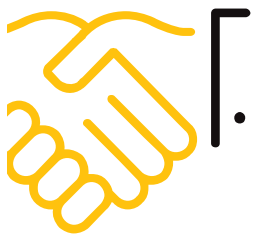


BOUSTEAD PLANTATIONS BERHAD

LEPAN KABU ESTATE

RSPO MEMBERSHIP NO: 1-0012-04-000-00
KM88.8, KG PAHI, JALAN KOTA BAHRU – GUA
MUSANG, 18000 KUALA KRAI, KELANTAN, MALAYSIA





INITIAL CERTIFICATION AUDIT REPORT ON RSPO P&C CERTIFICATION PUBLIC SUMMARY REPORT

BOUSTEAD PLANTATIONS BERHAD

RSPO Membership No: 1-0012-04-000-00

UNIT OF CERTIFICATION

Boustead Plantations Berhad - Lepad Kabu Estate
Km88.8, Jalan Kota Bahru – Gua Musang Pahi,
18000 Kuala Krai, Kelantan, Malaysia

CERTIFICATE NO.	RSPO 932888
Certificate Start Date	20 May 2024
Certificate Expiry Date	19 May 2029

AUDIT TYPE	AUDIT DATES
Initial Certification (Main Assessment)	26 – 28 February 2024
Annual Surveillance Audit (ASA-01)	-
Annual Surveillance Audit (ASA-02)	-
Annual Surveillance Audit (ASA-03)	-
Annual Surveillance Audit (ASA-04)	-
Re-Certification Audit (RA-01)	-

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TABLE OF CONTENTS

1.0	SCOPE OF AUDIT	4
1.1	Introduction	4
1.2	Location (Address, GPS, and Map) of Palm Oil Mill and Estates	4
1.3	Description of Supply Base (FFB Sources)	4
1.4	Summary of Plantings and Cycle	4
1.5	Summary of Land Use, Conservation and HCV Areas	5
1.6	Other Certifications Held and Use of RSPO Trademarks	5
1.7	Organizational Information / Contact Person	6
1.8	Tonnages Verified for Certification	6
1.9	Time Bound Plan and Multiple Management Units	8
1.10	Abbreviations Used	11
2.0	AUDIT PROCESS	12
2.1	Audit Methodology, Plan and Site Visits	12
2.2	Audit Programme	12
2.3	Date of Next Scheduled Visit	12
2.4	Qualifications of the Lead Auditor and Audit Team	12
2.5	Certification Body	12
2.6	Process of Stakeholder Consultation	13
3.0	AUDIT FINDINGS	15
3.1	Summary of Findings	15
3.2	Status of Identified Noncompliance and Corrective Actions, Observations and Positive Elements	69
4.0	AUDIT CONCLUSION AND RECOMMENDATION	73
4.1	Acknowledgement of Internal Responsibility and Confirmation of Audit Findings	73
4.2	INTERTEK – RSPO P&C Certificate Details for The Unit of Certification	74
APPENDIX A: QUALIFICATIONS OF LEAD AUDITOR AND AUDIT TEAM		75
APPENDIX B: AUDIT PLAN (ACTUAL)		77
Appendix B-1: Audit Team Competency Matrix		Error! Bookmark not defined.
APPENDIX C: LOCATION MAP OF TRONG POM & ESTATES GROUPING		79
Appendix C-1: Location Map of Lapan Kabu Estate (Scale 1 : 200 KM)		79
Appendix C-2: Location of Lapan Kabu Estate		Error! Bookmark not defined.
APPENDIX D: TIME BOUND PLAN		80

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1.0 SCOPE OF AUDIT

1.1 Introduction

This Initial Certification Audit was conducted on the Unit of Certification (UoC) – Lepad Kabu Estate of Boustead Plantations Berhad (hereafter abbreviated as BPB), from 26 until 28 February 2024, to assess if the organization's operations of the mill and its supply bases were in compliance against the **RSPO Principles and Criteria (P&C 2018)** and **Malaysian National Interpretation (MY-NI 2019)**.

The unit of certification (UoC) or management unit is equivalent to a certification unit as defined in the **RSPO Certification Systems Document**. Each UoC consists of supply bases which are made up of estate owned by Boustead Plantations Berhad.

1.2 Location (Address, GPS, and Map) of Palm Oil Mill and Estates

Lepad Kabu Estate of Boustead Plantations Berhad consists of one (1) single estate as indicated in **Table 1** below, which includes the addresses and GPS locations of the estate. The location maps are provided in **Appendix C**.

Table 1: Address of Palm Oil Mill, Estates and GPS Location

NAME (LEGAL REGISTRATION / MPOB LICENCE)	ADDRESS	GPS REFERENCE	
		LONGITUDE	LATITUDE
Lepad Kabu Estate	KM 88.8, Jalan Kota Bharu - Gua Musang Pahi, 18000 Kuala Krai, Kelantan, Malaysia	102° 13' 15.60" N	5° 28' 58.10" E

Table 1-1: Registered Name of Palm Oil Mill, Estates and MPOB License

NAME (LEGAL REGISTRATION / MPOB LICENCE)	MPOB LICENSE NO.	VALIDITY PERIOD
Lepad Kabu Estate	616061011000	31/12/2024

1.3 Description of Supply Base (FFB Sources)

The supply base i.e., FFB sources is only one (1) single estate which is owned by Boustead Plantations Berhad. Verification done on site during the audit confirmed that there are no smallholders and outgrowers supply the FFB to the said UoC. Details of the planted hectareage for the FFB supply for Lepad Kabu Estate is as shown in **Table 2** below.

Table 2: Estate Area Summary

Name of Estate	Area Summary – Year 2024		Area Summary – Year 2023	
	Certified (Titled) Area (Ha.)	Total Planted Area (Ha.)	Certified (Titled) Area (Ha.)	Total Planted Area (Ha.)
Lepad Kabu Estate	2,046.40	1,901.20	N/A	N/A
Total:	2,046.40	1,901.20	N/A	N/A

Notes:

1.4 Summary of Plantings and Cycle

The one (1) single estate had been developed beginning from 1996 (1st cycle and 2nd cycle), replanting had started in 2008 (2nd cycle) onwards at the various estates. The age profile is as shown in **Table 3**.

Table 3: Age Profile of Planted Oil Palm (Year 2024)

Name of Estate	Year of Planting	Cycle of Planting	Mature OP [> 3 years] (Ha.)	Immature OP [≤ 3 years] (Ha.)	Total Planted Area (Ha.)
Lepad Kabu Estate	Year 1996	1 st Cycle	118.80	-	118.80
	Year 1997	1 st Cycle	130.70	-	130.70
	Year 2003	1 st Cycle	58.70	-	58.70
	Year 2004	1 st Cycle	113.90	-	113.90
	Year 2005	1 st Cycle	62.30	-	62.30



Year 2008	2 nd Cycle	104.50	-	104.50
Year 2010	2 nd Cycle	8.80	-	8.80
Year 2012	2 nd Cycle	81.40	-	81.40
Year 2013	2 nd Cycle	92.50	-	92.50
Year 2014	2 nd Cycle	97.60	-	97.60
Year 2015	2 nd Cycle	81.50	-	81.50
Year 2016	2 nd Cycle	130.70	-	130.70
Year 2017	2 nd Cycle	117.80	-	117.80
Year 2018	2 nd Cycle	94.70	-	94.70
Year 2020	2 nd Cycle	116.60	-	116.60
Year 2021	2 nd Cycle	-	122.20	122.20
Year 2022	2 nd Cycle	-	121.40	121.40
Year 2023	2 nd Cycle	-	112.10	112.10
Year 2024	2 nd Cycle	-	135.00	135.00
Sub-Total:		1,410.50	490.70	1,901.20
Grand-Total:		1,410.50	490.70	1,901.20

1.5 Summary of Land Use, Conservation and HCV Areas

The summary of Conservation and HCV Areas as identified in Lepad Kabu Estate during this audit is as per **Table 4** below:

Table 4: Conservation and HCV Areas

#	Statement of Land Use	ASA01 (Year: 2024) Hectarage (Ha.)	RA (Year: 2023) Hectarage (Ha.)	CB Verification
1	Oil Palm - Planted Area	1,901.20	N/A	Verified on site
1-1	OP Mature (Production)	1,410.50	N/A	Verified on site
1-2	OP Immature (Non-Production)	490.70	N/A	Verified on site
1-3	OP Planted on Peat	0.00	N/A	Verified on site
2	Other Crop such as Rubber etc.	0.00	N/A	Verified on site
2-1	Coconut	0.00	N/A	Verified on site
3	Conservation Areas	4.10	N/A	Verified on site
3-1	Conservation (forested)	4.10	N/A	Verified on site
3-2	Conservation (non-forested)	0	N/A	Verified on site
<i>Note: Conservation areas such as unplanted steep / hilly and swampy areas, buffer zones, riparian areas etc.</i>				
4	HCV Areas	59.77	N/A	Verified on site
<i>Note: Areas as defined under HCVP Toolkit for HCV 1 – 6, comprising buffer zones near forest reserves, water catchments, burial & religious sites</i>				

Notes:

- (1) This Initial Certification Audit covered the overall land use for oil palm plantation areas, and the identified Conservation areas including HCV areas marked out at the estates.
- (2) Lepad Kabu Estate sampled for this Initial Certification Audit have been selected based on their potential risks on social, environmental and biodiversity issues such as their proximity to forest reserves, hill sides, riparian zones, and high conservation value areas.
- (3) There has been no New Planting in the Lepad Kabu Estate at the certified areas.

1.6 Other Certifications Held and Use of RSPO Trademarks

Currently, the other certifications held by Lepad Kabu Estate of Boustead Plantations Berhad are MSPO Part 3 certification, which is still valid.

The RSPO's logo, trademarks and label are not being used by the UoC audited. The certification unit had agreed to adhere with the use of the RSPO Trademark, labels, and logos as per the latest "**RSPO Rules on Market Communications &**



Claims” which was acknowledged through the signed Memorandum of Agreement valid for the duration of the 5-year certification cycle.

1.7 Organizational Information / Contact Person

Boustead Head Office:-

Name : Mitah Binti Limpu
 Position : Sustainability Executive
 Address : 18th Floor, Menara Boustead, 69 Jalan Raja Chulan, 50200 Kuala Lumpur, Wilayah Persekutuan Kuala Lumpur, Malaysia
 Tel. No. : +60 3-2145 2121 ext. 829
 Fax. No. : +60 3-2144 7917
 Email : mitah@bplant.com.my

Lepan Kabu Estate:-

Name : Nizam Hj. Sahat
 Position : Estate Manager
 Address : KM88.8, Jalan Kota Bharu – Gua Musang, 18000 Kuala Krai, Kelantan.
 Tel. No. : +60 9-960 9257
 Fax. No. : –
 Email : nizamsahat@bplant.com.my / lepankabu@bplant.com.my

1.8 Tonnages Verified for Certification

1.8.1 The actual tonnages of FFB produced by Lepan Kabu Estate is as in **Table 5** below.

Table 5: The Actual Tonnages of FFB Produced

Name of Estate	FFB Produced		Processing Palm Oil Mill
	N/A (MT)	N/A (MT)	
Lepan Kabu Estate	N/A	N/A	N/A
Grand Total (MT):	N/A	N/A	N/A

1.8.2 The breakdown of all the suppliers and their tonnages of FFB supplied to the Lepan Kabu Estate based on the actual tonnages is as in **Table 6** below:

Table 6: The Actual Tonnages of FFB Processed

#	Estate / Supplier	FFB Processed		Main Processing Palm Oil Mill	CB
		Jan 2023 (MT)	Dec 2023 (MT)		
A)	UoC (Own Estates) (Under Certification):				
	N/A	N/A	N/A	N/A	N/A
	(a) Sub-Total by UoC Estates FFB:		N/A	N/A	
B)	External Estates Under Parent Group (Certified):				
	N/A				
	(b) Sub-Total Other Certified Estates FFB:				
C)	External / Other Supplies (Non-Certified):				
1.	N/A				
	(c) Sub-Total Non-Certified Estates FFB:				
	Grand Total (A) + (B) + (C):		N/A	N/A	

1.8.3 Total annual volumes / tonnages of FFB supplied from the supply base to the Lepan Kabu Estate during the previous, current, and projected period are as follows:

Table 7: Annual Tonnages of FFB

Estate / Supplier	FFB Produced (Estimate)	FFB Produced (Actual)		FFB Produced (Projection)
	N/A	N/A	N/A	N/A



	(MT)	(%)	(MT)	(%)	(MT)	(%)	(MT)	(%)
A) Grouping Estates (Under Certification)	N/A	N/A	N/A	N/A	N/A	N/A	21,500.00	100.00
B) External Suppliers (Certified)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
C) External Suppliers: (Non-Certified)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total:	N/A	N/A	N/A	N/A	N/A	N/A	21,500.00	100.00

1.8.4 The annual certified tonnages of CPO and PK production by the POM from the supply base / suppliers as verified during this current audit are detailed as shown in **Table 8** below:

Table 8: Annual Certified Tonnages – FFB, CPO & PK

POM	Production (Estimate)		Production (Actual)				Production (Projection)	
	N/A (MT)	OER: N/A	N/A (MT)	OER: N/A	N/A (MT)	OER: N/A	N/A (MT)	OER: N/A
Total FFB Processed	N/A		N/A		N/A		21,500.00	
Total CPO Produced	N/A	OER: N/A	N/A	OER: N/A	N/A	OER: N/A	N/A	OER: N/A
Total PK Produced	N/A	KER: N/A	N/A	KER: N/A	N/A	KER: N/A	N/A	KER: N/A
SCCS Model for POM	N/A		N/A		N/A		N/A	

Notes:

(1) The POM has established and maintained procedures for the bookkeeping and monitoring requirements for the CPO at the mill. It is verified the POM has procedures for the 'Mass Balance-mb' model in accordance with the RSPO P&C MYNI (2019) requirements. Verified activities and checked items for the Supply Chain of the POM are reported in the audit finding, Criterion No 3.8 (Indicator 3.8.1 – 3.8.17).

1.8.5 Certified Products Volumes Traded – The Production data and traded volumes of certified products which was verified for current and next year's projection is detailed as per **Table 9** below:

Table 9: Traded Volumes (Certified and Non-Certified) of CPO and PK

Details As Per RSPO Certification System Document		
Last Year's (N/A) Certified Volume (RSPO Certified)	CPO (MT)	PK (MT)
	N/A	N/A
A) Last Year's Actual Sold Volume (RSPO Certified) Current Palm Trace (PT) Period (N/A)	N/A	N/A
B) Last Year's Actual Sold Volume (Other Schemes Certified) Current Palm Trace (PT) Period (N/A)	N/A	N/A
C) Last Year's Actual Sold Volume (Conventional) Current Palm Trace (PT) Period (N/A)	N/A	N/A
Total of (A) + (B) + (C):	N/A	N/A
Projected for Next PT License Period (N/A) Certified Volume (RSPO Certified)	N/A	N/A

Notes: RSPO Certificate for Lepan Kabu Estate is still under Initial Certification, therefore, no FFB certified production sold. All product is sold to mill as non-certified product.



1.9 Time Bound Plan and Multiple Management Units

RSPO Certification System (2020) Clause 5.5.3		
(a) No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;		
REQUIREMENTS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
<ul style="list-style-type: none"> Is there any replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12 	Neither any replacement after dates defined in NIs Criterion 7.3 for primary forest nor any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3.	Complied
<ul style="list-style-type: none"> Is there any new plantings since January 1st 2010 and did the new plantings comply with the RSPO New Planting Procedure (NPP) 	As at this current audit, there has been no recent new or additional new plantings by the BPB.	Complied
<ul style="list-style-type: none"> Was the new planting development verified by an RSPO accredited CB 	As at this current audit, there has been no recent new or additional new plantings by the BPB.	Complied
(b) Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;		
<ul style="list-style-type: none"> Are there any existing Land conflicts and is it being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.; 	Updates on the RSPO case tracking, google search was referred to on issues related to BPB's uncertified units prior to and during the audit. As at this current audit, there has been no other incidences of any replacement of primary forest at any other area under the BPB.	Complied
(c) Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;		
<ul style="list-style-type: none"> Are there any existing Labour disputes and is it being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2; 	As at this current audit, under the BPB, there has been no further known or existing Labour disputes at the uncertified units which are not being resolved in a mutually agreed process in accordance with RSPO P&C Criterion 6.3.	Complied
(d) Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;		
<ul style="list-style-type: none"> Are there any Legal non-compliance and is it being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1; 	It is noted that BPB is aware of the Legal compliances needed at the uncertified units and actions has been active taken in stages to address and fully comply with requirements of the related laws and regulations at the uncertified units. The progress made on above will be further evaluated in the next audit.	Complied
<ul style="list-style-type: none"> Has the organisation conducted an Internal Audit on the above (a) to (d)? Has the evidence been submitted for verification? 	Internal audit progress report till latest in 2022, had covered the requirements, conducted by the HQ-Sustainability Department. The report was available and submitted for verification. This was verified via: 1. BPB Details of Time Bound Plan and 2. Verification on Internal Assessment Checklist for Uncertified Management Units	Complied



<ul style="list-style-type: none"> Has a positive assurance statement been produced based on the internal audit and other supporting assessments results? 	<p>Overall positive assurance statement is made at the conclusion of the Internal audit and verified during on-site audit at UoC.</p> <p>This was also verified via:</p> <ol style="list-style-type: none"> BPB Details of Time Bound Plan and Verification on Internal Assessment Checklist for Uncertified Management Units <p>Intertek had also verified via the RSPO RaCP Case tracker, updated till Apr – Sept 2019, there are no units under BPB with RaCP issues.</p>	<p>Complied</p>
<p>(e) CBs shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with the requirements 5.5.3 (a) –(d) above based on self-declarations by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:</p>		
<ul style="list-style-type: none"> Are the evidences provided in 5.5.3 (a)-(d) adequate? 	<p>Verified that supporting evidences were adequately provided. Refer to findings on (a) to (d) above.</p>	<p>Complied</p>
<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e., internal audit) by the organisation or assessment carried out by an accredited CB. Evidence of the assessment against each requirement shall be demonstrated and if there is non-compliance whether the non-compliance has been actively addressed or communicated to RSPO. 	<p>Verified that evidences were adequately provided in support of the positive assurance statement made by the BPB were available.</p>	<p>Complied</p>
<ul style="list-style-type: none"> Where applicable, targeted stakeholder consultation, including consultation with the relevant NGOs, will be carried out by the CB 	<p>Targeted stakeholder consultations done via emails conducted has not revealed any new negative feedback.</p>	<p>Complied</p>
<ul style="list-style-type: none"> Desktop study, e.g., web check on relevant complaints 	<p>Desktop study conducted did not reveal any new negative feedback.</p>	<p>Complied</p>
<ul style="list-style-type: none"> If necessary, the CB may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements 	<p>Further stakeholder consultation was done on the uncertified units and records were available and evaluated.</p> <p>The progress of monitoring done and information publicly available on the existing issues on the said units are verified to be adequate.</p> <p>Based on above evaluations made under part (a) to (h), no further stakeholder consultation or field inspection is considered necessary at the said uncertified units at present.</p>	<p>Complied</p>
<p>(f) For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available;</p>		
<ul style="list-style-type: none"> Is there any non-compliance against a major indicator in the non-certified management unit identified? Is the identified major NC being actively addressed? Can the current assessment proceed to a successful conclusion? 	<p>Based on above findings made under part (a) to (e), at the said uncertified units, the existing issues were noted to be actively addressed with progress reports available.</p> <p>Thus, it is verified that the current audit at this UoC can be proceeded, and certification can be successfully concluded after effective closure of findings at the UoC.</p>	<p>Complied</p>



(g) Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems	As at the time of the current audit at this UoC, there is no evidence to suggest such failure at the uncertified units which may affect the certification of this UoC unit. Justification as received and evaluated were as follows: 1) Active engagement with Stakeholders has been carried out. Progress is monitored and reported 2) Under the RSPO RACP Case tracker, updated till July 2022, there are no units under BPB with RACP issues.	Complied
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Based on the evaluation done, the BPB was able to demonstrate commitment and provide positive assurance statements on its commitment to continued compliance with the **RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard (Nov 2020)** Clause 5.5 (Minimum Requirements for Multiple Management Units) for all its certified and non-certified units.

Intertek had also referred to the RSPO's Complaints website for the tracking of issues and the latest updates available on cases of legitimate complaints which may be filed against the BPB's statements of response and actions currently being undertaken to comply with their Sustainability commitments are indicated in **Appendix D**.



1.10 Abbreviations Used

ACOP	Annual Communication of Progress	JAS	Jabatan Alam Sekitar
ASA	Annual Surveillance Audit	JCC	Joint Consultative Committee
BMP	Best Management Practices	JKKP	Jabatan Kesihatan dan Keselamatan Pekerjaan
BOD	Biochemical Oxygen Demand	JTK	Jabatan Tenaga Kerja
BOMBA	Fire Services Department	KER	Kernel Extraction Rate
BPB	Boustead Plantations Berhad	KPI	Key Performance Indicator
CABI	Centre for Agriculture and Biosciences International	LTA	Lost Time Accidents
CB	Certification Body	MPOB	Malaysia Palm Oil Board
CBAs	Collective Bargaining Agreements	MPOCC	Malaysian Palm Oil Certification Council
CHRA	Chemical Health & Risk Assessment	MSPO	Malaysian Sustainable Palm Oil
CPO	Crude Palm Oil	MTCS	Malaysia Timber Certification Scheme
CSPO	Certified Sustainable Palm Oil	NC	Non-Compliance or Non-Conformance
CSPK	Certified Sustainable Palm Kernel	NGO	Non-Government Organization
DLW	Decent Living Wages	OBS	Observation
ECC	Employees Consultative Committee	OER	Oil Extraction Rate
EFB	Empty Fruit Bunch	OHS	Occupational Health & Safety
EHS	Environmental Health & Safety	PEFC	Programme for the Endorsement of Forest Certification
EIA	Environmental Impact Assessment	PK	Palm Kernel
ETP	Effluent Treatment Plant	POM	Palm Oil Mill
FFB	Fresh Fruit Bunch	POME	Palm Oil Mill Effluent
FPIC	Free, Prior, and Informed	PPE	Personal Protective Equipment
GAP	Good Agriculture Practice	RaCP	Remediation and Compensation Procedure
GHG	Greenhouse Gases	RSPO	Roundtable on Sustainable Palm Oil
GLWC	Global Living Wage Coalition	RTE	Rare, Threatened or Endangered
HCS	High Carbon Stock	SCCS	Supply Chain Certification Standard
HCV	High Conservation Values	SDS	Safety Data Sheets
HRD	Human Rights Defenders	SEIA	Social and Environmental Impact Assessment
Intertek	Intertek Certification International Sdn Bhd	SIA	Social Impact Assessment
ILO	International Labour Organization	SOP	Standard Operating Procedures
IPM	Integrated Pest Management	ToC	Theory of Change
ISCC	International Sustainability & Carbon Certification	UN	United Nations
ISO	International Organization for Standardization	UOC	Unit of Certification
IUCN	International Union for Conservation of Nature		



2.0 AUDIT PROCESS

2.1 Audit Methodology, Plan and Site Visits

Since **09th January 2024**, Intertek has initiated **public communications and notifications** and invited the relevant stakeholders before the audit to provide feedback and comments on their concern (if any) on the Lepad Kabu Estate of Boustead Plantations Berhad, regarding the environmental, biodiversity, community development and other relevant issues.

From **26 Until 28 February 2024**, the Audit Team of Intertek conducted the current audit in which one (1) single estate of Boustead Plantations Berhad namely Lepad Kabu Estate was audited for compliance against the **RSPO Principles and Criteria (P&C 2018)** and **Malaysian National Interpretation (MY-NI 2019)** requirements.

There no sampled applicable for this audit based on the Sampling Methodology as provided under the **RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard (November 2020)**, i.e., minimum sample of X estates = $(0.8\sqrt{Y}) \times Z$, where Y is the number of estates and Z is the multiplier as defined by the risk assessment. The Z multiplier value was determined as Low Risk for this UoC considering the geographical location and distance of the estates, complexity of the labour force, landscape setting and presence of HCV or peat, complexity of supply sheds, number of communities and known conflicts, legality etc. Additionally, the estates' selection was made based on their potential risks on environmental and biodiversity issues, such as proximity to forest reserves, hillsides, riparian zones, and HCV areas.

During the audit, relevant documents, and records, including Standard Operating Procedures (SOP), management plans, hectareage development, FFB, CPO and PK production, oil palm age profile, operational controls and measures, operational data and records, training records, etc. were reviewed and verified for compliance. The Audit Team using the process approach auditing technique, covering the palm oil mill and estate operations, agricultural practices, pest management, pesticide and fertilizer application, occupational health and safety, social accountability, environment, and other requirements. Stakeholders' interviews were conducted during the audit, and feedback obtained as part of information and evidence gathering. (See Section 2.6: Process of Stakeholders Consultation).

After completing the on-site audit, Intertek also evaluated conformity against the RSPO Certification System requirements for CB. The audit report, findings and associated documents were evaluated through an independent review by the Intertek Internal Technical Reviewer/Panel and the External Peer Reviewer (only required for Initial / Re-Certification audits) prior to the approval of this report and decision on continued certification by Intertek.

The details of the **Audit Plan** (actual) are provided in **Appendix B**.

Details of the findings and actions taken are provided in **Section 3.2** of this report.

2.2 Audit Programme

	Initial Certification Audit (Year: 2024)	ASA-01 (Year: 2025)	ASA-02 (Year: 2026)	ASA-03 (Year: 2027)	ASA-04 (Year: 2028)
Lepad Kabu Estate	√	√	√	√	√

2.3 Date of Next Scheduled Visit

The next scheduled visit will be the Annual Surveillance Audit (ASA-01) which will be carried out within a 12-month period after RSPO acceptance of this report.

2.4 Qualifications of the Lead Auditor and Audit Team

Competency details of the Lead Auditor and Audit Team are given in **Appendix A**.

2.5 Certification Body

Intertek Certification International Sdn Bhd is part of the Intertek Group, which is a **worldwide technical services organization** dedicated to reducing clients' risks by providing technical inspection services, management system certification in quality, environmental, occupational safety & health and product certification, RSPO P&C, RSPO SCC, ISCC, MSPO Part 2 (MS2530-2: 2013), MSPO Part 3 (MS2530-3: 2013), MSPO Part 4 (MS2530-4: 2013), MSPO SCC, Marine Sustainability Chain-of-Custody, MTCS and PEFC Chain-of Custody certification in applicable industry sectors including the agricultural and forestry sectors.

Intertek operates globally providing clients with a wide-ranging technical inspection expertise and access to thousands of skilled specialists worldwide. Intertek Group's certification business is ranked in the top 10 worldwide and is globally offering certification across a wide range of industries.



2.6 Process of Stakeholder Consultation

For Initial/Recertification Audit, stakeholder consultations began with notification of the upcoming audit through the websites of RSPO and Intertek. E-mails were sent to applicable stakeholders, including government agencies, NGOs, local communities, representatives of indigenous people (Orang Asal) and previous landowners/users.

E-mails and telephone enquiries were made prior to the actual audit, and stakeholder's response and feedback received were followed up accordingly.

For the Annual Surveillance Audit, stakeholder consultations began with notification of the upcoming audit through the websites of Intertek.

During the audit, stakeholders were interviewed, and their feedbacks were recorded. Among the stakeholders consulted at the site included workers, trade union leaders, women representatives, local community leaders, previous landowners/users (if any), goods and services suppliers and contractors.

Among the stakeholders consulted was the as follow:

List of Stakeholders Contacted	
Internal Stakeholders <ul style="list-style-type: none"> Estate's Workers 	Union/Contractors/Local Communities <ul style="list-style-type: none"> Akhmi (FFB Transporter) Penghulu Kampung Pahi (Nearby Local Community) NUPW District Branch Officer (Union) Kuala Pertang Mill (Neighboring Mill Buyer) Ladang Kampung Kuantan (Neighboring Estate)
Government Departments <ul style="list-style-type: none"> There is no complaint made towards UoC by any Government Department for this UOC. 	NGO <ul style="list-style-type: none"> There is no complaint made towards UoC by any NGOs for this UOC.

Issue	Description
1	Contractors Feedbacks: FFB Transporter (Akhmi) confirmed good business relationship with the UoC. Payments are received within stipulated agreed timeframe. Tender process was transparent, and terms of contracts are fair. Complaint and grievances procedure was well known and satisfied with existing practices. They are also aware on company's policies and guidelines, RSPO and MSPO, as they have been briefed during signing of contract agreement and during external stakeholder consultation Management Responses: No further issue Audit Team Comment: No further issue
2	Kuala Pertang Mill and Ladang Kampung Kuantan (Neighbouring Mill and Estate) Feedbacks: Kuala Pertang Mill and Ladang Kampung Kuantan are the neighbouring estate and mill of Lengan Kabu Estate. Mr. Mohd Saod and Mr. Mohan are the managers attended during the interview session informed they he always attends the informal discussions, formal meetings and activities organized by both parties. They expressed satisfaction with the cooperation of Lengan Kabu Estate. They stated they has no issues which is serious that cause impact to the current relationship with Lengan Kabu Estate. Management Responses: The management is always ensuring the current relationship with neighbouring estate and mill continuously. Audit Team Comment: No further issue
3	Community Leaders Feedbacks: Penghulu Kampung Pahi expressed his gratitude to Boustead Lengan Kabu Estate as the Company always fulfilled and contribute to local needs. He aware the company's policies and guidelines, RSPO and MSPO, including the grievance system. He attended to the external stakeholder meeting that conducted recently. Management Responses:



	<p>The management is always ensuring nearby communities always get benefit with good relationship with management and will keep it continuously.</p>
	<p>Audit Team Comment: No further issue</p>
4	<p>Union Representative</p>
	<p>Feedbacks: NUPW District Branch Officer expressed his gratitude to Boustead Lepad Kabu Estate as the Company always fulfilled the needs of workers. As mediator between estate and workers, he will always try to engage both parties to solve any matter or issues arise and to be solve accordingly. He aware the company's policies on engaging workers, socially and keep managing workers accordingly. As the company is complying with RSPO and MSPO standard, he are aware the commitment form the company to ensure all system of engaging workers benefit is in place. He been briefed the system and standard during his presence in the external stakeholder meeting that conducted recently.</p>
	<p>Management Responses: The management is always keep the current good relationship with union officer continuously to assist engaging workers with various programme.</p>
	<p>Audit Team Comment: No further issue</p>



3.0 AUDIT FINDINGS

3.1 Summary of Findings

Principle 1: Behave Ethically and Transparently

- Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.

1.1 – The unit of certification provides adequate information to relevant stakeholders on environmental, social, and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. ToC Outcomes: Improved Risk Management		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
1.1.1 – (C) Documents that are specified in the RSPO P&C are made available to the public.	<p>The UoC has established and implemented documented procedures (Stakeholder Request – Corporate Level, Stakeholder Request – POM Level, Stakeholder Request – Estate Level) for providing adequate information on environmental, social, and legal issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.</p> <p>Refer to Section 1.9 on Evaluation on Multiple Management Units and status of progress made on Complaints and related public issues.</p> <p>As at the time of audit, there were no additional requests for information from stakeholders for this UoC.</p> <p>Management documents relating to environmental, social, and legal issues were verified to be maintained and available to the public (notices and websites) and updated by HQ team.</p> <p>The following types of mandatory documents are available to the public upon request:</p> <ul style="list-style-type: none"> ▪ land titles/user rights, ▪ occupational health and safety plan, ▪ plans and impact assessments relating to environment and social impacts, ▪ pollution prevention plans, ▪ details of complaints & grievances, ▪ negotiation procedures ▪ continuous improvement plan ▪ Public summary of certification audit report. ▪ Human Rights Policy. <p>These publicly available documents include key indicators of performance like waste management and disposal plans for the mill and estates.</p> <p>Continual Improvement Action Plans had included approved budgets for social, environmental improvements and crop productivity.</p> <p>As at the time of audit, there were no additional requests for information from stakeholders for this UoC.</p>	Complied
<ul style="list-style-type: none"> • Land titles/user rights (Criterion 4.4); 	Land titles were only available upon justify reason.	Complied
<ul style="list-style-type: none"> • Occupational health and safety plans (Criterion 3.6); 	Occupational Safety and Health Plan was reviewed and available upon request.	Complied
<ul style="list-style-type: none"> • Plans and impact assessments relating to environmental and social impacts 	HCV Management Plan Was available dated Jan 2024. The above programs were regularly communicated by estate management to all employees from time to time during routine workers assembly. The recent specific	Complied



(Criterion 3.4);	biodiversity and environmental policy briefing was conducted on 18/02/2024 attended by all estate staff and employees.											
<ul style="list-style-type: none"> HCV & HCS documentation (Criterion 7.12); 	<p>The High Conservation Value assessment report was available dated December 2019 by Malaysian Environmental Consultant Sdn Bhd. This HCV report cover the identification of high biodiversity value habitat in Lepan Kabu estate. From the report, there are HCV 4 in Lepan Kabu estate with total 25.02 Ha. This HCV 4 regarding to buffer zone at Sg Lebir, Sg Pahi and buffer to riparian forest as per detail below:-</p> <table border="1"> <thead> <tr> <th>HCVMA</th> <th>Type of Land Cover</th> <th>Area (Ha)</th> <th>Total Area (Ha)</th> </tr> </thead> <tbody> <tr> <td rowspan="2">HCV 4</td> <td>Riparian Forest</td> <td>9.25</td> <td rowspan="2">25.02</td> </tr> <tr> <td>River buffer</td> <td>15.77</td> </tr> </tbody> </table> <p>Based on the Polisi Kemamanan BPB; dated 12/07/2021; signed by Boustead CEO, the HCV Management Plan has been established as 4 objectives as following:</p> <ol style="list-style-type: none"> There should be no disturbing and clearing of forests and riverine areas resulting in soil erosion during replanting. Currently, these areas are under passive management. Improving capacity in management of the HCV sites and require constant monitoring. HCV areas should be clearly demarcated, especially in areas that are on the estate boundary 	HCVMA	Type of Land Cover	Area (Ha)	Total Area (Ha)	HCV 4	Riparian Forest	9.25	25.02	River buffer	15.77	Complied
HCVMA	Type of Land Cover	Area (Ha)	Total Area (Ha)									
HCV 4	Riparian Forest	9.25	25.02									
	River buffer	15.77										
<ul style="list-style-type: none"> Pollution prevention and reduction plans (Criterion 7.10); 	<p>After evaluating the environmental impact of various activities, the estate identified fertilizer, diesel, and pesticide chemicals as the primary sources of pollution. To mitigate these significant pollutants, an action plan dated Jan 2024 has been devised, which includes implementing Integrated Pest Management (IPM) practices and recycling empty chemical containers and fertilizer bags.</p>	Complied										
<ul style="list-style-type: none"> Details of complaints and grievances (Criterion 4.2); 	<p>At Lepan Kabu Estate, all the details of complaints and grievances were available publicly.</p> <p>There are no complaints received from external parties at the time of audit. Details of complaints mainly from internal regarding to housing can be found in the respective Grievance Form (Internal and External) record, digital data storage and action taken. There are several mediums which allowed workers to forward their complaints, for example verbally, QR Code by UoC and Grievance Form (Internal and External). Employees and external parties can also submit their grievances through alternative channel such as Whistle Blowing Channel (http://www.bousteadplantations.com.my).</p>	Complied										
<ul style="list-style-type: none"> Negotiation procedures (Criterion 4.6); 	<p>At Lepan Kabu Estate, all the negotiation procedures were established and made available publicly.</p>	Complied										
<ul style="list-style-type: none"> Continual improvement plans (Criterion 3.2); 	<p>Continual improvement plans were available upon request</p>	Complied										
<ul style="list-style-type: none"> Public summary of certification audit report. 	<p>Public summary report was available upon request</p>	Complied										
<ul style="list-style-type: none"> Human Rights Policy (Criterion 4.1). 	<p>Human Right Policy dated 2 December 2019 signed by Chief Executive Officer states respecting human rights is</p>	Complied										



	<p>the foundation of Boustead Plantations Berhad's sustainability and in the communities in which Boustead operate. Human Rights direction is contained in BPB Sustainability Policy signed by Chief Executive Officer dated 12 July 2021 and made available publicly. It states the Company's commitment to respect human rights of all workers in accordance with the Universal Declaration of Human Rights, and International Labour Organization (ILO) core conventions.</p>	
<p>1.1.2 – Information is provided in appropriate languages and accessible to relevant stakeholders.</p>	<p>Evidence is available that LEPAN KABU ESTATE keep and maintain requests for information and responses which includes meeting minutes. These were kept and maintained in the respective files. At the time of audit, there is no request for such information by external parties. However, Information to relevant stakeholders is provided during internal and external stakeholder meetings. All documents are in appropriate languages.</p> <p>Example list of documents available upon requests are: -</p> <ul style="list-style-type: none"> ▪ Complaints and grievances procedure ▪ Human Rights Policy ▪ BPB Sustainability Policy ▪ OSH policy and plan ▪ EIA report and environment management plan ▪ SIA report and social management plan ▪ List of stakeholders <p>Documents such as company's policy can also be downloaded from website. Upon consultation with selected stakeholders, they mentioned that they are aware of the availability of such information and can get access from the office.</p>	<p>Complied</p>
<p>1.1.3 – (C) Records of requests for information and responses are maintained.</p>	<p>Records of requests for information and responses are established accordingly.</p> <p>However, at the time of audit, there is no request for such information by external parties. Sighted request made by workers mainly related to house repair and official internal request by Region Office. The records were maintained in Grievance Form (Internal and External), meeting minutes and digital data storage. Grievance Procedure (Doc No: HR/2022/023/003, Date: 1 March 2023, Rev: 0) states all grievances must be presented promptly, in fill in the form, but no later than 30 calendar days from the date the grievant become aware of or should have become aware of with the exercise of reasonable diligence. Grievances not presented within 30 calendar days' period shall be considered untimely for processing. An employee can present his grievance to his immediate superior, departmental manager, Human Resource Department and Chief Executive Officer (CEO) subsequently if the employee is not satisfied with the decision. The decision of the CEO after full examination of the facts shall be final.</p>	<p>Complied</p>
<p>1.1.4 – (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p>	<p>Consultation and Communication Procedure is established with approval by the individual management in LEPAN KABU ESTATE, supported by flow of social issues handling and external communications.</p> <p>This procedure was disclosed as evidenced by the handout materials given to the external stakeholders.</p>	<p>Complied</p>



	<p>These documents are also displayed at the main notice boards throughout the UoC. The implementation of this procedures can be verified from minutes of meetings, consultations and communications held with internal and external stakeholders.</p> <p>Regular morning briefings were used by the management to communicate the policies, procedures, rules and regulations and other information to the workers. In the case of external communications, they were in the form of correspondence, which were kept in the External Communication File or external stakeholders meeting.</p> <p>Mill/Estate Managers and their respective assistant managers are responsible for ensuring these procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders.</p>	
1.1.5 – There is a current list of contact and details of stakeholders and their nominated representatives.	<p>Each unit within Lepad Kabu Estate has its own list of contact and details of stakeholders. Each stakeholder has details of the nominated representatives such as classification, type, contact person, addresses and contact numbers. Based on the stakeholders lists sighted, the stakeholders comprise government agencies, embassy, schools, hospitals, transporters, neighbouring estates, neighbouring villages, suppliers, and contractors. The stakeholder list is updated as and when there are any changes with the latest update was done in August 2023 for all operating units.</p> <p>The lists were used for selection of stakeholder’s consultation during the audit conducted, face to face interview and tele interview.</p>	Complied
1.2 – The unit of certification commits to ethical conduct in all business operations and transactions.		
ToC Outcomes: Improved Risk Management		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
1.2.1 – A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>Documented code of ethical conduct and integrity titled ‘Code of Ethics and Conduct’ is maintained by the management and verified that the established document had been communicated to all level of the workforce of the Lepad Kabu Estate, including contractors/service providers.</p> <p>This Policy is available on the Boustead Plantations website (https://bousteadplantations.com.my/integrity/) and shared with external stakeholders.</p>	Complied
1.2.2 – A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>Overall compliance monitoring of the policy and ethical business practices are conducted as follows:</p> <ol style="list-style-type: none"> 1. Internal audit conducted by Sustainability Department in Yearly basis for Lepad Kabu Estate. 2. Account audits were also conducted internally and externally to ensure compliance and implementation of ethical business. 	Complied

Principle 2: Operate Legally and Respect Rights

- Implement legal requirements as the basic principles of operation in any jurisdiction.

2.1 – There is compliance with all applicable local, national and ratified international laws and regulations.		
ToC Outcomes: Improved Risk Management		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE



<p>2.1.1 – (C) The unit of certification complies with applicable legal requirements.</p>	<p>Based on observations during site visit and records reviewed, verified that Lepad Kabu Estate are complies with applicable legal requirements. The desktop study also showed there was no negative news related to violations of the law involving all operating units in this UoC. All operating units also did not receive any warning notices issued by Malaysian government authorities. Lepad Kabu Estate has obtained and renewed license and permits as required by the law. Amongst the sampled licenses or permit viewed in the mill and estates were as following:</p> <ul style="list-style-type: none"> • MPOB License: 616032002000, valid until 30th Nov 2024, Nursery 616061011000, valid 31/12/2024. • Scheduled Controlled Goods Permit (Supply Control Regulations 1974 - Regulation 9(2)) for 13,500 litres of industrial diesel, valid until 10 May 2024 • CF – Air Receiver KN PMT 1161, valid until 17 Sep 2024. • Hospital Assistant Registration Certificate No. 14803 dated 31st Dec 2024. • Typoid vaccine recorded 6 persons, example: valid 07th dec 2026 (831639). 	<p>Complied</p>
<p>2.1.2 – A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p>	<p>Legal register covering the applicable local and international laws and regulations are available at Lepad Kabu Estate, namely Legal and Other Requirements Register (LORR)", which were reviewed in 06-Jan-2023 by respective operating unit manager. The legal register included Federal Laws, State Laws, International Laws, Covenants & Standards, and Guidelines, Condes of Conduct/Practice, and other standards. Changes to the law and regulation are monitored by the OSH Department of Boustead HQ KL. Various sources were referred to in obtaining information about the updates of legal requirements. This includes checking with the industrial association (e.g., MPOA, EMPA, SECA, etc.), attending seminars/conferences, buying law books, government agencies' websites, etc. The Lepad Kabu Estate maintained track of any changes to applicable law and appointed Mr. Amrul Nizam B. Abdul Ghani of Boustead Plantation Division as the person responsible for monitoring any changes to the law and cascading those changes to all sites. Boustead Plantations also subscribed to lawnet.com for updates.</p>	<p>Complied</p>
<p>2.1.3 – Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p>	<p>It was verified that there has been no change to the stated land titles and designated use for cultivation of agricultural crop of economic value. Locations of several boundary stones and markers were re-visited and verified to be within the perimeters of the estate land titled boundaries. On-site verification confirmed that there has been no planting beyond the legal demarcated boundary areas of the mill and estates.</p>	<p>Complied</p>
<p>2.2 – All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. ToC Outcomes: Improved Risk Management</p>		
<p>INDICATORS</p>	<p>FINDINGS AND OBJECTIVE EVIDENCE</p>	<p>COMPLIANCE</p>



2.2.1 – A list of contracted parties is maintained.	List of contracted parties are available and duly maintained. The list contains names or company name, roles, address, and contact details of the contractors. The list is incorporated into the Stakeholders List, which is properly retained by each operating unit.	
2.2.2 – All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	<p>Contracts sampled during the audit as follow:</p> <ul style="list-style-type: none"> • Pt Kijang Lombok Raya (Labour Services Contractor) signed Sustainability Policy Pledge by Supplier dated on 19-Aug-2022. <p>The contracts include the specific clauses of:</p> <ul style="list-style-type: none"> • on meeting applicable legal requirements, • disallowing child, forced and trafficked labour, • where young workers, are employed, the contracts include a clause for their protection, • complies with relevant requirements of this RSPO P&C Certification, • ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary, • provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance, • shall accept RSPO approved auditors to verify assessments through a physical inspection if required, • agreed timeframe for payments to be made. <p>Due diligence on the appointed contractors/service providers are conducted and monitored. Documents such as copy of vehicle insurance, copy of vehicle road tax, workers' employment contract, payslip, vendor registration: checklist of documents along with a registration evaluation form, etc can be provided during the audit.</p> <p>The contractor will include into social engagement program for Lapan Kabu Estate include into HQ arrangement plan on November 2024.</p>	Complied
2.2.3 – All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	List of contracted parties are available and duly maintained. The list contains names or company name, roles, address, and contact details of the contractors. The list is incorporated into the Stakeholders List, which is properly retained by each operating unit.	Complied
2.3 – All FFB supplies from outside the unit of certification are from legal sources. ToC Outcomes: Improved Risk Management		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
2.3.1 – (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims 	Not Applicable	Not Applicable



<ul style="list-style-type: none"> Valid MPOB license 		
2.3.2 – For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	Not Applicable	Not Applicable

Principle 3: Optimise Productivity, Efficiency, Positive Impacts and Resilience

- Implement plans, procedures, and systems for continuous improvement.

<p>3.1 – There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability. ToC Outcomes: Improved risk management; Productivity optimised</p>														
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE												
3.1.1 – (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	<p>The 5-year Planning Horizon for the UOC was documented, reviewed and available. The Annual Budget for each year includes the following:</p> <ul style="list-style-type: none"> Cost variations Costing detail Manpower statement Seasonal monthly crop Vehicle & engine running Machinery data Water supply allocation Summary estimate General charges budget 5 years planning horizon. <p>The Estate Manager have monitored the operational performance against Key Performance Indications and targets (costs, FFB yields, quality, productivity, pesticides usage, fertilizers usage, etc.). Records of monitoring of costs against budget to achieve specified targets were verified to be available. Performances are discussed in the monthly meetings held at the UOC and issues and actions needed are recorded for follow up in the meeting. The records of these meetings were available and verified during the audit.</p>	Complied												
3.1.2 – An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The updated replanting program has been established, and the outlined details of the replanting program are as follows:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Replanting (Ha)</th> </tr> </thead> <tbody> <tr> <td>2024</td> <td>135</td> </tr> <tr> <td>2025</td> <td>117.80</td> </tr> <tr> <td>2026</td> <td>118.80</td> </tr> <tr> <td>2027</td> <td>70</td> </tr> <tr> <td>2028</td> <td>86.20</td> </tr> </tbody> </table>	Year	Replanting (Ha)	2024	135	2025	117.80	2026	118.80	2027	70	2028	86.20	Complied
Year	Replanting (Ha)													
2024	135													
2025	117.80													
2026	118.80													
2027	70													
2028	86.20													
3.1.3 – The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	<p>Mill Management Review Meeting was conducted on 26/11/2023. The meeting was chaired by Acting Head, Sustainability & Safety Department from HQ for Lapan Kabu Estate. The meeting was discussed on The Result of The Internal and External Audit, Preventive and correction actions plan, Customer Feedback, changes affecting policy, recommendation for improvement any</p>	Complied												



	other business. The minutes of meeting was available for verification.							
3.2 – The unit of certification regularly monitors and reviews their economic, social, and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations. ToC Outcomes: Improved risk management								
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE						
3.2.1 – (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	<p>The Lepan Kabu Estate has identified and implemented the following Continual Improvement Action Plans for 2024.</p> <p>At all estate visited, the sampled as follows:</p> <ul style="list-style-type: none"> ▪ Replaced surau roof and electrical rewiring for surau ▪ Flooring tiles at 2 unit of workers quarters ▪ Construct perimeters drain for workers quarters ▪ Implementation of grabber system for FFB evacuation to the mill. ▪ Implementation of FM3 machine for fertilizer spreading ▪ Fixing and maintaining barn owl. ▪ To repair the damaged staff quarters fence ▪ To improve the condition of the surau building ▪ To use badang-mounted blower for palms sanitation works ▪ To use precision spreader for circle spraying ▪ To use FM OryX machine (200 L) for P&D spraying ▪ To install new warning and safety signs as many signs are getting worn out. ▪ To practice pulverization method for replanting area. 	Complied						
3.2.2 – As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].	<p>This is initial certification audit, this management unit will only submit the RSPO P&C Metrics to RSPO Secretariat once the certification is approved.</p> <p>The RSPO P&C Metric template and PalmGHG for this UoC will only been reviewed on the next audit.</p>	Not Applicable						
3.3 – Operating procedures are appropriately documented, consistently implemented and monitored. ToC Outcomes: Improved risk management								
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE						
3.3.1 – (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Work Instructions have been derived from SOPs and it were displayed at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards. Eg: WI Boiler Station, WI Sterilizer Station, WI Oil Room, WI Press Station and etc.</p> <p>Boustead Plantations Bhd has established the agriculture manual (Oil Palm Circular) covers felling and clearing, planting material, weeding, lallang, manuring, pest & disease, census & thinning out, drains, road & bridges, soil/water conservation, boundaries, fences & survey, supplying, pruning, collection (harvesting), external transport and etc.</p> <p>SWP - Safe work procedure including SOP for Reception & dispatch, Fruit Handling, Sterilisation, Threshing, Pressing, Workshop, Store, Working at height and etc.</p> <p>Water sampling for river used in Lepan Kabu Estate as per result report no. 23-251256 (By Permula Sdn Bhd) dated 30/09/2023) available as per below:-</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Result (mg/L) in</th> <th>Result (mg/L) in</th> </tr> </thead> <tbody> <tr> <td>Ammoniacal Nitrogen</td> <td>0.025</td> <td>0.034</td> </tr> </tbody> </table>	Parameter	Result (mg/L) in	Result (mg/L) in	Ammoniacal Nitrogen	0.025	0.034	Complied
Parameter	Result (mg/L) in	Result (mg/L) in						
Ammoniacal Nitrogen	0.025	0.034						



	<table border="1"> <tr> <td>pH</td> <td>7.06</td> <td>6.93</td> </tr> <tr> <td>Turbidity</td> <td>537</td> <td>842</td> </tr> <tr> <td>Arsenic</td> <td><0.0005</td> <td><0.0005</td> </tr> <tr> <td>Cyanide</td> <td><0.01</td> <td><0.01</td> </tr> </table>	pH	7.06	6.93	Turbidity	537	842	Arsenic	<0.0005	<0.0005	Cyanide	<0.01	<0.01	
pH	7.06	6.93												
Turbidity	537	842												
Arsenic	<0.0005	<0.0005												
Cyanide	<0.01	<0.01												
3.3.2 – A mechanism to check consistent implementation of procedures is in place.	<p>To uphold compliance, a robust mechanism has been established, involving regular evaluations. The latest evaluation, conducted on 16/10/2023, signifies our commitment to adherence. Moreover, an annual internal audit is diligently performed by the Sustainability section, with the inaugural audit for Lepan Kabu Estate executed on 22-23/11/2023, meticulously covering all prescribed standards.</p> <p>In fostering best practices, a Planting Advisory Visit occurred from 14-17/10/2023. The ensuing report from this visit has been thoroughly examined, aligning our dedication to excellence in plantation management.</p>	Complied												
3.3.3 – Records of monitoring and any actions taken are maintained and available.	<p>Records of monitoring and actions taken have been conscientiously preserved for a period exceeding 12 months at the Lepan Kabu estates. Daily Muster chits and briefing records are easily accessible within the Lepan Kabu estates. On-site field inspections at the audited estates have substantiated the authenticity of actual operational and field activities.</p> <p>During the assessment at the estates, it was ascertained that monitoring records on spraying, manuring, and harvesting operations, as well as records pertaining to throughput/starting & stopping time, and the boiler monitoring sheet, Daily notification report, and Daily supervision and walkabouts by Supervisor and Assistant Managers, were meticulously maintained and readily available. Furthermore, reports of top management and government agency visits are appropriately retained by estates management.</p> <p>The Management Review Meeting minutes, meticulously maintained, reflect the scrutiny of internal audit findings to assess the effectiveness of implementing the RSPO P&C requirement. All records related to Internal Audit and Estate Plantation Advisory Visit are consistently maintained and accessible at the Lepan Kabu Estate Office.</p>	Complied												
<p>3.4 – A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p> <p>ToC Outcomes: Improved risk management; Human rights upheld</p>														
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE												
3.4.1 – (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder / outgrower scheme, is documented.	<p>Social Impact Assessment for Lepan Kabu Estate, which impacts of operations were related to land and resource development and employment conditions is available during this audit.</p> <p>Based on content of the report includes External community and the estate (competition for land, income generation, the estate’s CSR, flooding, and animal/pest encroachment) and internal community (wages and workers’ rights, housing and living conditions, and occupational safety and health).</p> <p>Environmental aspect and impact assessments have been completed for all activities within the estate, as verified in</p>	Complied												



	<p>the Lepan Kabu Estate environmental impact assessment conducted and reviewed in January 2024. The assessment was conducted by the assistant and subsequently approved by the Manager. Through these assessments, the company underscores its commitment to achieving a comprehensive understanding of the social and environmental aspects linked to its operations. This proactive approach facilitates the identification and effective management of potential impacts, fostering responsible and sustainable practices within the estates.</p>	
<p>3.4.2 – For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p>	<p>Lepan Kabu Estate’s SEIA plan is available had been updated and include action plan for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, with consultations of relevant stakeholders.</p> <p>There was evidence that the action plan or “<i>Pelan Tindakan Sosial</i>” for 2024 has been developed at all estates and Lepan Kabu Estate in UoC through consultation with the affected parties as sighted during this audit.</p> <p>The plan was updated in January 2024. The action plan was documented with timeline of each action and the person-in charge.</p> <p>The information provided indicates that an Environmental Aspect and Impacts Assessment (EAIA) was conducted for Lepan Kabu estates on 16/02/2024. The assessment documents include the identification of various aspects related to field activities, such as fertilizing, spraying, transportation of FFB, garbage disposal, and road construction, repair, and maintenance. The EAIA report also includes action plans and recommendations to mitigate negative effects and promote positive impacts, including relevant conservation activities and the proper demarcation of riparian zones. Records and documentation related to the mitigation plan, implementation, and monitoring activities were available during the audit and found to be satisfactorily implemented.</p> <p>The environmental management plan and monitoring activities were developed with the participation of affected stakeholders, including the Forestry/Wildlife department and local communities. The plan is implemented and continuously monitored. The report also highlights that a visit to the site confirmed satisfactory implementation.</p> <p>The implementation and monitoring of the documented environmental improvement plans will be reviewed on an annual basis, ensuring ongoing assessment and improvement of environmental practices.</p>	<p>Complied</p>
<p>3.4.3 – (C) The social and environmental management and monitoring plan is implemented, reviewed, and updated regularly in a participatory way.</p>	<p>Evidence is available that all units’ action plan or ‘<i>Pelan Tindakan Sosial</i>’ are being updated on a yearly basis. Latest revision was done in January 2024. Evidence is available that the reviews were done in a participatory way as evidenced from minutes of discussions, written feedback, and responses from both internal and external stakeholders.</p> <p>The review was conducted internally with the participation of stakeholders and local communities. The</p>	<p>Complied</p>



	<p>review was done based on feedback from stakeholders, during the stakeholders meeting. The consultations were recorded, documented and later the monitoring plans updated to current practices.</p> <p>The review on the management and monitoring of environmental issues were done annually. The latest review was conducted on 16/02/2024 for the estate. The plan was updated as necessary and documented.</p> <p>The review was conducted internally with the participation of stakeholders. The review was done based on feedback from stakeholders, during the stakeholders meeting. The consultations were recorded, documented and later the monitoring plans updated to current practices. The latest Social, Environmental and High Conservation Value Impact assessment minute meeting for Lapan Kabu Estate conducted on 09/11/2023 at Lapan Kabu Estate Office</p>	
<p>3.5 – A system for managing human resources is in place. ToC Outcomes: Improved risk management; Safe and decent work</p>		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
3.5.1 – Employment procedures for recruitment, selection, hiring, promotion, retirement, and/or termination are documented and made available to the workers and their representatives, where applicable.	<p>Boustead Plantations Berhad established SOP for Recruitment Estates SOP(I)/04/2022/REC-02, dated 29/09/2022.</p> <p>Procedures available is include with process recruitment requisition, receive application, interview, and selection, hiring approval, appointment of candidate.</p> <p>For locals, the procedures are in SOP on Hiring of Local workers. The procedure details the hiring process (application form, screening, interview, requisition approval from HR Manager/ Estate or Mill Manager, medical check-up, and issuance of letter of offer).</p> <p>For foreign workers, the employment procedures are contained in Standard Operating Process & Procedures (SOPP) dated 01-Nov-2017. Promotions are available in the procedure, retainment, and termination. Employee has a copy of the Employee Handbook for Estate/Mill Executive Staff. It states that promotion of executives is at the sole discretion of the company.</p> <p>The SOP on recruitment, selection, hiring, retirement, and termination has been formalized and implemented accordingly internally for business unit is available.</p>	Complied
3.5.2 – Employment procedures are implemented, and records are maintained.	<p>There is evidence that the employment procedures for local and foreign workers enumerated are being implemented, and employment records are maintained. All local applications are preceded with a job application form, relevant qualifications and certificates, job interview, records of medical check-up, and the issuance of letter of job offer.</p>	Complied
<p>3.6 – An occupational health and safety (H&S) plan is documented, effectively communicated, and implemented. ToC Outcomes: Improved risk management; Safe and decent work</p>		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
3.6.1 – (C) All operations are risk assessed to identify H&S issues. Mitigation plans, and procedures are documented and implemented.	<p>CHRA – conducted by HQ/12/ASS/00/306. Sighted report no. HQ/12/ASS/00/306-2019/0033 dated 11-12/2019. The assessment covered 2 work unit involving 12 chemicals) including chemical mixtures). The assessment was done on tasks with 20 possible inhalation risk and 17 possible demal risk. The assessment summary 5 tasks</p>	Complied



	<p>were categorized as low risk, 15 tasks were labelled medium risk. No tasks was categorized high risk. For the tasks involving dermal exposure, 6 tasks were labelled as low risk and 11 tasks were labelled as medium risk. No that was labelled high risk for dermal exposure.</p> <p>NRA – conducted by HQ/08/PEB/00/87. Sighted report dated 05 Apr 2022. The assessment covered work unit of tractor driver, mist blower, grass cutter, Cantas, water pump attendant, mechanic.</p> <p>Audiometric Test – on 28th -29th Jan 2024, 06th Feb 2024 & 18th Feb 2024 for 17 workers. No hearing impairment detected. OHD recommendation is to conduct annual audiometric test – next will be in 27th – 28th Jan 2025, 05th Feb 2025 and 17th Feb 2025.</p>	
<p>3.6.2 – (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>SOP for HIRARC has been established. It was reviewed accordingly by all sites visited in 2023 which included workshop, chemical store, Harvesting, Manuring, Spraying, Nursery, Replanting, to name a few. The risk assessment for chemical (CHRA) in for all estates had been conducted by OHD. The management also has established the guidelines regarding to COVID-19 under title COVID-19 Emergency Preparedness and Response Guidelines. Latest revision dated 15-Jun-2023 were sighted.</p>	<p>Complied</p>
<p>3.7 – All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained. ToC Outcomes: Improved risk management; Safe and decent work</p>		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
<p>3.7.1 – (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p>	<p>The formal training program has been documented for implementation for year 2024 at estate.</p> <p>The training programmes were based on the training needs identified for various categories of all employees and contractors and their related work functions / activities, RSPO requirements, Occupational Health & Safety and Environmental matters, including gender-specific needs.</p> <p>Verified that trainings conducted had including the refresher training on all aspects of the RSPO Principles and Criteria, productivity, and best management practice subjects on estates operating procedures as well as procedural matters caring for Occupational Health & Safety and Environmental, from felling of oil palm trees, nursery, replanting, harvesting and upkeep of fields to evacuation of FFB to mill. In addition to the Agricultural Practice training, that is, Process stations / field SOP related to trade/job skills, the following topics, among others, were included in the 2024 annual training program:</p> <ul style="list-style-type: none"> ▪ OSH Act & regulations 1994. ▪ Environmental Quality Act 1974 ▪ Induction Program for new workers. ▪ OSH Committee and function. ▪ First Aid Training ▪ Scheduled waste training ▪ RSPO/MSPO/ISCC Principles ▪ HCV & Biodiversity training. ▪ Mechanical/electrical workshop 	<p>Complied</p>



	<ul style="list-style-type: none"> ▪ Environmental/safety & health policy/ environmental responsibility, ▪ Emergency Response drill ▪ Social program, including sexual harassment for male and female employees, needs of new mother, etc. <p>Evaluation of understanding was done, and this was confirmed during on-site interviews with the relevant Estate personnel.</p>	
3.7.2 – Records of training are maintained.	Training records for each staff and workers, including new employees hired to date in year 2023/2024 on RSPO P&C implementation were available and was verified on-site to be satisfactorily maintained. Fire extinguisher on 26 th Jul 2023	Complied
3.7.3 – Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Not Applicable	Not Applicable

Supply Chain Requirements for Mills

3.8 – Supply Chain Requirements for Mills ToC Outcomes: Improved risk management		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
3.8.1 – (C) Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Not Applicable	Not Applicable
3.8.2 – (C) Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Not Applicable	Not Applicable
3.8.3 – (C) The estimated tonnage of CPO and PK products that could potentially be	Not Applicable	Not Applicable



<p>produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>		
<p>3.8.4 – (C) The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>
<p>3.8.5 – (C) Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>Not Applicable</p>	<p>Not Applicable</p>
<p>3.8.6 – (C) Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct an annual internal audit to determine whether the mill: <ul style="list-style-type: none"> (a) conforms to the requirements in the RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims. (b) effectively implements and maintains the standard 	<p>Not Applicable</p>	<p>Not Applicable</p>



<p>requirements within its organisation</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued and required corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>		
<p>3.8.7 – (C) Purchasing and Goods in</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified volume.</p> <p>iii) The mill shall have a mechanism in place for handling of non-conforming FFB and/or documents</p>	Not Applicable	Not Applicable
<p>3.8.8 – (C) Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <p>The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <p>a) The name and address of the buyer;</p> <p>b) The name and address of the seller;</p> <p>c) The loading or shipment / delivery date;</p> <p>d) The date on which the documents were issued;</p> <p>e) RSPO certificate number;</p> <p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	Not Applicable	Not Applicable
<p>3.8.9 – (C) Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsources activities to independent third parties (e.g. subcontractors for</p>	Not Applicable	Not Applicable



<p>storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>(ii) The mill shall ensure the following:</p> <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 		
<p>3.8.10 – (C) The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	Not Applicable	Not Applicable
<p>3.8.11 – (C) The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	Not Applicable	Not Applicable
<p>3.8.12 – (C) Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified 	Not Applicable	Not Applicable



<p>status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.).</p>		
<p>3.8.13 – (C) Extraction Rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Not Applicable	Not Applicable
<p>3.8.14 – (C) Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	Not Applicable	Not Applicable
<p>3.8.15 – (C) Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Not Applicable	Not Applicable
<p>3.8.16 – (C) Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the</p>	Not Applicable	Not Applicable



<p>dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>		
<p>3.8.17 – (C) Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Not Applicable	Not Applicable

Principle 4: Respect Community and Human Rights and Deliver Benefits

- Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

<p>4.1 – The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p> <p>ToC Outcomes: Human rights upheld</p>		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
<p>4.1.1 – (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>Lepan Kabu Estate adopt Boustead Plantations Behad Sustainability Policy dated 12/07/2021 signed by CEO. Statement of policy clause 2.2 Respect Human Rights</p> <p>2.2.1. Respect women’s right to family planning, as well as the right to sexual and reproductive health as long as it does not violate the provisions of the law.</p> <p>2.2.2. Comply with prevailing fair wages practices.</p> <p>2.2.3. Provide fair and equal employment opportunities regardless race, nationality, religion, or gender, and practice no contract substitution. Training and development opportunities are provided based on business need, job requirements and individual qualification to ensure that employees are able to utilize their full potential.</p> <p>2.2.4. Assure that there will be no threats, retaliation, or violence against human rights defenders (HRD) regardless of individuals or groups. This guarantee is also given to our employees who are directly or indirectly involved in HRD activities in the workplace.</p> <p>Verified from training records reviewed during the audit that the communication and briefing of the policy were conducted accordingly.</p> <p>Document had been communicated to all level of the workforce of the Lepan Kabu Estate includes contractors/service providers.</p> <p>Human Rights Policy is communicated to external parties through stakeholders meeting and also is available on the Boustead Plantation website (https://bousteadplantations.com.my/).</p>	Complied
<p>4.1.2 – The unit of certification does not instigate violence or use any form of harassment in their operations.</p>	<p>There is no evidence of any use of violence or the instigation of violence within the Lepan Kabu Estate as such issues never occur. There is no abusive language or</p>	Complied



	threatening gestures observed during site visit nor reported by workers during interviews. This was also cross-checked with stakeholders during stakeholders' consultation via Phone Call.	
4.2 – There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties. ToC Outcomes: Human rights upheld		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
4.2.1 – (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	<p>The mutually agreed system or SOP titled Grievances Procedure, Doc. No HR/2022/023/003, issue date 01/03/2022. Internal/External' open to all affected parties, resolves dispute in an effective, timely and appropriate manner, ensure anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. This procedure is open to all employees and stakeholders. The documented system comes in the form of complaints form/book where complainant can fill up and submit to the office.</p> <p>The grievance procedure includes the mechanism of receiving, recording, and addressing any complaints/grievances from affected parties up to satisfactorily closure. The procedure most complaints were resolved within 3 working days at immediate superior, should the employee be not satisfied with the decision of his immediate superior, he may present his grievance to the Head of Department (HoD) in writing within 5 working days from the date that the employee's' immediate superior rendered his decision. The HoD shall give his decision in writing within 5 working days from the date of grievance is referred to him. Should the employee be not satisfied with the decision of his HoD, he may present his grievance to the Head of Human Resource. The Head of Human Resource shall give his decision in writing within 10 working days facilitate a meeting to resolve the issue. A meeting shall consist of 3 panel members to be appointed by the Head of Human Resource. If no agreement is reached within 10 working days after the meeting with the Head of Human Resource, if the employee desire further consideration of his complaint, he can present his case to the Chief Executive Officer (CEO). The decision of CEO shall be final.</p> <p>The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through management/workers/stakeholders meeting.</p>	Complied
4.2.2 – Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	The procedure for complaint/grievance resolution was explained to all workers and external stakeholders through training and management/workers/stakeholders meeting. Sighted document for Lapan Kabu Estate showed briefing during the stakeholders meeting or training.	Complied
4.2.3 – The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available	Based on the housing complaints records, any complaints brought to the attention of respective unit is attended promptly, often on the same day, or the next depending on availability of material and severity of complaint. Any delay due to, would be informed to the complainant	Complied



and communicated to relevant stakeholders.	accordingly. This were confirmed during worker's interview.	
4.2.4 – The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Lepan Kabu Estate in resolving disputes and grievances exists in the procedure called Grievance Procedure. The estate within TBU each has its own Internal Complaint Form/Book and External Communication/Complaint Form/Book available. The Internal Complaint Books are mostly for employees to lodge complaint pertaining to their houses. The external stakeholder complaint record/book reviewed did not show complaints against. BPB established 'E-Adu" by used QR code.	Complied
4.3 – The unit of certification contributes to local sustainable development as agreed by local communities. ToC Outcomes: Human rights upheld		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
4.3.1 – Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Contributions to local development was demonstrated in the provision of facilities and monetary contributions, where feasible as follows: <ul style="list-style-type: none"> • Grass cutting and cooperation at Football field Kampung Pahi • Cleaning and cooperation at Tanah Perkuburan Islam Kampung Pahi. • Pruning and cooperation at main road to Sekolah Kebangsaan Pahi. 	Complied
4.4 – Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior, and informed consent. ToC Outcomes: Human rights upheld		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
4.4.1 – (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	Copies of the land titles of all estates were maintained and noted to be legally owned by the BPB. The original copies are maintained by the Corporate Head Office. The legal use of the land confirmed to be for the cultivation of oil palms and agricultural use. There were no recorded or known disputes over the ownership of the land. No changes to the land ownership or new land acquisition since the last audit. Based on the verification of the documents, all the land titles were for planting either oil palm or agricultural crops for economic value. Verify through land title has been confirmed that Boustead has the right to use the land which is legitimately owned by their company.	Complied
4.4.2 – Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: <ol style="list-style-type: none"> Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making 	There has been no dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	Complied



<p>b. Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p> <p>c. Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>		
<p>4.4.3 – (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>Appropriate landscape maps with latitude & longitudes showing the legal boundary and neighbouring/ surrounding areas of the estate were available and maintained.</p> <p>The lands at the UoC are legally owned by Boustead and no other users were identified in the land area.</p> <p>The existing estates are not encumbered by any customary land rights and therefore the process of participatory mapping is not required.</p>	<p>Complied</p>
<p>4.4.4 – All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p>	<p>There was no land dispute in this UoC at the time of audit. As such this process is not applicable for verification.</p>	<p>Complied</p>
<p>4.4.5 – (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	<p>Based on documentation review, observations made and interview with management, there is no evidence of any land conflicts, or claims for legal or customary rights against Lepan Kabu Estate.</p> <p>Therefore, this Indicator about communities being represented by parties of their own choosing is not applicable.</p>	<p>Complied</p>
<p>4.4.6 – There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p>	<p>Based on documentation review, observations made and interview with management, there is no evidence of any land conflicts, or claims for legal or customary rights against Lepan Kabu Estate.</p> <p>Therefore, this Indicator about communities being represented by parties of their own choosing is not applicable.</p>	<p>Complied</p>
<p>4.5 – No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p> <p>ToC Outcomes: Human rights upheld</p>		
<p>INDICATORS</p>	<p>FINDINGS AND OBJECTIVE EVIDENCE</p>	<p>COMPLIANCE</p>
<p>4.5.1 – (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>Based on observations, documentation review and interview with management, it was verified that there is no occurrence of any new planting on local peoples' land but occurrence within the Lepan Kabu Estate's land. The existing Estate is not encumbered by any legal, customary and user rights.</p>	<p>Complied</p>
<p>4.5.2 – (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full</p>	<p>Based on observations, documentation review and interview with management, it was verified that there is no occurrence of any new planting on local peoples' land</p>	<p>Complied</p>



<p>respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>but occurrence within the Lapan Kabu Estate's land. The existing Estate is not encumbered by any legal, customary and user rights.</p>	
<p>4.5.3 – Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>Based on observations, documentation review and interview with management, it was verified that there is no occurrence of any new planting on local peoples' land but occurrence within the Lapan Kabu Estate's land. The existing Estate is not encumbered by any legal, customary and user rights.</p>	<p>Complied</p>
<p>4.5.4 – To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p>	<p>Based on observations, documentation review and interview with management, it was verified that there is no occurrence of any new planting on local peoples' land but occurrence within the Lapan Kabu Estate's land. The existing Estate is not encumbered by any legal, customary and user rights.</p>	<p>Complied</p>
<p>4.5.5 – Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>Based on observations, documentation review and interview with management, it was verified that there is no occurrence of any new planting on local peoples' land but occurrence within the Lapan Kabu Estate's land. The existing Estate is not encumbered by any legal, customary and user rights.</p>	<p>Complied</p>
<p>4.5.6 – Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p>	<p>Based on observations, documentation review and interview with management, it was verified that there is no occurrence of any new planting on local peoples' land but occurrence within the Lapan Kabu Estate's land. The existing Estate is not encumbered by any legal, customary and user rights.</p>	<p>Complied</p>
<p>4.5.7 – New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p>	<p>There's no new land acquired for plantation. Evidence of documentations and stakeholder consultation shown that the existing land was owned by the company as per sighted the land titles sample in indicator 4.4.1 above.</p>	<p>Complied</p>
<p>4.5.8 – (C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>There's no new land acquired for plantation. Evidence of documentations and stakeholder consultation shown that the existing land was owned by the company as per sighted the land titles sample in indicator 4.4.1 above.</p>	<p>Complied</p>



4.6 – Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities, and other stakeholders to express their views through their own representative institutions.

ToC Outcomes: Human rights upheld

INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
4.6.1 – (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the 'Prosedur Penentuan Hak Pemilikan Tanah / Procedure in resolving land conflict'. The CU had also developed a SOP - Fair Compensation in order to handle any issues related with compensation. In accordance with the 'Prosedur Penentuan Hak Pemilikan Tanah' and SOP - Fair Compensation, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the Boustead Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.	Complied
4.6.2 – (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	'Prosedur Penentuan Hak Pemilikan Tanah' and SOP - Fair Compensation, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers.	Complied
4.6.3 – Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	Smallholding units are held by smallholders via family landholdings, and Lapan Kabu Estate does not have any say in allocating land titles to any party.	Complied
4.6.4 – The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	There has been no evidence of negotiated agreements, compensation, and payments being made as there is no occurrence of such issues at Lapan Kabu Estate.	Complied

4.7 – Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.

ToC Outcomes: Human rights upheld

INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
4.7.1 – (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Lapan Kabu Estate. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership, and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any. The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.	Complied



<p>4.7.2 – (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Lengan Kabu Estate. However, in case of any compensation required, the process will be managed based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership, and access to land between parties involved in considering differences in ethnic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	<p>Complied</p>
<p>4.7.3 – Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Lengan Kabu Estate. However, in case of any compensation required, the process will be managed based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership, and access to land between parties involved in considering differences in ethnic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	<p>Complied</p>
<p>4.8 – The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. ToC Outcomes: Human rights upheld</p>		
<p>INDICATORS</p>	<p>FINDINGS AND OBJECTIVE EVIDENCE</p>	<p>COMPLIANCE</p>
<p>4.8.1 – Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Lengan Kabu Estate. However, in case of any compensation required, the process will be managed based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership, and access to land between parties involved in considering differences in ethnic group, gender differences and etc. if any.</p> <p>The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p>	<p>Complied</p>
<p>4.8.2 – (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any</p>	<p>Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Lengan Kabu Estate. However, in case of any compensation required, the process will be managed based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights,</p>	<p>Complied</p>



unresolved conflict through appropriate conflict resolution mechanisms.	ownership, and access to land between parties involved in considering differences in ethnic group, gender differences and etc. if any. The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.	
4.8.3 – Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)	Evidence of documentations and stakeholder consultation shown that no customary land and disputes occurred within Lepan Kabu Estate. However, in case of any compensation required, the process will be manage based on the available procedure of Fair Compensation; Ref. # 1; Issue date: 4/2/2015; Version # 01 to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership, and access to land between parties involved in considering differences in ethnic group, gender differences and etc. if any. The procedure is also to ensure that any negotiation concerning indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.	Complied
4.8.4 – For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	Based on documentation review, observations made and interview with management, it was verified that Lepan Kabu Estate are not bind to any legal, customary and user rights. There is no conflict or dispute over land at the time of audit.	Complied

Principle 5: Support Smallholder Inclusion

- Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.

5.1 – The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. ToC Outcomes: Inclusive access to benefits		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
5.1.1 – Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lepan Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable
5.1.2 – (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders (at least once a year or upon request).	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lepan Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable
5.1.3 – (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lepan Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable
5.1.4 – (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lepan Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable



reductions for replanting and or other support mechanisms where applicable.		
5.1.5 – Contracts are fair, legal, and transparent and have an agreed timeframe.	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lepad Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable
5.1.6 – (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions, and amount paid are given.	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lepad Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable
5.1.7 – Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Each weighbridge undergoes an annual calibration process conducted by a weighing and measuring equipment verification service provider appointed by the Federal Government of Malaysia through the Ministry of Domestic Trade and Consumer Affairs (KPDNHEP) under Akta Timbang dan Sukat 1972. The calibration of the weighbridge at Lepad Kabu Estate is supported by Certificate B1791027, dated 20/06/2023, confirming compliance. The weighbridge model is Mettler-Toledo with a capacity of 60,000 kg x 10 kg, and this verification is carried out by Paradigm Technology Sdn Bhd. This aligns with the practice of having weighing equipment verified by an independent third party regularly, as specified by governmental regulations.	Not Applicable
5.1.8 – The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lepad Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable
5.1.9 – (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Evidence is available that Lepad Kabu Estate deal fairly and transparently with its contractors.	Not Applicable
5.2 – The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains. ToC Outcomes: Inclusive access to benefits		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
5.2.1 – The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lepad Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable
5.2.2 – The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lepad Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable



Independent Smallholder Standard or RISS).		
5.2.3 – Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lengan Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable
5.2.4 – (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lengan Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable
5.2.5 – The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Verification done on site during the audit confirmed that there were no outgrowers, independent suppliers, or smallholders involved in the supply of FFB to Lengan Kabu Estate. Therefore, this Indicator is not applicable.	Not Applicable

Principle 6: Respect Workers' Rights and Conditions

- Protect workers' rights and ensure safe and decent working conditions.

6.1 – Any form of discrimination is prohibited.		
ToC Outcomes: Human rights upheld; Safe and decent work		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
6.1.1 – (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	<p>Lengan Kabu Estate adopted the Boustead Group Sustainability Policy. Equal Opportunity Policy with no changes since on 12th July 2021.</p> <p>The policy signed by Chief Executive Officer and Group Head of Sustainability. Paragraph 2.2 under Subparagraph Human Rights of the Policy states that the Company Provide fair and equal employment opportunities regardless race, nationality, religion, or gender, and practice no contract substitution.</p> <p>Document review on Training programmed, it was sighted the management provided development opportunities to employee based on business need, job requirements and individual qualification to ensure all employees can utilize their full potential.</p> <p>Onsite visit to sampled of operating units, observed the Policy is available and displayed at the main notice boards, workers' housing and on the website.</p> <p>This policy was briefed to all employee during morning muster at each operating unit.</p> <p>Onsite interview with sample of workers informed they been briefed on the equal opportunity policy and not experienced any form of discrimination of any kind. They informed during the interview that they are been treated with equal opportunities to enjoy equal terms of employment, pay, medical, housing, and other benefits such as use of amenities provided by the Company.</p>	Complied
6.1.2 – (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.	<p>Lengan Kabu Estate able to demonstrate that all employees are treated equally, and there has been no form of discrimination against any employee, or group of employees.</p> <p>Document review and onsite interviews with sampled workers (local, foreign, male and female) at Lengan Kabu Estate.</p> <p>Document review on sampled workers' payslips and employment contracts sighted with irrespective of nationalities, gender, religion, etc, are accorded the same terms of employment, pay, benefits and living standards.</p>	Complied



	Onsite interview with sampled of foreign workers informed they have not been charged any recruitment fee once entry.	
6.1.3 – The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.	Based on documentation review and onsite interviews with sampled of workers informed their recruitment selection, hiring, access to training and promotion are based on workers’ skills, capabilities, qualities, and medical fitness necessary for the job. Sighted during document review on the application forms, relevant certificates, interview checklist, medical check-up report and confirmation of fitness for job by general practitioner doctors are available and performed accordingly.	Complied
6.1.4 – Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Lepan Kabu Estate management will only conduct pregnant assessment to all female manurers, sprayers, mandores, and Women Committee members if necessary. Based on document review and interview with female workers inform no pregnancy among workers as at audit date.	Complied
6.1.5 – (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Lepan Kabu Estate encourage all female workers to joint in Gender Committee known as Women Committee (WC) which is available at each units. A grievance form was available workers or staff to lodge sensitive complaint. The form was kept safe and controlled by the WC Chairperson and office. 2023 WC Committee organizational chart for Lepan Kabu Estate is observed displayed and available at each operating unit’s office notice board. Review on the chart, the committee is comprised female employees from various job description, including foreign workers. Membership is open to all women employees. The objective of WC to act as platform for female employees to discuss any issues that may affect them in their operating unit including but not limited to sexual harassment, physical violence, gender discrimination, welfare, and workplace-related issues, new mother assessment, crèche ayah. It also acts as a platform for lodging sexual harassment complaints, investigate and report, and discuss with the WC Advisor actions to be taken, and ensuring all information and complaints received be treated confidentially. Meeting conducted three monthly a year. Based on minutes of meeting agenda review, sighted the committee includes topics discussed on WC functions, gender discrimination, sexual harassment, domestic violence, procedure or lodging complaints, new mothers, and importance of breast milk. Activity planned for the committee is also included part of meeting agenda.	Complied
6.1.6 – There is evidence of equal pay for the same work scope.	Based on review of employment contracts and monthly payslips, operating unit manage to demonstrate all employee are receive equal pay for the same scope of work regardless of gender and nationality. Document review on sampled of workers’ employment contracts and payslip were crosscheck which covered from the month of September 2023, December 2023 and January 2024.	Complied



6.2 – Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).
 ToC Outcomes: Human rights upheld; Safe and decent work

INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
<p>6.2.1 – (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p>	<p>Details of applicable labour laws under such as wages, rest day, workdays, working hours, overtime, annual leave, medical leaves are available in employment contracts signed between the company and each worker. Document review on sampled of workers’ payslip issued every month includes details such as name, month of pay, wage for the month, overtime pay, paid public holiday, statutory deductions such as EPF, SOCSO and EIS. Both employment contracts and payslips are prepared in Bahasa which is a language that the workers are conversant in. Onsite interview with sampled workers informed they can brief the information contains in their payslips and terms in their employment contracts.</p>	<p>Complied</p>
<p>6.2.2 – (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p>	<p>Lepan Kabu Estate adopted Boustead Group employment contract which is available at each sampled operating unit. The document established in Bahasa Malaysia, Bangladesh and English. Document review on the contracts includes with terms from Labour Ordinance. It stipulates terms of conditions of service such as position, period of employment, notice of termination, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave and public holidays, mutual termination of contract, etc. Maternity entitlement for female workers. The sampled workers’ employment contracts sighted workers’ signature together with Estate representative signature. Based on sampled workers’ payslip review, sighted the information includes on wages rate on daily, piece rated wages, overtime pay, and public holiday pay. Based on overtime pay, record of overtime job recorded on monthly basis were cross reference with payslip accordingly. Document review on sampled of workers’ employment contracts and payslip were crosscheck which covered from the month of September 2023, December 2023 and January 2024.</p> <p>12 Workers sampled as follow.</p> <ol style="list-style-type: none"> 1. ID#0817J, Malaysian, Upkeep & Maintenance. 2. ID#0823E, Malaysian, Upkeep & Maintenance. 3. ID#1638E, Malaysian, Upkeep & Maintenance. 4. ID#1606D, Indonesian, Driver 5. ID#1629C, Indonesian, Driver 6. ID1645G, Indonesian, Driver 7. ID#0220H, Malaysian, Harvester 8. ID#1502C, Bangladesh, Harvester 9. ID#1534C, Bangladesh, Harvester 10. ID#1605C, Indonesian, Harvester 11. ID#1625E, Indonesian, Harvester <p>Based on sampled, it was sighted the payslip include with basic wages, price bonus, normal day overtime and public</p>	<p>Complied</p>



	<p>holiday, medical sick leave pay, special gratuitous pay, productive incentive, field work wages and vacation leave pay (end of year).</p>	
<p>6.2.3 – (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	<p>Lepan Kabu Estate demonstrated compliance to legal requirements with regards as follows:</p> <ol style="list-style-type: none"> 1. Regular working hours: Sighted workers’ payslip that they work between 24 to 26 days a month and average of 6 days per week. Stipulated in Clause 6 of their employment contracts was agreed working hours which is 8 hours per day including break. Sample payslip for workers as listed in 6.2.2. 2. Overtime: Sighted overtime work done by workers at Trong POM and Estates Grouping with mutual consent of workers and not made mandatory. The rates payable for overtime work is stipulated in the employment contracts and evident through sampled payslip and overtime record for April, May and June 2023. Also sighted, overtime requisition form for worker’s prior working overtime. 3. Sickness and holiday entitlement: Sampled employment contract and payslip for April, May and June 2023 evident that public holidays leaves were paid a daily rate of RM57.69 per day. 4. Maternity leave: Based on interview conducted with the WC chairperson, female workers are entitled to 2 months paid maternity leave. 5. Period of notice and reasons for dismissal: Period of termination notice is clearly stipulated of the employment contracts. The notice period varies with the length of service as follows: 4 weeks’ notice. 	<p>Complied</p>
<p>6.2.4 – (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>Lepan Kabu Estate has provided adequate amenities and facilities to both local and foreign workers equally. This include free-of-charge 2 to 3 bedroom living quarters and are generally in reasonably good condition, scheduled treated water for consumption and electricity.</p> <p>Onsite visit to worker housing observed conditions at Block B are not in good order including hygiene, drain, workers houses.</p> <p>Onsite interview with management informed domestic waste collection at linesite were conducted once or twice a week and transported to government landfill area. They informed grass cutting at housing compound conduct once a month.</p> <p>Medical treatment provided at clinic by Estate Health Assistance (EHA) at all sampled operating unit. Linesite inspection were adequately done in weekly interval by EHA and Visiting Medical Officer (VMO).</p> <p>Each sampled operating unit’s clinics are visited by visiting medical officer (VMO) fortnightly as follow.</p> <ol style="list-style-type: none"> 1. Batu Pekaka Estate visited by VMO on 13/07/2023 and 28/07/2023. <p>Major Non-conformance</p> <p>The housing quarters at Block B, Lepan Kabu Estate were not adequately inspected by management.</p> <p>Lepan Kabu Estate management has conduct housing inspection however, during the site visit observed at foreign and local workers housing observed as follow: -</p>	<p>NC # 20240228- M1 (Major)</p>



	<ol style="list-style-type: none"> 1. Domestic waste left unattended at the back yard of house no.3 and no.4. 2. Blockage in the drainages at the rear side and back yard of each house which not able to permit free flow from housing. 3. Domestic waste at the back site of House No. 01 left unattended. 4. Open burning observed at the backside of House no.03. 	
<p>6.2.5 – The unit of certification makes efforts to improve workers' access to adequate, sufficient, and affordable food.</p>	<p>Lepan Kabu Estate able to demonstrate by providing workers' access to adequate, sufficient, and affordable food were seen in.</p> <p>Onsite visit to sampled operating units, observed Sundry Shop is available near to workers housing. This is demonstrated that the workers have closed access to adequate, sufficient, and affordable food. The shops which sell daily necessities such as rice, flour, eggs, sugar, milk, cooking oil, frozen food, beverages, toiletries, etc. The price of each item is listed out and monitored every month. The price difference for several items ranges from RM 0.20 to RM 1.00.</p> <p>Onsite interview with sundry shop owner admitted that the price is slightly higher to those sold outside considering location and distance to bring the goods in. The prices were also differed for those paid in cash or credit.</p> <p>Onsite interview sampled workers informed items sold in the shops are with reasonable price considering they will pay in debt during payday. They also stated that they always have adequate and sufficient access for it.</p>	Complied
<p>6.2.6 – A “DLW” is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: RSPO STANDARD STANDING COMMITTEE 14th of October 2019</p> <p>STATEMENT FROM THE RSPO STANDARD STANDING COMMITTEE REGARDING THE INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist¹.</p> <p>Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry</p>	<p>BPB has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefits as below:</p> <ul style="list-style-type: none"> • Basic salary: RM1,500.00 • Working period: 7.50 hours per day and 3 hours overtime • Facilities and amenities: housing and medical facilities • Outsource benefits: transportation mode and public facility. <p>Lepan Kabu Estate adopted the system established by BPB Group to do calculation based on achievable quotas based on employee productivity. Based on document review of sampled worker's payslips, sighted with evidence that daily rated workers receive at least minimum wages is RM57.69 per day. For piece-rated workers paid according to capability of the workers to achieve daily target. The piece-rated workers received their wages from RM1,500.00 and above per each month. The assessment of the prevailing wages for Lepan Kabu Estate management adopt the computation included with in-kind benefits provided to workers such as Housing, electricity & water, medical, education and transportation.</p>	Complied



<p>benchmarks². These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations. For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage³. Once the benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>1. As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam. These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate.</p> <p>2. Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance with the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country.</p> <p>3. RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology</p>		
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which may include independent studies by local experts in their respective region or country.		
6.2.7 – Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	Based on documents sighted and onsite interviews with sampled workers and management, Lepad Kabu Estate employ full-time employees ONLY. All employees are employed either with permanent or contractual full-time basis.	Complied
6.3 – The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel. ToC Outcomes: Human rights upheld; Safe and decent work		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
6.3.1 – (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	<p>Lepad Kabu Estate adopt Boustead Plantations Berhad Sustainability Policy signed by CEO with no changes from 12-Jul-2021.</p> <p>Respect the right to freedom of association/collective bargaining in organizations that are not against the laws of the Malaysian government.</p> <p>The policy was briefed to workers on Implementation of the Policy is demonstrated when workers are able to bring issues to the management’s attention at the NUPW meetings. These representatives will consult with workers prior meeting with management.</p> <p>Document review on latest minutes of meetings sighted conduct on annually basis.</p> <p>Onsite interviews with sampled workers at each sampled of operating unit informed they attended the meeting by invitation from respective operating unit NUPW chairman/secretary. The meeting discuss agenda include collective bargaining which stated the revision on the benefit that will be provided to worker.</p>	Complied
6.3.2 – Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	<p>Lepad Kabu Estate continues to retain minutes of meeting with trade unions, NUPW and AMESU representatives.</p> <p>Document review on latest minutes of meetings sighted conduct on annually basis.</p> <p>The meeting discuss agenda include collective bargaining which stated the revision on the benefit that will be provided to worker. Based on minutes no issue raised in the meeting. Minutes of meeting between NUPW/AMESU representatives with estates management were documented and as verified.</p>	Complied
6.3.3 – Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Evidence is available that all worker representatives were freely appointed by the workers as confirmed by the workers’ representatives themselves as confirmed by a spraying mandore from Lepad Kabu Estate.	Complied
6.4 – Children are not employed or exploited. ToC Outcomes: Human rights upheld; Safe and decent work		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
6.4.1 – A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Lepad Kabu Estate implemented Boustead Plantations Berhad Children Employment and Minimum Age Limit Policy; Signed by Ibrahim Bin Abdul Majid; Date: 2/12/2019. The policy emphasized that the company is committed to ensure all workers and children safety are	Complied



	protected and all employment are within minimum age limit and in compliance with national regulations and state ordinance. The policy too is subjected to the International Labour Organization (ILO) Convention 138 (1973).	
6.4.2 – (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	The policy was communicated directly during various meeting with both internal and external stakeholders of mill and estate within Lepad Kabu Estate and indirectly via website (http://www.bousteadplantations.com.my/sustain_policy.html)	Complied
6.4.3 – (C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.	There was no evidence that Lepad Kabu Estate employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit. A documented age screening verification procedure exists where details of the workers’ passport and IC and dates of birth are reviewed and verified before issuance of employment contracts. Copies of identity cards and passports were sampled and verified during the audit.	Complied
6.4.4 – The unit of certification demonstrates communication about its ‘no child labour’ policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	Based on documents sighted, interviews and observations, there was no evidence that Lepad Kabu Estate employ any young persons. This was further verified by examining the master lists of each operating unit where details of the workers’ IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those aged 18 and above are employed.	Complied
6.5 – There is no harassment or abuse in the workplace, and reproductive rights are protected.		
ToC Outcomes: Human rights upheld; Safe and decent work		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
6.5.1 – (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	Policy to prevent sexual and other forms of harassment and violence are documented in Boustead Plantations Berhad Sustainability Policy 21/07/2021. The policy spells out the Company’s commitment to Respect women’s right to family planning, as well as the right to sexual and reproductive health if it does not violate the provisions of the law. It was noted that policy and was communicated to all level of workforce and conducted accordingly as sighted at Lepad Kabu Estate.	Complied
6.5.2 – (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	Policy to prevent sexual and other forms of harassment and violence are documented in Boustead Plantations Berhad Sustainability Policy 21/07/2021. The policy spells out the Company’s commitment to Respect women’s right to family planning, as well as the right to sexual and reproductive health as long as it does not violate the provisions of the law. It was noted that policy and was communicated to all level of workforce and conducted accordingly as sighted at Lepad Kabu Estate.	Complied
6.5.3 – Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	At the time of audit, there is no new mothers at Lepad Kabu Estate. Sighted list of new mother assessment was established at Lepad Kabu Estate with no pregnant female workers or staff sighted.	Complied
6.5.4 – A grievance mechanism, which respects anonymity and protects	Policy to prevent sexual and other forms of harassment and violence are documented in Boustead Plantations	Complied



<p>complainants where requested, is established, implemented, and communicated to all levels of the workforce.</p>	<p>Berhad Sustainability Policy 21/07/2021. The policy spells out the Company's commitment to Respect women's right to family planning, as well as the right to sexual and reproductive health if it does not violate the provisions of the law.</p> <p>Women Committees (WC) have been established and the grievance mechanism has been communicated to its members during their meetings. The mechanisms too were conveyed during morning muster briefings to all level of workforce. Interviews conducted with workers confirmed their awareness and understanding of this grievance mechanism. Also verified, grievance form for confidential and sensitive grievances were available and kept private by using "E Adu" by QR code.</p>	
<p>6.6 – No forms of forced or trafficked labour are used. ToC Outcomes: Human rights upheld; Safe and decent work</p>		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
<p>6.6.1 – (C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	<p>Lepan Kabu Estate pledged to Foreign Workers Recruitment Guideline and Procedure which was revised in July 2018. Implement responsible recruitment practices by preventing and eliminating the use of any form of forced labour, child labour, and human trafficking in accordance with ILO principles. Evident based on documentation review and interviews with workers where workers are not in a forced employment and all of them confirmed that they keep their own passports. There is no evidence of charging recruitment fee. Recruitment and legalisation of foreign workers arranged by operating centre and Human Resource Department through approved recruitment agencies by Boustead Plantation.</p> <p>Contract substitutions were not evident as they were aware of what jobs would be before started working. Most workers came with their relatives or friends to Malaysia to work and this is duly confirmed during interview. This practice is an implementation were the company commits to follow responsible recruitment practices including not charging recruitment fees at any stage in the recruitment process, whether by the company, its contractors or agents or the sub-agents in the receiving and sending countries. This were confirmed during interview with workers that they did not pay any recruitment fee.</p> <p>Involuntary overtime: Available were overtime records for overtime work in Jan, May and August 2022. There is no force made if workers refuse to do overtime work and this was duly confirmed during interviews.</p> <p>Lack of freedom of workers to resign: There is no evidence observed of workers being prohibited from resigning.</p> <p>Debt bondage: Based on interviews with workers, there is no evidence of any form of debt bondage.</p> <p>Withholding of wages: Based on interviews, review of the employment contracts and workers' pay slips, there is no evidence of any wages being withheld from the workers.</p>	<p>Complied</p>
<p>6.6.2 – (C) Where temporary or migrant workers are employed, a specific labour</p>	<p>A special labour policy for employment of foreign workers has been addressed in the 'Polisi Pekerja Buruh Asing'.</p>	<p>Complied</p>



<p>policy and procedures are established and implemented.</p>	<p>The policy mentioned that all employees should be treated fairly in terms of recruitment, terms and conditions of work, provide decent living, no contract substitution and post arrival programme will be conducted once arrived for three months. The OuC maintained its specific procedure / flowchart for employment of foreign workers titled 'Sourcing Process for Foreign Workers'. The procedure has been implemented for any employment related with foreign workers.</p> <p>Based on observations and interviews of foreign workers (harvesters, sprayers, mill workers), there is no evidence of contract substitution and no discriminatory practices against foreign workers. A post-arrival briefing is also given, in particular on the contents of their employment contracts, safety, benefits.</p> <p>Declaration of Admission to Malaysia has been established by BPB which strictly private and confidential. The company had visited and explained to the workers that the following descriptions are entirely under the responsibility of the company to recruit them as employee with description includes medical check-up, passport, certification of 'Balai Latihan Kerja (BLK)', biometric fingerprint, registration 'Badan Pekerja Jaminan Sosial (BPJS)', one channel system, bestinet registration, passport attestation, permanent resident card, all transportation arrangements and induction program.</p>	
<p>6.7 – The unit of certification ensures that the working environment under its control is safe and without undue risk to health. Toc Outcomes: Safe and decent work</p>		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
<p>6.7.1 – (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>Responsible person for safety and health already identified as per OSH organization chart. Manager was the one that responsible as safety and health. The meeting was conducted accordingly. This meeting regarding concern of all parties about health, safety, welfare and other issued. The workplace inspection been done and discuss during meeting accordingly. OSH meeting conducted 3 monthly once. Latest safety meeting was conducted at Lapan Kabu estate was in Dec 2023.</p>	<p>Complied</p>
<p>6.7.2 – Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>Emergency Response Plans are available for Emergency Contact Number, Emergency Evacuation, First Aid Locations, Fire Extinguisher Locations, Emergency Response Plan (Fire, Chemical Spillage, Chemical Contamination, Flood and Accident) and displayed at strategic locations around estate office and stores. The competent personals are appointed and trained to be part of the Emergency Response Team. Appointment letters were sighted in both mill and estate respectively. Accident record such as JKKP 8, JKKP 6 was available at estate.</p> <p>Lapan Kabu estate, JKKP 8 record were available and was submitted before 07th Jan 2024.</p> <p>First Aider: 10 persons, example: siri no: (PPC01) 16836, valid until 18th Mar 2025</p>	<p>Complied</p>



	Lepan Kabu estate, the latest first aid training was conducted by the appointed Hospital assistant as sighted in the training record 'taklimat Pemegang Peti Pertolongan Cemas' dated 17 th May 2023	
6.7.3 – (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing.	Appropriate PPEs were given to workers based on HIRARC recommendations suitable for the job position or hazardous operation undertaken. This was verified in the PPE issuance records viewed. Checked during site visit that PPE given were worn correctly by the operators and the condition of each PPE item and their validity lifespan were found good. Interview of workers showed they know when to change to a new set, either by expiry date or when they are damaged or rendered ineffective to use. The operators had been given training on the use of PPE and SOP for the job they were assigned to work. Example PPE issue to sprayer on 13 th Feb 2024, safety helmet.	Complied
6.7.4 – All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	All workers, including foreign workers, are covered by SOCSO. It is sighted the records of SOCSO contribution for Apr 2023, May 2023, and Jun 2023. Other that insurance from NUPW recorded for critical illness, death, accident, and other benefits. Records sighted anniversary date 01/07/2023.	Complied
6.7.5 – Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Records on Lost Time Accident (LTA) metrics had been maintained and verified. JKPP8 reports had been sent to JKPP before end Jan of each year. JKPP 8 (Ref. No. 8/152706/2023) date submitted 07 Jan 2024 with 37 cases with 142 loss man-days. 8 cases without loss man-days and total all 45 cases in year 2023.	Complied

Principle 7: Protect, Conserve and Enhance Ecosystems and the Environment

- Protect the environment, conserve biodiversity, and ensure sustainable management of natural resources.

7.1 – Pests, diseases, weeds, and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.		
ToC Outcomes: Pollution reduced; Resource use minimised; Productivity optimised		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
7.1.1 – (C) IPM plans are implemented and monitored to ensure effective pest control.	The OPC related to Pest & Diseases (OPC 04.a, 04.c, 04.f, 04.g) and the Integrated Pest Management Action Plan for Lepan Kabu Estate, established in January 2024, are comprehensive strategies that involve the planting of beneficial plants, addressing issues like leaf-eating caterpillars, rhinoceros beetles, and promoting natural enemies. Notable beneficial plants, including Turnera subulata, Antigonon leptopus, and Cassia cobanensis, are actively cultivated throughout the estates. Documentation encompasses records of the planting of new areas, maintenance of existing beneficial plant areas, location maps, and a barn owl census. Training sessions for individuals involved in Integrated Pest Management (IPM) implementation have been conducted and are well-documented. During the on-site assessment, training records for both staff and workers engaged in IPM implementation were found to be available and verified as satisfactory. The latest record, sighted on 16/08/2023 by Mr. Kumayl Bin Ismail (Staff), indicates the participation of 5 workers involved in IPM implementation.	Complied



	<table border="1"> <tr> <td></td> <td>Distance</td> <td>Estate</td> </tr> <tr> <td>Beneficial Plant</td> <td>2,589 meter</td> <td>Lepan Kabu Estate</td> </tr> </table> <p>The occupancy rate for Barn owl box on Sept 2023.</p> <table border="1"> <tr> <td></td> <td>Occupancy rate</td> <td>Estate</td> </tr> <tr> <td>Barn owl</td> <td>74%</td> <td>Lepan Kabu Estate</td> </tr> </table>		Distance	Estate	Beneficial Plant	2,589 meter	Lepan Kabu Estate		Occupancy rate	Estate	Barn owl	74%	Lepan Kabu Estate	
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	Occupancy rate	Estate												
Barn owl	74%	Lepan Kabu Estate												
7.1.2 – Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	No alterations were identified in comparison to the previous assessment, and there is no indication of the presence of species listed in the Global Invasive Species Database and CABI.org. The management practices employed in Lepan Kabu Estate rely on information sourced from CABI.org to effectively oversee the designated areas.	Complied												
7.1.3 – There is no use of fire for pest control unless in exceptional circumstances, i.e., where no other effective methods exist, and with prior approval of government authorities.	No changes have been observed since the previous year. The verification and interviews revealed that the BPB Sustainability Policy, dated 12/07/2021, explicitly outlines a No Open Burning Policy across all premises. Conversations with estate management and workers consistently conveyed that fire is not utilized as a method of pest control in the estates. A thorough estate visit further substantiated this information, indicating a lack of evidence for fire use in pest control. These practices align with the stipulation that the use of fire for pest control is only permissible under exceptional circumstances, where no alternative methods exist, and with prior approval from government authorities.	Complied												
7.2 – Pesticides are used in ways that do not endanger health of workers, families, communities, or the environment.														
ToC Outcomes: Reduced pollution; Resource use minimised														
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE												
7.2.1 – (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	<p>Justification for all pesticide available Weed Management In Oil Palm O.P.C No. 01.b dated November 2008. In this Justification all chemical such as pesticide, Herbicide and Fungicide is available for each chemical as per Below: -</p> <table border="1"> <thead> <tr> <th>Herbicide</th> <th>Rate/ha</th> <th>Note</th> </tr> </thead> <tbody> <tr> <td>Glyphosate 41% +metsulfuronmethyl</td> <td>1.5L + 75g</td> <td>Grasses like imperata, paspalum, ottochloa nodosa</td> </tr> <tr> <td>Fluroxypr or metsulfuronmethyl</td> <td>0.375L 150g</td> <td>Broad leaves like clidemia hirta, Melastoma malabathicum and Lantana.</td> </tr> <tr> <td>Glufosinate ammonium</td> <td>3.0L</td> <td>Bracken & Fern</td> </tr> </tbody> </table>	Herbicide	Rate/ha	Note	Glyphosate 41% +metsulfuronmethyl	1.5L + 75g	Grasses like imperata, paspalum, ottochloa nodosa	Fluroxypr or metsulfuronmethyl	0.375L 150g	Broad leaves like clidemia hirta, Melastoma malabathicum and Lantana.	Glufosinate ammonium	3.0L	Bracken & Fern	Complied
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Glufosinate ammonium	3.0L	Bracken & Fern												
7.2.2 – (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	<p>Documentation detailing the use of pesticides is maintained, encompassing information on active ingredients utilized, their LD50 values, the treated area, the quantity of active ingredients applied per hectare, and the number of applications.</p> <p>Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained.</p> <table border="1"> <tr> <td></td> <td>2023</td> </tr> <tr> <td></td> <td>a.i/ha</td> </tr> </table>		2023		a.i/ha	Complied								
	2023													
	a.i/ha													



	Lepan Kabu	1.10	
7.2.3 – (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	<p>The estate has implemented an Integrated Pest Management Plan and a Continuous Improvement Plan, expressing the commitment to diminish chemical usage through the application of Integrated Pest Management strategies.</p> <p>During the site visit, the presence of beneficial plants along estate roads and immature areas, along with strategically placed barn owl boxes, was observed. Additionally, the substitution of Paraquat with alternatives like Glyphosate has been implemented. These initiatives reflect the estate's proactive approach to environmental sustainability and reduced reliance on chemical solutions.</p>		Complied
7.2.4 – There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	<p>There is no prophylactic use of pesticides in all estates visited. Pesticides are not used prophylactically, except in exceptional circumstances as identified by national best practice guidelines.</p>		Complied
<p>7.2.5 – Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and <i>paraquat</i>, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. 	<p>The Chemical Registers for both the mill and estates were accessible for verification, subject to annual reviews and updates whenever new chemicals are introduced into operations.</p> <p>Upon scrutiny, the register revealed the exclusive use of Class III & IV pesticides at both the mill and estates. Notably, Paraquat and Monocrotophos were phased out, making room for the adoption of less hazardous alternatives like Glyphosate and Cypermethrin. This transition underscores a commitment to environmental sustainability and a proactive approach to reducing the environmental impact of chemical usage in the operations.</p>		Complied
7.2.6 – (C) Pesticides are only handled, used, or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	<p>All pesticide handlers have undergone training in compliance with Regulation 22 of the Pesticides Act 1974, focusing on the safe handling and application of pesticides.</p> <p>Adequate safety and application equipment, including safety boots, helmets, rubber boots, cartridge masks, safety goggles, gloves, aprons, and raincoat-type long trousers, has been provided and utilized by the pesticide operators.</p> <p>Stringent adherence to all precautions outlined in the pesticides' Safety Data Sheets (SDS) has been consistently observed, applied, and comprehended by the workers. Verification of programs and training records has confirmed their satisfactory compliance.</p> <p>The training curriculum covers essential aspects such as spraying techniques, precautions, and recognition of</p>		Complied



	<p>symptoms associated with toxic reactions, including but not limited to skin disorders, rashes, mouth and throat pain, breathing difficulties, or nail problems.</p> <p>The UOC (Unit of Certification) boasts sufficient facilities for the proper mixing of pesticides and post-work cleanup. Additionally, designated storage areas for Personal Protective Equipment (PPE) are available.</p> <p>A sampled review of the training conducted for pesticide handlers is provided below: -</p> <table border="1" data-bbox="639 495 1262 725"> <thead> <tr> <th data-bbox="639 495 783 539">Estate</th> <th data-bbox="783 495 1102 539">Training</th> <th data-bbox="1102 495 1262 539">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="639 539 783 595">Lepan Kabu Estate</td> <td data-bbox="783 539 1102 595">Chemical Store Training</td> <td data-bbox="1102 539 1262 595">05/02/2024</td> </tr> <tr> <td data-bbox="639 595 783 725"></td> <td data-bbox="783 595 1102 725">Training for SDS, PPE, Safe Mixing Of Pesticides and Safe Spraying and Safe Handling Of Chemicals</td> <td data-bbox="1102 595 1262 725">12/02/2024</td> </tr> </tbody> </table>	Estate	Training	Date	Lepan Kabu Estate	Chemical Store Training	05/02/2024		Training for SDS, PPE, Safe Mixing Of Pesticides and Safe Spraying and Safe Handling Of Chemicals	12/02/2024	
Estate	Training	Date									
Lepan Kabu Estate	Chemical Store Training	05/02/2024									
	Training for SDS, PPE, Safe Mixing Of Pesticides and Safe Spraying and Safe Handling Of Chemicals	12/02/2024									
<p>7.2.7 – (C) Storage of all pesticides is in accordance with recognised best practices.</p>	<p>Storage of pesticides found to be kept under lock and key and its use in accordance with the Occupational Safety and Health Laws and Regulation 9 of the Pesticides Act 1974.</p> <p>Chemicals were mixed in the pre-mixing areas of the store that was under lock and key.</p> <p>Emergency shower and eye wash were available at the pesticides store in case of accidents. The water pressure was noted to be sufficient for such purpose.</p> <p>Safety Data Sheets (SDS) were available in the stores. The SDS are in English and Bahasa Malaysia (understood by the workers).</p> <p>Chemical containers were reused as containers for spraying solutions.</p>	<p>Complied</p>									
<p>7.2.8 – All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.</p>	<p>Pesticide containers were repurposed as pre-mixed containers for spraying activities. Some of the emptied containers were punctured during the triple rinse procedure, and then stored in the designated area for empty containers. All triple-rinsed empty containers were subsequently disposed of through a licensed contractor approved by the Department of Environment (DOE).</p> <p>During the audit at each estate within the Unit of Certification (UoC), comprehensive records concerning the disposal and recycling of pesticide containers and fertilizer bags were provided. Thorough documentation covering both the usage and disposal of these items was diligently maintained. The disposal of used pesticide containers was handled by a DOE-approved service provider, and the latest disposal was recorded on 21/01/2024 at Pentas Flora (Kelantan) Sdn Bhd. The record is detailed as follows: SW 409 – 0.1452 mt (Consignment note: 2024012216F71XWK). This practice aligns with the requirement that all pesticide containers are appropriately disposed of and/or handled responsibly if repurposed for other purposes.</p>	<p>Complied</p>									
<p>7.2.9 – (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48</p>	<p>Following an exhaustive review of pertinent documentation, encompassing meticulous examination of chemical application records, complemented by on-site visits to observe and scrutinize chemical spraying activities, assess the chemical store, and evaluate the pre-mix area, along with comprehensive interviews, it has been definitively verified that no instances of aerial</p>	<p>Complied</p>									



<p>hours prior to application of aerial spraying.</p>	<p>spraying have been conducted in the Lapan Kabu Estates up to the present. This aligns seamlessly with the prohibition of aerial spraying of pesticides, a practice strictly regulated unless deemed absolutely necessary under exceptional circumstances where no other viable alternatives are available. In such cases, explicit approval from government authorities is prerequisite. Additionally, adhering to regulatory requirements, all pertinent information is meticulously provided to the affected local communities at least 48 hours before the commencement of any aerial spraying activity.</p>	
<p>7.2.10 – (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>Lapan Kabu Estate conducted CHRA, ref no: HQ/12/ASS/00/306-2019/0033, DOSH: HQ/12/ASS/00/306, dated 11-12/12/2019. Clause 6.5-page 39 medical surveillance is not required because there is no possibility of long-term systemic effect. The chemicals have been diluted which further reduced their hazard level. Possible inhalation exposure is minimal, and the workers are well protected from possible skin absorption due to proper PPE used when handling chemicals. Estate also has own clinic for monitoring the health conditions of workers.</p>	<p>Complied</p>
<p>7.2.11 – (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p>	<p>Engagement in tasks involving pesticides is unequivocally prohibited for individuals below the age of 18, pregnant or breastfeeding women, and those under medical restrictions. In strict compliance with this mandate, a thorough commitment is undertaken to guarantee that such excluded individuals are provided with alternative and commensurate work opportunities. This commitment aims to uphold the stringent standards delineated for the conscientious handling and involvement with pesticides within the designated workforce. This assurance is substantiated through interviews and document reviews conducted at Lapan Kabu Estate.</p>	<p>Complied</p>
<p>7.3 – Waste is reduced, recycled, reused, and disposed of in an environmentally and socially responsible manner. ToC Outcomes: Reduced pollution; Resource use minimised</p>		
<p>INDICATORS</p>	<p>FINDINGS AND OBJECTIVE EVIDENCE</p>	<p>COMPLIANCE</p>
<p>7.3.1 – A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented, and implemented.</p>	<p>The waste management plan for Lapan Kabu Estate, established in January 2024 by the management, comprehensively outlines the identification and documentation of all waste products generated within the organization. This includes scheduled waste, domestic waste, clinical waste, and recyclable waste, encompassing materials such as metal, plastic, and pollutants like EFB (empty fruit bunches). Within the waste management plan, specific attention is given to the identification of various types of scheduled waste, namely spent lubricant oil (SW 305), spent hydraulic oil (SW 306), used filters (SW 410), used welding rods (SW 101), waste welding rod (SW 104), clinical waste (SW 404), and used batteries (SW 102). The storage facilities for scheduled waste undergo regular inspections and audits, and disposal is executed by authorized and licensed scheduled waste disposal companies, all of which are approved by the Department</p>	<p>Complied</p>



	<p>of Environment. Notably, the mill maintains a dedicated Scheduled Waste Store for the secure storage of scheduled waste until the time of disposal. Rigorous record-keeping practices ensure that the inventory and disposal of scheduled waste are meticulously documented and consistently up to date. It is noteworthy that all scheduled wastes generated from the estates are efficiently handed over to the mill for proper disposal.</p>	
<p>7.3.2 – Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>The Lepan Kabu Estate has a comprehensive waste management and disposal plan in effect, meticulously documented and implemented in accordance with required standards. This plan is being executed responsibly and satisfactorily. The segregation of wastes, distinguishing between general and scheduled wastes, was verified as a practiced and satisfactory procedure within the estate. Properly designated storage areas for recyclable wastes have been identified and established at Lepan Kabu Estate.</p> <p>A robust record-keeping system ensures that usage and disposal activities are well-documented within the estate. Adequate secondary containment measures for diesel skid tanks, chemical storage, and scheduled waste storage areas were verified to be properly maintained on the estate premises. The disposal of scheduled waste is entrusted to a duly appointed contractor licensed by the Department of Environment, namely Pentas Flora (Kelantan) Sdn Bhd. The latest scheduled waste disposal occurred on 21/01/2024, with detailed consignment notes indicating the quantities disposed of for various waste types.</p> <p>Record verified as per below: -</p> <ul style="list-style-type: none"> • SW 305 – 0.0079 Mt (Consignment note: 20240122166N5GUA) • SW 410 – 0.070 Mt (Consignment note: 2024012216N0RE73) • SW 409 – 0.1452 Mt (Consignment note: 2024012216F71XWK) • SW 404 – 0.0020 Mt Consignment note: 2023101909PKRELJ) <p>Previously, the last scheduled waste disposal was on 30/10/2023. Management of solid waste, specifically domestic waste, falls under the purview of Majlis Perbandaran Kuala Krai (MBKK).</p> <p>Moreover, proactive recycling practices for crop residues/biomass, such as Empty Fruit Bunches (EFB) and Palm Oil Mill Effluent (POME), have been implemented. The POM features recycling bins with three different color codes, facilitating the segregation and recycling of specific waste types.</p> <p>Within Lepan Kabu Estate, EFB serves a valuable purpose as compost for replanting areas, a practice actively managed by the estate's management. The total usage of EFB for compost purposes has been documented and verified, particularly in Block PM16B covering 53.4 hectares. In the year 2023, as of the present date, 433.14 metric tons of EFB have been applied at Block PM16B, involving an estimated application rate of 30 tons per hectare across the specified area. During field visits, the</p>	<p>NC # 20240228- N1 (Minor)</p>



	<p>application of EFB, especially around immature areas, was observed, with a distinctive pattern of application involving the placement of EFB in rings around palm canopies.</p> <p>Minor Non-conformance Improper implementation of Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 As per Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 under Responsibility of waste generator 8. (1) Every waste generator shall ensure that scheduled wastes generated by him are properly stored, treated on-site, recovered on-site for material or product from such scheduled wastes or delivered to and received at prescribed premises for treatment, disposal or recovery of material or product from scheduled wastes. However sighted: - Diesel spillage was observed at the Diesel Skid tank, indicating improper management and soil pollution during site verification.</p> <p>Several empty chemical containers were sighted dumped in the field near the Skid tank, lacking proper storage. Thus, Minor NC was raised.</p>	
<p>7.3.3 – The unit of certification does not use open fire for waste disposal.</p>	<p>The Group Policy, implemented in 2011, outlines restrictions on open burning. A circular, specifically O.P.C No. 51c from July 1999, details protocols for instances of Basal Stem Rot (BSR) on old stands or a high risk of Oryctes infestation, specifying that partial burning and pulverization should be conducted. Prior to commencing any burn, a permit must be obtained from the Department of Environment (DOE) and burning is strictly prohibited during the period from July to November or whenever a "No Open Burning" circular is issued by local authorities. A site visit to the estate field confirmed the absence of fire usage for land preparation during replanting activities.</p>	<p>Complied</p>
<p>7.4 – Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. ToC Outcomes: Reduced pollution; Resource use minimised; Productivity optimised</p>		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
<p>7.4.1 – Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p>	<p>Boustead Plantations Bhd has crafted an agricultural manual known as the Oil Palm Circular, which comprehensively covers a wide array of topics ranging from felling and clearing, planting material, weeding control, manuring, pest and disease management, census and thinning out, drains, road and bridges, soil and water conservation, boundaries, fences, and survey, to supplying, pruning, collection (harvesting), and external transport. Additionally, Boustead Plantations Bhd has implemented Standard Operating Procedures (SOP) that specifically address planting on slopes, emphasizing Soil Conservation and Water Management, as noted during our assessment. The documented strategies, encompassing soil conservation practices, vegetation</p>	<p>Complied</p>



	types, and ground cover establishment, were observed to be faithfully implemented in the field.	
7.4.2 – Periodic tissue and soil sampling are carried out to monitor and manage changes in soil fertility and plant health.	<p>On an annual basis, a systematic protocol is implemented for leaf sampling and subsequent analysis, aimed at assessing nutrient levels and identifying any potential deficiencies. Likewise, diligent soil sampling and analysis procedures are conducted to ascertain the nutrient composition and detect any deficiencies within the soil. Guided by insights gleaned from the comprehensive Agronomist report, tailored recommendations are provided, outlining the necessary rounds of fertilizer applications customized for each designated estate field block. These recommendations are intricately crafted with the overarching objective of ensuring the enduring sustainability of soil fertility and optimizing nutrient efficiency over the long term.</p> <p>The estate proudly possesses a comprehensive Soil Map, identified as AAR/01/11/2018, which was made available and dates to 05/2013. Upon thorough verification, it has been duly confirmed that the estate encompasses 14 distinct soil types, meticulously listed as follows: Bungor, Kuah, Batu Lapan, Musang, Benta, Padang Besar, Durian, Pohoi, Keledang Rasau, Kemuning, Tebok, Kerayong and Local Alluvium series</p> <p>These measures are meticulously implemented to ensure compliance with the requirement of carrying out periodic tissue and soil sampling, which serves to monitor and manage changes in soil fertility and plant health effectively.</p>	Complied
7.4.3 – A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	<p>Records have been sighted pertaining to the Program Delivery and Application of Empty Fruit Bunches (EFB) for the fiscal year 2023, specifically within Block PM16B, encompassing an extensive area of 53.4 hectares. For the year 2023, the cumulative application of EFB in Block PM16B stands at an impressive 433.14 metric tons. This application, as of the current date, translates to an estimated 30 metric tons per hectare, involving the entirety of the 53.4-hectare expanse.</p> <p>Noteworthy observations during a field visit include the application of EFB, particularly targeting immature areas, employing a technique involving the application of EFB around the palm canopies in five-ring formations. This robust practice aligns seamlessly with a comprehensive nutrient recycling strategy in place, encompassing the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues, and the judicious utilization of inorganic fertilizers. This strategic approach reflects a commitment to sustainable agricultural practices and optimal nutrient management within the estate.</p>	Complied
7.4.4 – Records of fertiliser inputs are maintained.	<p>Fertilizer application program was monitored using records i.e. program sheets, bin cards, field cost book, fertilizer application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by the auditors. Review of the records revealed that the actual fertilizers applied in 2022/2023 and</p>	Complied



	2024/2024 was in line with the program. The record was available and verified during audit.	
7.5 – Practices minimise and control erosion and degradation of soils. ToC Outcomes: Ecosystems protected; Reduced pollution; Productivity optimised		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
7.5.1 – (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was available. There were no other problem soils (e.g., podzols and acid sulphate soils) in the estate. The soil map (AAR/01/11/2018) is prepared by GPS Mapping. Lepad Kabu Estates have Topography maps detailing their topo line, soil profile including marginal and fragile soils.	Complied
7.5.2 – No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.	Boustead Plantations Bhd has established SOP related to planting on slope namely Soil Conservation/Water Management was sighted. All the strategy including soil conservation practices, type of vegetation, ground cover establishment were found implemented accordingly. It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop <i>Mucuna Bracteata</i> had been planted along crucial slopes by management. Large areas with <i>Neprolepis Biserrata</i> in the inter rows were sighted during the visit.	Complied
7.5.3 – There is no new planting of oil palm on steep terrain.	No new planting in Lepad kabu estate, verified that there is no new planting at estates visited. SOP related to planting on slope namely Soil Conservation/Water Management was sighted. All the strategy including soil conservation practices, type of vegetation, ground cover establishment were found implemented accordingly in the field. During field visits, it was observed that planting terraces have been constructed on land with slopes exceeding 6 degrees. This strategic measure helps mitigate soil erosion by controlling water runoff. Furthermore, proper stop bunds were verified during the visits, indicating that effective measures have been taken to prevent soil erosion. Notably, no planting activities were observed on slopes steeper than 25 degrees, which significantly contributes to erosion control efforts. In conclusion, the Lepad Kabu estate commitment to implementing effective soil erosion control measures is evident through the construction of planting terraces, installation of stop bunds, and adherence to SOPs for erosion control. These practices demonstrate the estates' dedication to protecting waterways from sedimentation and ensuring the sustainability of their agricultural operations.	Complied
7.6 – Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations. ToC Outcomes: Ecosystems protected; Resource use minimised; Reduced pollution		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE



<p>7.6.1 – (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p>	<p>Boustead Plantations Bhd has established SOP related to planting on slope namely Soil Conservation/Water Management was sighted. All the strategy including soil conservation practices, type of vegetation, ground cover establishment were found implemented accordingly in the field. The management also already establish the Soil map as AAR/01/11/2018 was available dated 05/2013. As per verification the soil type in estate was 14 soil type as per below: - Bungor, Kuah, Batu Lapan, Musang, Benta, Padang Besar, Durian, Pohoi, Keledang, Rasau, Kemuning, Tebok, Kerayong and Local Alluvium series. Soil surveys are made and available in a soil map for both the visited estates. Topographic contour maps are also available which are both used to manage the drainage and road works in the estate. The estate had no new planting for the current year and for the forthcoming 5 years operations. Soil maps were available at all the sampled estates. Based on the maps, 100% of the soil at the estate is of mineral type. There is no soil categorized as fragile or marginal.</p>	<p>Complied</p>
<p>7.6.2 – Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p>	<p>There is no new planting or replanting at peat soil or soil categorized as marginal or fragile soil at the sampled estates. Lapan Kabu Estates had no planting on areas of more than 25 degree. Plantings on steep slope are avoided.</p>	<p>Complied</p>
<p>7.6.3 - Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads, and other infrastructure.</p>	<p>Soil surveys are made and available in a soil map at Lapan Kabu estates. Topographic contour maps are also available which are both used to manage the drainage and road works in the estate.</p>	<p>Complied</p>
<p>7.7 – No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. ToC Outcomes: Ecosystems protected; Reduced pollution; Productivity optimised</p>		
<p>INDICATORS</p>	<p>FINDINGS AND OBJECTIVE EVIDENCE</p>	<p>COMPLIANCE</p>
<p>7.7.1 – (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p>	<p>No peat soil in Lapan Kabu estate as per soil map (AAR/01/11/2018 was available dated 05/2013) and soil analysis record.</p>	<p>Complied</p>
<p>7.7.2 – Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared, and shared in line with RSPO Peatland Working Group (PLWG) audit guidance.</p>	<p>No peat soil in Lapan Kabu estate as per soil map (AAR/01/11/2018 was available dated 05/2013) and soil analysis record.</p>	<p>Not Applicable</p>
<p>7.7.3 – (C) Subsidence of peat is monitored, documented and minimised.</p>	<p>No peat soil in Lapan Kabu estate as per soil map (AAR/01/11/2018 was available dated 05/2013) and soil analysis record.</p>	<p>Not Applicable</p>
<p>7.7.4 – (C) A documented water and ground cover management programme is in place.</p>	<p>The management has established documents as reference and procedure for the estate to implement the BMP for peat soil area, i.e., IOI Peatland Protection & Management Policy (July 2018), IOI Peat Management Guideline (Aug 2018), SOP for Water Management in Peat</p>	<p>Not Applicable</p>



	<p>Area (SOP/IOI/PD/003) and Water Management for Peat Area documented in Water Management Plan.</p> <p>Management has established Standard Procedure for Planting Leguminous Cover Plant to implement after OP seedling been planted. The cover crops that being used are Pueraria javanica (3kg/ha), Calopogonium mucunoides (3kg/ha), and Calopogonium caeruleum (1kg/ha).</p> <p>Drainage map (including canals, outlets, and water control structures and monitoring points, and flow direction) is available with scale of 1:8,100, by GIS Dept.</p>	
<p>7.7.5 – (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>	<p>No peat soil in Lepad Kabu estate as per soil map (AAR/01/11/2018 was available dated 05/2013) and soil analysis record.</p>	Not Applicable
<p>7.7.6 – (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for Existing Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p>	<p>No peat soil in Lepad Kabu estate as per soil map (AAR/01/11/2018 was available dated 05/2013) and soil analysis record.</p>	Not Applicable
<p>7.7.7 – (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p>	<p>No peat soil in Lepad Kabu estate as per soil map (AAR/01/11/2018 was available dated 05/2013) and soil analysis record.</p>	Not Applicable
<p>7.8 – Practices maintain the quality and availability of surface and groundwater.</p> <p>ToC Outcomes: Ecosystems protected; Reduced pollution; Resource use minimised</p>		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE



<p>7.8.1 – A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <ol style="list-style-type: none"> The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. Workers have adequate access to clean water. 	<p>Lepan Kabu Estate has formulated and documented a Water Management Plan (WMP) with an effective date of January 2024 for each operational unit. This comprehensive WMP encompasses the identification of water sources, delineates action plans to guarantee a reliable and sustained water supply, and outlines measures to uphold water quality, along with the maintenance of the supply base or sources. The effective implementation of the WMP serves as a tangible demonstration of the Unit of Certification's (UoC) steadfast commitment to responsible water management.</p> <p>The existence of a meticulously documented WMP underscores the UoC's profound understanding of the paramount importance of protecting, preserving, and enhancing water sources. The outlined action plans within the WMP play a pivotal role in ensuring the long-term sustainability of water resources within the plantation.</p> <p>Upon a site visit, it was verified that the action plan specified in the WMP is being diligently implemented. This observation provides further evidence of the UoC's dedication to upholding their water management commitments.</p> <p>In summary, the Lepan Kabu Estates showcase a proactive stance towards water management, as evident in the availability and execution of the Water Management Plan (WMP). This approach ensures not only a continual and high-quality water supply but also emphasizes the protection and enhancement of water sources within their operational domain.</p> <p>As part of their rigorous water management practices, water sampling for the river used in Lepan Kabu Estate was conducted, as evidenced by result report number 23-251256, prepared by Permula Sdn Bhd and dated September 30, 2023, available as per the details below:</p> <table border="1" data-bbox="639 1364 1262 1603"> <thead> <tr> <th>Parameter</th> <th>Result (mg/L) in</th> <th>Result (mg/L) in</th> </tr> </thead> <tbody> <tr> <td>Ammoniacal Nitrogen</td> <td>0.025</td> <td>0.034</td> </tr> <tr> <td>pH</td> <td>7.06</td> <td>6.93</td> </tr> <tr> <td>Turbidity</td> <td>537</td> <td>842</td> </tr> <tr> <td>Arsenic</td> <td><0.0005</td> <td><0.0005</td> </tr> <tr> <td>Cyanide</td> <td><0.01</td> <td><0.01</td> </tr> </tbody> </table>	Parameter	Result (mg/L) in	Result (mg/L) in	Ammoniacal Nitrogen	0.025	0.034	pH	7.06	6.93	Turbidity	537	842	Arsenic	<0.0005	<0.0005	Cyanide	<0.01	<0.01	<p>Complied</p>
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Arsenic	<0.0005	<0.0005																		
Cyanide	<0.01	<0.01																		
<p>7.8.2 – (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with '<i>RSPO Manual on BMPs for the management and rehabilitation of riparian reserves</i>' (April 2017).</p>	<p>It is commendable to note that the estate has undertaken initiatives to identify and safeguard water sources and courses through the delineation of riparian zones. The demarcation of these zones, visibly marked on the ground, acts as a protective barrier for water courses, ensuring the preservation of their ecological integrity.</p> <p>In an effort to maintain the pristine condition of riparian zones, the estate has wisely prohibited activities such as chemical spraying and fertilizer application in these designated areas. This proactive measure serves to prevent potential contamination of water bodies, contributing to the overall health and sustainability of riparian ecosystems.</p> <p>To reinforce the importance of preserving these zones and mitigate potential negative impacts on water quality,</p>	<p>Complied</p>																		



	<p>the estate has installed signage prohibiting chemical spraying in and around riparian zones. This visual reminder enhances awareness and underscores the significance of these areas in maintaining water quality. Crucial training sessions conducted on 05/02/2024 equip workers with the knowledge to identify riparian areas, fostering a culture of environmental responsibility. This educational approach ensures that all personnel comprehend the significance of riparian protection. The availability of a guideline on the protection of riparian/buffer zones and the monitoring of river water quality serves as a valuable resource for the estate. The satisfactory implementation of this guideline signifies the estate's commitment to adhering to best practices for riparian zone protection and upholding river water quality.</p> <p>In essence, the estate's comprehensive efforts in identifying, protecting, and monitoring riparian zones, coupled with training initiatives and adherence to guidelines, exemplify a responsible approach to safeguarding water resources and maintaining ecological balance within the plantation.</p> <p>Furthermore, water analysis reports for two sampling points within Lengan Kabu Estate, flowing from Ladang Ibu Estate and leading out to Kg Pahi, are available under report number 23-251256, dated 30/09/2023. This analysis was conducted by Permula Sdn Bhd.</p>							
<p>7.8.3 – Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>						
<p>7.8.4 – Mill water use per tonne of FFB is monitored and recorded.</p>	<p>Not Applicable</p>	<p>Not Applicable</p>						
<p>7.9 – Efficiency of fossil fuel use and the use of renewable energy is optimised. ToC Outcomes: Ecosystems protected; Reduced pollution; Resource use minimised</p>								
<p>INDICATORS</p>	<p>FINDINGS AND OBJECTIVE EVIDENCE</p>	<p>COMPLIANCE</p>						
<p>7.9.1 – A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored, and documented.</p>	<p>Monthly records on energy consumption for both renewable and non-renewable energy sources have been meticulously maintained and documented. The objective of this monitoring is to optimize the utilization of energy sources. The collected data is compiled for the purpose of comparison and control, enabling future improvements. The documentation of these records has been satisfactorily executed.</p> <p>During the site visit to the Lengan Kabu Estate, it was evident that the data pertaining to energy consumption was diligently compiled and documented, indicating a commitment to take further action in improving the efficiency of renewable and non-renewable energy utilization.</p> <p>Records available were verified and showed satisfactory monitoring of the resources.</p> <p>Diesel usage in Lengan Kabu estate</p> <table border="1" data-bbox="639 1982 1262 2076"> <tr> <td data-bbox="639 1982 836 2018">Year</td> <td colspan="2" data-bbox="836 1982 1262 2018">Unico 3</td> </tr> <tr> <td data-bbox="639 2018 836 2076"></td> <td data-bbox="836 2018 1038 2076">Diesel usage record</td> <td data-bbox="1038 2018 1262 2076">Diesel/FFB</td> </tr> </table>	Year	Unico 3			Diesel usage record	Diesel/FFB	<p>Complied</p>
Year	Unico 3							
	Diesel usage record	Diesel/FFB						



	2023	36,710	1.78	
	2022	35,324	1.85	
7.10 – Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented, and monitored and new developments are designed to minimise GHG emissions. ToC Outcomes: Reduced Pollution				
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE			COMPLIANCE
7.10.1 – (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator, and publicly reported.	Not Applicable			Not Applicable
7.10.2 – (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	Not Applicable			Not Applicable
7.10.3 – (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Not Applicable			Not Applicable
7.11 – Fire is not used for preparing land and is prevented in the managed area. ToC Outcomes: Ecosystems protected; Reduced pollution				
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE			COMPLIANCE
7.11.1 – (C) Land for new planting or replanting is not prepared by burning.	<p>The Group Policy, implemented in 2011, delineates regulations pertaining to open burning restrictions. Circular O.P.C No. 51c from July 1999 specifies protocols for instances of Basal Stem Rot (BSR) on old stands or a high risk of Oryctes infestation, mandating partial burning and pulverization. Prior to initiating any burn, a permit must be secured from the Department of Environment (DOE), with strict prohibition during the period from July to November or when a "No Open Burning" circular is issued by local authorities. A visit to the estate field affirmed the absence of fire usage for land preparation during replanting activities.</p> <p>The Zero Burning Policy (the "Policy") underscores Boustead Lepad Kabu estate's commitment to zero burning practices across the estates, aligning with their environmental protection efforts and addressing the haze problem. The policy explicitly declares Boustead's commitment to comply with all applicable legislation and codes of practice.</p> <p>This commitment was validated after a site visit at Lepad Kabu Estate, recently engaged in replanting activities, revealing no evidence of open burning during the land preparation phase. Waste generated from replanting activities, such as palm trunks and fronds, was not subjected to burning; instead, it was chipped and left to decompose on the ground. Furthermore, there was no indication of domestic waste burning at the housing line sites and the estate's sanitary landfill during the audit.</p>			Complied



	The verification process also confirmed the presence of Training on Zero Burning dated 18/09/2023.	
7.11.2 – The unit of certification establishes fire prevention and control measures for the areas under its direct management.	To enhance fire prevention and control efforts, every operational unit under the Unit of Certification (UoC) has implemented a structured Emergency Response Team (ERT). Various stations within the unit are equipped with an ample supply of fire extinguishers, subject to an annual assessment by a qualified entity to verify their operational efficiency. An interview with a member of the ERT committee revealed a comprehensive understanding of the necessary actions to be taken in the event of a fire.	Complied
7.11.3 – The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	This Lepan Kabu Estate training sessions to enhance readiness in managing fire outbreaks. Stakeholders, including the Fire Department and Forestry Department, were extended invitations to participate in a dedicated meeting, fostering discussion and coordination of efforts pertaining to fire prevention and control. The most recent engagement with adjacent stakeholders occurred on 29/01/2024 at Dataran Damar Inn Meeting Room, attended by Ladang Ibu, Kampung Bekok, Kampung Pahi, and Ladang Kampung Kuantan. Additionally, training has been provided to the Emergency Response Team (ERT), as confirmed by the verification of training records at Lepan Kabu Estate dated 17/11/2023, aligning with the requirement that the unit of certification collaborates with neighboring stakeholders on fire prevention and control measures.	Complied
7.12 – Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced. ToC Outcomes: Ecosystems protected		
INDICATORS	FINDINGS AND OBJECTIVE EVIDENCE	COMPLIANCE
7.12.1 – (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	No new clearing was conducted to any additional land, primary forest, or HCV since first planting in year 1995. Planting was carried out inside the designated area itself. Any planting intended to be carried out will be done in the existing area.	Complied
7.12.2 – (C) HCVs, HCS forests and other conservation areas are identified as follows: a. For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	The HCV (High Conservation Value) assessment was reviewed by the sustainability team and estates, and a report was documented on February 14, 2023, for all estates. The assessment thoroughly considered all aspects of environmentally sensitive areas, such as ponds, streams, and wildlife boundaries, and the findings were documented. The High Conservation Value assessment report was available dated December 2019 by Malaysian Environmental Consultant Sdn Bhd. This HCV report cover the identification of high biodiversity value habitat in Lepan Kabu estate. From the report, there are HCV 4 in Lepan Kabu estate with total 25.02 Ha. This HCV 4 regarding to buffer zone at Sg Lebir, Sg Pahi and buffer to riparian forest as per detail below: -	Complied



	HCVMA	Type of Land Cover	Area (Ha)	Total Area (Ha)	
	HCV 4	Riparian Forest	9.25	25.02	
		River buffer	15.77		
	<p>The HCV and other environmentally sensitive areas were documented and inspected on-site. Conservation areas and environmentally sensitive areas, including buffer zones along rivers and streams that pass through the estates, have been identified, demarcated, and are being monitored.</p> <p>Signage prohibiting hunting, fishing, and water polluting activities were verified on-site at all visited estates and found to be satisfactorily erected and maintained.</p> <p>HCV Management Areas (HCVMA) bordering reserves were also clearly demarcated with a buffer zone and are being monitored. Some stretches of the perimeter roads around the estates are included in the HCVMA areas</p>				
<p>b. Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual.</p> <p>This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: for 7.12.2, requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p>	<p>There is no new clearing in the existing plantation being carried out after 15 November 2018. This is not applicable to this unit.</p>				Not Applicable
<p>7.12.3 – (C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>PROCEDURAL NOTE for 7.12.3: There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p>	<p>This Indicator is not applicable in Malaysia context. Thus, this is not applicable to this unit.</p>				Not Applicable



Indicator is not applicable in Malaysia context.		
7.12.4 – (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented, and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	The unit has recognized the presence of High Conservation Values (HCVs) both within its boundaries and in the surrounding areas. To safeguard and enhance these areas, a comprehensive management plan has been devised. This plan incorporates the establishment of buffer zones around the conservation areas, designating these zones as restricted areas. To deter any illicit activities such as hunting, encroachment, or unauthorized harvesting of river or forest resources, strategic signage has been installed. The formulation of this management plan involved extensive consultations with pertinent authorities, particularly the Forest Department and Wildlife Department, along with engagement with local communities residing in the vicinity. Originally revised in Feb-2024, the plan undergoes regular updates to stay in line with the latest requirements and developments, with the most recent revision reflecting the unit's commitment to adhering to the latest standards in its management approach.	Complied
7.12.5 – Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	Not applicable since there is no land clearing after 15 November 2018.	Complied
7.12.6 – All rare, threatened, or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Records of RTE sighting was checked and verified for the Lapan Kabu estate. Summary of record of animal sightings spotting wild boars, monkeys, and squirrels among others. The management conducted a regular patrol of HCV areas, access, and boundary of estates. Signage, such as “No Hunting”, “No Fishing”, “Buffer Zone” were available. No use of chemicals observed been applied in the buffer zone as prohibited. Record verified as per below: - a. Penerangan Serangan Hidupan Liar dated 06/02/2023. b. Penerangan RTE dan Biodiversity – dated 17/12/2023	Complied
7.12.7 – The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in Lapan Kabu estates. Monitoring of conservation areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/RC and personnel from the Sustainability Unit. Sighting of RTE is made and recorded during the AP rounds in the estate if any.	Complied
7.12.8 – (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15	The audit findings have confirmed that there is no new land clearing affecting areas of HCVs, HCS forests peatland and other conservation areas. Not applicable since there is no land clearing after November 2005.	Complied



November 2018, the Remediation and Compensation Procedure (RaCP) applies.

See Summary of Net GHG Emissions submitted by the POM in the Tables below.

This is an initial certification audit; therefore, the record of submission will be verified during next audit to verify of any potential liability under the RSPO Remediation and Compensation Procedure at this UoC.

SUMMARY OF NET GHG EMISSIONS

This is an initial certification audit; therefore, the record of information will be verified during next audit on any of the latest summary report generated through **PalmGHG Calculator Version 4.0**.

GHG Table 1: Summary of Net GHG Emissions (12 months: N/A)

Emissions per Product	tCO2e/t Product
CPO	N/A
PK	N/A

Production	t/year
FFB Processed	N/A
CPO Produced	N/A
PK Produced	N/A

Extraction	%
OER	N/A
KER	N/A

GHG Table 2: Summary of Net GHG Emissions

Land Use	Ha
OP Planted on Mineral Soil	N/A
OP Planted on Peat	N/A
OP Planted Area	N/A
Conservation (Forested)	N/A
Conservation (Non-Forested)	N/A
Total	N/A

GHG Table 3: Summary of Field Emissions and Sinks

Description	Own			Group			3 rd Party			Total
	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e/t FFB	
Emission Source										
Land Conversion	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CO ₂ Emissions from Fertiliser	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N ₂ O Emissions from Peat	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
N ₂ O Emissions from Fertiliser	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Fuel Consumption	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Peat Oxidation	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sinks										
Crop Sequestration	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Conservation Sequestration	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total:	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

GHG Table 4a: Summary of Mill Emissions and Credits

	tCO2e	tCo2e/t FFB
Emissions Sources		



POME	N/A	N/A
Fuel Consumption	N/A	N/A
Grid Electricity Utilisation	N/A	N/A
Credits		
Export of Excess Electricity to Grid and Housing	N/A	N/A
Sales of PKS	N/A	N/A
Sales of EFB	N/A	N/A
Total	N/A	N/A

GHG Table 4b: Palm Oil Mill Effluent (POME) Treatment

Divert To Compost	N/A
Divert To Anaerobic Digestion	N/A

GHG Table 4c: POME Diverted to Anaerobic Digestion

Divert To Anaerobic Pond	N/A
Divert To Methane Capture (Flaring)	N/A
Divert To Methane Capture (Electricity Generation)	N/A

3.1.1 Status on Supply Chain on POM

Based on the documents and records presented during the on-site verifications made, it is concluded that Lapan Kabu Estate is Not Applicable to comply with the **Supply Chain Requirements for Mills of the RSPO Principles and Criteria for Sustainable Palm Oil Production (RSPO P&C 2018)**.

3.2 Status of Identified Noncompliance and Corrective Actions, Observations and Positive Elements

The status of the Non-Compliances (NC) and Observations (OBS) identified against the **RSPO Principles and Criteria (P&C 2018)**, and **Malaysian National Interpretation (MY-NI 2019)** Indicators is as per the details below:

Audit Type	Year	NC		OBS	Follow up status
		Major	Minor		
Initial Certification Audit	2024	1	1	0	<ul style="list-style-type: none"> 1 Major NC raised was closed on 02-May-2024 and the implementation of the effectiveness will be verified during the next Annual Surveillance Audit (ASA-01). The CAP for 1 Minor NC was accepted was on 20-Mar-2024 and the implementation of the effectiveness will be verified during the next Annual Surveillance Audit (ASA-01). No observation was observed during this audit.

3.2.1 Year 2024 – Initial Certification Audit (ICA): 1 Major NC

Details of Non-Conformance (NC)	
Non-Conformance #: 20240228-M1	Date Issued: 28-Feb-2024
RSPO Indicator Requirement: 6.2.4 (Major)	
The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	



<p>Statement of Non-Conformance:</p> <p>The housing quarters at Block B, Lepad Kabu Estate were not adequately inspected by management.</p>
<p>Evidence of Non-Conformance:</p> <p>Lepad Kabu Estate management has conduct housing inspection with latest on 25-Jan-2024, document review on the checklist stated conditions of each housing at Block B is at satisfactorily.</p> <p>However, during on site visit to Block B observed the actual conditions as follow: -</p> <ol style="list-style-type: none"> 1. Domestic waste left unattended at the back yard of house no.1, no.3 and no.4. 2. Harvesting pole left unattended at the back yard of house no.3 and no.4. 3. Blockage in the perimeter drainages located behind the house no.4, no.10 and no.9 which cause to stagnant and difficulty of free flow water from housing. 4. Sighted the brokerage of drain at edge of perimeter drainage behind house no.4. 5. Open burning observed at the backside of House no.03.
<p>Root Cause Analysis, Correction(s), and Corrective Action(s) by Auditee Representative</p> <p>Root Cause Analysis (RCA):</p> <ol style="list-style-type: none"> 1. Lack of awareness or responsibility on behalf of the residents of house no.1, no.3, and no.4 regarding proper waste disposal and management. 2. Lack of awareness on safety aspect among harvester and negligence in keeping the harvesting pole secured. 3. Lack of regular maintenance of drainage systems. 4. Lack of regular maintenance of drainage systems. 5. Lack of understanding on behalf of the residents of house no.3 regarding company's policy regarding zero-burning. <p>Correction(s):</p> <ol style="list-style-type: none"> 1. Collect all domestic waste at the back yard of house no.1, no.3 and no.4. Next, dispose it via district council. Next, re-inspect the house no.1, no.3 and no.4. 2. Relocate the harvesting pole from house no.3 and no.4. to the equipment store. Next, re-inspect the house no.3 and no.4. 3. Clear the debris at perimeter drainage of houses no.4, no.10, and no.9. 4. Prompt repair of damaged drainage at house no.4. 5. Clear the debris at the backside of house no.3. Next, dispose the debris via district council. After that, re-inspect the house no.3. <p>Corrective Action(s):</p> <ol style="list-style-type: none"> 1. Revise the housing inspection checklist to include, but not limited to, the following criteria: <ol style="list-style-type: none"> a. "Absence of domestic waste near housing compound". b. "Absence of sharp item such as harvesting sickle near the housing compound". c. "No obstruction of water flow at perimeter drainage". d. "No sign of perimeter drainage cracks or collapse". e. "No sign of open burning". 2. Conduct training to the person in-charge for housing inspection on the required item to check during housing inspection. Evaluate the PIC's understanding of the training using training evaluation form. 3. Once the housing inspection checklist was revised, conduct thorough inspection using the revised checklist and immediately report any damages, if any, to the estate management for prompt repair or inform the resident of the house to do cleaning, where necessary. 4. Conduct BPB Sustainability Policy, waste management training, and safety training to all workers and evaluate their understanding of the training using training evaluation form. Retraining, if necessary. 5. Conduct biannual <i>Gotong-royong</i> at all housing complex/block. 6. Engage with <i>Unit Promosi Kesihatan</i> from Pejabat Kesihatan Daerah Kuala Krai to conduct awareness program on hygiene at housing area, biennial basis. <p>Corrective Action Implementation Timeline: 28th May 2024</p>
<p>Verification on Corrective Action(s): by Lead Auditor / Auditor</p> <p>Based on the onsite inspection conducted on 02-May-2024, it was observed that the housing complex at Block B of the estate underwent recovery and corrective measures as detailed below. However, during the onsite visit to Block B, the following actual conditions were observed:</p>



However, during on site visit to Block B observed the actual conditions as follow: -

1. The management has reconstructed the perimeter drainage behind house numbers 4, 10, and 9, which previously caused stagnation and hindered the free flow of water within the housing area.
2. The management has also reconstructed the broken drain at the edge of the perimeter drainage behind house number 4.

During the onsite visit on 02-May-2024, the management conducted revisions to documents and activities to address previous non-conformances, as outlined below:

1. Revised the housing inspection checklist on 01-March-2024 which now includes additional criteria for inspecting domestic waste, sharp items such as harvesting sickles, perimeter drainage, perimeter drainage cracks or collapse, and open burning.
2. Conducted training for the person in charge of housing inspection on 05-March-2024.
3. Completed the latest housing inspection checklist using the revised version with thorough inspections conducted on 11-March-2024.
4. Conducted training sessions on BPB Sustainability Policy, waste management handling, and safety for all staff and workers on 20-March-2024.
5. Established a Gotong-royong schedule for the year 2024 (scheduled for June and December). The schedule includes activities for Block A, Block B, Block C, Block D, Staff Quarters/Estate Clinic, Main Office, and Workshop & Fertilizer Store.
6. Contacted the Pejabat Kesihatan Daerah Kuala Krai through a letter titled 'Program Taklimat Kesedaran Berkenaan Kebersihan Dikawasan Perumahan Ladang Lepad Kabu', Letter ref.: LKE/0069-04/2024 dated 03-April-2024. This letter serves as evidence of communication with the health department to engage their Health Promotion Unit in conducting an awareness program on hygiene in the housing area, which was conducted on 21-April-2024. The document review indicates that the management minuted the briefing points, including individual and committee health, environmental protection, and pest/insect reduction programs.

Conclusion: Closed

Non-Conformance Status Closed by Auditor: MNA

Date Closed: 02-May-2024

Verification of Effectiveness:

The implementation of the effectiveness for the current corrective action taken will verify next audit.

Non-Conformance Status Verified by Auditor:

Date Verified:

Status of NC:

- Closed
 Upgraded _____
 Immediate Suspension

3.2.2 Year 2024 – Initial Certification Audit (ICA): 1 Minor NC

Details of Non-Conformance (NC)	
Non-Conformance #:20240228-N1	Date Issued: 28-Feb-2024
RSPO Indicator Requirement: 7.3.2 (Minor)	
Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	
Statement of Non-Conformance:	
Improper implementation of Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974	
Evidence of Non-Conformance:	
Diesel spillage was observed at the Diesel Skid tank, indicating improper management and soil pollution during site verification.	
Several empty chemical containers were sighted dumped in the field near the Skid tank, lacking proper storage.	
Root Cause Analysis, Correction(s), and Corrective Action(s) by Auditee Representative	
Root Cause Analysis (RCA):	
i) No person in-charge was appointed to monitor the implementation of Environmental Management Plan ii) Lack of supervision or oversight in the field, allowing individuals to disregard proper disposal protocols.	
Correction(s):	



i) Clean up the diesel spillage and collect the spill kit. Next, store the spill kit at Scheduled Waste Store before disposing it via licensed contractor. ii) Collect the empty chemical containers and store it in the Scheduled Waste Store. Next, update the Scheduled Waste inventory record. Plan for disposal within 180 days.	
Corrective Action(s):	
i) Appoint person in-charge to monitor the implementation of Environmental Management Plan. Next, provide spill tray at the diesel skid tank. Conduct regular maintenance of the pump hose and regular housekeeping at the diesel skid tank area. ii) Maintenance Mandore and Storekeeper to monitor the storage and disposal of empty chemical container.	
Corrective Action Implementation Timeline: Next audit	
Verification on Corrective Action(s): by Lead Auditor / Auditor	
CAP submitted been accepted, the effectiveness of the implementation will be review in the next surveillance audit. The NC will remain open.	
Conclusion: Open	
Non-Conformance Status Closed by Auditor:	Date Closed:
Verification of Effectiveness:	
Non-Conformance Status Verified by Auditor:	Date Verified:
Status of NC:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded _____ <input type="checkbox"/> Immediate Suspension

3.2.3 Year 2024 – Initial Certification Audit (ICA): 0 Observation

3.2.4 Identified Positive Elements

- (1) The UoC has manage documentation and presentation of planning documents is at satisfactory.
- (2) The UoC has continued to maintain facilities provided is at satisfactory.
- (3) The UoC management participate and cooperation of all levels of personnel are good.
- (4) Overall, The UoC Management is committed to the implementation of the palm oil sustainability certification standards.



4.0 AUDIT CONCLUSION AND RECOMMENDATION

Based on the findings above, Boustead Plantations Berhad – Lapan Kabu Estate had been able to demonstrate its compliance with the **RSPO Principles and Criteria (P&C, Nov 2018)** and **Malaysian National Interpretation (MY-NI, Nov 2019)**.

Therefore, it is recommended that the re-certification of Boustead Plantations Berhad – Lapan Kabu Estate be approved.

Signed for and on behalf of
Intertek Certification International Sdn Bhd

Mohd Nur Amin Bin Mohd Halim
Lead Auditor

Date: 03-May-2024

4.1 Acknowledgement of Internal Responsibility and Confirmation of Audit Findings

This is to acknowledge and confirm the audit visits described in this report and the acceptance of the contents and findings in this audit report.

Signed for and on behalf of
Lapan Kabu Estate

Name: Mitah Binti Limpu

Date: 15-May-2024



4.2 INTERTEK – RSPO P&C Certificate Details for The Unit of Certification

Certificate No.:	RSPO 932888
Certificate Start Date:	20/05/2024
Certificate Expiry Date:	19/05/2029
RSPO PalmTrace License Start Date:	20/05/2024
RSPO PalmTrace License Expiry Date:	19/05/2025
Organization:	Boustead Plantations Berhad
Address of Head Office:	10th, 11th & 18th Floor, Menara Boustead, 69 Jalan Raja Chulan, 50200 Kuala Lumpur.
RSPO Membership No:	1-0012-04-000-00
Unit of Certification:	Lepan Kabu Estate
Address of POM:	KM 88.8, Jalan Kota Bharu - Gua Musang Pahi, 18000 Kuala Krai, Kelantan, Malaysia
Standards:	RSPO Principles and Criteria (Nov 2018); Malaysian National Interpretation (MY-NI 2019)
RSPO Certification Scope:	Production of Fresh Fruit Bunch (FFB)
Supply Chain Model of POM:	Not Applicable

Details of the Mill and Supply Base covered by this certificate and the hectareage approved are:

Name	Address	GPS Reference		Certified (Titled) Area (Ha.)	Total Planted Area (Ha.)
		Latitude	Longitude		
Lepan Kabu Estate	KM 88.8, Jalan Kota Bharu - Gua Musang Pahi, 18000 Kuala Krai, Kelantan, Malaysia	5° 28' 58.10" E	102° 13' 15.60" N	2,046.40	1,901.20
MPOB License No.: 616061011000 (01/01/2024 – 31/12/2024)					
Total Hectareage:				2,046.40	1,901.20

The certified tonnages available for trade under PalmTrace by the CH unit is Not Applicable as this stage is still Initial Certification.

Production	
Total FFB Produced (MT)	21,500.00



APPENDIX A: QUALIFICATIONS OF LEAD AUDITOR AND AUDIT TEAM

Mr. Mohd Nur Amin Mohd Halim –Lead Auditor / Team Leader / Technical Expert

(GAP, Integrated Pest Management, Safety and Health, Social Responsibility and Conservation & HCV Area Aspects)
- Diploma Office Management & Technology (UiTM)

Mr. Mohd Nur Amin gained his career as sustainability practitioner in Government Link Company related to palm oil plantation for over 6 years and 10 months majorly handling operational excellent, environment, safety and health at the upstream and downstream operations. He then started his auditing career at TUV Nord for three (3) years as scheme coordinator and qualified lead auditor for MSPO (OPMC and SCCS) scheme; and qualified auditor for ISCC Waste and Residue scheme. Prior joining Intertek he was with BSI Services Malaysia for one (1) year with experience in auditing RSPO P&C scheme. He had almost five (5) years engaged with international CBs in conducting certification audits of plantation operations for compliance with the ISCC, RSPO and MSPO requirements.

He has completed Exemplar IMS (9001, 14001 & 45001) LA Course (2019), SA 8000 Course (2019), Endorse MSPO SCCS Course (2020), Endorse MSPO LA Course (2020), Endorse ISCC Waste and Residue Course (2020), HCV & HCS Course (2020), Endorse ISCC Basic & PLUS Course (2022), CQI & IRCA ISO 14001:2015 LA Course (2022), Endorse RSPO P&C LA Course (2022), Endorse RSPO SCCS LA Course (2022).

He is now successfully been qualified as Lead Auditor for RSPO P&C, RSPO Supply Chain, MSPO OPMC, MSPO SCCS and ISCC certification audits.

Mr. Muhammad Naquiddin Mazeli (NAQ) – Auditor / Technical Expert

(Palm Oil Mill, Environment, GAP, Integrated Pest Management, Safety and Health, Conservation & HCV Area and Supply Chain)

- Bachelor Science Horticulture (UPM)

Mr. Muhammad Naquiddin gained his career for over 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, managed, implement and monitors the RSPO, ISCC, MSPO and ISO 9001 and ISO 45001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also supports in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He has completed ISO 9001:2015 LA Course (2019), ISO 14001:2015 LA Course (2018), ISO 45001:2018 LA Course (2018), HCV & HCS Training (2019), Endorsed RSPO P&C LA Course (2018), MSPO LA Training (2018), SMETA Training (2021), SCCS Training and Refresher (2019). He had been involved in RSPO auditing within Malaysia, Papua New Guinea, Solomon Islands, Gabon, and Liberia. He has good on-field knowledge in the Palm Oil sector such as industry fundamentals on good agricultural practices (GAP), best management practices (BMP), sustainability, social, OHS issues (e.g., worker welfare issues and social matters such as employment terms, gender issues, worker welfare etc.) and environmental matters (e.g., pollution control, conservation of resources). He is a qualified Lead Auditor for the RSPO P&C, RSPO Supply Chain, MSPO OPMC and MSPO Supply Chain.

Mr. Zul Hairi Bin Abu Hassan (ZH) – Auditor / Technical Expert

(GAP, Integrated Pest Management, Safety and Health, Social Responsibility and Conservation & HCV Area Aspects)
– Diploma in Plantation Industry Management (UiTM)

Mr. Zul Hairi boasts over 9 years of extensive experience in oil palm plantation operations, agriculture, safety and health, as well as social and environmental fields. He has been affiliated with a prominent publicly listed plantation organization since 2008. His role involves supervising and monitoring estate operations to ensure compliance with RSPO, ISCC, and MSPO requirements and regulations, Good Agricultural Practice (GAP), and other standard operating procedures. He actively participated in Internal Audits of plantation operations, ensuring adherence to RSPO, ISCC, and MSPO standards. Since 2017, he has garnered more than 6 years of auditing experience, initially with TUV NORD (M) and currently with INTERTEK. He has successfully completed certifications in ISCC EU & PLUS, RSPO P&C, MSPO Part 2, 3, & 4, RSPO SCCS, ISO 14001, ISO 9001, SA8000, ISO 45001, MSPO SCCS, ISCC Waste & Residues, ISCC Circular Economy & Bioeconomy, ISCC GHG, ISCC ARIA, and HCV-HCSA. He possesses in-depth on-field knowledge of the Palm Oil sector, covering industry fundamentals such as Good Agricultural Practices (GAP), Best Management Practices (BMP), sustainability, and social and Occupational Health and Safety (OHS) issues. His extends to environmental matters like pollution control and conservation of resources. As a qualified Lead Auditor, he specializes in RSPO P&C, RSPO Supply Chain, ISCC, MSPO OPMC, and MSPO Supply Chain certification audits.

Dr. Suhaili bin Sahari – Peer Reviewer

PhD in Economics & Muammalat (University Sains Islam Malaysia)

Dr. Suhaili bin Sahari has more than 28 years' experience in training, teaching, consulting, quality, and production for both manufacturing and plantation operation as well as education industry. Some of the training and projects that he has conducted are Roundtable on Sustainable Palm Oil (RSPO), ISO, Project Management, Global Gap, Problem Solving, Strategic Management, SWOT Analysis, Leadership, Malcolm Baldrige, 5S, Cycle Time Reduction, Lean Manufacturing, Six Sigma GB and BB, Auditing and assessment,

Lepan Kabu Estate

Report No: R9324/22-2



HACCP, Soft Skills, Stress Management, 8D problem solving, ICC etc. He has been conducted training and audit on RSPO and MSPO more than 200 estates and mills since 2010 until today. He also the External Peer Reviewer for Certification Body such as BSI, TUV, GGC, BVC and Intertek, which has been reviewing more than 100 estates and mills and still conducting peer review until today.



APPENDIX B: AUDIT PLAN (ACTUAL)

Date	Time (Note 3)	Auditors and Audit Activity		
		Audit Team		
26/2/2024 Monday Day 1	9:00 am – 9:30 am	Opening Meeting and Briefing at Lepad Kabu Office (to be attended by representatives from the Estates as well)		
	9:30 am – 1:00 pm	Document Review and Audit by all Auditors on respective RSPO P&C: P1 to P7 at Estate		
		Site Audit at Lepad Kabu Estate		
		<u>Management Facilities</u> Store (Chemical, General, Scheduled Waste, Petrol, Oil & Lubricant, PPE, Diesel Tank, workers quarters, staff quarters		
		Discussion with Audit Team after site verification		
		MNA	NAQ	ZH
	<ul style="list-style-type: none"> • Principle 1 • Principle 2 • Principle 3 • Principle 4 • Principle 5 • Principle 6 • Principle 7 	<ul style="list-style-type: none"> • Principle 1 • Principle 2 • Principle 3 • Principle 4 • Principle 5 • Principle 6 • Principle 7 	<ul style="list-style-type: none"> • Principle 1 • Principle 2 • Principle 3 • Principle 4 • Principle 5 • Principle 6 • Principle 7 	
	<ul style="list-style-type: none"> • Review of documentation changes (incl. Organization, Policies, SOPs, Laws etc.) • Evaluation of the Pre-Verification Data • Review of Time Bound Plan (TBP) • Verification on compliance with Minimum requirements for Multiple Management Units (MMU) • Verification of Effectiveness of Corrective Actions for Non-Conformances 			
	1:00 pm – 2:00 pm	Lunch Break		
2:00 pm – 6:00 pm	Continue Site Audit at Lepad Kabu Estate			
6:00 pm – 7:00 pm	Travel to Hotel & Break			
7:00 pm – 8:00 pm	Team Meeting and Discussion			

Date	Time (Note 3)	Auditors and Audit Activity		
		Audit Team		
27/2/2024 Tuesday Day 2	9:00 am – 1:00 pm	Document Review and Audit by All Auditors on Respective RSPO P&C: P1 to P7		
		Site Audit at Lepad Kabu Estate		
		<u>Activities</u> Harvesting		
		<u>Environmental</u> Boundaries with Ladang Ibu, HCV area		
		<u>Management Facilities</u> Workers quarters		
		Discussion with Audit Team after site verification		
	MNA	NAQ	ZH	
<ul style="list-style-type: none"> • Principle 1 • Principle 2 • Principle 3 • Principle 4 • Principle 5 • Principle 6 • Principle 7 	<ul style="list-style-type: none"> • Principle 1 • Principle 2 • Principle 3 • Principle 4 • Principle 5 • Principle 6 • Principle 7 	<ul style="list-style-type: none"> • Principle 1 • Principle 2 • Principle 3 • Principle 4 • Principle 5 • Principle 6 • Principle 7 		
11:00 am – 1:00 pm	NAQ		MNA	
Stakeholders' Consultation on the following categories (see Notes 1 and 2 below):				
<ul style="list-style-type: none"> ▪ Contractors ▪ Suppliers 				



		<ul style="list-style-type: none"> ▪ Transporters ▪ NGOs ▪ Government Department / Agencies ▪ Local Community <p>Notes:</p> <ol style="list-style-type: none"> 1. It is mandatory for the UoC to inform Intertek and provide the information (as a minimum the no. of stakeholders in each applicable category and contact number) on the stakeholders prior to the Audit. 2. This will facilitate the random and impartial selection of stakeholders (including independent and organized smallholders, where applicable) and to meet the sample size requirement
		Discussion with Audit Team after stakeholder consultation
	1:00 pm – 2:00 pm	Lunch Break
	2:00 pm – 6:00 pm	Continue Site Audit at Lepad Kabu Estate
	6:00 pm – 7:00 pm	Travel to Hotel & Break
	7:00 pm – 8:00 pm	Team Meeting and Discussion

Date	Time (Note 3)	Assessors and Assessment Activity		
		Assessment Team		
28/2/2024 Wednesday Day 3	9:00 am – 10:00am	Site assessment at estate to follow up on any specific criteria/areas		
		MNA	NAQ	ZH
		<ul style="list-style-type: none"> • Principle 1 • Principle 2 • Principle 3 • Principle 4 • Principle 5 • Principle 6 • Principle 7 	<ul style="list-style-type: none"> • Principle 1 • Principle 2 • Principle 3 • Principle 4 • Principle 5 • Principle 6 • Principle 7 	<ul style="list-style-type: none"> • Principle 1 • Principle 2 • Principle 3 • Principle 4 • Principle 5 • Principle 6 • Principle 7
	10:00 am – 10:30 am	Preparation for Closing Meeting		
	10:30 am – 11:30 am	Team Meeting and Discussions with POM & Estate Management Representatives		
	11:30 am – 12:00 pm	Closing Meeting & Briefing at Lepad Kabu office (to be attended by representatives from the Estate)		

Note 3: Time allotted for the Audit activities may vary whenever situation warrants. Furthermore, the arrangements may change depending upon circumstances.

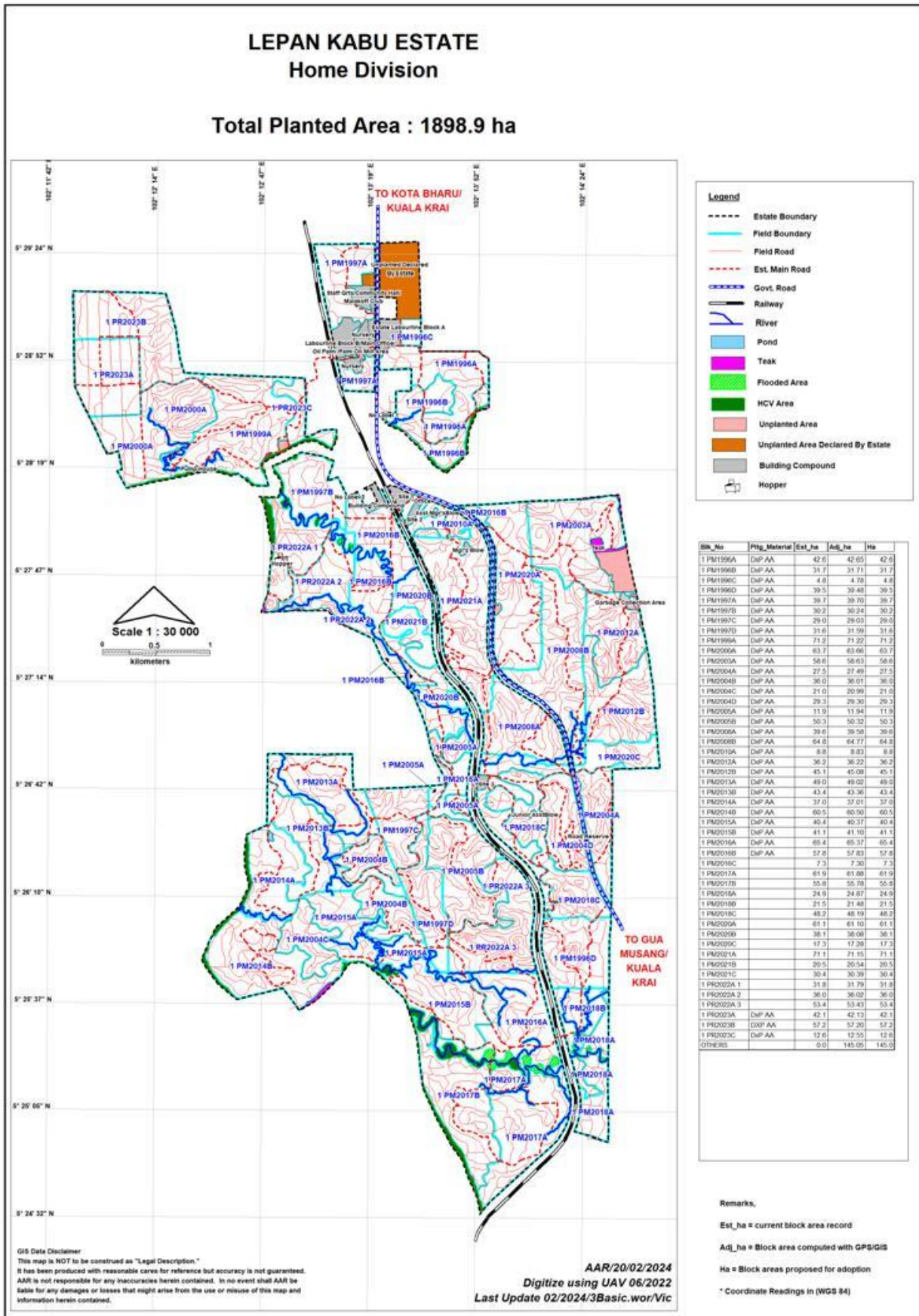
Appendix: Audit Team Competency Matrix

RSPO P&C Areas	Lead Auditor / Auditors / Technical Experts		
	MNA	NAQ	ZH
Principle 1: Behave Ethically and Transparently	✓	✓	✓
Principle 2: Operate Legally and Respect Rights	✓	✓	✓
Principle 3: Optimise Productivity, Efficiency, Positive Impacts and Resilience	✓	✓	✓
Principle 4: Respect Community and Human Rights and Deliver Benefits	✓	✓	✓
Principle 5: Support Smallholder Inclusion	✓	✓	✓
Principle 6: Respect Workers' Rights and Conditions	✓	✓	✓
Principle 7: Protect, Conserve and Enhance Ecosystems and The Environment	✓	✓	✓
Supply Chain Requirements for Mills	✓	✓	✓



APPENDIX C: LOCATION MAP OF LEPAN KABU ESTATE

Appendix C-1: Map of Lengan Kabu Estate





APPENDIX D: TIME BOUND PLAN

Details of Time Bound Plan as submitted by Boustead Plantations Berhad

No	UoC	Main Assessment	Certification Status	Progress	Updated Information on Minimum Requirements for Multiple Management Units, Clause 5.5.1, 5.5.2 & 5.5.3 of RSPO Certification Systems for P&C 2020
1.	Sg Jernih POM and Estate Grouping	Sep 2011	Completed	-	No outstanding issues
2.	Trong POM and Estate Grouping	July 2017	Completed	-	No outstanding issues
3.	Telok Sengat POM and Estate Grouping	Aug 2019	Completed	-	No outstanding issues
4.	Segaria POM and Estate Grouping	Dec 2017	Completed	-	No outstanding issues
5.	Segamaha POM and Estate Grouping	Oct 2018	Completed	-	No outstanding issues
6.	Nak POM and Estate Grouping	May 2015	Completed	-	No outstanding issues
7.	Lepan Kabu Estate	Nov-22	Not Certified	CB appointment process Deferred to 2022 (initially 2020) (Delayed due to Pandemic Covid-19 and land liability disclosure)	BPB in progress of RFQ (Request For Quotation) stage to appoint CB and the audit will be conducted by this year. The company aims to certify Lepan Kabu by 2023. However, the appointment process for the certification body (CB), which began in October 2023, concluded only in December 2023. The initial certification audit is scheduled for February 2024.
8.	Bekoh Estate	Nov-22	Not Certified	CB appointment process Deferred to 2022 (initially 2020) (Delayed due to Pandemic Covid-19 and land liability disclosure)	BPB in progress of RFQ (Request For Quotation) stage to appoint CB and the audit will be conducted by this year. The company aims to certify Eldred Bekoh by 2023. However, the ongoing appointment process for the certification body (CB), initiated in October 2023, is still pending completion.
9.	Eldred Estate	Nov-22	Not Certified	CB appointment process Deferred to 2022 (initially 2020) (Delayed due to Pandemic Covid-19 and land liability disclosure)	BPB in progress of RFQ (Request For Quotation) stage to appoint CB and the audit will be conducted by this year. The company aims to certify Eldred Bekoh by 2023. However, the ongoing appointment process for the certification body (CB),



					Updated Information on Minimum Requirements for Multiple Management Units, Clause 5.5.1, 5.5.2 & 5.5.3 of RSPO Certification Systems for P&C 2020
No	UoC	Main Assessment	Certification Status	Progress	
					initiated in October 2023, is still pending completion.
10.	Rimba Nilai (Sugut) CU	Dec-22	Not Certified	CB appointed Deferred to 2022 (initially 2020) (Delayed due to Pandemic Covid-19)	<p>BPB in progress of RFQ (Request For Quotation) stage to appoint CB and the audit will be conducted by this year. The company plans to certify the certification unit in 2023, however the Land Liability Disclosure (LLD) studies discovered potential noncompliance at the certification unit. As a result, a Land Use Change Assessment (LUCA) is required to confirm the violation. The Company planned to carry out LUCA in 2024. The company is in the midst of engaging an ALS-certified consultant to undertake LUCA.</p> <p>Taking into consideration the time required to finish LUCA, the Concept Note is expected to be issued in 2025. As a result, the Company's goal to certify with the RSPO was shifted from 2023 to 2026.</p>
11.	Tawai CU	2023	Not Certified	New Acquisition in 2018 and 2019, the planning to certified in 2021. However, due to the pandemic Covid-19, the company need to postpone to 2023, apart from that the company plans to certify another 1 business unit consisting of 1 mill and 5 supply base and 3 estate without mill in 2022.	<p>New Acquisition in 2019 from Sit Seng & Sons Realty Sdn Bhd as per RSPO Certification System Nov. 2020; new acquisitions shall be certified within a three-year timeframe. Latest TBP was approved by RSPO. The certification unit is projected to be certified by 2024. However, the existing HCV report does not meet the RSPO P&C standard because it was prepared by a non-ALS-accredited consultant. As a result, the Company plans to re-conduct the HCV and SIA in order to meet the RSPO P&C requirement. The HCV and SIA were scheduled to take place in 2024. Following that, Land Liability Disclosure (LLD) to be conducted in 2024 as well. If there is a potential of noncompliance, LUCA will be undertaken in 2025. Finally, the RSPO initial certification is scheduled for 2026.</p>
12.	Kanowit CU	2024	Not Certified	The company has put out a Request for Proposal (RFP) for all assets in Sarawak. The process for disposal is in progress and waiting for a potential buyer.	<p>The Kanowit CU has been proposed for disposal and still in negotiation process. All decision is pending for the Board of Directors discretion and direction. TBP was approved by RSPO. The company plans to defer the certification for Kanowit Tinjar until 2026. This decision is to allow the completion of Land Liability Disclosure</p>



No	UoC	Main Assessment	Certification Status	Progress	Updated Information on Minimum Requirements for Multiple Management Units, Clause 5.5.1, 5.5.2 & 5.5.3 of RSPO Certification Systems for P&C 2020
					(LLD) in 2024, and if needed, the implementation of LUCA in 2025, with the ultimate goal of obtaining RSPO certification in 2026. Furthermore, Requests for Proposals (RFP) have been issued for all assets in Sarawak. The disposal process has been initiated and is currently awaiting a potential buyer.

CB Evaluation and Verification:

Based on the evaluation done, the Boustead Plantations Berhad was able to demonstrate commitment and provide positive assurance statements on its commitment to continued compliance with the **RSPO P&C Certifications Systems (2020)** Clause 5.5.1, 5.5.2 & 5.5.3 (Minimum Requirements for Multiple Management Units) for all its certified and non-certified units.

Monitoring done of the Timebound Plan and details of progress provided by Boustead Plantations Berhad units were evaluated and actions taken found to be appropriate and satisfactory in complying with the RSPO requirements. The last amended on TBP was APPROVED by RSPO on 18th January 2024.

- End of Report -