

# MSPO CERTIFICATION SUMMARY REPORT

## KRETAM HOLDINGS BERHAD SILIMPOPON ESTATES

ANNUAL SURVEILLANCE AUDIT 01

Date: 03/01/2020

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Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



#### Table of Contents

1.	INTRODUCTION	4
1.1.	Objective	4
1.2.	Scope	4
1.3.	Appointment and qualification of team members	4
2.	METHODOLOGY	9
3.	ORGANISATION INFORMATION	11
3.1.	Production volume	11
3.2.	Planting Program for Each Estate	11
3.3.	Replanting program for each estate	11
3.4.	Maps of Company Location and Plantations	12
4.	CERTIFICATION ASSESSMENT	14
4.1.	Annual Surveillance Audit (ASA 01)	14
4.2.	Stakeholders' Consultation	14
4.3.	Summary of Assessment	16
4.4.	Status of Non-Conformities Previously Identified	38
4.5.	Detail of Audit Findings in last audit	38
4.6.	Detail of Audit Findings Identified During This Audit	40
5.	CONCLUSION	41
6.	RECOMMENDATION	42
7.	LIST OF INTERVIEWEES	43
Anne	x / Enclosures	44

#### Abbreviations

CHRA	Chemical Health Risk Assessment
СРО	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
КНВ	Kretam Holdings Berhad

Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



## 1. INTRODUCTION

Kretam Holdings Berhad has commissioned TUV NORD (Malaysia) Sdn Bhd to conduct annual surveillance audit for its Silimpopon 1 and Silimpopon 2 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 Silimpopon 1 and Silimpopon 2 estates by an independent certification body with the aim for compliance of the standards.

#### 1.2. Scope

The certification is based on the documentation established by the group office and estates.

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 MSPO 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 use as part of the assessment; the compliance of the requirements out of the guidelines applied is checked.

1. Malaysian Sustainable Palm Oil Part 3: General Principles for Oil Palm Plantations and Organised Smallholders audit guidance;

#### 1.3. Appointment and qualification of team members

The audit team appointed consists of one team leader and 3 team members. The audit team members contributed to the review of documents, the assessment of the project activity and to the preparation of this report.

#### Qualification of the Lead Auditor: Muhammad Khairul Anuar Bin Azizul Hasan

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

Company Name:	Kretam Holdings Berhad
Certifying Unit:	Silimpopon Estates
Client Number:	92-049
Audit Type:	ASA 01



Domuiroment	Qualifications
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)	7 years working experience in oil palm plantations.
Successfully completed MS 2530 series of standards training	Successfully completed MS2530: 2013 LA Course.
Conducted 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 as auditor, conducted more than 3 certification audits with total more than 15 man-days audits.
A good knowledge in handling and evaluating sources of information and data. Able to communicate in Bahasa Malaysia, English and/ or any other local language.	Able to communicate in Bahasa Malaysia and English.
Field working experience in the palm oil sector, or demonstrable equivalent	7 years working experience in oil palm plantation.
Good Agricultural Practices (GAP), and Integrated Pest Management (IPM), pesticide and fertilizer use	7 years working experience in oil palm plantation.
Health and safety auditing on the farm and in processing facilities, for example ISO 45001 or Occupational, Health & Safety Assurance System	Successfully completed IMS ISO 9001, 14001 and 45001 LA course.
Worker welfare issues and social auditing experience, for example with SA8000 or related social or ethical accountability codes	Successfully completed SA 8000 Basic training and Auditor MSPO and RSPO scheme.
Environmental and ecological auditing, for example experience with organic agriculture, ISO 14001 or Environmental Management Systems (EMS) or High Conservation Value (HCV)	Successfully completed IMS 9001, 14001 and 45001 LA course, Auditor for MSPO and RSPO scheme.

## **Qualification of Team Members**

Requirement	Assessor	Qualification	Compliance
Post-secondary education, college or university diploma / degree in one of the following		Graduate in Plantation Industry and management	Yes
i) Agriculture;	Khairul Anwar bin Ismail	Graduate in Agricultural Science	Yes



Requirement	Assessor	Qualification	Compliance
<li>ii) Science &amp; Technology (e.g. Environmental Sciences, Life Sciences, Geological Sciences, Natural Sciences,);</li>	Mohd Nur Amin bin Mohd Halim	Graduate in Office Management and Technology	Yes
<li>iii) Engineering, Process Technology;</li>			
<li>iv) Energy Management, Quality Management;</li>			
<ul> <li>v) Social Sciences and/or Anthropology;</li> </ul>			
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	Zul Hairi Abu Hassan	9 years working experience in oil palm plantations.	Yes
of similar industry or equivalent related to and as necessary for the certification process. (e.g., sustainability, palm oil management;	Khairul Anwar bin Ismail	5 years working experience in oil palm plantation.	Yes
agriculture, ecology; social science)	Mohd Nur Amin bin Mohd Halim	7 years working experience in oil palm plantation.	Yes
Successfully completed MS 2530 series of standards training	Zul Hairi Abu Hassan	Successfully completed MS2530 series training	Yes
	Khairul Anwar bin Ismail	Successfully completed MS2530 series training	Yes
	Mohd Nur Amin bin Mohd Halim	Successfully completed MS2530 series training	Yes
Conducted 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	Zul Hairi Abu Hassan	Qualified as auditor, conducted more than 6 on site audits with total more than 20 man days audits.	Yes
and guidance of a qualified Lead Auditor for MSPO or equivalent sustainability certification schemes.	Khairul Anwar bin Ismail	Qualified as auditor, conducted more than 6 on site audits with total more than 20 man days audits.	Yes
	Mohd Nur Amin bin Mohd Halim	Auditor in training.	Yes
A good knowledge in handling and evaluating sources of information	Zul Hairi Abu Hassan	Bahasa Malaysia and English.	Yes
and data. Able to communicate in	Khairul Anwar bin Ismail	Bahasa Malaysia and English.	Yes



Requirement	Assessor	Qualification	Compliance
Bahasa Malaysia or any other local language.	Mohd Nur Amin bin Mohd Halim	Bahasa Malaysia and English.	Yes
Field working experience in the palm oil sector, or demonstrable equivalent	Zul Hairi Abu Hassan	9 years working experience in oil palm plantations.	Yes
	Khairul Anwar bin Ismail	5 years working experience in oil palm plantation.	Yes
	Mohd Nur Amin bin Mohd Halim	7 years working experience in oil palm plantation.	Yes
Good Agricultural Practices (GAP), and Integrated Pest Management (IPM), pesticide and fertilizer use	Zul Hairi Abu Hassan	9 years working experience in oil palm plantations.	Yes
	Khairul Anwar bin Ismail	5 years working experience in oil palm plantation.	Yes
	Mohd Nur Amin bin Mohd Halim	7 years working experience in oil palm plantation.	Yes
Health and safety auditing on the farm and in processing facilities, for example ISO 45001 or Occupational, Health & Safety	Zul Hairi Abu Hassan	Successfully completed ISO 45001 LA course, Auditor for MSPO and RSPO scheme.	Yes
Assurance System	Khairul Anwar bin Ismail	Successfully completed IMS ISO 9001, 14001 and 45001 LA course.	Yes
	Mohd Nur Amin bin Mohd Halim	Successfully completed IMS ISO 9001, 14001 and 45001 LA course.	Yes
Worker welfare issues and social auditing experience, for example with SA8000 or related social or ethical accountability codes	Zul Hairi Abu Hassan	Successfully completed SA 8000 Basic training and auditor for MSPO schemes	Yes
	Khairul Anwar bin Ismail	Successfully completed SA 8000 Basic training and auditor for MSPO schemes	Yes
	Mohd Nur Amin bin Mohd Halim	Auditor in training	Yes
Environmental and ecological auditing, for example experience with organic agriculture, ISO 14001 or Environmental Management	Zul Hairi Abu Hassan	Successfully completed ISO 14001 LA course, Auditor for MSPO and RSPO scheme.	Yes



Requirement	Assessor	Qualification	Compliance
Systems (EMS) or High Conservation Value (HCV)	Khairul Anwar bin Ismail	Successfully completed IMS ISO 9001, 14001, 45001 LA course, Auditor for MSPO scheme.	Yes
	Mohd Nur Amin bin Mohd Halim	Successfully completed IMS ISO 9001, 14001 and 45001 LA course.	Yes

Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



## 2. METHODOLOGY

The audit approach consists of the following steps:

- Contract review;
- Appointment of team members and technical reviewer;
- Contact client for relevant documentation according to the applicable MSPO standards;
- Audit planning;
- Background investigation, desk review of submitted documents;
- On-Site assessment, inspections, interviews with operational personnel, stakeholders and its contractors; review of documentation;
- On-site reporting
- Resolution of non-conformance (NC) (if any)
- Draft audit reporting
- Technical review
- Final audit reporting
- Peer review
- Address Peer Review Comments (if any)
- Final approval and issuance of certificate.

#### Annual Surveillance Audit (ASA 01):

Annual Surveillance audit was conducted on 14/10/2019 to 16/10/2019 covers the following activities but not limited to below:

- Onsite visit, observations and inspections of estate facilities and field activities;
- Interview operation personnel and field workers for understanding for the work assigned;
- Reviewed revised and updated documentation established and implemented;
- Operating records;
- Training records;
- Reports established;
- Work plans established;
- Stakeholders consultation meeting;
- Review and closed out of non-conformance raised during stage 1 audit;
- Assessment reporting;

#### **On-site Assessment**

Company Name:	Kretam Holdings Berhad
Certifying Unit:	Silimpopon Estates
Client Number:	92-049
Audit Type:	ASA 01



The audit of the estates is conducted 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 included physical site inspections, observation of tasks and processes, interviews of stakeholders, communities, staff, workers and their families, review of documentation and data. Checklists and questionnaires were used to guide the collection of information. The comments made by external stakeholders are taken into account in the assessment.

For the annual surveillance audit the selected estates was based on the formula  $S = 1.0\sqrt{n}$  where S = sample size and n = number of estates which is in accordance to MSPO certification procedure.

Based on the formula, the sample size for the estate  $S = 1.0\sqrt{2} = 1.41$ , therefore round up to the next integral of 2 estates. Thus, a total of 2 estates selected for the onsite assessment and inspection as listed in Table 2-1 below:

Name of Estate	Coordinates
Silimpopon 1 Estate	N : 04°19'44.76", E : 117°27'32.88
Silimpopon 2 Estate	N : 04°20'58.6" , E : 117°25'28.9"

#### 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.

Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



## 3. ORGANISATION INFORMATION

Silimpopon 1 and Silimpopon 2 estates are owned by Kretam Holdings Berhad located at Kalabakan, Sabah.

The details of the two estates as below:

Name of Estate	Location	Coordinates
Silimpopon 1 Estate	KM 128, Tawau Kalabakan Highway, Mukim Sg.	N : 04°19'44.76"
	Silimpopon	E : 117°27'32.88"
Silimpopon 2 Estate	KM 128, Tawau Kalabakan Highway, Mukim Sg.	N : 04°20'58.6"
	Silimpopon	E : 117°25'28.9"

#### 3.1. Production volume

Name of Estate	Area	ı (Ha)	Projected FFB Production (mt)	
Name of Estate	Total*	Production**	(Jan 2020 – Dec 2020)	
Silimpopon 1 Estate	3,934.82	2,884.90	61,000	
Silimpopon 2 Estate	4,155.18	2,660.49	51,000	
Total	8,090.00	5,545.39	112,000	

\*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	1999	2000	2001	2002	2003	2004	2005	Total
Silimpopon 1	0.00	0.00	1,028.92	823.00	1,013.46	0.00	19.52	2,884.90
Silimpopon 2	705.15	687.09	0.00	458.25	480.20	329.80	0.00	2,660.49
Total Mature	705.15	687.09	1,028.92	1,281.25	1,493.66	329.80	19.52	5,545.39
Total Immature	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Oil Palm	705.15	687.09	1,028.92	1,281.25	1,493.66	329.80	19.52	5,545.39

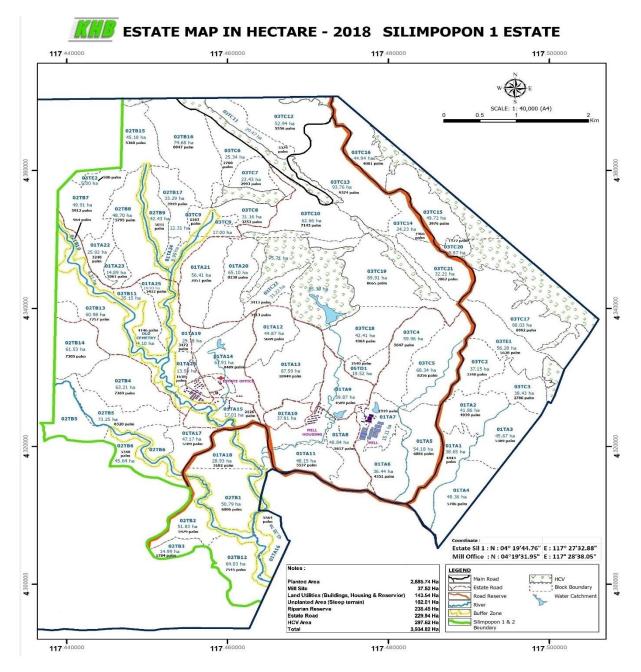
#### 3.3. Replanting program for each estate

Estate / Year of	Planted area (ha) in eac	ch estate	Total area to be replanted (ha)	
Replanting	2022	2023		
Silimpopon 1 Estate	0.00	0.00	0.00	
Silimpopon 2 Estate	345.32	1,047.52	1,392.84	
TOTAL	345.32	1,047.52	1,392.84	

Company Name:	Kretam Holdings Berhad
Certifying Unit:	Silimpopon Estates
Client Number:	92-049
Audit Type:	ASA 01

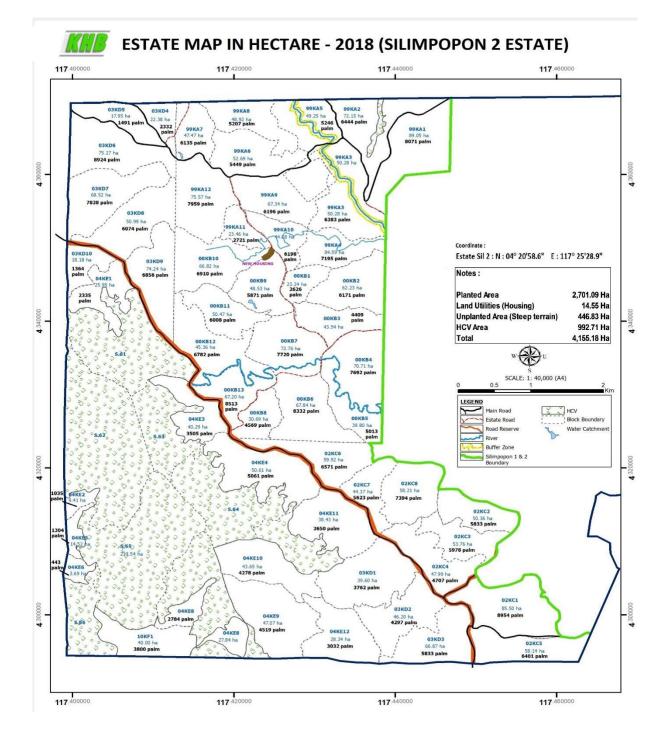


## 3.4. Maps of Company Location and Plantations



Company Name:	Kretam Holdings Berhad
Certifying Unit:	Silimpopon Estates
Client Number:	92-049
Audit Type:	ASA 01





Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



## 4. CERTIFICATION ASSESSMENT

#### 4.1. Annual Surveillance Audit (ASA 01)

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

#### 4.1.1. ASA 01:

The annual surveillance audit is conducted on 14/10/2019 to 16/10/2019 covering 2 selected estates – Silimpopon 1 and Silimpopon 2.

During the Stage II audit, there is 1 Minor and 2 Opportunities for Improvement (OFI) are raised. Action plan is submitted for Minor non-conformance with implementation review during the next audit.

During this audit, the minor non-compliance raised in the last audit, the audit team has review by means of inspection of estates, 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.

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

TUV NORD (Malaysia) Sdn. Bhd., has published the public notification on 11/09/2019 as to accommodate stakeholder's consultation meeting for Silimpopon Estates to provide comments. As at audit date on 14/10/2019 there are no comments received.

Invitation letters are sent on 11/09/2019 to invite relevant stakeholders to attend a local stakeholders' consultation on 14/10/2019 to gather information from the local communities in accordance to §7, 3.2 of the Certification Procedure requirements.

The topics of discussion are as below:

- 1. Introduction of MSPO certification.
- 2. Development of oil palm plantations
- 3. Community service and support provided
- 4. Wildlife management and wildlife corridor
- 5. Type of wildlife sighted at the plantations and wildlife corridor.
- 6. Local communities' development.

The following relevant Principles & Criteria of the applied standard are discussed during the stakeholders' consultation:

1. Principle 2 Criteria 2 Indicator 1: Consultation and Communication with stakeholders:

The stakeholders could confirm they have attended meetings with the company on MSPO certification.

Company Name:	Kretam Holdings Berhad
Certifying Unit:	Silimpopon Estates
Client Number:	92-049
Audit Type:	ASA 01



2. Principle 4 Criteria 2 Indicator 3 & 4: A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint

The stakeholders' advice they are informed a logbook and form is available at the office to lodge any complaints or suggestions.

3. Principle 4 Criteria 3 Indicator 1: Contribute to local development in consultation with the local communities.

The local communities could confirm the company has provide assistance and support to communities.

4. Principle 6 Criteria 4 Indicator 1: Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information

The contractors who provides maintenance and service could confirm they are briefing on MSPO requirements.

There is no issues raised during the stakeholder's consultation in terms of tenure and/or use rights, social or environmental aspects of management and operations that need to be addressed by the certified unit. It can be concluded the relevant Principles and Criteria clauses of the applied standard are in compliance.

Items	Subject discussed	Audit team findings	Company response and proposed action to be taken
1	Any information from Company as regards to the MSPO audit?	Stakeholders confirmed received information of MSPO audit via invitation letter received.	Positives comment
2	Social issues	Stakeholders are not local communities or government authorities. Therefore, no input of this topic.	No action required.
3	Type of land title – Country Leased, Provisional Leased, Native title	Stakeholders are not local communities. Therefore, no input of this topic.	No action required.
4	Economy / livelihood Is there any impact on livelihood after the introduction of MSPO?	Stakeholders are not local communities. Therefore, no input of this topic.	No action required.
5	Does MSPO largely benefits the local community?	Stakeholders are not local communities. Therefore, no input of this topic.	No action required.
6	Environmental understanding	Stakeholders are not local communities. Therefore, no input of this topic.	No action required.
7	Awareness towards species, habitats, and	Stakeholders are not local communities. Therefore, no input of this topic.	No action required.

The list of stakeholders who attended the meeting refer to Table 7-1

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Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



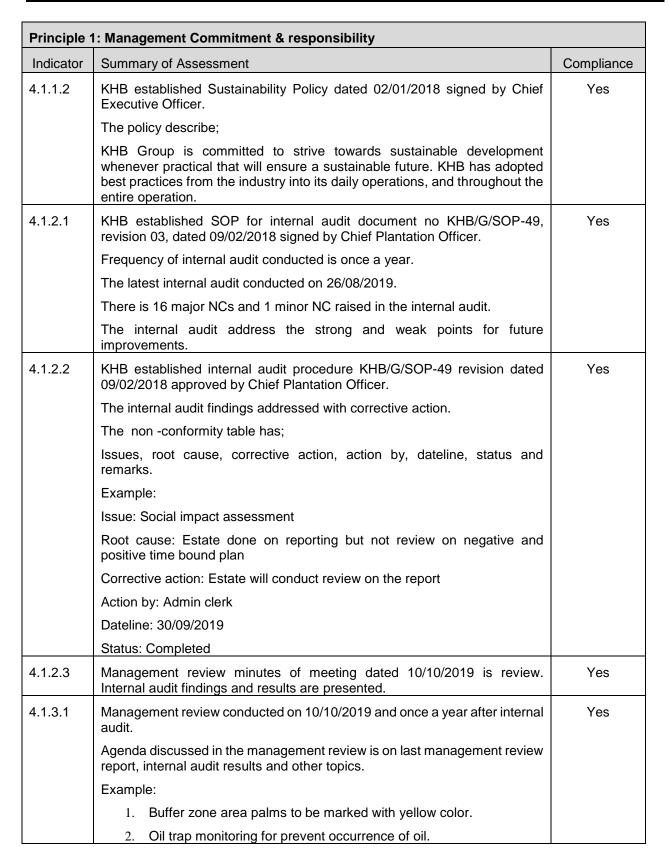
Items	Subject discussed	Audit team findings	Company response and proposed action to be taken
	high conservation values		
8	Are there any plantation management practices that affect you?	Stakeholders confirmed there are no management practices affect them as the estate located far from the surrounding villages.	Positives comment
9	Do you consider any management is in conflict with the MSPO principles and criteria?	Stakeholders confirmed that estate has taken effort to meet the MSPO requirements by improving cooperation and communication.	Positives comment
10	Do you have any suggestions for management?	No suggestion.	No action required.

#### 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 criteria and indicator or evidences and when non conformity is found. Summary of the non-conformity can be found below

Principle 1	Principle 1: Management Commitment & responsibility				
Indicator	Summary of Assessment	Compliance			
4.1.1.1	KHB established Sustainability Policy dated 02/01/2018 signed by Chief Executive Officer.	Yes			
	The policy describes:				
	a) Commitment to adhere on applicable laws				
	b) Ensure protection and conservation to HCV.				
	c) Ensure protection of RTE in HCV area.				
	<ul> <li>Promote innovation for product and process enhancement, water conservation, waste management and recycling.</li> </ul>				
	e) Transparency and accountability to stakeholders				
	The policy is publicly display at the estate and workers quarters notice boards.				
	Sustainability Policy training conducted on 21/08/2019 to the workers.				
	Site interview workers are aware on MSPO implementation and its importance on oil palm sector.				







Principle '	I: Management Commitment & responsibility	
Indicator	Summary of Assessment	Compliance
4.1.4.1	KHB established Continual Improvement Plan for Estates date of review 30/09/2019 and next review will be held on 31/08/2020.	Yes
	Table of contents:	
	a) Pesticide	
	b) Environment	
	c) Waste reduction	
	d) Pollution and emission	
	e) Social impact-plantation	
	f) Health and safety issues	
	g) Legal compliance and transparency	
	h) General issues	
	Example on Environment:	
	<b>Improvement action:</b> To conduct oil trap monitoring at diesel skid tank, gen-set room, lubricant store and workshop.	
	Expected outcomes: No spillage of oil from running to the waterway.	
	Timeframe: Jan to Dec 2019.	
	Review and Monitoring: Monthly monitoring of oil trap	
	Responsibility: Estate Assistant Manager	
	<b>Status:</b> Monthly monitoring has implemented in $1^{st}$ half 2019, to continue $2^{nd}$ half of 2019.	
	Example on Social:	
	<b>Improvement action:</b> To provide comfortable housing for employees. The estate will build new permanent quarters for employees.	
	<b>Expected outcomes:</b> Improvement of livelihood for Silimpopon Estates employees.	
	Timeframe: 2024	
	<b>Review and Monitoring:</b> Continuous implementation of building master plan	
	Responsibility: Estate management	
	<b>Status:</b> 9 block were constructed in 2019, another 25 block will be constructed from year 2020 to 2024.	
4.1.4.2	KHB established SOP KHB/G/SOP-46 "New Information, Technique, Equipment, revision dated 09/02/2018 approved by Chief Plantation Officer.	Yes
	The SOP states	
	a) To train operators in regarding implementation of new technology	



Principle	Principle 1: Management Commitment & responsibility				
Indicator	Summary of Assessment	Compliance			
	b) Report by estate manager on every 2 weeks for first two months and monthly from three to six month and then evaluation either to continue or stop the implementation.				
	Example: Implementation of new system called (Quarto System) which was used on upgrading and improving estate and mill accounting system.				
	Training on the new system conducted on 18/09/2018 to 20/09/2018. The latest training conducted on 01/10/2019 for further monitoring.				
	The Quarto system is implemented during the audit date.				
	Sighted in the CIP is the improvement action of new technology of Quarto System.				
4.1.4.3	KHB established SOP KHB/G/SOP-46 "New Information, Technique, Equipment, revision dated 09/02/2018 approved by Chief Plantation Officer.	Yes			
	• The SOP includes a flowchart: The product information				
	Site selection				
	Target group				
	Justification and comparison				
	Economical viable				
	SOP and training				
	Training guidance				
	Records				
	Reporting				

Principle 2	Principle 2: Transparency		
Indicator	Summary of Assessment	Compliance	
4.2.1.1	KHB established list of stakeholders dated 05/05/2017 includes surrounding communities, government authorities, suppliers, contractors and NGOs.	Yes	
	External stakeholder meeting conducted on 14/08/2019 with following agenda;		
	1) Company policies & Complaints procedure in line with the MSPO requirement.		
	<ol> <li>Positive implementation of MSPO in the aspect of social, safety &amp; environment.</li> </ol>		
	3) Method of communication between company and stakeholders.		
	4) Regularly communicate with communities, authorities and NGOs.		
4.2.1.2	KHB established 'List of Documents and Transparency Status' on 29/09/2018.	Yes	
	The list is publicly available at notice board.		

Principle 2: Transparency		
Indicator	Summary of Assessment	Compliance
	Examples of documents:	
	- Land title	
	- Crop projection	
	- Water management plan.	
4.2.2.1	KHB established SOP on Stakeholder Engagement / Negotiation dated 05/05/2017.	Yes
	The procedure states the "Consultation and meeting" specify the process including:	
	<ul> <li>To hold periodic consultation with stakeholder on issue pertaining to estate/mill operation, crop quality, health and safety, certification activity, training, road accessibilities etc.</li> </ul>	
	The stakeholders are brief on the consultation and communication flowchart during the stakeholders meeting held on 14/08/2019.	
4.2.2.2	KHB established SOP, on Stakeholder Engagement / Negotiation dated on 05/05/2017.	Yes
	Item 3 updating of list, address and contact number, the responsibilities states the estate manager shall be overall in charge of the implementation of the procedure.	
4.2.2.3	KHB established list of stakeholders dated 15/08/2019.	Yes
	The stakeholders list includes government agencies, schools, suppliers, contractors, transporter, NGO, smallholder and FFB supplier.	
	Consultation & Communication flowchart states the timeframe to attend any grievance or complaint received within 30 working days.	
4.2.3.1	KHB established traceability procedure dated on 01/12/2017.	Yes
	The SOP description as below:	
	1. Identification, implementation & monitoring of document;	
	2. Implementation, monitoring of records by management to ensure the traceability system is implemented	
	3. Retention of traceability records archive with minimum period of 10 years.	
	4. Frequency of traceability record by annual internal audit.	
	5. List of records on crop production that should be available for inspection.	
4.2.3.2	KHB conducts monthly check on the delivery to Silimpopon kill.	Yes
	The internal audit conducted on 26/08/2019 for Silimpopon 1 Estate and 07/08/2019 for Silimpopon 2 Estate with no findings raised.	
4.2.3.3	KHB appoints the Senior Assistant Manager (SAM) as person in charge for maintaining the traceability system.	Yes



Principle 2: Transparency			
Indicator	Summary of Assessment	Compliance	
4.2.3.4	Records for production and delivery of FFBs documented and maintained.	Yes	
	The records of delivery could be traced to the date of harvesting, block number, number of FFB bunches, FFB transport vehicle number, delivery note issued by the estates to the mill and weighbridge ticket issued by mill		

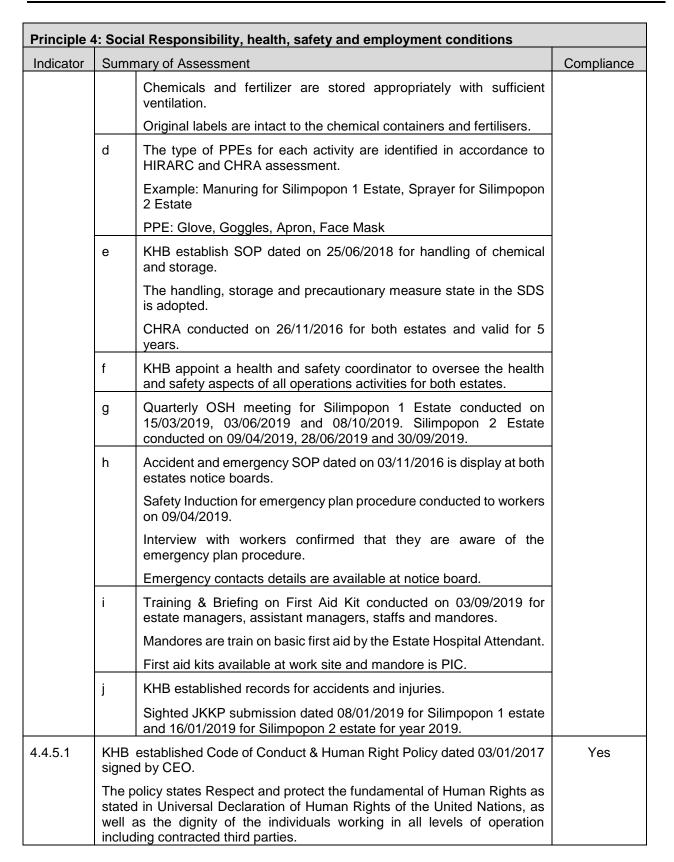
Principle 3	Principle 3: Compliance to legal requirements			
Indicator	Summary of Assessment	Compliance		
4.3.1.1	KHB established monitoring records of licenses updates dated 03/10/2019.	Yes		
	List of licenses and validity as below:			
	<ul> <li>a) Silimpopon 1 MPOB license 503884002000 with validity until 31/03/2020.</li> </ul>			
	<ul> <li>b) Silimpopon 2 MPOB license 508393402000 with validity until 28/02/2020.</li> </ul>			
	c) Air compressor license: SB PMT 11251 valid until 26/12/2019.			
	d) Genset license by Suruhanjaya Tenaga valid until 31/05/2020			
	e) Trading license R43670/12 with validity until 31/12/2019			
	<ul> <li>f) Permit barangan Kawalan Berjadual for Diesel PPDNKK.TWU900- 3/1/05-2006(P) valid until 29/11/2019</li> </ul>			
4.3.1.2	KHB established list of related laws, regulations and guidelines updated on 25/09/2019.	Yes		
	Example of law applicable;			
	1. Land Ordinance Sabah Cap 68			
	2. Labour Ordinance Sabah Cap 67			
	3. Minimum Wage Order amendment 2018			
	4. Pesticides 1974 (Act 149)			
	5. Occupational Safety & Health Act 1994 (Act 514)			
4.3.1.3	KHB list of related laws, regulations and guidelines with latest update on 25/09/2019.	Yes		
4.3.1.4	KHB appointed Head of Human Resources and Sustainability as person in charge for Legal Register.	Yes		
4.3.2.1	KHB land titles are country lease issued by Director of Lands and Surveys Sabah to Kretam Holdings Berhad.	Yes		
	The land title describe land usage is for the purpose of cultivation of an agricultural crop of economic value.			
4.3.2.2	KHB land titles are issued by the Director of Lands and Surveys Sabah to Kretam Holdings Berhad.	Yes		
	The activity is for cultivation of an agricultural crop of economic value.			

Principle	Principle 3: Compliance to legal requirements		
Indicator	Summary of Assessment	Compliance	
	The tenure period is 99 years.		
4.3.2.3	KHB land titles have a map with the title number, size in hectare and boundary markers.	Yes	
	Boundary stone is inspected during site visit and crosscheck with e map for correctness.		
4.3.2.4	The land titles are issued by Director of Lands and Surveys, Sabah. Therefore, no FPIC and disputes.	Yes	
4.3.3.1	KHB land titles are country lease issued by Director of Lands and Surveys, Sabah.	Yes	
	There are no native or customary sub-leased land in KHB.		
4.3.3.2	KHB land titles are country lease issued by Director of Lands and Surveys, Sabah.	Yes	
	There are no native or customary sub-leased land by KHB.		
4.3.3.3	KHB land titles are country lease issued by Director of Lands and Surveys, Sabah.	Yes	
	There are no native or customary sub-leased land in KHB.		

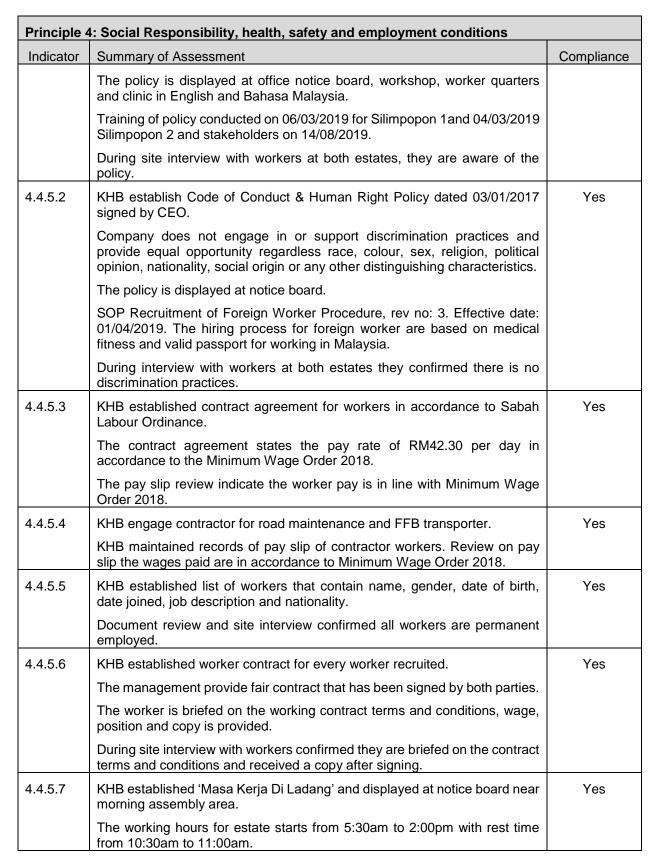
Principle 4	Principle 4: Social Responsibility, health, safety and employment conditions		
Indicator	Summary of Assessment	Compliance	
4.4.1.1	KHB established SIA on December 2017 and updated on September 2019.	Yes	
	The SIA includes information from survey and meeting feedback from internal and external stakeholders.		
	The SIA has a summary of positive and negative impacts and the timeline to monitor.		
	The action and implementation is the responsibility of the Estate Management.		
	The positive impacts are continuously promoted while negative impacts are mitigated with a timeframe to carry out the action and included in CIP for monitoring.		
	The SIA will be reviewed once a year with feedback from stakeholders.		
4.4.2.1	KHB established Complaint and Grievance procedure, doc no: KHB-PR-P05, revision no 2 effective date 01/08/2018 approved by Director.	Yes	
	The procedure is displayed at estate notice boards and available in English and Bahasa Malaysia.		
	The procedure states that any complaint received by the Manager should be resolve within 10 days. If the Manager is not able to resolve it will be forwarded to the group top management to resolve within 30 days.		
	Compliant / Grievance form (KHB-HR-P05/F01) available for stakeholders to lodge complaint.		



Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator	Summ	nary of Assessment	Compliance
		interview with field workers for both estates confirmed their standing on the process to make complaint or grievance when ed.	
4.4.2.2	KHB e	established complaint and grievance form.	Yes
	Mana	chart in the SOP describing the process and responsible person, HR ger or Manager (grievance officer) are in-charge for the complaint and e the compliant to be solve 30 working days.	
	Recor date.	ds are review with no complaints lodged in both estates as of audit	
	Worke	ers interview confirmed no complaints lodged.	
4.4.2.3		complaint and grievance form is available at the office that can be s by workers and stakeholders.	Yes
4.4.2.4		conducted briefing to workers on 06/09/2019 and external stakeholders /04/2019 on complaint and grievance procedure.	Yes
	During any tir	g interview with workers they informed complaint could be lodged at me.	
4.4.2.5	Review of complaint records confirmed there are no complaints lodged as at audit date.		Yes
4.4.3.1	KHB provides job opportunity to local communities for estate operation and office admin work.		Yes
4.4.4.1		establish Health & Safety Policy dated 01/04/2019 signed by Chief utive Officer.	Yes
		policy is available at estate notice board and workers are brief on /2019 for Silimpopon 1 Estate and 08/07/2019 for Silimpopon 2 Estate.	
4.4.4.2	а	The policy is display at notice board.	Yes
		Briefing provided to workers on 11/09/2019 for Silimpopon 1 Estate and 08/07/2019 for Silimpopon 2 Estate	
		Stakeholders consultation conducted on 15/08/2019 include safety & health policy.	
	b	KHB establish HIRARC by work area for each activity.	
		The table describe the activity, hazard, injury, risk rating, control measures, residue risk and reduce risk rating.	
		PIC is the Safety Executive	
		Date of review 28/05/2019 for Silimpopon 1 Estate and 12/01/2018 for Silimpopon 2 Estate	
	сi	Workers are briefed on company policies on 11/09/2019 for Silimpopon 1 Estate and 08/07/2019 for Silimpopon 2 Estate.	
		Policies are display at the notice boards. Briefing records are verified.	
	c ii	SDSs for chemicals and fertilisers are available at store and office.	







Indicator	Summary of Assessment	Compliance
	Workers reporting for daily work is recoded during the morning muster roll call.	
	Working hours and overtime stated in working contract.	
	Overtime rate according to Sabah Labour Ordinance requirements of 1.5 times daily rate for normal overtime and 2.0 time daily rate for rest day and public holidays.	
	Interview with workers, they are aware on the working hours and overtime rate.	
4.4.5.8	Reviewed on the pay slip, contract and check roll of workers for working hours and OT complied with legal regulations.	Yes
	During field visit workers feedback they understand the working hours and overtime time. Worker confirmed the wage paid is in line with legal requirements.	
4.4.5.9	Pay records are reviewed to crosscheck the wage paid is in line with legal regulations and working contracs.	Yes
	The wages records from September 2019 sighted are according to the Minimum Wage Order 2018.	
	Interview with workers at both estates they understood the wages and overtime paid.	
4.4.5.10	KHB provide benefits to workers such as annual leave, SOCSO, medical treatment and transport.	Yes
4.4.5.11	KHB housing adopts the industry best practices.	Yes
	Site observation on the worker living quarters has basic amenities such as crèche, recreation place, mosque, chapel, shops, water, electricity and gardening area.	
4.4.5.12	KHB established Sexual Harassment Policy dated 15/04/2019.	Yes
	The policy is displayed at notice boards	
	The policy briefing conduct during gender meeting dated 04/10/2019 for Silimpopon 1 and 18/10/2019 for Silimpopon 2.	
	There are no complaints lodged for related issue.	
4.4.5.13	During the interview with workers there are no union form in KHB. However, worker JCC meeting is conducted annually as communication tools between workers and management team.	Yes
	KHB conducted workers JCC meeting dated 09/10/2019 at Silimpopon 1 and 08/10/2019 at Silimpopon 2.	
4.4.5.14	KHB established Social Policy dated 15/04/2019.	Yes
	The policy states Ensure no child or young person under age 18 shall be or permitted to be engaged in any employment other that those allowed by the laws.	



Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator	Summary of Assessment	Compliance	
	Worker personal file and workers master list review indicate no child labour employed by the estates.		
	Onsite observation, no child labour or young person employed by estates. All workers are above 18 years prior joining the estates.		
4.4.6.1	KHB established training program 2019 dated 22/01/2019.	Yes	
	Trainings are provided to staff and workers.		
	Example of training conducted:		
	Accident procedure on 01/10/2019		
	<ul> <li>Chemical handling, surplus chemical handling, fuel &amp; Lubricant handling 02/10/2019</li> </ul>		
	Hygiene policy 03/10/2019		
	Emergency plan procedure 04/10/2019		
	Gender policy & sexual harassment policy 07/10/2019		
	Foreign workers policy 05/10/2019		
	Battery handling & charging 08/10/2019		
4.4.6.2	KHB established training programme based on job task.	Yes	
	Training matrix is establish to identify training needs for each worker.		
4.4.6.3	KHB established annual training plan 2019 dated 22/01/2019 ti ensure workers are regularly briefed safe work practices.	Yes	

Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Summary of Assessment	Compliance
4.5.1.1	KHB established Environmental Policy dated 02/01/2018 sign by CEO.	Yes
	Environmental Management Plan (EMP) established doc no EAIA Jil.2/2019 dated 20/02/2019.	
	The EMP include the relevant laws and regulations as below list :	
	1. Licensed control as prescribed premises under section 18	
	2. Environmental Quality Act 1974	
	3. Environmental Quality (Clean Air) Regulation 2014	
	4. Occupational Safety and Health Act (Act 514)	
	5. Environmental Quality (Scheduled Waste) Regulation 2005	
	KHB conducted training on Environmental Management Plan (EMP) dated 26/09/2019 and 06/09/2019.	
	Site interview workers are aware of environmental management plan.	
4.5.1.2	a KHB established EMP Doc no EAIA Jil.2/2019 dated 20/02/2019.	Yes



Principle	5: E	nvironment, natural resources, biodiversity and ecosystem services	
Indicator	Su	mmary of Assessment	Compliance
		The EMP include the environmental policy and objectives follows.	
		<ol> <li>To ensure a continuous awareness of the need to check and monitor key environmental components for Kretam Holding Berhad – Tawau Region and take appropriate remedial measures to avoid environmental degradation</li> </ol>	
		<ol> <li>To protect the environmental of Kretam Holding Berhad –Tawau region from neglect, mismanagement and irresponsible activities in palm oil operation</li> </ol>	
		<ol> <li>To ensure conformation to all activities are within the law/ Acts and legislation of state and nation</li> </ol>	
	b	The environmental aspect and impact table is included in the EMP, listing the aspects and impacts analysis by activity.	Yes
		Example:	
		Activities: Pest Control	
		Environment Aspect: Pesticides Spillage	
		Environment Impacts: Pollution to water courses and land	
		Risk assessment: High	
		Mitigation/improvement plan: Follows SOPs on pesticide handling and application	
		Monitoring plan: Monthly	
		Responsibility: Estate Manager/ Assistant Manager	
4.5.1.3		e environmental aspect and impact table is included in the EMP, listing aspects and impacts analysis by activity	Yes
	Ex	ample:	
	Fe	rtilizer Application	
		egative Impact: Leaching losses run off nutrients during application in onsoon season	
		tigation plan: Correct timing of fertilizer application and Fertilizer plication on the top of fronds stacking in mature palm area	
	Mo	onitoring: Record of fertilizer application	
	Po	sitive Impacts:	
		rtilizer application is essential for palm growth and crop production and n maintain soil nutrients in balance and replacement for taken up by plants	
	Pla	an to promote:	
	Fe	rtilizer recommendation by agronomist and fertilizer application training	
	Мо	onitoring: Record of fertilizer application	
4.5.1.4		e programme to promote positive impacts are listed in the environment pact assessment and action plan.	Yes

Principle	5: Environment, natural resources, biodiversity and ecosystem services	
Indicator	Summary of Assessment	Compliance
	Example:	
	Fertilizer Application	
	Positive Impacts	
	Fertilizer application is essential for palm growth and crop production and can maintain soil nutrients in balance and replacement for taken up by plants	
	Plan to promote:	
	Fertilizer recommendation by agronomist and Fertilizer application training	
	Monitoring: Record of fertilizer application	
	EMP dated 20/02/2019 include continual improvement to promote the positive impact.	
	Example	
	1. Fertilizer application training	
	2. Safe fertilizer application	
4.5.1.5	KHB established training program 2019 dated 20/01/2019.	Yes
	Example of the training related to environmental plan	
	1. Environmental policy dated 26/09/2019.	
	<ol> <li>Waste disposal and scheduled waste management dated 06/09/2019.</li> </ol>	
4.5.1.6	The 3 <sup>rd</sup> quarterly environmental meeting conducted on 10/10/2018 between management and environmental committee team.	Yes
	The meeting discussed the environmental concern such as buffer zone and riparian zone monitoring environmental training programmed and scheduled waste monitoring update.	
4.5.2.1	KHB monitor the usage of fossil fuel usage on diesel consumption vs FFB tonnage on annually basis for operation and transporting FFB to mill.	Yes
	Comparison of current usage compared with baseline established. The diesel usage from Jan'19 – Aug'19 are high due to new additional vehicles and usage for construction of 12 unit new labor quarters.	
	Fuel efficiency improvement plan established dated 10/07/2019 stated for the usage of vehicle, workshop, genset, general.	
4.5.2.2	Monthly budget usage of diesel for 2019 is compared with monthly actual usage to monitor the cause for increase or decrease	Yes
4.5.2.3	Fuel efficiency improvement plan established dated 10/07/2019.	Yes
	The plan state the implementation of solar panel for main gate and weighbridge.	
	Sighted solar panel for lighting at main gate and weighbridge.	
4.5.3.1	Environment Management plan dated 20/02/19 include waste identification and disposal method.	Yes



Principle 5	Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Su	Immary of Assessment	Compliance
	Th	e waste identification include source, location and disposal method.	
	Ex	ample	
	Wa	aste identification: Used Engine Oil	
	So	ource: Vehicle, Gear-Box	
	Lo	cation: Used Oil Store	
	Dis	sposition method: Disposed by authorized contractor	
	Re	esponsibility: Workshop supervisor	
4.5.3.2	а	KHB established Environment Management plan dated 20/02/2019 includes waste and pollution sources, identification and monitoring plan and disposal method	Yes
		Example	
		Waste identification: Disposal of spent Engine Oil/ lubricants	
		Source: Vehicle, Gearbox	
		Monitoring Plan: Proper monitoring, storage and disposal as schedule	
		waste, Constant checks on storage drum for any leakages	
		Responsibility: Workshop supervisor	
		Pollution: Soil Pollution, Water Pollution	
		Used engine oil has been recorded with latest updated on 1/10/2019.	
	b	Environment Management plan dated 20/02/2019 include the list of recyclable waste for Silimpopon 1 and Silimpopon 2 Example;	
		1. Source of pollution: Fertilizer bag	
		Type of recycle: Reuse	
		Remarks: Use for loose fruit collection	
		2. Source of pollution: EFB, Pome, Palm frond	
		Type of recycle: Reused	
		Remarks: Used for mulching, soil conditioner, nutrient enhancement	
4.5.3.3		B established SOP for waste disposal doc no: KHB/G/SOP-08, rev no: 5, ective date: 18/08/2013, revision dated 04/05/2018.	Yes
	Th	e SOP state handling of used engine oil:	
		1. The scheduled waste must be kept in the drum for disposal	
		2. The scheduled waste must be recorded, labelled and be kept in the store	
		<ol> <li>The estate will follow the Environment Quality Act 1974 (Scheduled Waste Regulation 2005) and notify the mill manager on the total of volume of scheduled waste in the store by updating the ESWIS records</li> </ol>	

Company Name:	Kretam Holdings Berhad
Certifying Unit:	Silimpopon Estates
Client Number:	92-049
Audit Type:	ASA 01



Indicator	Summary of Assessment	Compliance
	Environmental Management plan list all scheduled waste generated from estate operations according to legal requirement.	
	For example	
	1. Used Engine / motor oil (SW 305)	
	2. Used battery (SW 102)	
	3. Electrical waste (SW 109)	
	4. Contamination Soil (SW 408)	
	5. Clinical Waste (SW 403)	
	The scheduled waste will be collected by DOE authorized collector.	
	Estate established scheduled waste monitoring records to ensure the quantities are not more than 20mt or stored for more than 180 day.	
4.5.3.4	KHB established SOP Empty Container Rinsing, doc no: KHB/G/SOP-19, rev no: 4, effective date: 18/08/2013, revision date 09/02/2018.	Yes
	The SOP states	
	1. All empty chemical container shall be kept in the premixing facilities store	
	2. The container must be rinsed 3 times before storage	
	3. The water inside the container to be emptied into premix water tank	
	4. The rinsed water are reused for chemical premix activities	
	<ol> <li>The empty container will be punctured before collected by DOE authorized collector or reused as chemical premix storage</li> </ol>	
	KHB established inventory for recycling and reused records of empty chemical containers.	
4.5.3.5	KHB disposed domestic wastes at designated landfills located away from waterways and housing.	Yes
	During site verification at Silimpopon 1 and 2 estate, landfill is located more than 500 meters from housing and waterways. The area is fenced and marked, with opening and closing dates.	
4.5.4.1	KHB established pollution aspects and impacts.	Yes
	The document is attach to EAIA and Environmental Management plan dated 20/02/2019	
	The list of pollutants listed	
	1. EFB	
	2. GHG	
	3. Engine Oil	
	4. Scrap Iron	

Indicator	Summary of Assessment		Compliance
		disposal and treatment method for each type of waste as below mple :	
		1. Used Engine Oil	
		2. Disposal Method : Disposed by authorized Contractor	
		3. Expected outcome: Less pollution	
	GHO	G source:	
	Exa	mple: EFB - Methane (CH4), Used Engine Oil - Carbon Monoxide (CO)	
4.5.4.2		I efficiency improvement and action plan included the pollution and ssion plan for Silimpopon 1 and 2 Example :	Yes
	Veh	icle – Farm tractor, lorry & heavy machineries	
		<ul> <li>Proper vehicle maintenance schedule</li> </ul>	
		nted vehicle maintained record for Silimpopon 1 and 2 estate dated on 09/2019. All the vehicles are maintains as per programme.	
4.5.5.1	а	KHB established water management plan dated 30/09/2019 describe the source and usage.	Yes
		Catchment ponds: For domestic usage and chemical application	
		Rain water: For domestic consumption.	
	b	Water quality tests conducted to monitor in and outgoing water by 3 <sup>rd</sup> party laboratory dated18/03/2019 to meet DOE requirements.	
		Housing water is discharge to the nearest field.	
		KHB conducted water quality test for water catchment pond and water treatment plant by 3 <sup>rd</sup> party laboratory to monitor the drinking water quality meets national drinking water standard.	
		Example:	
		The Certificate of analysis dated on 31/07/2019 shows that the water quality is within the limit of National Standard for drinking water quality.	
	с	KHB established water consumption monitoring record to monitor estate and labour quarter water usage	
		The water pumped monitored with installed flow meter and daily usage of water is recorded. The operator is responsible to record the water usage on daily basis and summarized on monthly basis.	
		Piping system found in good order during inspection at housing and facilities area	
	d	Silimpopon River flowing through the Silimpopon 1 & 2 estates.	
		Monthly monitoring of riparian zone establish to ensure no activities of chemical and fertilizer application.	
		Appropriate signage installed at buffer / riparian zones	





Principle	Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Su	mmary of Assessment	Compliance
		Workers are brief during buffer zone training on 17/08/2019 for restriction of spraying, manuring and any activities at buffer zone area.	
	е	No vegetation removed from riparian zones at Silimpopon 1 and 2 estate as sighted during site visit	
		KHB has planted tree such "Pokok Jati", "Pokok Laran" and "Pokok Batai" with the objective to increase vegetation at riparian area	
	f	There are no bore wells constructed to extract ground water.	
		This could be observed during inspection of housing and facilities areas at both Silimpopon 1 and 2 estate	
4.5.5.2	Th	ere are no bunds or weirs or dams constructed across rivers.	Yes
	Thi	is could be confirm during field visit observation at Silimpopon river.	
4.5.5.3		in water harvesting is practice at all housing compound in Silimpopon 1 d 2 estates.	Yes
4.5.6.1	а	KHB established HCV Assessment report dated 12/10/2018 prepared by consultants to identify the wildlife & ecosystems and provide HCV management & monitoring recommendation to protect the RTE	Yes
		The identification of the wild life divided into flora and fauna.	
		Example of identified rare, threatened, or endangered species (RTE) are	
		1. Kapur Gumpait (Dyrobalanops keithii)	
		2. Meranti Tembaga (Shorea Leprosula)	
		3. Belian (Eusideroxylon Zwageri)	
		4. Burung Kekek (Anthracoceros Malayanus)	
		5. Beruk (Macaca Nemestrina)	
		6. Tenggiling ( <i>Manis Javanica</i> )	
		7. Kelawat (Hylobates Muelleri Funereus)	
		Silimpopon 1 and Silimpopon 2 estates conducted quarterly observation survey with objective is to identify sighted wildlife, changes to ecosystems and ensure no hunting or capturing activities at HCV river area. Sighted monitoring record dated 11/07/2019.	
		Appropriate signage install as information to workers to discourage any illegal or inappropriate hunting, fishing or collecting activities.	
	b	The identification of the wild life divided into flora and fauna.	
		Example of identified rare, threatened, or endangered species (RTE) are	
		1. Kapur Gumpait ( <i>Dyrobalanops keithii</i> )	
		2. Meranti Tembaga (Shorea Leprosula)	
		3. Belian ( <i>Eusideroxylon Zwageri</i> )	
		4. Burung Kekek (Anthracoceros Malayanus)	

Principle	5: E	nvironment, natural resources, biodiversity and ecosystem services	
Indicator	Su	Immary of Assessment	Compliance
		5. Beruk ( <i>Macaca Nemestrina</i> )	
		6. Tenggiling ( <i>Manis Javanica</i> )	
		7. Kelawat (Hylobates Muelleri Funereus)	
		Training for RTE conducted dated 05/09/2019.	
4.5.6.2	а	KHB established Sustainability policy dated 02/01/2019 sign by CEO with a statement "ensure protection on Rare, Threated and Endangered (RTE) species living in the HCV areas"	Yes
		A management plan and monitoring system is establish to monitor protected wildlife and RTE from any illegal or inappropriate hunting, fishing or collecting activities and type of wildlife within the estate.	
		Appropriate signage install as information to workers to discourage any illegal or inappropriate hunting, fishing or collecting activities.	
		Workers interview informed no hunting, fishing and capturing of wildlife are permitted.	
	b	Appropriate signage install as information to workers to discourage any illegal or inappropriate hunting, fishing or collecting activities.	
		Workers are brief during RTE training dated 05/09/2019 on wildlife within the estate especially monkeys and birds.	
		Interview workers from Silimpopon 1 and 2 estates could confirmed they understand the penalty of hunting, fishing and capturing of wildlife.	
4.5.6.3	hu	monitoring system is establish to monitor any illegal or inappropriate inting, fishing or collecting activities and type of wildlife within the estate a quarterly observation survey at HCV area.	Yes
4.5.7.1	K⊦	HB established zero burning policy dated 11/01/2016 sign by CEO.	Yes
	de inc	the policy stated there shall be no open burning of any kind except where beened necessary with prior approval of the relevant authorities. This cludes domestic waste, agricultural waste, and biomass or by-products enerated by the estate and palm oil mill.	
		nere are no burning sighted at landfill and housing area during site rification.	
4.5.7.2	Kŀ	IB established zero burning policy dated 11/01/2016 sign by CEO.	Yes
	de inc	the policy state that there shall be no open burning of any kind except where beened necessary with prior approval of the relevant authorities. This cludes domestic waste, agricultural waste, and biomass or by-products interated by the estate and palm oil mill.	
		nere are no serious palm diseases sighted during the field visits that quire burning.	
4.5.7.3	Kŀ	IB established zero burning policy dated 11/01/2016 sign by CEO.	Yes
		ne policy state that there shall be no open burning of any kind except where been denoted and the relevant authorities. This	

Principle \$	Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Indicator	Summary of Assessment	Compliance		
	includes domestic waste, agricultural waste and biomass or by-products generated by the estate and palm oil mill.			
	There are no application documents sighted for controlled burning.			
4.5.7.4	KHB established replanting procedure Doc. No. KHB/G/SOP-07 Revision no 4 dated 09/02/2018.	Yes		
	During site verification visit, no replanting and no previous crop felled and chipped or burn observed.			

Principle	6: Best Practices	
Indicator	Summary of Assessment Compliance	
4.6.1.1	KHB established standard operating procedures	Yes
	Example:	
	1. Scheduled waste management SOP	
	2. Manuring SOP	
	3. Chemical spraying SOP	
	4. Chemical store handling	
	5. Harvesting SOP	
	Training conducted at Silimpopon 1 Estate: Chemical Spraying on 05/09/2019	
	Training conducted at Silimpopon 2 Estate: Manuring on 10/09/2019 and Chemical Spraying on 12/10/2019.	
4.6.1.2	KHB established Planting Manual Procedure includes the soil conservation measure.	Yes
	The procedure states 'to prevent erosion, cover plants should be established on slopes as soon as possible after land clearing.'	
	During site visit, sighted Legume Cover Crop (LCC) such as Mucuna Bracteata, Nephrolipies & Vertivar Grass planted along riparian and terracing to retain soil moisture and reduce soil erosion.	
4.6.1.3	KHB maps with the field block numbers identified.	Yes
	This could be confirm during field inspection block signage with the block number according to the assigned block number in the estate maps.	
4.6.2.1	KHB established financial budget for Silimpopon 1 and Silimpopon 2 estates for year 2019 to 2024.	Yes
	The budget includes following:	
	1. FFB production by division	
	2. Cost of production	
4.6.2.2	KHB has no replanting program until 2022.	Yes



Principle 6	Principle 6: Best Practices		
Indicator	Summary of Assessment	Compliance	
4.6.2.3	KHB established financial budget for Silimpopon 1 and Silimpopon 2 estates for year 2019 to 2024.	Yes	
	The financial plan includes:		
	a. Planting Material		
	b. Crop projection based on age profile mature		
	c. Cost of production for all divisions in both estates		
	d. Cost per ton of FFB		
	e. Income and expenditure		
4.6.2.4	KHB established monthly progress report to monitor the income and expenditure, FFB production and price of FFB.	Yes	
4.6.3.1	KHB engaged external parties for services on maintenance road & constructed new workers housing.	Yes	
	The contract dated 28/08/2019 for Silimpopon 1 Estate and 07/08/2018 for Silimpopon 2 Estate states the rates and terms of payment and duly agreed and signed by both parties.		
4.6.3.2	KHB engaged external parties for services on maintenance road & constructed new workers housing.	Yes	
	The rates and terms of payment duly agreed and signed by both parties.		
	Sighted payment voucher paid in timely manner according to the terms and conditions stated in the contract.		
4.6.4.1	KHB engaged external parties for services on road maintenance and construct new workers housing.	Yes	
	Contract agreement signed by management and contractors stated that contractors to comply MSPO standard and subjected to be audited by CB.		
	The contractor and workers are briefed on the company MSPO policies and requirements on 04/01/2019 for Silimpopon 1 Estate; and 14/09/2018 for Silimpopon 2 Estate.		
4.6.4.2	KHB establish contract agreements for services on road maintenance and construct new workers housing contractor duly signed by both parties on the agreed rates and terms of payment.	Yes	
4.6.4.3	KHB contract agreements has include statement in accordance to company policies and rules.	Yes	
	Contract agreement signed by management and contractors stated that contractors has to comply with MSPO requirements and subjected to be audited by CB.		
4.6.4.4	KHB payment to contractors based on progress report monitored and approved by office administrator prior to issue payment.	Yes	

Principle 6: Best Practices		
Indicator	Summary of Assessment	Compliance
Indicator	Summary of Assessment	Compliance
4.7.1.1	KHB planting statements are review. There are no new planting in Silimpopon 1 and Silimpopon 2 estates.	Yes
	Silimpopon 1 estate 1 <sup>st</sup> planting in 2001 and the latest planting in 2005.	
	Silimpopon 2 estate 1 <sup>st</sup> planting in 1999 and the latest planting in 2004.	
4.7.1.2	KHB planting statements are review. There are no new planting within the estate.	Yes
	Replanting program is review with no replanting started	
4.7.2.1	KHB planting statements and maps are review. There are no peat land.	Yes
	Site observation indicates there is no peat land occur within the estates.	
4.7.3.1	KHB planting statements are review and there are no new planting. Therefore, no SEIA conducted.	Yes
4.7.3.2	KHB planting statements are review and there are no new planting. Therefore, no SEIA conducted.	Yes
4.7.3.3	KHB planting statements are review and there are no new planting. Therefore, no SEIA conducted.	Yes
4.7.3.4	There are no smallholder's scheme in KHB certification. Therefore, not applicable.	Yes
4.7.4.1	KHB planting statements are review and there are no new planting. Therefore, no soil map established.	Yes
4.7.4.2	KHB planting statements are review and there are no new planting. Therefore, no topography map established.	Yes
4.7.5.1	KHB planting statements are review and there are no new planting. Therefore, no map established and no permit available.	Yes
4.7.5.2	KHB planting statements are review and there are no new planting. Therefore, no plan established.	Yes
4.7.5.3	KHB planting statements are review and there are no new planting. Therefore, no soil map established.	Yes
4.7.6.1	KHB planting statements are review and there are no new planting. Therefore, no FPIC conducted and no communities affected.	Yes
4.7.6.2	KHB planting statements are review and there are no new planting. There are no sacred sites, therefore no management plan established.	Yes
4.7.6.3	KHB planting statements are review and there are no new planting. Therefore, no SOP established.	Yes
4.7.6.4	KHB planting statements are review and there are no new planting. Therefore, no compensation and agreement established.	Yes
4.7.6.5	KHB planting statements are review and there are no new planting. Therefore, no assessment established.	Yes



Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



Principle 6	Principle 6: Best Practices			
Indicator	Summary of Assessment	Compliance		
4.7.6.6	KHB planting statements are review and there are no new planting. Therefore, no system establish for calculating the compensation for distribution.	Yes		
4.7.6.7	KHB planting statements are review and there are no new planting. Therefore, no compensation plan established.	Yes		
4.7.6.8	KHB planting statements are review and there are no new planting. Therefore, no communities affected.	Yes		

#### 4.4. 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.		
x	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.		
	Not applicable. No non-conformity raised in previous audit.		
	Note 1: If a minor non-conformity raised in last audit, is not closed out, then this finding will be re-raised to a Major non-conformity.		

Note 2: All minor NCs raise in last audit are required to capture in this report together with the closing of the non-compliance.

#### 4.5. Detail of Audit Findings in last audit

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

Non Conformity Number < 1 >		
	Indicator: 4.4.4.2	
Description:	The occupational safety and health plan shall cover the following:	
	(MAJOR)	
	a. A safety and health policy, which is communicated and implemented.	
Location:	Silimpopon 1 and Silimpopon 2 estate	
Description of Finding / Objective Evidence:		

Estate has established HIRARC for working at slippery area. The SOP for harvesting includes avoid stand too close to cliff at terrace area. There are no accident cases related to fall from hilly or terrace area. However, the risk assessment for harvesting activity shall consider the probability and severity of the accident for working condition at hilly or terrace areas. Base on this justification, a minor non-conformity is raised since there are no incidents occured

Company Name: Kretam Holdings Berhad

Silimpopon Estatos Certifying Unit:

Jennying Unit.	Silimpopon Estates			MALAYSIA
Client Number:	92-049			
Audit Type:	ASA 01			
	Non Conformit	y Number «	<1>	
Classification	🔲 Major	$\square$	Minor	1
Raise by: Mo	hamad Norhisham bin Mohd Salleh	Date	Raise:	18/10/2019
Deadline for in	nplementation	Next s	surveillan	ce audit
Root Cause Ar	nalysis ( <i>by company</i> ):			
not specifically	KHB/G/SOP-26/S&H-04 and list of F for Silimpopon Estates. The manage ce because most of Silimpopon Esta	ment should	develop	ing risk assessment for
Correction (by	company):			
23 <sup>rd</sup> Octob	nd risk assessment have been conducted on the second oper 2018 for harvesters and 24 <sup>th</sup> Octor developing HIRARC working at terra	ber 2018 fc		
spraying a – Estate N	<ol> <li>HIRARC for working at terrace area for three main estates operations such as harvesting, spraying and fertilizing has been done on 25<sup>th</sup> October 2018. Conducted by Mr. Robert D. Melodia – Estate Manager Silimpopon 1 Estate, Mr. Mustapa Sindring – Senior Assistant Manager In- Charge Silimpopon 2 Estate and assisted by Mr. Hamli Awang – Safety and Health Assistant.</li> </ol>			
KHB/G/S0 <i>avoiding</i>	<ol> <li>SOP Sprayer KHB/G/SOP-26/S&amp;H-09 and SOP Fertilizing Using Machinery Or Manual KHB/G/SOP-26/S&amp;H-26 has been reviewed and implemented on 7<sup>th</sup> November 2018 with addition avoiding stand too close to cliff on terrace area same as stated in SOP Harvester KHB/G/SOP-26/S&amp;H-04.</li> </ol>			
Corrective / Pr	eventive Action (by company)			
1. The Estate attached)	. The Estates will keep updating and review the HIRARC Working at terrace area (half yearly as			
	. Continuous training will be given to employees on quarterly basis to raise awareness about hazards working in the terrace area as stated in the revised SOP.			
Review of Corr	rection & Corrective / Preventive A	ction		
Sighted revised terrace area.	HIRARC for harvesting dated 23/10/	2018 has in	corporate	e risk assessment for working at
The estates have	The estates have conducted briefing for working at terrace area on 23/10/2018.			
Further review of	Further review on effective implementation will be conducted in next surveillance audit			
Closed: 🛛 Yes	Closed: Yes No Site verification : Yes No			🗌 Yes 🖾 No
Name of Lead	Auditor:	Date of Cl	osure:	
Mohamad Norhisham Bin Mohd Salleh N			illance au	Jdit
Review of Impl	lementation			
KHB establishe	d HIRARC include assessment work	ing on terra	ce area.	
Training working	g on terrace area to the harvesting w	orkers conc	lucted on	03/06/2019.
	ith harvesting workers confirmed the k while conducting the harvesting ac		I the train	ing working on terrace area and

The evidence sighted and implementation on field operation is sufficient to close the minor NC.

aware of



39 of 44



Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



Non Conformity Number < 1 >	
Name of Lead Auditor:	Date of Review:
Muhammad Khairul Anuar bin Azizul Hasan	14/10/2019

## 4.6. Detail of Audit Findings Identified During This Audit

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

AUDIT OUTCOME		
During this audit,	0	<b>MAJOR Non-Conformities</b>
	0	MINOR Non-Conformities

No.	Indicator	Location	Opportunity for Improvement
1.	4.1.2.1	Silimpopon 1 & 2	KHB management could consider improve in identifying the strong and weak points in the internal audit results.
2.	4.1.2.2	Silimpopon 1	KHB management could consider improve in addressing the findings raised in the internal audit.
3.	4.1.2.3	Silimpopon 1	KHB management could consider improve the internal audit results presented in the management review.
4.	4.4.4.2	Silimpopon 1	KHB management could consider improve the frequency of OSH meeting.
5	4.5.1.6	Silimpopon 1 & 2	KHB management could consider in improve providing information to the workers.
6.	4.5.3.3	Silimpopon 1 & 2	KHB management could consider improve the handling and disposal of scheduled wastes.

Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



## 5. CONCLUSION

Kretam Holdings Berhad has commissioned TUV NORD (Malaysia) Sdn Bhd to conduct surveillance audit for its estates according to MSPO 2530-3:2013 Part 3 General Principles for Oil Palm Plantations and Organised Smallholders.

From the review of the standard operating procedures, relevant forms, work flow charts established and implemented; the subsequent background investigation and interviews conducted 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.

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:	2	
Total certified production area:	5,545.39	На
Certified FFBs January to September 2019	65,825.77	Mt
Projection FFBs October to December 2019	32,200	Mt
Projection FFBs January to December 2020	112,000	Mt

Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



## 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, 03/01/2019

Muhammad Khairul Anuar bin Azizul Hasan TUV NORD (Malaysia) Sdn Bhd Audit Team Leader

Puchong, 03/01/2019

Nur Amanina Zahir TUV NORD (Malaysia) Sdn Bhd Certifier / Approver

Company Name:Kretam Holdings BerhadCertifying Unit:Silimpopon EstatesClient Number:92-049Audit Type:ASA 01



## 7. LIST OF INTERVIEWEES

## Table 7-1: List of Interviewed Persons and Stakeholders

No.	Name	Organisation / Function
1.	Ulis	Rhylston Park Sdn Bhd
2.	Tan Kee Siong	Aneka Kerjaya Sdn Bhd

Company Name:	Kretam Holdings Berhad
Certifying Unit:	Silimpopon Estates
Client Number:	92-049
Audit Type:	ASA 01



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

This report is send to the certification body or bodies, 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	<ul> <li>P&amp;C Audit Report / Checklists</li> <li>Audit Plan</li> </ul>	
	Additional annexes, number	