	-
Management Representative contact no.	012-7234820
E-mail address	gepsb@yahoo.com
Fax Number	07-3512450
Fixed Line Number	07-351 1692 / 012-7045597
Number of Group Member	-



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Section B Previous Audit Result

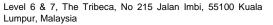
The result of the last audit system have been reviewed, in particular to ensure appropriate correction and corrective action has been implemented to address any non-nonconformity identified. This review has concluded that:

has	concluded that:
	No non-conformityhave been raised during last assessment.
	Any non-conformity identified during last previous audit have been corrected and the corrective action continuous to be effective.
	The management system has not adequately addressed non conformity identified during previous audit activities and the specific issue has been re-defined in the nonconformity section of this report.
Sa	ction C Conclusion
Sei	Stion C Conclusion
	audit team conducted a process based audit focusing on significant aspects/risk objectives required ne standard(s). The audit methodology used is based on 3P which were People, Paper and Practice.
The	audit team concludes and express
□с	ONGRATULATION and has
⊠c	ONGRATULATION however some processes need to address non-compliance(s) but others has
□S the	ORRY and the organization has not established and maintained its management system in line with
red	quirements of the standard and
⊠d€	emonstrated
□no	ot demonstrated
	ability of the system to systematically achieved agreed requirements within the scope of the nizations.

Base on the record, there is/are $\underline{\mathbf{0}}$ unresolved issue(s).

Therefore the audit team recommends that based on the results of this audit, the demonstrated system, state of development and maturity, management system certification for the organization should be:







□G	Granted upon acceptance of the necessary corrective action plan(s) and implementation				
□c	Continued upon acceptance of the necessary corrective action plan(s) and implementation				
□v	/ithheld				
□sı	uspend until satisfactory corrective action(s) is completed				
	Others (please specify)				
Note):				
mus For	every Major Nonconformity raised: Relevant action plan must be submitted to the auditor and in t carried prior to certificate issuance. every Minor Noncorfimity raised: Relevant action plan must be submitted to the auditor be ance and the implementation will be verified durng the next assessment				
Se	ction D (For Re-certification only)				
1	The company has demonstrated effective implementation and maintenance/improvement on its management system	□Yes □No			
2	The internal audit program has been fully implemented and demonstrates its effectiveness as a tool for maintaining and improving the management system.	□Yes □No			
3	The management review process demonstrates its capability to ensure the continuing suitability, adequacy and effectiveness of the management system	□Yes □No			
3	The management review process demonstrates its capability to ensure the continuing suitability, adequacy and effectiveness of the management system	□Yes □No			
4	Throughout the audit process, the management system demonstrates overall conformance with the requirements of the audit standard	□Yes □No			

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Section EAuditor and Auditees Information

MR3 Assessors	Attendance during opening and closing meeting			
Team Leader	Name	Designation		
Afiq Othman (AO)	1. Tan ChiakLuang	Director/ Estate Manager		
Team member	2. Nur Izzati Jaafar	Officer		
-	3. Mas AnidaWakiran	Supervisor		
Trainee auditor	4. Syahira Nadia Supaat	Consultant		
-				
Observer				
-				

MR3 Assessors	Role	Qualification, Education, Working Experience.
Afiq Othman (AO)	Lead Auditor	- MSPO Certified Lead Auditor - BSc. (Hons) Marine Technology - A year experience working in Ministry of Natural Resources and Environment - 5 years experiences working for Sime Darby Plantation Berhad as Sustainability and Quality Management. - More than a year experience working in certification body



Section F Audit Process Matrix

Audit Matrix (legend "⊠" plan to cover & covered, "□" for not applicable)

Planned month & year	Dec	Dec	Dec	Dec	Dec
	2019	2020	2021	2022	2023
Site(s) visited/to be visited	1. GEPS				
	В	В	В	В	В
Internal Audits	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
Stakeholder consultation / survey	\boxtimes				
Use of logo					
Follow-up from previous audit finding		\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.1 Management Commitment & Responsibility					
4.1.1 MSPO Policy	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.1.2 Internal audit	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.1.3 Management Review	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.1.4 Continual Improvement	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.2 Transparency					
4.2.1 Transparency of information and documents relevant to MSPO requirements				\boxtimes	\boxtimes
4.2.2 Transparent method of communication and consultation					
4.2.3 Traceability	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.3 Compliance to legal requirements					
4.3.1 Regulatory requirements	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.3.2 Land use rights	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.3.3 Customary land rights		\boxtimes			



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4.4 Casial yang analisiiti, haaltha asfati, and amplayment annelsing					
4.4 Social responsibility, health, safety and employ	ment condit	ion			
4.4.1 Social impact assessment (SIA)	\boxtimes				\boxtimes
4.4.2 Complaints and grievances	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.4.3 Commitment to contribute to local sustainable development		\boxtimes			\boxtimes
4.4.4 Employees safety and health	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.4.5 Employment conditions	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.4.6 Training and competency	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.5 Environment, natural resources, biodiversity and ecosystem services					
4.5.1 Environmental management plan	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.5.2 Efficiency of energy use and use of renewable energy		\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.5.3 Waste management and disposal	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.5.4 Reduction of pollution and emission including green house gas	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.5.5 Natural water resources	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.5.6 Status of RTE species and high biodiversity value area		\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.5.7 Zero burning practices	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.6 Best Practices					
4.6.1 Mill management	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.6.2 Economic and financial viability plan	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.6.3 Transparent and fair price dealing	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes
4.6.4 Contractor	\boxtimes	\boxtimes	\boxtimes	\boxtimes	\boxtimes

Assessment man days for the next assessment: 2md.Recertification:2024

Note: Recertification should be carry out minimum 2 months prior to the expiry of the certificate



Section G Audit Note

Summary of Area Audited

Auditor	Date	Time
Afiq Othman	4-5 Dec 2019	0800 - 1700

Sampling Methodology

Sampling of the operating units to be audited has been conducted in accordance to the Risk Management (MPOB/MSPO/RMP/06) documents as below:

S = r√n

Risk Factor: Low (1.0)

 $S = 1.0 (\sqrt{1}) = 1$

1.0 estates to be visited

Since this is an individual certification, sampling method is not applicable.

Audit Plan

Date	Time	Assessor	Business area / process	Clause
4 & 5 /	0900	AO	Introduction by client	
11 / 2019			Opening meeting at GEPSB	
	0915	AO	Management commitment & responsibility	4.1
			Transparency	4.2
			Compliance to legal requirement	4.3
			Social responsibility, health, safety & employment condition	4.4
	1230		BREAK	
	1330	AO	Environment, natural resources, biodiversity and ecosystem services	4.5
			Best practices	4.6
			Development of New Planting (if any)	4.7





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		1700	AO	Closing Meeting	
--	--	------	----	-----------------	--

Site's Information

1. Group Background

Garisanemas Plantation Sdn Bhd (GEPSB) estate located at PTD 3327 Batu 26 Sungai Semberong Mukim Kahang, 86700 Kluang Johor. Total area is 900.43ha, total planted area is 883.28ha and total area for unplanted area is 17.15 ha. Date of incorporated is 19 August 1991. The director of GEPSB are Tay Ah Tee @ Tay Hee Peng, Tan Chiak Luang, Lim Boon Kuang, Rogayah Binti Abdullah, Zainudin Hj. Othman, Tan Wee Woon and Salehuddin Bin Hassan.

Estate managed by Mr. Tan Chiak Luang and assisted by Cik Nur Izzati Binti Jaafar and estate supervisor, Mr. Chin Choon Choy. Total workers are 35 peoples, and all workers are Indonesian. FFB were sent to Seong Thye Plantations Sdn Bhd.

2. Site(s) Address List

Estate/ Mill	Location Address	Geo-Coordinate
Garisanemas Plantation Sdn Bhd	PTD 3327 Batu 26 Sungai Semberong Mukim Kahang, 86700 Kluang Johor.	2.2520245,103.4767907

3. MPOB License(s)

Estate/ Mill License Number	Scope of Activity	Expiry Date
Garisanemas Plantation Sdn	Menjual dan mengalih FFB	30/9/2020
Bhd	,	
502947602000		

4. Description of Operating Unit(s)

Estate	FFB Production (MT)		
	Period:		
	Actual last FY	Estimated new FY	
Garisanemas Plantation Sdn	21173.76	23470.00	
Bhd			
Total	21173.76	23470.00	



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5. Area Statement

Estate	Certified/ Titled Area	Plante	d Area	Conservation Area (Ha)	Conservation HCV Area (Ha) Area (Ha)	Others (Ha)	
	(Ha)	Immature Area (Ha) <3 years	Mature Area (Ha) >3 years				
Garisane mas Plantation Sdn Bhd	900.43	1	883.28	0	0	17.15	
Total	900.43	•	883.28	0	0	17.15	

6. Current Certification

Cu	Current Certification (Please tick the certification you are currently certified)				
	ISO 9001		НАССР		
	EMS 14001		RSPO		
	OHSAS 18001		ISCC		
	ISO 22001		GMP Plus		
	HALAL		KOSHER		
	Co-GAP		None / Others:		

Stakeholder Consultation

Stakeholder Details	Stakeholder's Input/ Comment	Client's Feedback/ Response
Mr. Raner Choong Jing Hui (Cadet Planter Seong Thye Ladang Padang)	- Sole buyer of FFB (Seong Thye Ladang Padang POM). 1000 mt - 2000 mt average every month 3 years working in the company - The manager usually communicate with Mr. Tan (GEPSB Estate Manager) - FFB Quality satisfactory - Called upon for stakeholder meeting. Asked about any complaint. Company policies communicated Relationship between the 2 estates is in good term No additional comment	- Noted by the management
Mr. Rahamat Bin	- 30 years living in the village	 Noted by the management
M Amin -	- Current Tok Batin, Yusri Bin Abdullah	- The management is more than
Pengerusi MPKK	- Currently no CSR activity done for	happy to give assistance to the
(Kg Org Asli Sg.	the village	villagers provided they come up



Peroh)	- Some of the villagers working at the estates nearby - The villagers used estate road to river - Suggested for donation to develop the village as Eco-Tourism - Request for machinery for grass cutting - Request for seed link - They welcome the estate to use their facilities for any event		with office	cial request.
	Nonconf	ormity & Observat	ion	
Nonconform During the assessment	nity ent <u>3</u> nonconformities were	e identified.		
NCR No.: GEPS	B-2019-NCR-1	☐ Major		⊠ Minor
Standard:		Indicator:		Status & Due Date:
MSPO MS 2530 – 3: 2013		4.5.2.1		Open (4 th December 2020)
Section 1 - Detai	ils of nonconformity			
Electricity is bein not being monitor	g generated using gener ed accordingly.	ator set. However,	the power	er generation and usage is
Section 2 - Resu	It of investigation and o	determination of ro	ot cause	•
Root Cause:				
	sage of power generation the power produce by the			diesel consumption of the
Section 3 - Correction (if applicable) and corrective action plan including completion date:				
Correction:				
Management will start recording the power generation usage by using kWh consumption for every cycle.				

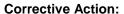


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Corrective Action:				
Management will nominate and appoint a PIC in order to make sure every cycle of the generator				
set in the premise being used to be record	ed in the form.			
NCR No.: GEPSB-2019-NCR-2	☐ Major	Minor Minor		
Standard:	Indicator:	Status & Due Date:		
MSPO MS 2530 – 3: 2013	4.5.2.2	Open (4 th December		
		2020)		
Section 1 - Details of nonconformity				
Baseline value established is being used a usage and petrol were sighted. However, tavailable during the audit.	as estimation for the future unthe estimation for electricity of	sage. Estimation for diesel consumption was not made		
Section 2 - Result of investigation and determination of root cause				
Book Course				
Root Cause:				
Since previously the management only re	·	_		
the premise. Hence, estimation only made	de for diesel usage instead	of with power generation		
(kWh)				
Section 3 - Correction (if applicable) and	d corrective action plan inc	luding completion date:		
Correction:				
Management will record the power consu	mption of generator set and	will set the baseline value		
for the future estimation.				



Management will make sure the PIC will record the power usage of generator set and will established the baseline value to future estimation.



NCR No.: GEPSB-2019-NCR-3	⊠ Major	Minor			
Standard:	Indicator:	Status & Due Date:			
MSPO MS 2530 – 3: 2013	4.5.3.5	Open (4 th March 2020)			
Section 1 - Details of nonconformity					
Upon visiting the landfill, noted that the pesticide container was found dumped in the pesticide container.	location was close to worke he landfill	ers housing area. An empty			
2. Upon visiting the worker housing are domestic waste was found behind Block housing area	ea, observed rubbish scatte A. Also observed several ru	red in vicinity. A hump of ubbish pits dug nearby the			
3. Observed several traces of open burnin	g done at the housing area.				
Section 2 - Result of investigation and	determination of root cause)			
Root Cause:					
1.Management wanted each worker to d	ump their own trash at the	landfill. Hence the location			
was close to the housing area.					
2.Attitude problem where workers show la	ck of awareness of environm	ental cleanliness.			
3.Lack of awareness to the workers regard	ding to the no open burning a	t the premise.			
Section 3 - Correction (if applicable) an	d corrective action plan inc	cluding completion date:			
Correction:					
1. The management has relocated the old		,			
away from the worker's quarters) on 4/12/ the landfill and located at the schedule wa		itainer were taken out from			
2. The management has closed up all the rubbish pit identified nearby the housing and cleared up the found rubbish pit on 4/12/19.					
3.All traces of open burning have been cle	3.All traces of open burning have been cleared up on 4/12/19				
Corrective Action:					
Management has started conducting the st	ne housekeeping 'audit' at th	ne worker's housing area.lt			



will be conducted weekly in order to avoid any unwanted diseases caused by trash as well as focusing on the 'housekeeping/cleanliness' in the checklist. (evidence has been provided dated 11/12/2019).

- 2. Management will organize monthly community works with workers starting year 2020 in order to nurture the importance of cleanliness at housing area. (evidence of Jadual Gotong Royong Bulanan 2020 has been provided).
- 3. 3) A signage of the 'don'ts' has been installed at housing area including no open burning at the housing area on 4/12/19 (pictorial evidence has been provided).

1. Observations

No	Observation Details
•	
1.	4.3.1.1
	BAKAJ License for water abstraction has been applied by the management. The application currently
	being processed by BAKAJ. The completion will be verified in the next audit.
2.	4.3.2.2
	Based on sighted land title HS(D) 46615, observed the "Syarat Syarat Nyata" Solely for "Program Zon
	Pemakanan". The management has taken this matter to YPJ to change the Syarat Syarat Nyata to
	Zon Penanaman Sawit. Currently required documents are being processed by Jurukur Anugerah,
	referred letter issued to Jurukur Anugerah from YPJ dated 17/11/19. The conversion will be verified in
	the next audit
3.	4.4.4.2 (j)
	No accident recorded as of the audit date. JKKP 8 has yet to be submitted. According to the
	management, they they had just successfully registering MYKKP on the day of audit 5/8/19. After
	consulted with JKKP, JKKP instructed to submit starting next year. The submission of 2019 JKKP 8
	will be verified in the next audit.
4.	4.5.3.3
	Upon visiting the estate's SW store, noted the facility is being built at the point of audit. Observed the
	base for the facility has been built together with containment system (bund). The completion will be
	verified in the next audit.
5.	4.5.5.1 (d)
5.	4.5.5.1 (d)



6.

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There is a tributary flowing to Sg. Sembrong within the estate while the main river flowing adjacent to
the estate. Upon visiting the main river adjacent at block 9 observed no trace of chemical activity in
the area. However the width of the buffer zone was not clearly demarcated.
4.6.1.1
Manual sighted only focused on safety element instead of operation element.

Random examples verified:

- 1. The Harvesting SOP does not specify ripe, under ripe, unripe, overipe etc.
- 2. Spraying SOP does not specify on pesticide dosage/ pump, pesticide application/palm etc.
- 3. Fertilizing SOP does not specify on dosage/palm



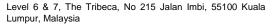
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Section H Audit Findings

P1: Management Commitment & Responsibility

P1: Management Commitment & Responsibility				
P1C1	Malaysian Sustainable Palm Oil (MSPO) Po	licy		
Indicator	Requirement	Compliance	Findings	
¹ I1	A policy for the implementation of MSPO shall be established.	✓ YesNoOFI	Policy sighted namely Polisi Kemampanan. Signed by Director, Mr. Tan Chiak Luang. Dated 16/5/19	
	The policy shall also emphasize commitment to continual improvement.	☑ Yes □ No □ OFI	The policy emphasises on continual improvement "Pihak kami komited kearah penanambahbaikan berterusan"	
12				
P1C2	Internal Audit			
Indicator	Requirement	Compliance	Findings	
1 11	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement	Yes No	Sighted Pelan Audit Dalaman . Proposed date 16/8/19. Internal auditor appointed Shahrizal, Kamarul, Syahira, Farah, Mas Anida and Izzati. Findings: 15 NC, 27 OFI.	
12	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.	✓ Yes □ No □ OFI	SOP sighted namely Prosedur Audit Dalaman GEPSB-SOP-02 dated 15/5/19. The result documented. Based on sampled CAR Forms for NC 1-15, root cause has been analysed and corrective action identified. Corrective actions have been carried out.	
1 3	Report shall be made available to the management for their review.	✓ Yes □ No □ OFI	The report has been presented to the Director on $23/10/19$.	
P1C3	Management Review			
Indicator	Requirement	Compliance	Findings	
Ti	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.	✓ Yes ☐ No ☐ OFI	Management review conducted on 5/11/19. Chaired by the Director, Mr. Tay Ah Tee. The meeting discuss on Internal Audit Findings, Continual Improvement Plan, Expenditure and other matters. The minute meeting was evident.	
P1C4	Continual Improvement			
Indicator	Requirement	Compliance	Findings	
11	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company	☑ Yes □ No □ OFI	Plan sighted "Pelan Penambahbaikan Berterusan" for 2019. Dated 27/11/19. The plan considered the socia and environmental impacts. sample: 1. Pembanterasan makhluk perosak - Old practice empty chemical container were used as barn owl. Currently the management in the midst of changing the barn to more appropriate container 2. Ubah Syarat Nyata Tanah dari Zon Program Pemakanan kepada Kelapa Sawit - YPJ (land leaser) in progress changing the land use term.	
12	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.	☑ Yes ☐ No ☐ OFI	Recently the estate management had a water treatment facility installed on 3/12/19. Previously the estate purchased mineral water for workers consumption. Since the new treatment facility installed, the estate no longer need to purchase mineral water for consumption.	







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13	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.	☑ Yes □ No □ OFI	The water treatment installation was budgeted in 2019 expenses. The facilities will be mantained by the contractor appointed UM Electrical & Engineering Work Sdn Bhd. All necessary recources have been provided by the management.		
P2: Transparency					
P2C1 Indicator	Transparency of information and documen Requirement	ts relevant to N Compliance	15PO requirements Findings		
⁷ 11	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.	▼ Yes □ No □ OFI	To date no evidence of information request by relevant stakeholders. Any request will be recorded into "Borang Pertanyaan" that has been established.		
12	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.	□ Yes □ No ☑ OFI	Relevant information such the company's policies and Complaint and Grievance SOP were only communicated to 5 external stakeholders namely Balai Polis Kahang, Klinik Palani, Ladang Mutiara, Wakil Kampung Org Asli Sg Peroh dan Seong Thye (Buyer). Other external stakeholders were communicated through letter. 23 letters were send out to 23 different external stakeholders.		
P2C2	Transparent method of communication and				
Indicator		Compliance	Findings		
['] I1	Procedures shall be established for consultation and communication with the relevant stakeholders.	☑ Yes □ No □ OFI	Sighted namely Prosedur Rundingan Bersama Pihak Berkepentingan GEPSB-SOP-04 dated 18/11/19.		
12	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.	☑ Yes □ No □ OFI	Available. Appointed Ms. Nur Izzati Binti Jaafar as Pegawai Sosial effective 1/7/19. Appointed by Mr. Tan Chiak Luang		
I3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.	☑ Yes □ No □ OFI	Stakeholder List available. Categorised into Contractors, Vendors, Local Community, Other Interested Parties and Buyer.		
P2C3	Traceability				
Indicator	Requirement	Compliance	Findings		
1 11	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).	✓ Yes No OFI	"Sighted namely Prosedur Kebolehkesanan GEPSB-SOP-08 dated 16/5/19. The SOP explains on responsibility of all personnel involve with FFB movement. The SOP is designed to aid continuous monitoring and less supervision.		
I2	The management shall conduct regular inspections on compliance with the	☑ Yes □ No	Inspection done during Internal Audit. The appointed PIC randomly checked on the implementation.		



I3

established traceability system.

The management should identify and

and maintain the traceability system.

assign suitable employees to implement

Appointed PIC Ms. NurIzzati Binti Jaafar dated

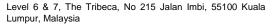
1/7/19. Appointed by the Director.

☐ OFI

✓ Yes

☐ No

☐ OFI





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I4	Records of sales, delivery or transportation of FFB shall be maintained.	✓ Yes No OFI	Records of sales and delivery of FFB are being retained appropriately. Several information being recorded into several record books and chits such as FFB Tonnage by Block Record Book, FFB Despatched Record Book, Weigh Bridge Record Book, Lorry Transporter Record Book
			Sampled:
			1. From FFB Tonnage by Block Record Book, date /11/19, Buyer Song Thye Plantations SB, destination Kahang, Mill Weighbridge Ticket Number 197927, field 8, mill weight 37.3 MT.
			 Estate Weighbridge Ticket Number S0001727, date 29/11/2019, Vehicle No BGW 7448, DO No 29139, weight 37.68 MT, Buyer Song Thye Plantations SB.
			3. Mill Weighbridge Ticket Number 197927, date 29/11/2019, Vehicle No BGW 7448, DO No 29139, weight 37.3 MT
			Sales records evident from Credit Note issued by Song Thye Plantations SB on monthly basis. Sighted for October 19 Credit Note STK/PCN/236.

P3: Compliance to legal requirements

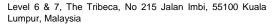
P3C1 Regulatory requirements

P3C1 Regulatory requirements			
Indicator	Requirement	Compliance	Findings
I1	All operations are in compliance with the applicable local, state, national and ratified	☐ Yes	License in posession:
international laws and regulations.	□ No ☑ OFI	1. MPOB License 502947602000 for Menjual dan Mengalih FFB# for 883.28 ha valid thru 30/9/20. 2. Permit Barang Kawalan Berjadual SN: J 036390 for Diesel (19000 liter) valid thru 25/12/19 3. Lesen Pepasangan Persendirian SN: 38344 fro 27 kW valid thru 21/7/20	
			OBS BAKAJ License for water abstraction has been applied by the management. The application currently being processed by BAKAJ. The completion will be verified in the next audit.
12	The management shall list all laws applicable to their operations in a legal requirements register.	☑ Yes □ No □ OFI	List has been developed. The list is categorised into few categories namely General Safety & Health Requirement, Chemical Handling & Exposure, Accident Incident Reporting, Open Burning, Palm Oil, Labor etc.
13	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.	✓ Yes □ No □ OFI	The legal register was updated on 1/11/19 prepared by Mrs. Mas Anida Binti Wakiran. New requirement such as Minimum Wage Order (Amendment) 2018 has been included.
14	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.	✓ Yes □ No □ OFI	PIC, Mrs. Mas Anida Binti Wakiran dated 1/7/19. Appointed by Director.

P3C2	Land	used	riaht
FJCZ	Lanu	useu	HIGHL

Indicator	Requirement	Compliance	Findings
1 11	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.	☑ Yes □ No □ OFI	The plantation owns 2 land titles with no specific syarat nyata. The land is being differentiated either by trenches or fences. During site visit observe the management does not diminish land use right of other users.







12	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.	♥ Yes □ No □ OFI	All 2 land titles were made available during the audit. Total area of all land title was 900.4217 ha. 883.28 ha is planted with OP while the remaining is for building and unplanted area. The land currently being leased from Yayasan Pelajaran Johor. Sampled land titles: 1. HS(D) No 32662, 764.8547 ha 2. HS(D) 46615, 135.567 ha All sighted land titles with Land Use Term: Pertanian OBS Based on sighted land title HS(D) 46615, observed the "Syarat Syarat Nyata" Solely for "Program Zon Pemakanan". The management has taken this matter to YPJ to change the Syarat Syarat Nyata to Zon Penanaman Sawit. Currently required documents are being processed by Jurukur Anugerah, referred letter issued to Jurukur Anugerah from YPJ dated 17/11/19. The conversion will be verified in the next audit Evidences of Quit Rent Payment of 2019 were also made available during the audit. Sampled receipt number from B 0378743 and B 0378742.
13	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	☑ Yes □ No □ OFI	Total of 6 boundary stone were recovered. Sampled 1 of the stones during site visit. Sampled BS coordinates visited: 1. N 02°14.9796', E 103°27.5172'
14	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).	☐ Yes ☐ No ☐ OFI	No land dispute

P3C3	Customary	rights
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	P3C3	Customary rights		
Indica	ator	Requirement	Compliance	Findings
⁷ I1		Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	☑ Yes ☐ No ☐ OFI	No customatry right land within the area
I2		Maps of an appropriate scale showing extent of recognized customary rights shall be made available.	☑ Yes □ No □ OFI	NA
13		Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	YesNoOFI	NA





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P4: Social responsibility, health, safety and employment condition

P4C1 Social impact assessment (SIA)

Indicator	Requirement	Compliance	Findings
7 11	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.	☑ Yes □ No □ OFI	Sighted "Laporan Penilaian Impak Sosial" report dated 3/5/19. From the report, observed 9.0 "Rumusan Analisa SIA". Negative and positive impacts were listed in the action plan. "Pelan Tindakan SIA" was specified to identify further action to be taken by the management to promote the positive impacts and mitigate negative impacts. Sighted the Action Plan. Sampled plans as below: 1. Workers suggested for the management to recruit new workers - The management has appointed several contract workers to ease the burdened of existing workers. 2. Kg Org. Asli Sg Peroh suggested for the estate to install an estate signage to enhance better demarcation of the estate area - Several signages have been installed at few juctions starting from the main road.

P4C2 Complaints and grievances

P4C2	Compiaints and grievances		
Indicator	Requirement	Compliance	Findings
1 11	A system for dealing with complaints and grievances shall be established and documented.	☑ Yes ☐ No ☐ OFI	"SOP GEPSB-SOP-03 has been developed named "Prosedur Aduan". The SOP includes a flowchart for "Prosedur Aduan Am". Also sighted procedure for sexual harrassment complaint named "Prosedur Serangan Gangguan Sexual" GEPSB-SOP-01.
12	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.	✓ Yes No OFI	According to the SOP, the management must resolve all complaints within 14 days.
13	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.	Yes No OFI	^r Complaint form has been established namely "Rekod Aduan & Gangguan Seksual Ditempat Kerja". The complaint form and suggestion box are being made available at the estate office.
14	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.	☑ Yes □ No □ OFI	It has been communicated externally during SIA through questionnaires session. SIA was conducted on 3/5/19. Sighted examples of answered questionnaires by respondents
15	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.	✓ Yes No OFI	In the SOP mentioned that all complaint must be retained for 24 months. However, no complain was recorded at the moment of audit.

P4C3 Commitment to contribute to local sustainable development

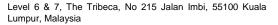
Indicator	Requirement	Compliance	Findings
Ĭ1	Growers should contribute to local	✓ Yes	CSR activity done in 2019:
	development in consultation with the local communities.	□ No □ OFI	1. Sumbangan Zakat perniagaan pada Majlis Agama Islam Negeri Johor dated 9/5/19. This was evident from Zakat Payment Receipt No 0102Z201907719.





P4C4	Employees safety and health		
Indicator	Requirement	Compliance	Findings
11	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.	♥ Yes No OFI	"Safety policy has been established namely "Polisi Keselamatan dan Kesihatan Pekerja" dated 16/5/19 signed by Director, Mr. Tan Chiak Luang. Relevant information such the company's policies and Complaint and Grievance SOP were only communicated to 5 external stakeholders namely Balai Polis Kahang, Klinik Palani, Ladang Mutiara, Wakil Kampung Org Asli SQ Peroh dan Seong Thye (Buyer). Other external stakeholders were communicated through letter. 23 letters were send out to 23 different external stakeholders. Internal communication has been done during "Latihann Keselamatan, Alam Sekitar, Polisi MSPO dan Amalan Terbaik Bagi Ladang" session conducted on 26/9/19. This was evident from Training Report. OSH plan sighetd for 2019. It was integrated with Trainig/Activity Matrix.
I2	The occupational safety and health plan	✓ Yes	The plan sighted above includes:
	shall cover the following: a) A safety and health policy, which is communicated and implemented.	No OFI	a) Policy and Communication as mentioned in 4.4.4.1
	b) The risks of all operations shall be assessed and documented.	☑ Yes □ No □ OFI	HIRARC has been established for all operational activities such as harvesting, pruning, weeding, manuring, machinery maintenance etc. CHRA has been conducted. Report was made available during the audit dated 12/7/19 Ref No. HQ/15/ASS/00/363-2019-047. According to the report, Table D4 (Field Spraying), the management is recommended to engage OHD for medical surveillance on yearly basis. 2 workers namely Muhammad Ridwan Sidik and Akhyar Rosidi were sent for medical surveillance on 27/11/2019 to Poliklinik Intan. However, the results have yet to be reverted by the clinic at the point of audit.
	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 ii) all precautions attached to products shall be properly observed and applied	▼ Yes □ No □ OFI	Training programme has been developed for 2019 integrated with Activities Matrix. The programme called "Training/Activities Matrix - Year 2019" which includes several training covering Safety, Environmental and Social aspects. Planned safety training as below: 1. PPE Training - Sep 19 2. Safe Chemical Handling, Storage, Usage and Disposal - Sep 19 3. Emergency Response Plan - Oct 19 4. First Aid Training - June 19 Actual conducted training: 1. PPE Training - 26/9/19 2. Safe Chemical Handling, Storage, Usage and Disposal - 26/9/19 3. Emergency Response Plan - 31/10/19 4. First Aid Training - 20/6/19 Attendance record was sighted for the sampled training.
	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).	☑ Yes ☐ No ☐ OFI	Sighted "Rekod Pengeluaran Peralatan Perlindungan Diri (PPE) - Baru". The PPE is given based on job task such as Harvesting, Manuring and Spraying. Among provided PPEs are Hard Hat, Safety Shoes, Apron, Mask, Goggle and Glove Upon visiting Harvesting and Loose Fruit picking activity area at Block 18, observed workers were

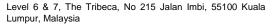




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re) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	☑ Yes ☐ No ☐ OFI	SOP has been established namely Pengurusan Bahan Kimia. GEPSB-SOP-06 dated 28/5/19. The SOP included procurement, storage, issuance, risk assessment, exposure control, PPE, signage etc.
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.	☑ Yes ☐ No ☐ OFI	Total number of employees working in the estate is 43 including workers, contract workers and management. Safety Committee Org Chart has been established. PIC appointed. Ms. Nur Izzati as "Pegawai Keselamatan dan Kesihatan". He was appointed by the Director of the organisation on 1/7/19. He has attended training on safety conducted by SRZ Corp Services on 26/9/19 and First Aid Training on 20/6/19.
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.	☑ Yes □ No □ OFI	The first safety meeting conducted on 5/11/19. The meeting attended by the management and a worker representative. The meeting discussed on weakness detected during internal audit, explanation on HIRARC, Safe Working and PPE, Information on injury and MC. Feedback from worker representative was captured. The content of the meeting was evident from meeting minute.
^r h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.	☑ Yes □ No □ OFI	FERP has been established for Fire Outbreak, Chemical Spillage, Accident and Animal Attack.
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.	☑ Yes □ No □ OFI	First aid training was conducted on 20/6/19 by SRZ Corp Service. The training combined 2 estates USG and GE. Training attendance and pictorial evidence were made available during the audit. First aid kits were made available at the site during site visit. The contents were found to be adequate.
^r j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.	☐ Yes☐ No☐ OFI	OBS No accident recorded as of the audit date. JKKP 8 has yet to be submitted. According to the management, they they had just successfully registering MYKKP on the day of audit 5/8/19. After consulted with JKKP, JKKP instructed to submit starting next year. The submission of 2019 JKKP 8 will be verified in the next audit

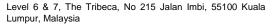




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P4C5	Employment Conditions		
Indicator	Requirement	Compliance	Findings
11	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.	V Yes ☐ No ☐ OFI	Policies established relevant to social: 1. Polisi Hak Asasi Manusia 2. Polisi Jantina They were established on 16/5/19 signed by the Director. Relevant information such the company's policies and Complaint and Grievance SOP were only communicated to 5 external stakeholders namely Balai Polis Kahang, Klinik Palani, Ladang Mutiara, Wakil Kampung Org Asli Sg Peroh dan Seong Thye (Buyer). Other external stakeholders were communicated through letter. 23 letters were send out to 23 different external stakeholders. Internal communication has been done during "Latihann Keselamatan, Alam Sekitar, Polisi MSPO dan Amalan Terbaik Bagi Ladang" session conducted on 26/9/19. This was evident from Training Report.
12	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.	✓ Yes ☐ No ☐ OFI	Based on the Polisi Hak Asasi Manusia noted that the management is committed in fair treatment to all workers in term of hiring, promotion, terms and conditions regardless of ethnic, nationality, gender, sexual orientation, politic view, religion and age.
13	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.	▼ Yes □ No □ OFI	The estate employs 35 foreign workers and 5 contract workers. All foreign workers were Indonesians. Sampled salary pay slips for Oct 2019: 1. Mahdi B5790998, Indonesian (Piece Rate & Hourly) - Hourly earned (RM 6.91 x 33 hours) = RM228, Piece rated earned (RM2.60/MT x 1029.44 MT) = RM2676.55 2. Suharni B2106808, Indonesian (Hourly rate) - basic earned (RM6.90 x 153 hrs) = RM1056 (not reaching minimum wage due to not enough hour served) 3. Siti Rosidah B4076186, Indonesian (Monthly) - basic earned RM1100.
14	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.	✓ Yes No OFI ✓ Yes	The estate monitors salary payment of its contractor workers. Engaged contractors: 1. Sri Thilakkumar Ent - General Workers 2. Sasaran Perentas SB - FFB Transport Sampled October 19 worker's payslip (Sri Thilakkumar Ent): 1. Haerul C3812853 (Indonesian) - RM 1507.80 2. Mashur (1) B3619803 (Indonesian) - RM 1424.92 Sampled October 19 worker's payslip (Sasaran Perentas SB): 1. Fairul Nizam Bin Abu Bakar 910408-01-6659 - RM 4158.44
15	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.	□ No □ OFI	Such record has been established entailing all required details including contractor workers.

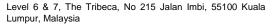




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16	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.	♥ Yes □ No □ OFI	When asked workers during site visit, they admitted copy of employment contract has been provided Sampled contract agreement for: 1. Mahdi B5790998, Female, Indonesian - General Worker. 2. Reni B7204064, Female, indonesian - General Worker. The contract specifies on: 1. Accommodation - provided in the estate 2. Service Duration - 3 years 3. Working Hour - 8hrs/ daily 4. Leave - 11 PH, AL as Employment Act, Medical Leave 5. Salary - According to MAPA/NUPW 6. OT as employment act 7. Facilities provided - Transport, Water, Electricity 8. Insurance 9. etc The employment agreement is signed by the worker and the employer.
17	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	✓ Yes No OFI	The attendance of the workers is being recorded by Office Worker. From the sample of attendance and pay slips, noted no OT is being offered at the moment.
I8	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.	✓ Yes ☐ No ☐ OFI	Working hours as mentioned in 4.4.5.6.
19	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	✓ Yes No OFI	From the sample of attendance and pay slips, noted no OT is being offered at the moment. But according to the contractor, if the need arises, OT will be given accordingly.
110	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.	☑ Yes □ No □ OFI	benefit provided to the workers: 1. Free accommodation 2. Free water supply and electric supply 3. Allowance 4. Annual Bonus and incentives.
I11	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.	✓ Yes No OFI	Quarters provided. 3 Blocks (15 houses). Each house equipped with 2-3 rooms, a bathroom, shower room, kitchen. Sighted two Surat Perakuan (Borang 2) from JTK dated 1/9/10 and 27/8/19. Weekly Inspection conducted accordingly. Last conducted on 26/11/19
I12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.	♥ Yes ■ No ■ OFI	As mentioned in 4.4.5.1 The policy specifies on: 1. To ensure any complaints will be investigate 2. To prevent all potential of sexual harassment by providing training to the management and workers. 3. To create working environment free from sexual harassment.

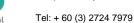




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I13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom 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.	☑ Yes ☑ KR# □ OFI	No union at the estate or workers representative. The management however had their commitment towards freedom of association expressed in its Social Policy.
I14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.	□ No □ OFI	Youngest worker in the estate was Muhammad Rahmatullah Ruslan age 20. He joined the company on 5/11/19.

P4C6	Training and competency		
Indicator	Requirement	Compliance	Findings
1 11	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.	♥ Yes No OFI	Training needs analysis matrix was sighted recorded into GEPSB-Borang-07-JS01. The analysis done based on task such as mandore, sprayer, manure, harvester, store keeper, tractor driver etc. Training programme sighted for 2019. The training covers several aspects including safety, environmental and social. Safety training record as sighted in 4.4.4.2 Other training records reviewed: 1. Segregation/ 3R, Landfill, Buffer Zone Training - 31/10/19
12	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.	♥ Yes No OFI	Training needs analysis matrix was sighted recorded into GESPB-Borang-07-JS01. The analysis done based on task such as mandore, sprayer, manure, harvester, store keeper, tractor driver etc.
13	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.	▼ Yes □ No □ OFI	Same as 4.4.6.1

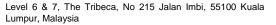


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P5: Environment, natural resources, biodiversity and ecosystem services

Environmental management plan Reauiremen Sighted Environmental Policy namely "Polisi Alam T1 An environmental policy and ✓ Yes Sekitar dan Biodiversiti" dated 28/5/19 signed by the management plan in compliance with the ■ No Director. relevant country and state environmental ☐ OFI laws shall be developed, effectively Relevant information such the company's policies and Complaint and Grievance SOP were only communicated to 5 external stakeholders namely Balai Polis Kahang, Klinik Palani, Ladang Mutiara, communicated and implemented. Wakil Kampung Org Asli Sg Peroh dan Seong Thye (Buyer). Other external stakeholders were communicated through letter. 23 letters were send out to 23 different external stakeholders. Internal communication has been done during 'Latihann Keselamatan, Alam Sekitar, Polisi MSPO dan Amalan Terbaik Bagi Ladang" session conducted on 26/9/19. This was evident from Training Report. The policy emphasizes on: Zero burning practice
 Effective waste management 3. Clean environment and free from pollution 4. No illegal hunting EMP was sighted for 2019 namely Pelan Pengurusan Alam Sekitar & Pelan Penecegahan Pencemeran. The plan include the action plan to be taken, PIC and Status of Implementation. According to the document, most of the plans have been carried out while some of it are still in progress. a) Policy and its objectives as stated in the 4.5.1.1. 12 The environmental management plan ✓ Yes shall cover the following: b) Sighted "Penilaian Impak Aspek Alam Sekitar" for 2019. The assessment done for all operations □ No ☐ OFI a) An environmental policy and relevant to the estate such as Spraying, Harvesting and Slashing, Manuring, Replanting, Transportation objectives; etc. Among assessed impacts were natural resources b) The aspects and impacts analysis of all depletion, global warming, land erosion, air pollution, operations. water pollution, soil contamination and wildlife conflict. "Langkah-Langkah Kawalan" were included in the Environment Aspect Impact Assessment Register. The I3 An environmental improvement plan to ✓ Yes mitigate the negative impacts and to assessed impacts are as follow: ■ No promote the positive ones, shall be ☐ OFI developed, effectively implemented and 1. Beneficial to environment 2. Natural resources depletion monitored. 3. Global warming 4. Soil erosion 5. Air pollution 6. Water pollution 7. Wildlife conflict Mitigation plan for negative impact included in the Environment Management Plan. Example: 1. To minimise chemical release to the soil, water source while doing chemical mixing and washing empty chemical containers. The action taken by the management was to recycle water from chemical mixing activity, to construct sum at premix area, to utilise tray as second containment for chemical substance 2. To minimise emission from machinery exhaust. The management ensures scheduled maintenance is being adhered for every machinery. Sighted "Pelan Penambahbaikan Berterusan" which 14 A programme to promote the positive ✓ Yes included environmental aspect. Listed in the plan as impacts should be included in the ☐ No below: continual improvement plan. 1. Implementation biological control - Installation of □ OFI barn owl to minimise rat attack 2. To have a session with Wildlife Dept on biodiversity conservation

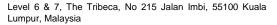




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15	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.	✓ Yes ☐ No ☐ OFI	Refer 4.4.6.1
I6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.	✓ Yes ☐ No ☐ OFI	Environmental aspect was discussed in Safety Meeting dated 5/11/19. The meeting attended by the management and worker representatives. "Amalan Baik dan Kesedaran Tentang Alam Sekitar" was discussed in the meeting including prohibition of open burning activity, recycling practice, prohibition of reusing SW for other purpose and prohibition of illegal hunting/ snaring.
P5C2	Efficiency of energy use and use of renewa	ble enerav	
Indicator		Compliance	Findings
I1	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.	Yes No OFI	Diesel usage is being recorded for every machinery, water pump and genset on monthly basis. Baseline value has been established based on previous year usage data. The similar record was sighted for petrol usage. Petrol is being used for motorcycles and grass cutter. Justification is provided for any monthly usage exceeded the baseline value. Minor #1 Electricity is being generated using generator set. However, the power generation and usage is not being monitored accordingly.
I2	The oil palm premises shall estimate the direct usage of non-renewable 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.	☐ Yes ☑ No ☐ OFI	Minor #2 Baseline value established is being used as estimation for the future ussage. Estimation for diesel usage and petrol were sighted. However, the estimation for electricity consumption was not made available during the audit.
I3	The use of renewable energy should be applied where possible.	Yes No OFI	At the moment no renewable energy usage. The management is planning to install solar panel lamp.
P5C3	Waste management and disposal		
Indicator	Requirement	Compliance	Findings
I1	All waste products and sources of pollution shall be identified and documented.	Yes No OFI	Waste indentification and sources done together with Pelan pengurusan Sisa. Among identified waste such as Sisa Berjadual, Sisa Domestik and Sisa Industri
12	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products	Yes No OFI	Waste management plan available namely Pelan Pengurusan Sisa V1.1. The plan incorporated together with type of waste, source location, action to be taken and PIC to handle. Sample as below: a) Sisa Domestik (Sampah) from linsesite, office, workshop and store. SW from workshop, office and SW store. Industrial waste from spraying activity (rinsed pesticide container) Store and workshop. b) Action to be taken by the management is to collect all rubbish and send to designated landfill and to cultivate recycling practice. SW is to be treated in accordance to SW regulation 2005. Industrial waste such as empty pesticide container to be rinsed and puncture







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13	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.	Yes No V OFI	SW handling procedure has been established namely Prosedu Sisa Berjadual GEPSB-SOP-07 dated 16/5/19. The SOP specifies on SW Notification, Storage, Labelling and Inventory. The estates do not produce SW as all potential SWs come from Contractors. OBS Upon visiting the estate's SW store, noted the facility is being built at the point of audit. Observed the base for the facility has been built together with containment system (bund). The completion will be verified in the next audit. At the point of audit, several types of SW have been collected such as used lubricant, used hydraulic and used oil filter. Observed the SW were generated in September 2019.
14	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.	▼ Yes □ No □ OFI	Upon visiting the site, noted no excess pesticide container. Pesticide containers are being reused for chemical mixing activity.
15	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.	Yes No OFI	Sighted "Sisa Domestic" procedure GEPSB-SOP-38 dated 16/5/29. The procedure specifies on the process flow of domestic waste handling starting from waste segregation from estate facilities up to landfill management. Major #1 1. Upon visiting the landfill, noted that the location was close to workers housing area. An empty pesticide container was found dumped in the landfill 2. Upon visiting the worker housing area, observed rubbish scattered in vicinity. A hump of domestic waste was found behind Block A. Also observed several rubbish pits dug nearby the housing area 3. Observed several traces of open burning done at the housing area.
P5C4	Reduction of pollution and emission		
Indicator	Requirement	Compliance	Findings
I1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.	Yes No OFI	Same 4.5.1.2 and 4.5.1.3
I2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.	Yes No	Same 4.5.1.2 and 4.5.1.3

OFI





P5C5

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Natural water resources

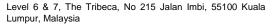
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Indicator	Requirement	Compliance	Findings
Indicator II	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a) 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.	Yes No ✓ OFI	Sighted "Pelan Pengurusan Air V1.0" for 2019. a) Water extracted from Sg Sembrong Tributary and harvested rain water at housing area being used for cleaning purpose. Since the company is new to MSPO, they had only started to record water usage since July 19. b) The estate does have a river called Sg Sembrong flowing in and out from the estate. 4 water sampling points have been identified which is for 2 upstreams and 2 downstreams. Last test results were made available to the auditor and observed the results from 14/10/19 were in compliance with national regulation. The estate even established an SOP for irrigation monitoring namely "Pemantauan Air Sungai atau Saliran (Pensampelan Air)" GEPSB-SOP-36 dated 16.5.19
	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.		c) The estate practices rain water harvesting at housing area being used for cleaning purpose. OBS d) There is a tributary flowing to Sg Sembrong within the estate while the main river flowing adjacent to the estate. Upon visiting the main river adjacent at block 9 observed no trace of chemical activity in the area. However the width of the buffer zone was not clearly demarcated. e) During site visit observed the vegetation within the buffer zone was left untouched. No sign or trace of chemical activity in the area. f) No bore well
I2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Yes No	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.
13	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).	▼ Yes □ No □ OFI	The estate practices rain water harvesting at housing area being used for cleaning purpose.
P5C6	Status of rare, threatened, or endangered	species and high	h hiodiversity value area
Indicator	Requirement	Compliance	Findings
11	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	▼ Yes □ No □ OFI	Sighted Biodiversity Assessment Report. The assessment was conducted on 3/5/19 by assessors appointed by SRZ Corp Services. a) identification and findings were included in the biodiversity report. The report mentioned that biodiversity value in the estate could be significantly affected if the estate was to have land opening or replanting activities.
	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)		 b) 12 types of mammalians, reptilians, amphibians and 30 types of avifauna were detected during the assessment. Out of 42 species 1 is classified as EN and 1 VU under 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.



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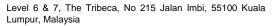
12	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include: a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.	Yes No OFI	The estate has taken few steps in discouraging illegal hunting and ensuring species protection. 1. "No Hunting" signage erected at the estate entrance and several other places in the estate. 2. The estate management will contact Perhilitan if there is any wild animal encroachment or illegal hunting activity spotted. 3. Minimising pesticide usage by implementing IPM such as using calf for herbicide control and barn owl for pest control. 4. Plant fruit trees to attract wild life
13	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.	▼ Yes □ No □ OFI	Sighted Pelan Tindakan Penilaian Biodiversiti. Sampled actions taken as below: 1. "No Hunting" signage erected at the estate entrance and several other places in the estate. 2. The estate management will contact Perhilitan if there is any wild animal encroachment or illegal hunting activity spotted. 3. Minimising pesticide usage by implementing IPM such as using calf for herbicide control and barn owl for pest control. 4. Plant fruit trees to attract wild life

P5C7	Zero burning practices		
Indicator	Requirement	Compliance	Findings
I1	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.	Yes No OFI	Upon visiting the site observed no trace of open burning being practiced
12	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.	□ No □ OFI	NA
13	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.	☐ Yes☐ No☐ OFI	NA
I 4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	☐ Yes☐ No☐ OFI	NA

P6: Best Practices

P6C1 Indicator	Site management Requirement	Compliance	Findings
11	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	Yes No V OFI	OBS Manual sighted only focused on safety element instead of operation element. Random examples verified: 1. The Harvesting SOP does not specify ripe, under ripe, unripe, overipe etc. 2. Spraying SOP does not specify on pesticide dosage/ pump, pesticide application/palm etc. 3. Fertilizing SOP does not specify on dosage/palm

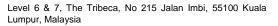






12	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.	☐ Yes ☐ No ☐ OFI	The estate occupied on a low lying land area.
I3	A visual identification or reference system shall be established for each field.	✓ Yes □ No □ OFI	Available. Observed sample from Block 1. "96/FLD 1 (39.29ha)"
P6C2	Economic and financial viability plan		
Indicator	Economic and financial viability plan Requirement	Compliance	Findings
III	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.	Yes No OFI	The business plan has been established. The company's plan could be viewed from its Agricultural Estimate 2019 - 2030.
I2	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.	Yes No OFI	Replanting programme is embedded in the Agricultural Estate. The management is planning to start replanting in year 2026 for field 1995.
13	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	Yes No OFI	The business plan has been established. The company's plan could be viewed from its Agricultural Estimate 2019 - 2030. From the viewed documents, these were observed. 1. Field Statement 2. FFB Yield Estimate 3. Mature Upkeep/Harvesting Cost 4. General Charges 5. Summary Expenditure 6. Estimated Revenue & Expenditure 7. Estimated FFB price
14	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.	✓ Yes ☐ No ☐ OFI	At the point of audit, the company all review the comparisons of actual company performance among years. The actual achievement against budgeted/estimation from from the business plan was also reviewed accordingly.
P6C3	Transparent and fair price dealing		
Indicator	Requirement	Compliance	Findings Pricing mechanism is documented into contract
11	Pricing mechanisms for the products and other services shall be documented and effectively implemented.	Yes No OFI	Pricing mechanism is documented into contract agreement between the company and contractors. Sampled contract agreements as below: 1. Sri Thilakkumar Ent (General Workers) dated 13/7/19 2. Sasaran Perentas SB (FFB Transport) dated 1/4/19







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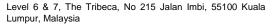
12	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	Yes No OFI	The contracts reviewed were signed by both parties the company and the contractors. 1. Payment evidence made to Contractor Sasaran Perentas SB on 1/11/19 for September 2019 can be seen from payment voucher, cheque number 278360 (MBB)
			2. Payment evidence to Contractor Sri Thilakkumar Ent for Oct 19 made on 11/11/19, cheque number 278360 (MBB)

P6C4	Contractor		
Indicator	Requirement	Compliance	Findings
11	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.	Yes No OFI	The contractors engaged had been briefed by the company on the MSPO requirement during stakeholder engagement done by the company. In sampled contract agreement between the company and contractor Sasaran Perentas, also notice a clause saying "Semua kontraktor/pembekal/vendor yang memberikan khidmat kepada Ladang Garisanemas perlu sedar tentang komitmen kamiterhadap MSPO. Oleh yang demikian, semua kontraktor/pembekal/ vendor Ldg Garisanemas juga perlu mematuhi keperluan keperluan yang berkaitan dalam standard tersebut sebarang pertanyaan boleh diajukan kepada tuan pengurus ladang"
I2	The management shall provide evidence of agreed contracts with the contractor.	Yes No OFI	Sighted contract agreements as below: 1. Sri Thilakkumar Ent (General Workers) dated 13/7/19 2. Sasaran Perentas SB (FFB Transport) dated 1/4/19
I3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	✓ Yes □ No □ OFI	No obstruction was given during the audit.
14	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.	▼ Yes □ No □ OFI	In the contract agreements reviewed noted set of conditions and terms were stipulated in ensuring the outsource services are being delivered as required.

P7: Developent of new plantings

P7C1	High biodiversity value		
Indicator	Requirement	Compliance	Findings
II	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.	Yes No OFI	The whole Principle 7 of the standard is not applicable as the organisation does not have new planting activity in place.
12	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.	Yes No OFI	NA

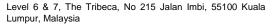




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	P/C2	Peatland		
Ind I1	icator	Requirement New planting and replanting may be	Compliance	Findings NA
		developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.	Yes No OFI	
	P7C3	Social and Environmental Impact Assessm		Pludius.
Ina I1	icator	Requirement A comprehensive and participatory social	Compliance	Findings NA
		and environmental impact assessment shall be conducted prior to establishing new plantings or operations.	Yes No OFI	
I2		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.	☐ Yes ☐ No ☐ OFI	NA
I3		The results of the SEIA shall be	Yes	NA
		incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.	□ No □ OFI	
I4		Where the development includes	☐ Yes	NA
		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.	□ No □ OFI	
	P7C4	Soil and topographic information		
Ind	icator	Requirement	Compliance	Findings
I1		Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.	Yes No OFI	NA
I2		Topographic information shall be	☐ Yes	NA
		adequate to guide the planning of planting programmes, drainage and irrigation	□ No	
		systems, roads and other infrastructure.	OFI	
	P7C5	Planting on steep terrain, marginal and frag		Eindinge
Ina I1	icator	Requirement Extensive planting on steep terrain,	Compliance	Findings NA
		marginal and fragile soils shall be avoided unless permitted by local, state and national laws.	Yes No OFI	
I2		Where planting on fragile and marginal	Yes	NA
		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.	□ No □ OFI	





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13	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion.	Yes No OFI	NA
P7C6	Customary land		
Indicator	Requirement	Compliance	Findings
II	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.	Yes No OFI	NA NA
12	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.	☐ Yes☐ No☐ OFI	NA
13	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.	☐ Yes ☐ No ☐ OFI	NA
14	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.	☐ Yes☐ No☐ OFI	NA
15	Identification and assessment of legal and recognised customary rights shall be documented.	☐ Yes ☐ No ☐ OFI	NA
16	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.	☐ Yes ☐ No ☐ OFI	NA
17	The process and outcome of any compensation claims shall be documented and made publicly available.	☐ Yes ☐ No ☐ OFI	NA
18	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development.	☐ Yes ☐ No ☐ OFI	NA





Section I Appendix

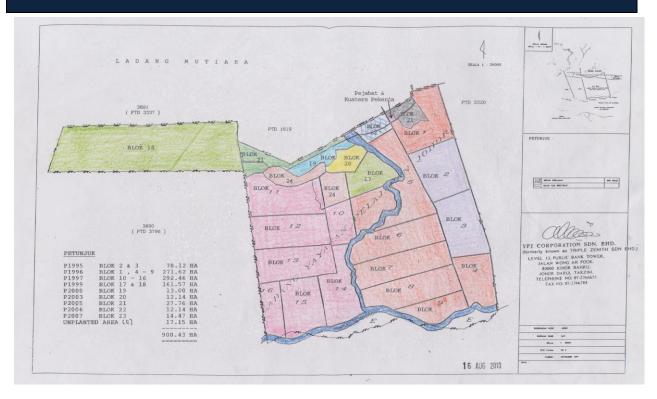


Figure 1: Garisanemas Plantation Sdn Bhd Estate Layout

