TÜVNORD

MSPO CERTIFICATION SUMMARY REPORT

APOGEE PLANTATION SDN BHD

SURVEILLANCE 04

Onsite Audit Date: 07/08/2023 - 08/08/2023

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Company Name:	Apogee Plantation Sdn Bhd.
Certifying Unit:	Apogee Plantation Sdn. Bhd.
Client Number:	92-091
Audit Type:	ASA 04
Mode of Audit:	Onsite

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Abbreviations

CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
CSR	Corporate Social Responsibility
DOE	Department of Environment
EFB	Empty Fruit Bunch
EIA	Environment Impact Assessment
FFB	Fresh Fruit Bunch
GAP	Good Agricultural Practice
GPS	Global Positioning System
ISCC	International Sustainability & Carbon Certification
ISO	International Standard Organisation
MSPO	Malaysia Sustainable Palm Oil
NC	Non Conformity
OSH	Occupational Safety and Health
P&C	Principle and Criteria
PK	Palm Kernel
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable Sustainable Palm Oil
RTE	Rare, Threatened and Endangered Species
SA8000	Social Accountability 8000
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
WHO	World Health Organization
МРОВ	Malaysian Palm Oil Board
MPOCC	Malaysia Palm Oil Certification Council
SDS	Safety Data Sheet



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1. INTRODUCTION

Apogee Plantation Sdn Bhd has commissioned TUV NORD (Malaysia) Sdn Bhd to conduct surveillance audit for its oil palm estates according to MS 2530-3:2013 Part 3 General Principles for Oil Palm Plantations and Organised Smallholders.

1.1. Objective

The objective of this surveillance audit is to assess the estates by an independent certification body with the aim for compliance of the standard.

1.2. Scope

The assessment is based on the documentation established by the Apogee Plantation Sdn. Bhd.

The supporting documents are provided to the audit team as well as information received by means of interviews and background investigation.

The documents and information are reviewed against the requirements and criteria based on MS 2530-3:2013 Part 3 General principles for Oil Palm Plantations and Organised Smallholders.

TUV NORD Malaysia has employed a risk-based approach in the audit, focusing on the identification of significant risks and reliability of the assessment and reporting.

The following references are used as part of the assessment; the compliance of the requirements out of the guidelines applied was checked.

- 1. Malaysian Sustainable Palm Oil Part 3: General Principles for Oil Palm Plantations and Organised Smallholders audit guidance;
- 2. Palm Oil Supply Chain Traceability Requirements

1.3. Appointment and qualification of team members

The audit team appointed consists of one team leader and one team members. The audit team members contributed to the review of documents, the assessment of the project activity and preparation of the report.

Qualification of the Lead Auditor: Khairul Anwar Bin Ismail

Requirement	Qualifications
Post-secondary education, college or university diploma / degree in one of the following	Graduate In Agricultural Science
i) Agriculture;	
ii) Science & Technology (e.g. Environmental Sciences, Life Sciences, Geological Sciences, Natural Sciences,);	
iii) Engineering, Process Technology;	
iv) Energy Management, Quality Management;	
v) Social Sciences and/or Anthropology;	
vi) Business Management; or	
vii)Other relevant related fields	



Requirement	Qualifications		
At least five (5) years of work experience in the oil palm sector or related field in consultancy / auditing of similar industry or equivalent related to and as necessary for the certification process. (e.g., sustainability, palm oil management; agriculture, ecology; social science)	5 years working experience in oil palm plantations.		
Successfully completed MPOCC endorsed lead auditor trainings	Successfully completed MS2530 series of standards for Lead Auditors		
Carried out at least three (3) MSPO or equivalent sustainability certification audits as Lead Auditor- in-training with a minimum of fifteen (15) man- days under the supervision of a qualified Lead Auditor for MSPO or equivalent sustainability certification schemes within the last two (2) years.	Qualified and appointed as Lead auditor for MS2530 scheme.		
Field working experience in the palm oil sector or demonstrable equivalent	5 years working experience in oil palm plantations.		
Good Agricultural Practices (GAP) and Integrated Pest Management (IPM), pesticide and fertilizer use	5 years working experience in oil palm plantations.		
Successfully completed Quality Management Systems (QMS) ISO9001 standard	Successfully completed IMS ISO 9001, 14001, 45001 Lead Auditor course		
Health and safety auditing on the estate processes and activities	Successfully completed IMS ISO 45001:2018 Lead Auditor course.		
Or Successfully completed Occupational, Health & Safety Management System ISO 45001 standard			
Worker's welfare and social auditing experience or	Successfully completed Basic SA 8000 training.		
Successfully attended SA8000 or related social or ethical accountability codes			
Environmental and ecological auditing or experience with organic agriculture.	Successfully completed IMS ISO 14001:2015 Lead auditor course and auditor for MSPO scheme.		
Successfully completed Environmental Management Systems ISO 14001 standard			
Attended High Conversation Value Assessment training	Attended and completed the HCV-HCS for producers online course		
Able to communicate in Bahasa Malaysia, English and / or any other local language.	Able to communicate in Bahasa Malaysia and English.		



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Qualification of Team Member

Requirement	Name of Assessor	Qualification	Compliance
Post-secondary education, college or university diploma / degree in one of the following	Zulkifli Kamarol Zaman	Graduate in Bachelor Sciences Agriculture Business	Yes
i) Agriculture;			
 ii) Science & Technology (e.g. Environmental Sciences, Life Sciences, Geological Sciences, Natural Sciences,); 			
iii) Engineering, Process Technology;			
iv) Energy Management, Quality Management;			
v) Social Sciences and/or Anthropology;			
vi) Business Management; or			
vii)Other relevant related fields			
At least five (5) years of work experience in the oil palm sector or related field in consultancy / auditing of similar industry or equivalent related to and as necessary for the certification process. (e.g., sustainability, palm oil management; agriculture, ecology; social science)	Zulkifli Kamarol Zaman	10 years working experience in oil palm plantations.	Yes
Successfully completed MPOCC endorsed lead auditor trainings	Zulkifli Kamarol Zaman	Successfully completed MS2530 series of standards for Lead Auditors	Yes
Carried out a minimum six (6) on-site audits for a total of at least 20 man- days of audit experience as an auditor-in-training under the direction and guidance of a qualified Lead Auditor for MSPO or equivalent sustainability certification schemes.	Zulkifli Kamarol Zaman	Qualified and appointed as lead auditor for MSPO scheme.	Yes
Field working experience in the palm oil sector or demonstrable equivalent	Zulkifli Kamarol Zaman	10 years working experience in oil palm plantations.	Yes
Good Agricultural Practices (GAP) and Integrated Pest Management (IPM), pesticide and fertilizer use	Zulkifli Kamarol Zaman	10 years working experience in oil palm plantations.	Yes
Successfully completed Quality Management Systems (QMS) ISO9001 standard	Zulkifli Kamarol Zaman	Successfully completed IMS ISO 9001, 14001,	Yes



Requirement	Name of Assessor	Qualification	Compliance
		45001 Lead Auditor course.	
Health and safety auditing of the estate processes and activities Or Successfully completed Occupational, Health & Safety Management System ISO 45001 standard	Zulkifli Kamarol Zaman	Successfully completed IMS ISO 9001, 14001, 45001 Lead Auditor course.	Yes
Worker's welfare and social auditing experience or Successfully attended SA8000 or related social or ethical accountability codes	Zulkifli Kamarol Zaman	Successfully completed SMETA (Issue 6.0) Internal Training.	Yes
Environmental and ecological auditing or experience with organic agriculture. or Successfully completed Environmental Management	Zulkifli Kamarol Zaman	Successfully completed IMS ISO 9001, 14001, 45001 Lead Auditor course.	Yes
Systems ISO 14001 standard Completed High Conversation Value assessment	Zulkifli Kamarol Zaman	Attended and completed the HCV- HCS for producers' online course.	Yes
Able to communicate in Bahasa Malaysia, English and / or any other local language.	Zulkifli Kamarol Zaman	Able to communicate in Bahasa Melayu and English.	Yes



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2. METHODOLOGY

The audit approach consists of the following steps:

- Appointment of team members;
- Contact client for relevant documentation according to the applicable MSPO standards;
- Audit planning;
- Background investigation, desk review of submitted documents;
- Assessment, inspections, interviews operational personnel, workers,; review of documentation;
- Reporting
- Resolution of non-conformance (NC) (if any)
- Draft audit reporting
- Technical review
- Final audit reporting
- Final approval, certification decision and issuance of certificate.

Surveillance Audit:

The surveillance audit carried out onsite from 07/08/2023 - 08/08/2023 covering the following activities but not limited to below:

Onsite:

- Background investigation
- Review of documentation established but not limited to below
 - o Policies
 - Estate(s) map(s)
 - Land title(s)
 - o Standard Operating Procedures;
 - Work Flow Charts;
 - Management Plans;
 - Operating licenses and approvals;
 - o Operating records;
 - Training records;
 - Applicable Legislation Documents
- Onsite visit, observations and inspection of estate(s) facilities and field activities;
- Interview operation personnel and field workers for understanding of work assigned;
- Reviewed revised and updated documentation established and implemented;



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- Reports established;
- Work plans established;
- Review and closed out of non-conformance raised during in last audit;
- Assessment reporting;

On-site Assessment

The audit of the estates are carried out according to the MS 2530-3:2013 Part 3 General principles for Oil Palm Plantations and Organised Smallholders.

The methodology for collection of objective evidence by means of physical site inspections, observation of tasks and processes, interview workers and operation personnel, ,review of documentation and data. Checklists and questionnaires were used to guide the collection of information.

Table 2-1: Estates Selected

Name of Estates	Coordinates
Apogee Plantation Sdn. Bhd.	N 5°34'17.9", E 117°23'02.0"

Non-conformance:

On the basis of the desk review, evidences presented during the audits as well as from the onsite visits non-conformance (NC) Major, Minor and Opportunity for Improvement (OFI) may be raised during the audit.

Major non-conformance shall be addressed and responded with 60 days from closing date of audit. For minor non-conformances raised and action plan to be submitted within 30 days from closing date of audit for review and acceptance. Implementation of Minor NC will be review and verify in the next audit.



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3. ORGANISATION INFORMATION

Apogee Plantation Sdn. Bhd. is an oil palm plantation company located at at Block 5, Lot 2 & 3, Ground Floor Bandar Indah, 90706 Sandakan, Sabah.

The details of the estate as below:

Name of Estate or Division	Location	Coordinates	
Apogee Plantation Sdn. Bhd.	Mile 69, Jalan Telupid, Telupid, Beluru, Sabah, Malaysia	N 5°34'17.9", E 117°23'02.0"	

3.1. Production volume

Name of Estate or	Area (Ha)		Projected FFB Production (mt) (June 2023 to Dec 2023)
Divisions	Total* Production**		
Apogee Plantation	274.06 Ha	244.36 Ha	6,000
Total	274.06 Ha	244.36 Ha	6,000

*includes productive and non-productive area (infrastructures, conservation, HCV, housing & office compound use, set aside area etc.)

**Immature + Mature Area

3.2. Planting Program for Each Estate

Year / Estate	Apogee Plantation Sdn Bhd
2002	109.54
2003	123.89
2004	10.93
Total Mature	244.36
Total Immature	-
Total	244.36

3.3. Replanting program for each estate

Year of replanting	Planted area (ha) in each division	Total area to be replanted (ha)
NIL	NIL	NIL
TOTAL	-	-

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3.4. Maps of Estates Location

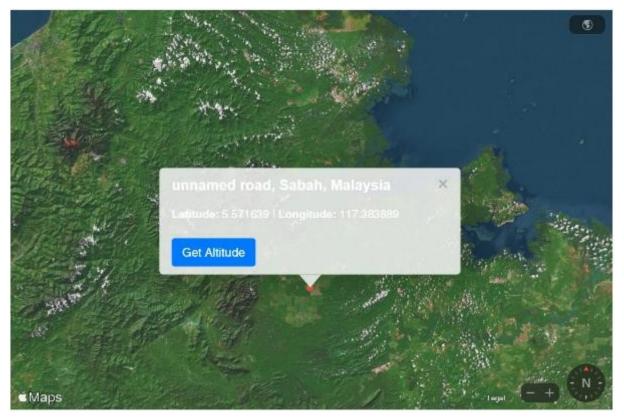


Figure 1: Apogee Plantation Sdn. Bhd. Location

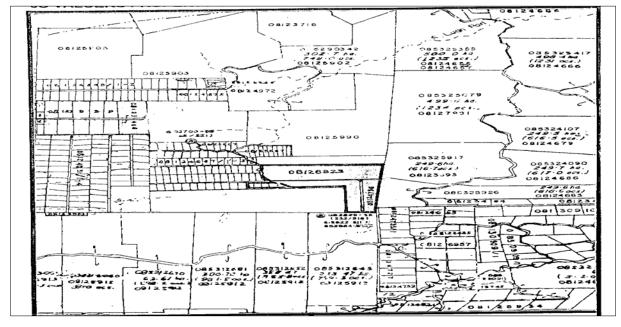


Figure 2: Apogee Plantation Sdn. Bhd. estate map.



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4. CERTIFICATION ASSESSMENT

4.1. ASA 04

The objective of the audit is to assess the activities of the estate are in compliance with MS 2530-3:2013 Part 3 General Principles for Oil Palm Plantations and Organised Smallholders.

4.1.1. Surveillance 04:

The Surveillance four 04 audit is carried out from 07/08/2023 – 08/08/2023 covering one estate – Apogee Plantation Sdn. Bhd.

During the last surveillance audit, there are one (01) Major and three (03) Opportunities for Improvement (OFI) are raised.

During this surveillance 04 audit, the major and minor non-compliance raised in the last audit, the audit team has review by means of physical inspection of estate(s), conduct interviews, review and verify documents that are established, corrected and implemented appropriately by the estate management. The corrective measures implemented could be verified as appropriate.

The major non-conformances raise during the last surveillance 03 audit are closed out by means of documents review that are establish, revised and implemented appropriately and preventive actions taken.

For details of the assessment, refer summary of assessment for each indicator in section 4.3 of this report.

The audit findings if any, raised in this audit refer to Section 4.6 of this report.

4.2. Stakeholders' Consultation

According to ACB – OPMC 4 Issue 2 dated 04/09/2020, Stakeholder Consultation Requirements Section 6: Consultation during audit, §6.1: During the stage 2 and recertification audit of the management unit, the CB shall carry out stakeholder consultation to ensure continued compliance with the requirements of the certification standards. However, stakeholders' consultation during surveillance audit may be limited to those stakeholders who have raised concerns, complaints or disputes prior to the audit.

Therefore, there is no physical stakeholders consultation carried out for this surveillance audit.

TUV NORD (Malaysia) Sdn. Bhd., has published the audit notification on 06/07/2023 to announce the audit of the certified unit. As at audit date on 07/08/2023 there are no comments received.



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4.3. Summary of Assessment

Principle and Criteria Assessment Summary

The assessment team conduct a thorough assessment of each principle and criteria. Over the 5 years' period of the certificate cycle, there will be 4 annual surveillance audits with all criterions will be assessed. Evidences are sought for conformity with the MSPO 2530-3. The summary of the assessment as below, where the "Findings/Comments" column reflects the findings in accordance with each indicator or evidences and when non conformity is found. Summary of the non-conformity can be found below in section 4.6.

Principle	1: Management Commitment & responsibility	
Indicator	Summary of Assessment	Compliance
4.1.1.1	Apogee Plantation Sdn Bhd (APSB) established the Sustainability Policy (MSPO policy) dated 01/01/2019 signed by Managing Director.	Yes
	The policy is available in Bahasa Malaysia and English and publicly displayed at office notice board.	
	Sustainability policy briefing is carried out on 12/07/2023 for internal stakeholders and external stakeholders.	
	Field interviews with sampled harvesters and chemical sprayers informed they are briefed on MSPO policy.	
4.1.1.2	APSB established the Sustainability Policy (MSPO policy) dated 01/01/2019 signed by Managing Director.	Yes
	APSB included a statement on commitment to continuous improvement in the Sustainability policy.	
	The policy states "we are committed to adhere to MSPO Certification principles and criteria that will ensure sustainability and continuous improvement".	
4.1.2.1	APSB established SOP for internal audit, updated on 22/10/2019.	Yes
	The internal audit SOP stated internal audit will be carried out at least once a year.	
	Latest internal audit is carried out on 15/03/2023.	
4.1.2.2	APSB established SOP for internal audit, dated 22/10/2019. The result of internal audit carried out on 15/03/2023 is identified based on categories. There are two findings raised during internal audit.	No
	Example:	
	Finding: Scheduled waste still pending updates from licence collector to collect the Scheduled wastes.	
	Correction: Document review on Continuous Improvement Plan (CIP) updated 14/07/2023, the issue has been identified for continuous improvement.	
	Document review on scheduled waste record, the volume is below 20 mt and not more than 180 days.	



Principle '	I: Management Commitment & responsibility	
Indicator	Summary of Assessment	Compliance
	Interview with estate management informed estate had contacted authorised contractor for the disposal.	
	Major Non Conformance 01	
	Reviewed the APSB internal audit report dated 15/03/2023, one (1) nonconformance had been raised during the internal audit.	
	The identification of root causes of nonconformities, corrective action and timeline to close the non-conformance is not available in report as required in the APSB Internal audit SOP dated $27/08/2020$ section 6.6 Writing Non Conformance report no v, b) The auditee shall determine the root cause(s) of non-conformance, propose and take corrective action(s) within agreed timeframe with the lead auditor.	
4.1.2.3	APSB carried out management review meeting on 17/07/2023.	Yes
	Internal audit results and action plan are discussed in the management review meeting minutes.	
4.1.3.1	APSB carried out management review dated 17/07/2023 includes:	Yes
	Internal audit review;	
	MSPO compliance;	
	Operation matters;	
	Complaint and grievances issues;	
	Employee's safety & health issues;	
	Employee's welfare & benefits.	
4.1.4.1	APSB established Continual Improvement Programme (CIP) updated on 14/07/2023.	Yes
	The CIP includes:	
	Environment;	
	Waste reduction;	
	Pollution and emission;	
	Social impact.	
	Review on CIP table include activity, unit, time frame implement date, person in-charge, improvement action to be taken, expected outcome and completion date.	
	Example:	
	Improvement Action: To revised Contract Piece rate and estate office salary effective 01/01/2023 to ensure compliance with minimum wages policy. In the events that contract piece rate and estate office salary do not meet the minimum wages requirements, it will revise and adjust accordingly.	
	Expected outcomes: Full compliance beginning 01/01/2023;	



Principle 1: Management Commitment & responsibility		
Indicator	Summary of Assessment	Compliance
	Time Frame: Continues program;	
	Review and monitor: Monthly Estate Payroll;	
	Location: HQ Office;	
	Responsibility: Connie (Office Admin);	
	Status Review: Done.	
	Review the latest piece rate updated on 01/01/2023. All the rate had been updated as per Minimum Wages Order 2022.	
4.1.4.2	APSB established the flowchart for new technology information and technique dated 29/03/2019.	Yes
	The flowchart includes the initial part of communication with new technology supply or product, implementation and monitoring for further improvement.	
	Field interviews with estate management informed no new techniques or new technology implemented as at audit date.	
4.1.4.3	The flowchart for new technology information and technique highlighted that workers will be informed on the new information, technique and technology when it is ready for implementation.	Yes
	Field interviews with estate management, informed there is no new technology currently implemented at the estate.	

Principle 2	Principle 2: Transparency		
Indicator	Summary of Assessment	Compliance	
4.2.1.1	Consultation and Communication Flow Chart was established dated 06/08/2019. The document stated that the flow chart of consultation and communication process of the company. The methods of consultation are through:	Yes	
	1. Circular;		
	2. Formal meeting;		
	3. Briefing for internal and external stakeholders.		
	APSB established 'Information Procedure', dated 25/03/2019 as a mechanism to request information by the stakeholders.		
	Verification on documentation review during the audit indicates that there is no request made by the relevant stakeholder as to date.		
	APSB carried out stakeholder meeting including internal and external stakeholder on 12/07/2023.		
	The meeting discuss the following:		
	 Social, environment and legal issues, 		
	Policies		

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Indicator	Summary of Assessment	Compliance
	Complaint and grievance;	
	Communication and consultation flow chart.	
4.2.1.2	List of Publicly Available Documents and Information was established, dated 25/03/2019. The document stated that the list of publicly available document and list of documents subject to management approval can be request by the stakeholders. Stakeholders that eligible to request information is listed in the stakeholder list.	Yes
	Example of the documents to be made publicly available that is listed in the above documents is as follows:	
	MSPO Policies;	
	 Complaint and Grievances Flow Chart and Form; 	
	Information Procedure;	
	 Consultation and Communication Procedure; 	
	Sexual Harassment Reporting.	
	Example of list document subject to management approval are as follows:	
	Financial Statements;	
	• Summary of Land Title;	
	As to the date of audit, there is no records of information request made by the stakeholders.	
4.2.2.1	'Consultation and Communication Flow Chart' established dated 06/08/2019. The document stated that the flow chart of consultation and communication process of the company. The methods of consultation are through:	Yes
	1. Circular;	
	2. Formal meeting;	
	3. Briefing for internal and external stakeholders.	
	The flowchart had divided into 2 main sections, which are communication to employee and other stakeholder and enquiry/issue from employee and other stakeholders. The complaint/grievances had included as part of consultation and communication flowchart. Apogee Plantation defined the time frame for procedures as below:	
	1. Complaint and Grievance: 30 days.	
	2. Sexual Harassment: 14 days	
	Despite the above, APSB also established 'Information Procedure', dated 25/03/2019 as a mechanism to request information by the stakeholders. In addition, APSB has established 'Information Requisition Form' for stakeholder request any document or information from the management. Verification on documentation review during the audit indicates that there is no request has been made by the relevant stakeholder as to date.	

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Principle 2: Transparency		
Indicator	Summary of Assessment	Compliance
	APSB carried out stakeholders meeting including internal and external stakeholder on 12/07/2023.	
4.2.2.2	Verification during audit found that APSB has appointed management representatives as personnel responsible for issues related to the communication and consultation.	Yes
	APSB has established 'Consultation and Communication Flow Chart' was established, dated 06/08/2019 and indicates that the person responsible for communication and consultation were mentions and available in the flow chart of the procedure.	
	Stakeholder were informed the appointed person during stakeholder meeting that was carried out on 12/07/2023 as verified in the minutes of meeting.	
4.2.2.3	List of Stakeholder dated 13/08/2019 is made available during the audit that specifying the name, address, relationship and contact no. including association, recruitment agencies, neighbouring estate, vendor/suppliers, NGOs, and local authority.	Yes
	Latest stakeholder meeting was carried out on 12/07/2023 and attended by internal and external stakeholder. Issues discuss are briefing for social, environment and legal matters, policies, complaint, and others matter related to issue with the stakeholder. Minutes of meeting and attendance of the stakeholder meeting is made available during the audit. It was found that action to be taken in response to input from stakeholders are recorded in the minutes of stakeholder meeting.	
4.2.3.1	APSB has established a procedure for the implementation of traceability of FFB as available in 'Traceability Procedure', dated 01/07/2019.	Yes
	The procedure is to ensure handling of outgoing FFB are carried out in the proper manner to ensure traceability and to meet sustainability requirement. The scope of the procedure is to defines the actions and responsibilities of the harvesters, FFB loaders, tractor drivers, lorry drivers, office clerk, supervisor and estate manager in delivery and recording of outgoing FFB from estates.	
	In practice, the estate is using FFB Delivery Note for the delivery of FFB from estate to mill. All crops are sent to Boustead Tawai Palm Oil Mill. Record of FFB Delivery Note, Weighbridge Ticket and monthly FFB Receiving Details Report from the mill are found well maintained since initial certification in 2019.	
	Traceability of FFB from field / block to mill can be demonstrate clearly as figure in the FFB Delivery Note, Weighbridge Ticket and monthly FFB Receiving Details Report can be trace and tally.	
	Weight of FFB is based on mill's weighbridge ticket. Weighbridge ticket from mill have been sampled, for example:	
	• Ticket no.: 283945, date 16/07/2023, 16,610 kg;	
	• Ticket no.: 283914, date 15/07/2023, 16,720 kg.	
	It is tallied with the estate's FFB delivery chit as follows:	

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Principle 2: Transparency		
Indicator	Summary of Assessment	Compliance
	• FFB Delivery Chit no.: 6884, date 16/07/2023;	
	• FFB Delivery Chit no.: 6883, date 15/07/2023.	
4.2.3.2	Referring to the section 7.3 and 7.4 of 'Traceability Procedure', dated 01/07/2019 stated that frequency of traceability inspection were carried out on daily basis and monthly basis by the estate clerk, estate manager and account in charge in the HQ.	Yes
	Further documentation review found that the estate has carried out daily monitoring for traceability system as evident in the FFB Record Book. In addition, internal audit was carried out on 15/03/2023 and traceability was a part of elements audited.	
4.2.3.3	As stated in the section 7.0 of 'Traceability Procedure', dated 01/07/2019, estate manager, estate clerk, FFB lorry driver and supervisors are responsible to implement and maintain traceability system.	Yes
4.2.3.4	APSB have maintained transportation documentation to the palm oil mill covering FFB delivery chit, mill weighbridge ticket, FFB record book and FFB monthly statement from mill as means to record all transportation of the FFB to the palm oil mill. This has been verified in the indicator 4.2.3.1	Yes
	Reviewed and verified traceability documents includes FFB production records, FFB transportation records, delivery orders and weighbridge tickets were kept since 2019.	

Principle 3: Compliance to legal requirements		
Indicator	Summary of Assessment	Compliance
4.3.1.1	APSB has listed laws applicable to their operations in a Legal Register List and List of Laws, Regulation and Guidelines Description, updated on 17/05/2022.	Yes
	APSB is operating in compliance with most of the applicable local, state, national and ratified international laws and regulations. The estate has listed all licenses and permits hold by the estate to monitor the validity and the list was updated on 15/05/2023.	
	Example of regulatory documentations verified during the audit are as follows:	
	 "Lesen Bagi Perpasangan Persendirian" (Serial No: 60806) valid until 14/03/2024; 	
	 Trading License (Reg. No: R34559/02) valid until 31/12/2023; 	
	• MPOB License No. 504231602000 valid until 31/07/2024;	
	 Permit for Storing Controlled Items and Goods under the Regulations 9(2) of the Controlled of Supplies Regulations, 1974 for storing Diesel – Ref No.: PPDNKK.SDK.25/2011 (SK) Serial No. S002539; valid until 14/07/2024; 	
	 "Lesen Untuk Menggaji Pekerja Bukan Pemastautin [Sekyen 118, Ordinan Buruh (Sabah Bab 67)]" (JTK.H.SDK.600-4/1/1/01261/002178) 	

MSPO Certification Summary Report

Principle 3	Principle 3: Compliance to legal requirements			
Indicator	Summary of Assessment	Compliance		
	valid until 01/04/2024.			
4.3.1.2	APSB has listed laws applicable to their operations in a Legal Register List and List of Laws, Regulation and Guidelines Description, updated on 17/05/2022. Among of laws listed in the documents are as follows:	Yes		
	Minimum Wages Order 2022;			
	Sabah Water Resources Enactment 1998;			
	Pesticides Act 1974;			
	Environment Quality Act 1974.			
4.3.1.3	APSB has listed laws applicable to their operations in a Legal Register List and List of Laws, Regulation and Guidelines Description, updated on 17/05/2022. The new amendments of laws were list are:	Yes		
	1. Minimum Wages Order 2022			
	2. Occupational Safety and Health Act 2022			
	According to the PIC, the list will be updated, when necessary, as there is any new amendments of laws coming into force.			
4.3.1.4	APSB has appointed Admin Office Executive as a person responsible to monitor compliance and update the changes as stated in the List of Laws, Regulation and Guidelines Description.	Yes		
4.3.2.1	Documents review confirmed oil palm cultivation activities by APSB do not diminish the land use rights of other users. APSB have a valid land title which is consists of 81 native titles with total at 274.059 hectares where indicating correct land title terms which specifies the purpose of the cultivation of an agricultural crop of economic value in the respective land. Copies of the land title is evident during the audit. All land titles are issued by Sabah Land Authority.	Yes		
	Example land titles verified during the audit are:			
	• NT08390877; Date of Commencement: 01/01/1980			
	• NT083090804; Date of commencement: 22/07/2013			
4.3.2.2	As reflected earlier, APSB has a valid land title indicating the correct ownership and belongs to the Director of APSB. Copies of the land title is evident during the audit. All land titles are issued by Sabah Land Authority.	Yes		
4.3.2.3	APSB land titles includes maps, total area, location, and boundary stone numbering were presented during the assessment.	Yes		
	Boundary markers such as wooden stick and boundary stones have been erected and maintained along the estate's boundary is verified during site visit.			
4.3.2.4	APSB land titles are issued by State Land Department and no disputed related to the land titles.	Yes		
	Therefore, no disputes found during document review.			



Principle 3: Compliance to legal requirements			
Indicator	Summary of Assessment	Compliance	
4.3.3.1	APSB land titles are native titles issued by Sabah Land Authority. No customary land titles listed in the summary of land titles.	Yes	
4.3.3.2	There is no customary right land leased or owned by APSB. Therefore, no maps established.	Yes	
4.3.3.3	There is no customary land leased or owned by APSB. Therefore, no FPIC or negotiated documents established.	Yes	

Principle 4	Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator	Summary of Assessment	Compliance		
4.4.1.1	APSB established SIA updated on 17/07/2023.	Yes		
	The SIA report include feedback from internal and external stakeholders, impacts, action plan, person in charge and time frame.			
	APSB carried out internal and external stakeholders meeting on 12/07/2023.			
	The SIA assessment includes positive impacts, promoting measure, negative impacts and mitigation measures. The identified positive impacts are addressed.			
	Example:			
	Activity / Process: Feedback raise from internal stakeholder meeting request to have ceiling for all labour quarters;			
	Negative impact: House feel very hot during hot season;			
	Controlling measures: The Management will provide the costing of ceiling for further discussion or approval;			
	Timelines: 2024.			
	Interview with the estate management, the ceiling installation will be carried out in year 2024.			
4.4.2.1	APSB established a flow chart for complaint and grievances dated 25/03/2019.	Yes		
	The flowchart described the process of complaint and grievances starting from rising, receiving complaint form to resolution of complaint.			
	Estate Manager appointed as person in charge to handle matters related to complaint and grievances.			
	Field interviews with sampled harvesters and chemical sprayers informed they understand the complaint and grievances process.			
4.4.2.2	APSB complaint and grievance record book is reviewed with no complaints and grievances lodged by internal and external stakeholders as of audit date.	Yes		
4.4.2.3	APSB complaint and grievance form and box are located at APSB estate office and security post gate.	Yes		

MSPO Certification Summary Report

		al Responsibility, health, safety and employment conditions	Commiliant		
Indicator		nary of Assessment	Compliance		
		interviews with sampled harvesters and sprayers informed they are of the location of complaint box and form.			
4.4.2.4		APSB carried out complaint and grievances briefing to workers on 12/07/2023.			
	Field interviews with sampled harvesters and sprayers informed they attended the training carried out and understand the procedure.				
4.4.2.5		PSB complaint and grievance record book reviewed with no laints and grievances lodged as at audit date.	Yes		
	The c	omplaint log book is maintained since 2019 until audit date.			
4.4.3.1		contributed to local people by offering jobs opportunity for local nunity and provide free transportation for school children.	Yes		
4.4.4.1	APSB Direct	established OSH policy dated 01/06/2019 signed by Managing for.	Yes		
	impor health mana	policy states "The company recognize its employees as the most tant and biggest asset. It strives to continuously provide a safe and ny environment in all company's workplaces. The joint effort of the gement and all level of employees is very crucial in order to achieve oble aspiration."			
	Site o board				
	Docur and sa				
4.4.4.2	а	APSB established Occupational Safety and Health policy updated 01/06/2019 signed by Managing Director.	Yes		
		Document reviewed on company policies briefing includes OSH policy briefing carried out on 12/07/2023.			
		Field interviews with sampled harvesters and chemical sprayer informed they have been briefed of the safety and health practices in the workplace.			
	b	APSB HIRARC is establish for respective operation activities applicable to the estate base on the risk assessment table, updated on 04/07/2023.	Yes		
		The table with headings: Activity, Hazard, Risk and Effects, Risk Assessment (Consequences, Likelihood, Risk Risking), Existing Control, Risk Control Proposal, PIC, Risk Assessment after Control (Consequences, Likelihood, Risk rating, Description) Date review.			
		Example:			
		Activity: Transporting FFB To oil mill;			
		Hazard: Accidental slipping or bunches falling on ramp attendant;			
		Risk and Effect: Broken Bone or sprain and possible fatality;			
		Risk Assessment;			



Principle 4	Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator	Sumn	nary of Assessment	Compliance	
		Consequence: 4;		
		Likelihood: 3;		
		Risk Rating: 12;		
		Existing Control: Regular safety briefing & training given to workers. PPE provided.		
		Risk Control Proposal: Consistent monitoring of current risk control;		
		PIC: Estate Manager/ mandore;		
		Risk Assessment after control:		
		Consequence: 3;		
		Likelihood: 4;		
		Risk Rating: 12;		
		Description: M;		
		Next review date: 04/07/2023.		
		Review the training for safety procedures at Ram dated 12/07/2023.		
		Field interview with sampled harvesters and sprayers informed they have been briefed on safe work practises on 12/07/2023.		
	сi	APSB workers are briefed on safe work practices SOP on 01/04/2022.	Yes	
		Field interviews with sampled harvesters and chemical sprayers informed they briefed on safe work practices.		
	c ii	APSB SDS is attached and available at chemical, fertilizer and diesel stores. All SDS are available in English and Bahasa Malaysia language.	Yes	
		Example:		
		- Ken Lai;		
		- Pounce,		
		- Glyphosate;		
		Site inspection sighted the chemical store is in good condition and locked. Liquid chemical placed in tray below and powder chemical placed on top.		
	d	APSB established records of PPEs issuance and review on the records are maintained and updated.	Yes	
		Type of PPE for activity in accordance to HIRARC and CHRA assessment is identified.		
		Example: Fertilizer Application;		
		Goggles, Face Mask, Apron, Rubber Boots and Rubber Gloves.		



Principle 4	Principle 4: Social Responsibility, health, safety and employment conditions				
Indicator	Sumn	nary of Assessment	Compliance		
		Field interviews with sampled harvesters and chemical sprayers informed there were provided with PPE by company.			
	е	APSB established SOP for safe work procedure chemical mixing dated 01/07/2019 with pictorial diagram made available at chemical store and pre-mixing area.	Yes		
		Document review on CHRA is carried out on 05/03/2019 and valid for 5 years.			
		Site verification at chemical store, all chemicals have original labelling and in original packaging.			
	f	APSB appoints Estate Manager to be the person in-charge of safety and health.	Yes		
	g	APSB has a total number of 34 workers. Establishment of Safety and Health Committee is not applicable as per Occupational Safety and Health Act 1994 section 30 requirements.	Yes		
		Discussion on safety and health agenda and was documented in the Internal stakeholders meeting on 12/07/2023.			
	h	APSB established ERP in OSHMP section 4 Emergency Response and list of emergency contact persons and numbers.	Yes		
		Site verification, observed emergency contact details are display at the estate office notice board.			
		Document review training record on emergency drill and fire drill is carried out on 12/07/2023.			
	i	APSB first aid training carried out on 23/06/2019 by Red Crescent Sandakan.	Yes		
		The security post guard, estate clerk and estate supervisor are trained as first aiders.			
		Site inspection verified first aid kits available at work site, estate office and housing compound handled by Estate Manager and Mandore.			
	j	APSB JKKP8 form for year 2021 submitted to DOSH on 31/12/2022. No injuries or accident reported in year 2022.	Yes		
		Records of injuries are kept and maintained at estate office.			
4.4.5.1		3 established Human Rights Policy dated 01/01/2019 signed by ging Director.	Yes		
		observation confirmed Human Right policy is displayed at estate board.			
		ment review on stakeholders meeting minutes, Human Right policy priefed to workers on 12/07/2023.			
		interviews with sampled harvesters and chemical sprayers informed are briefed on the Good Social Practice policy.			



	4: Social Responsibility, health, safety and employment conditions	
Indicator	Summary of Assessment	Compliance
4.4.5.2	APSB Recruitment and Selection Policy dated 01/01/2019 include a statement "Commit to the fair treatment of its staff or users of its services, regardless of nationality, age, gender, religion, responsibilities for dependents, age, physical and / or mental disability or offending background."	Yes
	Field interviews with sampled harvesters and chemical sprayers informed no discrimination practices in estate.	
4.4.5.3	APSB established employment contract for workers.	No
	The employment contract includes the agreed piece rate or hourly rate and salary during holiday & medical leave.	
	APSB has revised piece rate wage in accordance with Minimum Wages Order 2022.	
	Based on pay slips review, workers are paid according to the agreed piece rate or hourly rate.	
	Major Non Conformance 03	
	Reviewed the APSB workers' payslip dated June 2023, there are salary deduction for passport payment, groceries and mobile prepaid.	
	Employee's Salary Deduction Permit from Labour department is not established.	
4.4.5.4	APSB does not engage contractors for field activities in the plantation.	Yes
	Therefore, no documents established for review.	
4.4.5.5	APSB established summary list of workers dated 03/07/2023 includes name, gender, DOB, Nationality, passport number, DOJ and job description.	Yes
4.4.5.6	APSB established employment contract signed by both estate management and workers.	Yes
	Employment contract details in accordance to Sabah Labour requirements that include annual leave, public holidays, sick leave, maternity leave and working hours.	
	Field interviews with sampled harvesters and chemical sprayers informed they are briefed on employment contract signed and its contents. They are provided a copy for their safekeeping.	
4.4.5.7	APSB used the check roll records system to monitor the workers reporting work and record workers working hours on daily basis.	Yes
	Site visit observed, working hours are displayed at estate office notice board.	
	Field interviews with sampled harvesters and chemical sprayers informed they understand the estate working hours.	
4.4.5.8	APSB working hours are complying with Sabah Labour Ordinance 1950 (Chapter 67).	Yes
	Standard working hours throughout the estate within APSB:	



Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator	Summary of Assessment		
	Working hours: 6.00 am to 02.00 pm;		
	Break time: 11.00 am to 12.00 noon.		
	Field interviews with sampled harvesters and chemical sprayers informed they understand on estate working hours.		
4.4.5.9	APSB established pay slip records to document workers' wages.	Yes	
	Reviewed and verified pay slip for June 2023, workers are paid on piece rated basis for harvesting and pruning as described in the contract agreement.		
4.4.5.10	APSB provides benefits to foreign workers such as medical, annual leave, sick leave, SOCSO and public holidays as listed in the employment contract.	Yes	
4.4.5.11	APSB adopted the industry best practices for workers housing quarters with electricity and water supplies.	Yes	
	Site visit to APSB living quarters observed the workers are provided with basic amenities and sufficient space.		
4.4.5.12	APSB establish Prevention and Eradication of Sexual Harassment in work place policy dated 01/01/2019 signed by Managing Director.	Yes	
	Document review confirmed policy states the commitments and action taken on harassment complaints.		
	There are no complaints related to sexual harassment.		
	Field interviews with sampled harvesters and chemical sprayers confirm there were briefed and understand the Harassment policy. They informed no sexual harassment occur in their workplace.		
4.4.5.13	APSB establish Equal Opportunity Employment & Freedom of Association policy dated 01/01/2019 signed by Managing Director.	Yes	
	The policy includes a statement "The freedom of association shall be initiated according to the Labour Laws and Immigration Act of Malaysia" and display at estate notice board.		
	Workers are briefed during internal stakeholders meeting on 12/07/2023 includes Equal Opportunity Employment & Freedom of Association policy		
4.4.5.14	APSB Recruitment and Selection policy dated 01/01/2019 include a statement the minimum employment age is 18 years and available at estate notice board.	Yes	
	Review on workers master list and interviews with sampled harvesters and chemical sprayers informed no child and young labour working at APSB.		
4.4.6.1	APSB established training procedure dated 10/08/2019 and annual training programme.	Yes	
	Type of training carried out:		
	 Orientation and training for new estate worker/staff carried out on 12/07/2023 		



Principle 4	Principle 4: Social Responsibility, health, safety and employment conditions				
Indicator	Summary of Assessment	Compliance			
	MSPO Policies and company SOP briefing carried out on 12/07/2023				
4.4.6.2	APSB established employee training matrix which allocated training based on workers job scope. Example of training listed in the training matrix are as follows:	Yes			
	MSPO Company Policy				
	SOP Training				
	Safety Training				
4.4.6.3	APSB Continuous Training Programme established on 01/01/2023 which includes training for health, safety, environment and social.4	Yes			
	For examples:				
	• SOP Briefing on Related Work Scope / Operation on December 2023.				

Principle	Principle 5: Environment, natural resources, biodiversity and ecosystem services						
Indicator	Su	Summary of Assessment					
4.5.1.1		Environmental Policy dated 22/07/2023 signed by company's Managing Director was made available during the assessment.					
	The policy describes the company commitment to conduct oil palm business in such manner that potential impact on the environment is minimized. APSB also committed to run business in compliance with all relevant environmental legislation and strive to use pollution prevention and environmental best practices in all activities.						
	da	In addition, APSB established Environmental Management Plan (EMP) dated 10/05/2023. The plan includes objectives, compliance to laws and regulation, environmental aspects and impacts and action plan.					
	Field interviews with the sampled harvesters and general workers indicates that they were briefed on environmental policy and EMP dated 10/04/2023.						
4.5.1.2	а	⁶ 'Environmental Policy' dated 22/07/2023 signed by company's Managing Director was made available during the assessment. The policy describes the company commitment to conduct oil palm business in such manner that potential impact on the environment is minimized. APSB also committed to run business in compliance with all relevant environmental legislation and strive to use pollution prevention and environmental best practices in all activities.					
	b	APSB established Environmental Management Plan (EMP) dated 10/05/2023. The EMP covering all aspects and impacts analysis for all activities in the estates.	Yes				
		Example activities captured in the EMP are as below:					
		Activities: Fertilizer Application;					
		Environment Aspect: Reuse Fertilizer bag for loose fruit collections;					



Principle {	ciple 5: Environment, natural resources, biodiversity and ecosystem services			
Indicator	Summary of Assessment	Compliance		
	Environment Positive Impact: Reduced scheduled wastes;			
	Mitigation/improvement plan: Awareness training for 3R;			
	Monitoring plan: Empty Fertilizer Bag records;			
	Responsibility: Storekeeper.			
	Field interviews with sampled general workers and harvesters informed they are brief on company environmental policy dated 10/04/2023. In addition, 3R training had been carried out dated 12/07/2023			
4.5.1.3	APSB established Environment Management Plan (EMP) dated 10/05/2023 include mitigation for negative impact and promote positive.	Yes		
	Example of negative impact captured in the EMP are as below:			
	Activity: Storage of chemicals;			
	Aspect: Spillage of chemicals and subsequent release into the environment;			
	Impacts: Soil pollution;			
	Risk: Moderate;			
	Action Plan: Pre-mix room is set up and use for chemical storage with area locked and only accessible by authorized personnel;			
	Person in charge: Estate Manager and supervisors.			
	Besides that, it was found that positive impact in the EMP established, for example as below:			
	Activity: Waterways/ stream;			
	Aspect: Protection and Preservation of buffer zones in planted areas;			
	Impacts: Reduced pollution to Water, biodiversity and community impacts;			
	Risk: Moderate;			
	Action Plan: Training of estate workers and supervision not to do any chemical or weeding near the buffer zone;			
	Person in charge: Estate Manager and supervisors.			
4.5.1.4	APSB established Continual Improvement Plan dated 14/07/2023. Example of programme to promote the positive impacts are as below:	Yes		
	Improvement action: To socialize all RTE species to employees and internal stakeholders if any.			
	Expected outcome: Enhanced awareness of protected RTE species.			
	Timeframe: Ongoing			
	Person in charge: Estate Manager and mandore.			
4.5.1.5	Briefing on Environmental policy to workers was carried out on 10/04/2023.	Yes		



Principle 5: Environment, natural resources, biodiversity and ecosystem services							
Indicator	Summary	of Assessment			Compliance		
	the worke the envi	The objective in Environmental Management Plan has been informed to the workers on 10/04/2022. One of the objective highlighted is to protect the environmental of APSB from neglect, mismanagement and irresponsible activities in daily operations.					
	A training Programr		de available in the C	continuous Training			
4.5.1.6	quality are in the m	e discussed in Internal eeting is discussion	ere their concerns al Stakeholders Meeting pertaining to environ on 12/07/2023 with pa	. One of the agenda mental issue. The	Yes		
4.5.2.1	to 2022.		ue for diesel consump e of Diesel from 2020 e during the audit.		Yes		
	The total	diesel and baseline va	lue stated as below:				
	Year	Total Diesel (L)	Average (Baseline Value)	Average Lit/Mt			
	2020	81,240					
	2021	54,324	63,703	9.3			
	2022	55,544					
			l fuel usage is establis pare the actual diesel				
	Diesel us due reduc						
4.5.2.2			is stated in Vehicle Ri w – Management from		Yes		
		diesel are monitored a)-2022 updated on 10/	as evident in the Summ /05/2023.	ary Usage of Diesel			
		Diesel usage has reduced in 2022 compared to baseline years is mainly due reduce in tractor usage.					
	The energy management plan by reducing diesel genset usage and limit the time from 4.30 a.m $-$ 6.30 a.m and 6.00 p.m $-$ 10.00 p.m						
4.5.2.3	estate use	es solar panel for light	acilities compound, it ing at the office, and la ad within estate compo	bour quarters. As to	Yes		



Indicator	Summary of Assessment			Compliance		
4.5.3.1	Waste products and sources of pollution are identified and documented in the Category of Waste Products and Waste management Plan, dated 10/05/2023. Example as below:				Yes	
	Source and Type of Gaseous Waste					
		Sources	Т	ype of Gaseous Gasses		
		Tractor, Vehicle	I	Fumes/Smoke	Carbon Monoxide, Nitrogen Oxides	
		Landfill		Gasses	Methane, Carbon Dioxide	
		Frond		Gas	Methane	
	So	ource and Type of Soli	d Wa	ste		
		Source		Type of Solid	and Liquid Waste	
		Household (Domestic	;)	Plastic, food wa	ste, paper, glass etc.	
		Workshop/garage			es, scrap metals and strial waste	
	Industrial Activities			Agricultural waste – pesticide container, fertilizer bag, planting bags, harvesting equipment.		
4.5.3.2	a APSB established Waste Management Plan dated 10/05/2023.				Yes	
	The sources of wastes and pollutions are identified and monitored Example of the identified waste in the Waste Management Plan are a below:					
	Waste: Pruned oil palm fronds;					
		Source: Harvesting ac	tivity;			
		Location: Field/ Block;				
		Action Plan: To imple three or more portion,			ronds stacking; cut into the ground;	
		Monitoring Plan: Prun	ing pr	ogramme;		
		Responsibility: Estate	Mana	ager.		
					re stacked neatly at the hered with the above	
		22/06/2022 to 30/06/2 of schedule waste w	023 is as re	made available du ported online in e	schedule waste from ring the audit. Inventory -swis system which is any on monthly basis.	
	b	APSB established Wa generated that could b			identify type of wastes cle.	Yes
	Example:					



Indicator	Summary of Assessment	Compliance
	Waste: Empty chemical container	
	Method: Reused	
	Usage for: Chemical pre-mix	
	Field interviews with sampled general workers and harvesters informed they reuse the empty chemical containers after the empty chemical containers been triple rinsed.	
4.5.3.3	APSB established the SOP on handling of used chemical that classified under Environment Quality (Scheduled Waste) Regulations 2005 with updated on 23/07/2020.	Yes
	The SOP stated to ensure proper storage and disposal of used chemical such as spent engine oil, gear oil, lubricant, filter and rags.	
	The current practice adopted by the estate is to be disposed scheduled waste through a licensed agent that approved by the Department of Environment (DOE) in regular manner (six-month intervals).	
	The store well roofed to prevent rainwater entry and bounded in case of accidental spillage of spent oil.	
	Scheduled wastes consists of SW305 and SW409 were disposed to the approved contractor by DOE, Lagenda Bumimas Sdn. Bhd. Consignment Note dated 07/08/2023 were made available during the audit as evidence of disposal schedule waste generated by the company.	
4.5.3.4	APSB established SOP for empty container handling dated 23/07/2020.	Yes
	The procedure describe:	
	 All empty chemical containers must be triple rinsed, label, punctured and kept at proper storage. 	
	 All empty chemical container shall be disposed via authorized contractor. 	
	Onsite visit at chemical store and interview with chemical sprayers confirmed the used chemical containers marks with "X" and reuse for chemical premix purposes only.	
	Empty pesticide container which categorized as SW409 were disposed to the approved contractor by DOE, Lagenda Bumimas Sdn. Bhd. Consignment Note dated 07/08/2023 were made available during the audit as evident of disposal empty pesticide container generated by the company.	
4.5.3.5	It was found that collection of domestic wastes is carried out depends on the domestic waste capacity in the housing area and to be dumped in landfill. Landfill is located in the field at block 15 and far from labour quarters and water sources. This has been verified during site visit carried out during the audit.	Yes
4.5.4.1	APSB established Waste Management Plan dated 10/05/2023. The plan identified solid, liquid and gaseous wastes.	Yes
	Example of plan captured are as below:	



Principle 5	: Environment, natural resources, biodiversity and ecosystem services	5		
Indicator	Summary of Assessment	Compliance		
	Solid wastes			
	Source: Housing compound;			
	Example: Domestic waste;			
	Gaseous wastes			
	Source: Farm tractor/ Generator set;			
	Example: Carbon monoxide, Carbon dioxide;			
	Liquid wastes			
	Source: Chemical mixing;			
	Example: Chemical spillage at field;			
4.5.4.2	APSB established Waste Management Plan dated 10/05/2023 include action plan to reduce pollutants.	Yes		
	Example of action plan captured during the audit are as below:			
	Identification of waste products/pollutants: Domestic waste and sewage;			
	Action Plan: Proper management of landfill, educate on proper disposal to the workers.			
	Based on site verification, observed domestic waste were found proper manage by the estate. No evidence of burning domestic waste we sighted at the landfill and housing compound. Landfill is located in the fir at block 15 and far from labour quarters and water sources.			
	In addition, interview with sampled workers consists of harvester and general workers found that they were briefed by the estate management on domestic waste management.			
	Further verification on documentation review found that the training and briefing was carried out to the workers on 12/07/2023.			
4.5.5.1	a APSB established Water Management Plan, updated on 10/05/2023. Assessment of water usage and sources of water supplied captured in the plan are as below:	Yes		
	Source of water:			
	Rain water;			
	• Pond water as alternative source for emergency situation during drought.			
	Water usage:			
	1. Rain water:			
	Domestic and office.			
	Chemical mixing.			
	2. Catchment Pond:			
	Chemical mixing and vehicle washing.			



Principle !	5: En	vironment, natural resources, biodiversity and ecosystem services	5
Indicator	Sun	nmary of Assessment	Compliance
	b	APSB have streams, rivers or waterways within its estate. Maps of the divisions have been reviewed and verified.	Yes
		APSB carried out water sampling analysis once a year for 4 points water stream points and rainwater for housing in block 1. The inlet water are sampled at block 8 and outlet at block 14. Certificate of analysis from the 3 rd party laboratory were made available during the audit. Latest water sampling was carried out on 24/06/2023.	
	с	APSB monitor the efficiency usage of water:	Yes
		1. Rainfall records;	
		2. Estimation of estate water consumption.	
		APSB reuse the chemical premix water for spraying activities. The water tanks and water pond are able to store water to cater the demand from estate's domestic and operational activities.	
	d	Buffer zone is established for protection of river and pond area.	Yes
		Field interview with sampled general workers and harvesters informed the aware on marked palms as buffer zone area. These areas are restricted for chemical spraying and fertilizer application.	
	е	Buffer zone is established for protection of river pond area.	Yes
		Field interview with sampled general workers and harvesters informed the aware on demarcated palms as buffer zone area. These areas are restricted for chemical spraying and fertilizer application.	
	f	Field inspection and interviewed with APSB estate management confirmed, there are no bore wells constructed to extract ground water.	Yes
4.5.5.2	No construction of bunds, weirs and dams across waterways passing Yes through the estate as verified during site visit within the estate.		
4.5.5.3	APSB established water management plan dated 10/05/2023 describes Yes that rain harvesting is practices by estate for domestic uses.		Yes
	wor	site verification of worker housing and interview with sampled general kers and harvesters confirmed rainwater was collected for drinking nestic usage.	
	imp	thermore, collection drains, field drains and roadside drains is lemented within all visited estates area as a part of the estate's water vesting practices.	
4.5.6.1		APSB established Monitoring Checklist of Biodiversity area dated April 2023.	Yes
		The checklist includes monitoring of wildlife sighted based on different location in the estate.	
		Example of location:	
		1. Buffer zone and reserves area	
		2. Estate blocks	



Principle	5: E	nvironment, natural resources, biodiversity and ecosystem services	•
Indicator	Su	immary of Assessment	Compliance
		Field interview with sampled general workers and harvesters informed no hunting are allowed and any sighted of wildlife to inform the management.	
	b	APSB identified wildlife within estate in the document entitled 'identification of Wildlife Species and Biodiversity in APSB.	Yes
		No identification of RTE Or wildlife since April 2021.	
		Field interview with sampled general workers and harvesters informed they are aware on type of protected wildlife such as 'Jungle fowl' and no illegal hunting within the plantation area.	
4.5.6.2	а	APSB established Environmental Quality Policy include statement "Ensure protection of RTEs species living in HCV areas, if any and ensure that biodiversity is protected and enhanced.	Yes
		APSB also establish monitoring checklist to monitor any presence of RTE at the estate blocks, housing area, riparian reserve and buffer zone. The monitoring was updated in April 2023.	
	b	Field visit confirmed signage installed to inform public and workers on no hunting and capturing of any wildlife.	Yes
		Briefing on wildlife and the prohibitions to hunting and capturing to worker was carried out on 12/07/2023.	
4.5.6.3	.6.3 APSB established monitoring checklist to monitor RTE within the estate blocks, housing compound and buffer zones.		Yes
	Updated wildlife monitoring checklist review dated April 2023 were made available during the audit.		
4.5.7.1	4.5.7.1 APSB established Environmental Quality Policy dated 22/07/2020 signed by Managing Director.		Yes
	The policy statement includes the statement of zero burning practice as per described in Malaysia Law (A1102 Act / Environmental Quality Act 2001) that state that there shall be no burning of any kind except where deemed necessary with prior approval of the relevant authorities. This include domestic wastes, agricultural wastes and biomass or by products generated by estate.		
Field interviews with sampled general workers and harvesters informed that workers are briefed of the zero burning policy and do not practice any burning.			
4.5.7.2		ere is no disease observed on palm oil at APSB estate that required rning for treatment as confirmed through site verification.	Yes
	Th	erefore, no special approval for open burning from relevant authorities	
4.5.7.3	Onsite verification at APSB estate block condition, no disease observed at field operations that required burning method to be treated. Therefore, no application for approval of controlled burning.		Yes



Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Indicator	Summary of Assessment	Compliance		
4.5.7.4	APSB adopted the Field Handbook: Oil Palm Series for Immature Volume 2 & Mature Volume 3 by Ian Rankie and Thomas Fairhurst – September 1999 for their replanting management practice.	Yes		
	The SOP states that all palms must be felled, chipped and shredded during replanting activities.			
	APSB replanting programme will be commenced in 2025. Thus, no replanting activities taking place at estate during the assessment.			
	Therefore, no verification on the previous crops is felled, chipped and shredded, pulverized and mulched.			

Principle	Principle 6: Best Practices			
Indicator	Summary of Assessment	Compliance		
4.6.1.1	APSB established SOPs for best practices as follows:	Yes		
	Manuring SOP, last amended 01/07/2019;			
	• Spraying SOP, last amended: 01/07/2019;			
	Chemical mixing, last amended 01/07/2019;			
	Harvesting SOP, last amended 01/07/2019.			
	Training for SOP has been carried out to make sure that the SOP are consistently implemented:			
	Example:			
	Company SOPs training dated 12/07/2023.			
	Field interviews with sampled harvesters and chemical sprayers informed that they have been briefed of work procedures.			
4.6.1.2	APSB adopted the Field Handbook: Oil Palm Series for Immature Volume 2 & Mature Volume 3 that include the soil conservation measure.	Yes		
	The procedure stated to prevent erosion, cover plants should be established on slopes as soon as possible after land clearing.			
	APSB planting statement stated no replanting carried out since oil palm are in their productive age.			
	Altitude of terrace using tool "GPS Coordinate Malaysia" is 74m from sea level that is in line with code of practices provided by MPOB for best agricultural practices.			
4.6.1.3	APSB established permanent block markers for each block that include Yes block size, block number, dated of planting and planting material.			
4.6.2.1	APSB has established Summary of Projected Cash flow and Management Plan dated 01/06/2023 for 4 years from 2023 to 2026.	Yes		
	Example:			
	1. Price forecast;			



Indicator	Summary of Assessment	Compliance	
	2. Estimation of FFB produced (yield/ha);		
	3. Operation expenses;		
	4. Admin expenses and capital expenditure.		
4.6.2.2	There is no replanting activity for APSB since the palm are still in the production phase.	Yes	
	The expected 1st replanting is in year 2025.		
4.6.2.3	APSB established 4 years financial management plan from 2023 to 2026 includes following:	Yes	
	Cost per ton;		
	Expected FFB output;		
	• Yield per ha;		
	Price forecast.		
	Site interview with estate management informed implementation of budget allocated are monitored to ensure company financial are in order.		
4.6.2.4	APSB established monthly monitoring for the costing and FFB. The previous month actual had been used as the references to monitor the achievement.	Yes	
	APSB has established the WhatsApp group meeting to discuss crop production and financial performance.		
4.6.3.1	APSB establish pricing mechanism for purchase of chemicals and fertilizer using quotation and purchase order.	Yes	
	Example:		
	Purchase order for chemical and fertilizer is recorded and maintained.		
	The quotation and purchase order describes the product, price and terms and conditions.		
4.6.3.2	APSB purchased fertilizer from the suppliers using purchase order.	Yes	
	The invoices dated 01/12/2022 from supplier describes the product pricing and payment terms.		
4.6.4.1	Site interview with APSB management informed they does not engage Yes contractors. Therefore, no documents established.		
4.6.4.2	Site interview with APSB management informed does not engage Yes contractors. Therefore, no documents established.		
4.6.4.3	Site interview with APSB management informed they does not engage Yes contractors. Therefore, no documents established.		
4.6.4.4	Site interview with APSB management informed they does not engage contractors. Therefore, no documents established.	Yes	

MSPO Certification Summary Report

Principle 7: Development of new planting			
Indicator	Summary of Assessment	Compliance	
4.7.1.1	APSB land titles and planting statement documents are review and there is no new land acquire. The last planting is year 2004.	Yes	
	Field visit and interview with APSB management team informed no high biodiversity area within the estate.		
4.7.1.2	APSB planting statement is review and field observation confirmed no replanting programme for year 2023. Thus, there is no PMM carried out.	Yes	
4.7.2.1	APSB estate map, planting statement and field observation are review and confirmed there is no peat land.	Yes	
4.7.3.1	APSB estate map, planting statement and field observation confirmed there is no new planting. Therefore, no SEIA carried out.	Yes	
4.7.3.2	APSB estate map, planting statement and field observation confirmed there is no new planting. Therefore, no SEIA carried out.	Yes	
4.7.3.3	There is no new planting established within APSB area, therefore no management plan nor SOP established.	Yes	
4.7.3.4	There are no smallholders' scheme in APSB certification. Therefore, not applicable.	Yes	
4.7.4.1	APSB planting statement is reviewed and field observation confirmed there is no new planting. Therefore, no soil map established.	Yes	
4.7.4.2	APSB planting statement is reviewed and field observation confirmed there is no new planting. Therefore, no topography map established.	Yes	
4.7.5.1	APSB planting statement and field observation confirmed there is no new planting. Therefore, no topography map established.	Yes	
4.7.5.2	APSB planting statement and field observation confirmed there is no new planting. Therefore, no monitoring management plans for fragile and marginal soil established.	Yes	
4.7.5.3	APSB planting statement is reviewed and there is no new planting. Therefore, no soil map established.	Yes	
4.7.6.1	APSB planting statement is review and interview with estate management team confirmed there is no new planting. Therefore, no FPIC carried out and no communities affected.	Yes	
4.7.6.2	APSB planting statement is review and field observation confirmed there is no new planting. There are no sacred sites, therefore no management plan established.	Yes	
4.7.6.3	APSB planting statements are review and field observation confirmed there is no new planting. Therefore, no compensation or agreement established.	Yes	
4.7.6.4	APSB planting statements are review and field observation confirmed there is no new planting. Therefore, no compensation and agreement established.	Yes	
4.7.6.5	APSB planting statement is review and there is no new planting. Therefore, no assessment to identify customary right established.	Yes	



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4.7.6.6	APSB planting statement is review and field observation confirmed there is no new planting. Therefore, no system establish for calculating the compensation for distribution.	Yes
4.7.6.7	APSB planting statement is review and field observation confirmed there is no new planting. Therefore, no compensation plan established.	Yes
4.7.6.8	APSB planting statement is review and there is no new planting. Therefore, no communities affected.	Yes

4.4. Use of Marks and/or Any Other References to Certification

The audit team leader has reviewed and confirmed that there are no usage of mark/logo in Apogee Plantation Sdn Bhd operation or any on/off-products claim.

4.5. Status of Non-Conformities Previously Identified

	The stage 1 audit findings have been reviewed, in particular to assure appropriate corrective actions implemented to address the identified audit findings.			
Х	The last audit results of this system have been reviewed, in particular to assure appropriate corrections and corrective actions have implemented to address any nonconformity identified.			
	The last audit results of this system have been reviewed, in particular to assure appropriate corrections and corrective actions have not been implemented effectively. The non-conformity will be re-raised.			
	No non-conformity raised in previous audit.			
Note 1: If a minor non-conformity raised in last audit, is not closed out or repeated, the finding will be raised to a Major non-conformity.				
	Note 2: All major and minor NCs raise in last audit are required to capture in this report together with the review of the non- compliance implementation.			

4.6. Detail of Audit Findings in last audit

AUDIT OUTCOME				
During last Audit	1	MAJOR Non-Conformities		
	0	MINOR Non-Conformities		

Non Conformity Number < 01 >					
Indicator # Description		4.5.3.2 A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:			
		a. Identifying and monitoring sources of waste and pollution			
Location:		Estate			
Description of Finding / Objective Evidence:					
Review on APSB scheduled waste monitoring record for year 2022 confirmed scheduled waste generated. However, no evidence of scheduled waste amounts updated on eSWIS platform.					
Classification 🛛 Major					
Raise by:	Khair	ul Anwar Bin Ismail	Date Rais	e:	21/06/2022
Deadline fo	r impl	ementation	21/08/2022	2	



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Non Conformity Number < 01 >

Root Cause Analysis (by company):

Schedule waste recording has consistently been done and updated by the Estate Management with licensed contracted finally coming into estate to disposed the schedule waste generated accordingly.

However, the HQ and Estate management did not know that eSWIS will need updating online every time (not more than 30 days).

This has since been rectified and HQ admin executive has been tasked with updating the eSWIS monthly from now

Correction (by company):

eSWIS updating will be done monthly from now.

Corrective / Preventive Action (by company)

HQ Admin Executive has been assigned and appointed to task with the updating of the eSWIS online from now.

Review of Correction & Corrective / Preventive Action

eSWIS records sent to DOE for Apogee Plantation Sdn. Bhd. dated 22/06/2022 included wastes generated:

- 1. Used lubricant oil;
- 2. Used chemical containers.

Based on documents reviewed, the major non-conformity is considered closed.

Further verification on implementation will be verified on next surveillance audit.

Closed: 🛛 Yes 🔲 No	Site verification : 🗌 Yes 🛛 No
Name of Auditor:	Date of Closure:
Khairul Anwar Bin Ismail	27/06/2022

Review of Implementation

Verification of implementation were found sufficient and adequate to address the non-conformity during last assessment.

It was found that APSB consistently reported the inventory of schedule waste generated by the company through eswis websites on monthly basis.

Evidence inventory of schedule waste from 22/06/2022 to 30/06/2023 is presented during the audit. Hence this non-conformity is closed.

Name of Auditor:	Date of Review:
Zulkifli Bin Kamarol Zaman	08/08/2023

4.7. Detail of Onsite Audit Findings Identified during this audit

This section gives an overview of the non-conformities raised during this audit.

ONSITE AUDIT OUTCOME		
During this onsite	3	MAJOR Non-Conformities
audit,	0	MINOR Non-Conformities



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Non Conformity Number < 1 >				
Indicator # and Description	I Issuance of MSPO Logo Usage License by MPOCC under the Malaysian Sustainable Palm Oil (MSPO) Certification Scheme			
	8.3.2 Off-Product Use			
	For off-product use, Logo Users must use the logo with the logo license number that is issued as below:			
	MSPOIL1.1			
	The logo for off-product use shall adhere to MSPO Logo Reproduction Tool Kit with the exception of the size of the logo, which shall remain flexible and legible.			
Location:	Office			
Description of Fin	nding / Objective Evidence:			
	ISPO Logo has been used in FFB Deliver to the second second second second second second second second second se	very Note. No ev	idence that APSB has <i>Logo Usage</i>	
Classification	🔀 Major	Minor		
Raise by: Zulkif	li Bin Kamarol Zaman	Date Raise:	08/08/2023	
Deadline for implementation				
Root Cause Analysis (<i>by company</i>):				
APSB was not awa	are of licensing for MSPO Logo Usage			
Correction (by company):				
The Company has subsequently made a New Company Chop for use in FFB Delivery Note that shows only the MSPO Certification Number and Validity Date without any MSPO Logo. A sample of the new company chop is as below.				
04 300 92 091 Validity Date: 12.09.2024				
Corrective / Preve	entive Action (by company)			
The Company has been made aware of licensing for MSPO Logo and will be careful not to infringe any licensing rights.				
Review of Correc	Review of Correction & Corrective / Preventive Action			



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Non Conformity Number < 1 >

APSB established new company stamps whereby the MSPO logo has been removed from the company stamps as for use in FFB Delivery Note. It was found that the information of new company stamps consists of the following:

- MSPO Certificate Number
- Certificate Validity

Based on evidence submitted, the NC findings is subsequently closed. Implementation of the corrective action will be verified further during next surveillance audit.

Closed: 🛛 Yes 🔲 No	Site verification: 🗌 Yes 🛛 No
Name of Auditor:	Date of Closure:
Zulkifli Bin Kamarol Zaman	28/08/2023
Review of Implementation	

Name of Lead A	uditor / Auditor:
----------------	-------------------

Date of Review:

Non Conformity Number <2>			
Indicator # and Description	4.1.2.2 The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.		
Location:	Office		
Description of Fi	nding / Objective Evidence:		
Reviewed the APSB internal audit report dated 15/03/2023, one (1) non-conformance had been raised during the internal audit.			
The identification of root causes of nonconformities, corrective action and timeline to close the non- conformance is not available in report as required in the APSB Internal audit SOP dated 27/08/2020 section 6.6 Writing Non Conformance report no v, b) The auditee shall determine the root cause(s) of non- conformance, propose and take corrective action(s) within agreed timeframe with the lead auditor.			
Classification	Classification 🛛 Major		
Raise by: Khair	ul Anwar Bin Ismail	Date Raise:	08/08/2023
Deadline for impl	Deadline for implementation 08/10/2023		
Root Cause Analysis (<i>by company</i>):			
APSB has overlook this area required for reporting on non-conformance			
Correction (by company):			
The Company has subsequently performed a Root Cause Analysis for the Internal Audit Findings and Issues noted			
Corrective / Preventive Action (by company)			

The Company has been made aware and will be reminded to perform Root Cause Analysis whenever there are internal audit findings or issues raised.



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Non Conformity Number <2>			
Review of Correction & Corrective / Preventive Action			
Reviewed the APSB internal audit report dated 09/08/2023 include the root cause of nonconformities.			
Based on documents reviewed, the major non-conformity is considered closed.			
Further verification on implementation will be verified on next surveillance audit.			
Closed: Yes No Site verification : Yes No			
Name of Auditor:	Date of Closure:		
Khairul Anwar Bin Ismail	25/08/2023		
Review of Implementation			
Name of Lead Auditor / Auditor:	Date of Review:		

Non Conformity Number < 3 >			
Indicator # and Description	d 4.4.5.3 Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.		
Location:	Office		
Description of Fin	nding / Objective Evidence:		
Reviewed the APSB workers payslip dated June 2023, there are salary deduction for passport payment, groceries and mobile prepaid.			
Employee's Salary	Deduction Permit from Labour depart	ment is not esta	blished.
Classification	🖂 Major	Minor	
Raise by: Khair	ul Anwar Bin Ismail	Date Raise:	08/08/2023
Deadline for impl	ementation	08/10/2023	
Root Cause Analysis (<i>by company</i>):			
APSB has overlook this area as the Salary Deduction Permit from Labour Department has expired since 2020.			
Correction (by co	ompany):		
The Company has subsequently in the process of reapplication for the Salary Deduction Permit from Labour Department currently.			
Corrective / Preve	entive Action (<i>by company</i>)		
The Company has been made aware and will be reminded to renew the Salary Deduction Permit from Labour Department regularly.			
Review of Correction & Corrective / Preventive Action			



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Non Conformity Number < 3 >			
Review the APSB Salary Deduction Permit application to Labour Department dated 14/08/2023.			
Based on documents reviewed, the major non-conformity is considered closed.			
Further verification on implementation will be verified on next surveillance audit.			
Closed: Yes No Site verification: Yes No			
Name of Auditor:	Date of Closure:		
hairul Anwar Bin Ismail 25/08/2023			
Review of Implementation			
Name of Lead Auditor / Auditor:	Date of Review:		

Nr.	Indicator	Description	Location	Opportunity for Improvement
1.	4.2.3.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.	Office	APSB could improve the list of stakeholders by including stakeholder which is direct and indirectly involved with the company.
2.	4.4.4.2	The occupational safety and health plan shall cover the following: c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: ii) all precautions attached to products shall be properly	Estate	APSB could improve the SDS availability at the chemical store.
3.	4.4.6.1	observed and appliedAll employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.	Office	APSB could improve the training programme for workers.
4.	4.5.6.1	b) Conservation status (e.g., The International Union on Conservation of Nature and Natural Resources (IUCN)	Estate	APSB could improve on monitoring the conservation status of species sighted within the estates.



Nr.	Indicator	Description	Location	Opportunity for Improvement
		status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities		
5.	4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	Office	APSB could improve the timing of payment for chemical purchasing.



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5. CONCLUSION

Apogee Plantation Sdn Bhd has commissioned TUV NORD (Malaysia) Sdn Bhd to conduct surveillance ASA04 audit consisting of 1 estate according to MSPO 2530-3:2013 Part 3 General principles for Oil Palm Plantations and Organised Smallholders.

There are 3 Major NC raised and closed out successfully. The implementation of Major NC will be review and verify during the next audit.

From the review of the standard operating procedures, relevant forms, work flow charts established and implemented; the subsequent background investigation and interviews carried out during this surveillance audit have provided TUV NORD Malaysia with sufficient evidence on the fulfilment of the applied standard Principles & Criteria.

In conclusion the certified unit has been established, implemented and continued to improve in managing the estates are in line with the Principles & Criteria of the applied standards of MS 2530-Part 3:2013 General principles for Oil Palm Plantations and Organised Smallholders.

Any audit is based on sampling within an organization's management system and therefore is not a guarantee of 100 % conformity with requirements.

As a result of this audit, the audit team confirms that;

Total certified number of estates:	1	
Total certified production area:	244.36	На
Certified FFBs January to July 2023:	5,989.21	Mt
Project FFBs August to December 2023:	2,500.00	Mt



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6. RECOMMENDATION

The audit team conduct a process-based audit focussing on significant aspects/risks and objectives required by the standard(s). The audit methods used are interviews, observations, sampling of activities, review of documentation and records.

The structure of the audit is in accordance with the audit plan included in this summary report as annex.

The audit team concludes that the organisation has established and maintained its management system in line with the requirements of the standard(s) and demonstrated the ability of the system to achieve requirements for products and/or services within the scope and the organisation's policies and objectives.

Therefore the audit team recommends that, based on the results of this audit and the system's demonstrated state of development and maturity that this management system certification be

	Recommended for Certification
X	Recommended for Continuity of Certification
	Recommended for Suspension of Certification

Puchong, 25/08/2023

Khairul Anwar Bin Ismail TUV NORD (Malaysia) Sdn Bhd Audit Team Leader

Puchong, 07/09/2023

Muhammad Khairul Anuar TUV NORD (Malaysia) Sdn Bhd Certifier / Approver



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7. LIST OF STAKEHOLDERS

No stakeholders' consultation carried out in accordance to ACB – OPMC 4 Issue 2 dated 04/09/2020, Stakeholder Consultation Requirements Section 6: Consultation during audit, §6.1: During the stage 2 and recertification audit. Therefore, no stakeholders listed.



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Distribution / Confidentiality / Rights of ownership / Limitations / Responsibilities / Audit Objectives

This report is sent by the certification body to the members of the audit team and the audit representative of the organisation. All documents (such as this report) regarding the certification procedure are treated confidentially by the audit team and the certification body. This audit report remains the property of the certification body.

An audit is a procedure based on the principle of random sampling and cannot cover each detail of the management system. Therefore nonconformities of weaknesses may still exist which were not expressly mentioned by the auditors in the final meeting or in the audit report.

The responsibility for continuous effective operation of the management system always rests solely with the audited and certified organisation.

Salvo clause:

The audit report will be left to the organisation at the end of the audit - subject to approval by the certification body. The independent release process may cause modifications or additions. In these cases a modified revision will be sent to the audited organisation.

The objective (goal) of the audit is to establish compliance of the management system of the aforementioned organization with the requirements of the aforementioned standard in order to achieve or maintain certification through an independent and accredited certification body. Identification of possibilities to improve the management system can also be a component of the audit and is considered simply to be an enhancement; it does not constitute consultancy or advice with regard to the management system.

Annex / Enclosures

Annex /

corresponding audit documentation

P&C Audit Report / Checklists
 Audit Plan