

MY05004 Erajaya Synergy Sdn Bhd Audit Summary Report

Organization:	Erajaya Synergy Sdn Bhd			
Address:	Erajaya Synergy Sdn Bhd	_		
	No. 1-9, Pusat Suria Permata	ı, Lorong	Upper Lanan	g 10 A, 96000 Sibu Sarawak
	Lassa Plantation			
	LPF 0029, Lassa Division, 96	6000 Muka	ah, Sarawak.	
	Kabang Plantation			
	LPF 0029, Kabang Division,	96000 Mu	kah, Sarawak	.
	Sawai Plantation			
LPF 0029, Sawai Division, 96000 Sibu, Sarawak Mill Address				
Standard(s):	MS2530-3 Part 3: General Pri for Oil Palm Plantations and Organized Smallholders	•		n Body(s): Department Malaysia (DSM)
	MS2530-4:2013 Part 4 : Gene Principles for Palm Oil Mills	eral		
Representative:	Mr Stephen Wong (084-2132	55)		
Site(s) audited:	Kabang Plantation Sawai Plantation Lassa CPO Mill	Date(s)	of audit(s):	26 th -28 th June 2018
Visit Type:	MSPO Audit Stage 2	Type of assessn	certification nent	Main Audit
Lead auditor:	Dickens Mambu (DM) (LA)		nal team	Abdul Khalik (AK) (AM)
		member	r(s): ember (AM)	Afiq Othman (AO)(TA)
		Trainee Auditor		
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1. Audit objectives

The objectives of this audit were:

to confirm that the management system conforms with all the requirements of the audit standard; to confirm that the organization has effectively implemented the planned management system; to confirm that the management system is capable of achieving the organization's policy objectives.

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2. Scope of certification

The audit covered one site performing certification scope:

Production of Fresh Fruit Bunches (FFB) for Plantations in compliance to the MSPO Certification Standard MS2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholders

Processing of Fresh Fruit Bunches (FFB) and Production of Crude Palm Oil (CPO) and Palm Kernel (PK) in compliance to the MSPO Certification Standard MS2530-4:2013 Part 4: General principles for Palm Oil Mills

Paim Oil Mills			
The audit covered the MS 2530:2013 requirements 3:2013 Part 3 and MS2530-4:2013 Part 4	particularly MSPO Certification S	standard MS25	530-
Validation of processes for production and service	provision		
Has this scope been amended as a result of this a	udit?	☐ Yes	☑ No
This is a multi-site audit and an Appendix listing all locations has been established (attached) and agree		✓ Yes	□ No
3. Current audit findings and conclusions			
The audit team conducted a process-based audit by the standard(s). The audit methods used were documentation and records. The structure of the audit was in accordance with annexes to this summary report.	interviews, observation of activitie	s and review o	f
The audit team concludes that the organization management system in line with the requirements system to systematically achieve agreed requiremorganization's policy and objectives.	of the standard and demonstrated	d the ability of t	he
Number of nonconformities identified:7 Ma	ior <u>3</u> Minor		
Therefore the audit team recommends that, based demonstrated state of development and maturity,		-	
☐ Granted / ☐ Continued / ☐ Withheld / ☐ Se	uspended until satisfactory correct	ive action is co	mpleted.
4. Previous Audit Results			
The results of the last audit of this system have be and corrective action has been implemented to acconcluded that:			
Any nonconformity identified during previous continues to be effective.	audits has been corrected and the	e corrective act	ion

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The management system has not adequately addressed nonconformity identified during previous audit
activities and the specific issue has been re-defined in the nonconformity section of this report.

5. Audit Findings

The audit team conducted a process-based audit focusing on significant aspects/risks/objectives. The audit methods used were interviews, observation of activities and review of documentation and records.

The management system documentation demonstrated conformity with the requirem of the audit standard and provided sufficient structure to support implementation and maintenance of the management system.		⊠ Yes	□No
The organization has demonstrated effective implementation and maintenance / improvement of its management system.		⊠ Yes	□No
The organization has demonstrated the establishment and tracking of appropriate keeperformance objectives and targets and monitored progress towards their achievement	•	⊠ Yes	□No
The internal audit program has been fully implemented and demonstrates effectiveness a tool for maintaining and improving the management system.	ess	⊠ Yes	□No
The management review process demonstrated capability to ensure the continuing suitability, adequacy and effectiveness of the management system.		⊠ Yes	□No
Throughout the audit process, the management system demonstrated overall conformance with the requirements of the audit standard.		⊠ Yes	□No
Certification claims are accurate and in accordance with SGS guidance	⊠N/A	☐ Yes	☐ No

6. Significant Audit Trails Followed

The specific processes, activities and functions reviewed are detailed in the Audit Plan. In performing the audit, various audit trails and linkages were developed, including the following primary audit trails, followed throughout:

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	Kabang Plantation
	LPF 0029, Kabang Division, 96000 Mukah, Sarawak.
	Sawai Plantation
	LPF 0029, Sawai Division, 96000 Sibu, Sarawak
	Mill Address
	Maxi Wealth Holdings Sdn Bhd, Lassa CPO Mill, Lassa Plantation, LPF 0029, Lassa Division, Mukah, Sarawak.

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MPOB License No.:	Lassa Plantation – No. 595584004000 Sawai Plantation – No. 541093002000 Kabang Plantation – No. 554067002000 Maxi Wealth Holdings Sdn Bhd – No. 595584004000	Expiry date:	01/03/2018 - 28/02/2019 01/08/2018 - 31/07/2019 01/11/2018 - 31/10/2019 01/03/2018 - 28/02/2019		
Scope of Activity: Activities registered under the licence consist of: 1) Estate = Menjual dan Mengalih FFB 2) Mill = Menjual dan mengalih FFB, PK, CPO, SPO = Membeli dan Mengalih FFB, PK, CPO = Menyimpan PK, CPO, SPO = Mengilang FFB					
Date of certificate is	ssued and validity	Nil (New Applic	cation)		
Other Sustainability	y Certification	Nil			
Proposed Date Of N	Next Surveillance Audit	April 2019			
Visit Number:	02 (Stage 2)	Actual Visit Date:	26-28 th June 2018		
Visit Due by Date:	Nil	For auditor info	ormation only		
Lead Auditor :	Dickens Mambu (DM)				
Audit Member	Abdul Khalik Arbi (AK)				
Additional Attendees and Roles	Afiq Othman (AO) (Training Auditor) Tel: 013-3543521 Michael Entalai (ME) (Training Auditor) Tel: 013-8942184				
Standard(s):	MSPO MS2530-3:2013 Part 3: General Princip Smallholders MS2530-4:2013 Part 4 : General Principles fo		Plantations and Organized		
Audit Language:	English & Malay				
Audit Scope:	1.The audit covered Three (3) site performing the following scope: Operations, comprising of management systems, process of Fresh Fruit bunches (FFB), documentation and site assessment. 2.The audit covered all the MSPO 2530 Part 3 and 4 requirements with no permissible exclusion of clause in compliance to the standard document				

Date	Time	Auditor /	Organisational and Functional Units/ Processes and	Key Contact
		Trainee	Activities	
25 th	PM	AO	Flight Kuala Lumpur – Sibu	
June			Pm	
2018				
25 th	PM	DM / JR / ME	Flight Kuching- Sibu	
June			Pm	
2018				
26 th		ALL	Estate : Lassa Plantation	
June			MS 2530-3-2013 Part 3	
2018				Estate Personnel

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6.30 aı	m	Breakfast	
7.30		Depart to Estate (Boat Ride 1.5 hour)	
9.00		Arrive Lassa Plantation	
9.15		Opening Meeting	
9.30		Audit Process (Site visit)	
		Principle 1: Management commitment and responsibility	
		Principle 2: Transparency	
		Principle 3: Compliance to legal requirements	
		Principle 4: Social responsibility, health,	

Job / Cert.	MY05004	Visit Type:	Stage 2	Visit n°:	02
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			 safety and employment condition Principle 5: Environment, natural resources, biodiversity and ecosystem services Principle 6: Best practices 	
	12.30pm 1.00 pm		Lunch Continue Audit Process (Document review, Policies, local law compliances, deduction and pay slip, Safety and health procedures, environment procedure, minimum wages monitoring, social benefits)	
	6.00 pm		End of day 1 (Overnight in Estate)	
27 th June 2018		ALL	Palm Oil Mill: MaxiWealth Holdings Sdn Bhd (120 mt/hr) MS 2530-3-2013 Part 4	Mill Personnel
	7.00am 8.00 8.15		Breakfast Opening Meeting (Mill) Audit Process (Site visit)	Will 1 GISOTHICI
			 Principle 1: Management commitment and responsibility Principle 2: Transparency Principle 3: Compliance to legal requirements Principle 4: Social responsibility, health, safety and employment condition 	
			Principle 5: Environment, natural	

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	resources, biodiversity and ecosystem services • Principle 6: Best practices	
12.30pm 1.00pm	Lunch Continue Audit Process	
	(Document review, Policies, local law compliances, deduction and pay slip, Safety and health procedures, environment procedure,	
4.00pm	Depart to Sibu (Boat ride 1.5 hour) Overnight in Sibu	

28 th		ALL	Sawai Estate	
June			Depart to Sawai Estate (1.5 hr Journey)	
2018			Opening Meeting (Estate)	
	7.00am		Audit Process (Site visit)	
	8.30		 Principle 4: Social responsibility, health, 	
	8.45		safety and employment condition	
			 Principle 5: Environment, natural 	
			resources, biodiversity and ecosystem	
			services	
			Principle 6: Best practices	
			Principle 7 : New Planting	
	12.30pm		,	
	1.00pm		Lunch	
			Continue Audit Process	
			(Document review, Policies, local law	
			compliances, deduction and pay slip, Safety and	
			health procedures, environment procedure,	
			minimum wages monitoring, social benefits)	
			Preparation for Closing	
	4.00pm		- raparamental energy	
	5.00pm		Closing meeting	
	3.00pm			
			Depart to Sibu	
	6.00pm		Overnight in Sibu	
			Overnight in Sibu	
29 th		ALL	Sibu- KL (AM)	
June			Sibu-Kuching (AM)	
2018				

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Location and Maps

Erajaya Synergy Sdn Bhd (Maxi Wealth Holdings Sdn Bhd, Lassa CPO Mill) consist of 1 Palm Oil Mill and 3 Estates namely Lassa, Kabang and Sawai located 150KM from Sibu Sarawak.

Maps of the mill and estates are available in Figure 1-3.

The GPS locations of the estates and mill are shown in Table 1.

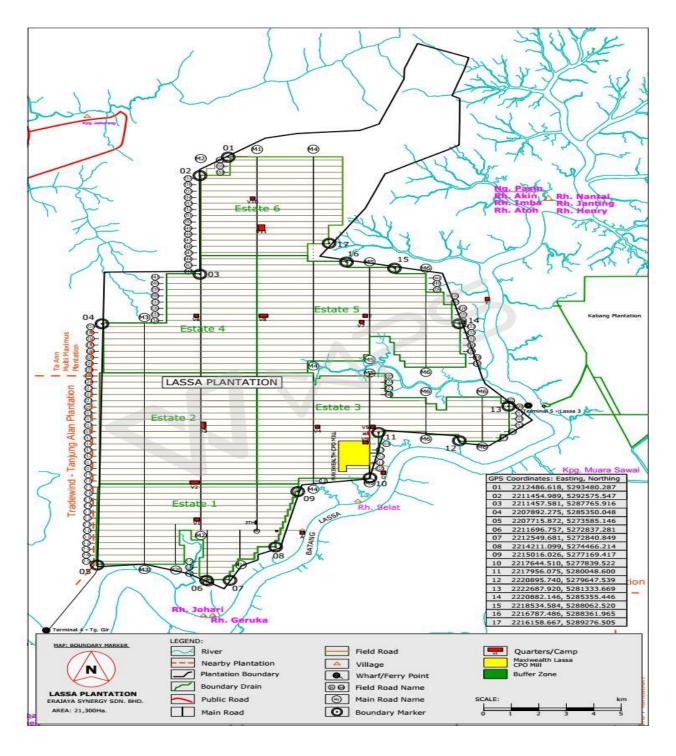
Table 1: GPS Location

No.	Mill	GPS R	eference	Capacity
NO.	Willi	Latitude	Longitude	(mt/hr)
1	Maxi Wealth Holdings Sdn Bhd, Lassa CPO Mill	5278614.350N	2217540.631E	120
No.	Estate	Latitude	Longitude	Total Planted Area (ha)
1	Lassa Plantation	5282957.674N	2213534.222E	16,300
2	Kabang Plantation	5283330.75N	2225714.96E	2,100
3	Sawai Plantation	5264497.863N	2224438.239E	5,500

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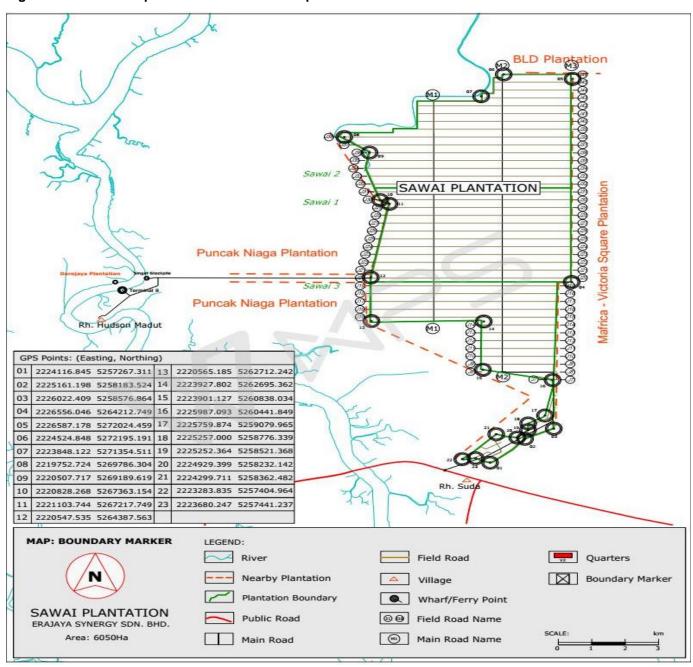
Figure 1: Location Map for Lassa and Maxi Wealth Holdings Sdn Bhd



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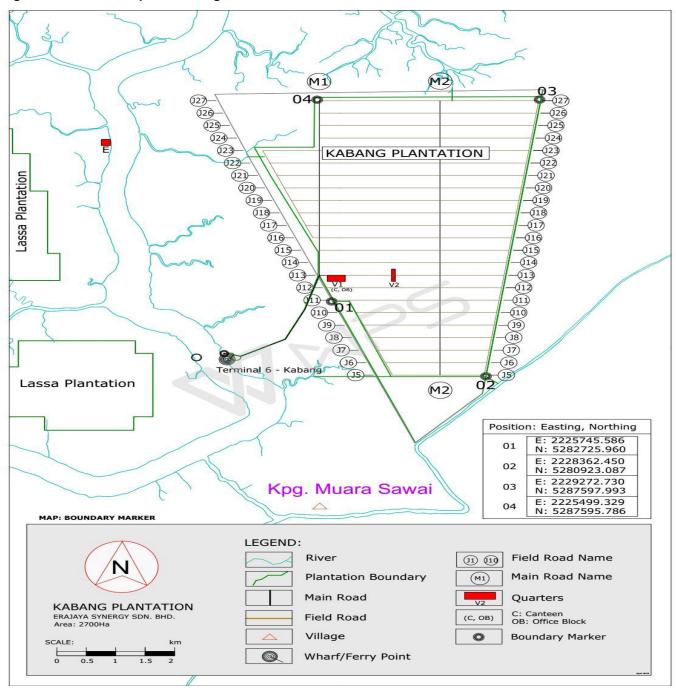
Figure 2: Location Map for Sawai Plantation Map



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Figure 3: Location Map for Kabang Estate



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Description of Estate Production

The FFB are sourced from the estate which are individually managed by Erajaya Estate through its parent company Shin Yang Group of companies. The crop yield from these estate is mention in **Table 2** below, CPO data in **Table 3** and Actual and Projected Mill Processing Data in **Table 4**.

Table 2: FFB Production

Month	Sawai		Kabang		Lassa	
	2017	2018	2017	2018	2017	2018
January	4,728.85	3,971.34	2,431.17	2,473.72	16,694.96	15353.54
February	4,096.75	3,819.37	1,782.44	1,680.14	13,071.33	12047.89
March	5,447.22	4,339.81	1,865.71	2,361.14	15,585.07	17185.11
April	6,451.59	5,319.19	2,168.24	2,262.38	17,857.91	18861.27
May	8,019.97	6,348.93	2,918.08	2,321.03	20,580.86	20718.55
June	9,728.50	6,154.55	3,382.95	2,470.92	21,070.63	18610.74
July	9,907.98	7,514.21	3,842.65	3,287.11	19,566.38	23565.46
August	8,315.95	8,890.21	4,692.38	4,205.84	23,375.85	28432.02
September	8,476.30	10,464.00	4,350.26	4,400.00	21,468.17	24649.54
October	7,924.63	9,436.00	4,151.81	4,300.00	20,962.65	22876.69
November	6,362.78	9,020.00	3,472.65	3,800.00	17,987.92	21524.95
December	5,525.36	7,738.00	3,271.15	3,400.00	17,832.00	19446.17
Total	84,985.88	83015.61	38,329.49	36,962.28	226,053.73	243,271.93

Table 3: CPO Production (2017 & 2018)

Manda	Maxi Wealth Holdings Sdn Bhd, Lassa CPO Mill					
Month	2047	20	18			
	2017	Projection	Actual			
January	3,613.76	3,600.00	3,294.31			
February	2,825.39	2,800.00	2,515.46			
March	3,531.35	3,500.00	3,947.46			
April	4,333.98	4,300.00	4,369.79			
May	4,911.57	4,900.00	4,773.94			

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June	5,086.92	5,000.00	4,263.45
July	4,791.22	4,700.00	5,738.80
August	5,521.34	5,500.00	7,020.21
September	5,105.06	5,100.00	Nil
October	5,218.51	5,200.00	Nil
November	4,297.23	4,200.00	Nil
December	3,973.93	4,000.00	Nil
Total	53,210.25	52,800.00	35,923.42

Table 4: Actual and Projected Mill Processing Data

Maxiwealth Holdings	Actual F	Y (2017)	Projecte	d (FY 2018)
Sdn Bhd, Lassa CPO Mill	CPO (mt)	PK (mt)	CPO (mt)	PK (mt)
Own source	53,210.25	16,664.90	29,554.71	18,126.17
	OER: 15.23%	KER: 4.77%	OER: 9.88%	KER: 4.99%

Stakeholder Consultation and List of Stakeholders Contacted

A public announcement was made 30 days prior to the audit.

https://www.sgs.com/en/certified-clients-and-products/fcm/malaysia/media/1621e89a83e14a74be5a269966dada75.ashx

Stakeholder consultation took place in the form of meetings and interviews. Due to this is the main assessment, meetings with stakeholders were held in the respected estate office. Detail can be referred to **Appendix 2**:

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Comment on MS2530-3 Compliance Status:

Comment on Principle 1

Policy on Implementation of MSPO -

Lassa 5 and Sawai Plantation

Erajaya Sdn Bhd is a subsidiary under Jaya Tiasa Holdings Berhad.

An MSPO Policy statement has been established by the mother company. In the policy, the organization emphasizes on their commitment towards MSPO implementation as per required by MSPO Certification. The policy was established on 15th March 2016 signed by the Chief Executive Officer, Dato' Wong Sie Young.

Internal Audit

Lassa 5

Latest Internal audit report was evident during the time of audit. It was conducted from 18th – 20th October 2017 which covers from Principle 1 to Principle 6 from the MSPO Standard Part 3. The internal audit was lead Mr Kevin Kong and assisted by 2 audit members namely, Ling Tek Shii and Ambrose Ho. The next internal audit scheduled for Lassa Estates will be in October 2018. Also sighted the Internal Audit Itinerary Plan that was prepared by Mr. Kevin Kong.

Sawai Plantation

Latest Internal audit report was evident during the time of audit. It was conducted from 25th – 26th October 2017 which covers from Principle 1 to Principle 6 from the MSPO Standard Part 3. The internal audit was lead Mr. Kevin Kong and assisted by 7 audit members namely, Ling Tek Shii, Ambrose Ho, Lim Con Hock, Ting Kang Huat, Kiu Kah Siong and Tony Tiong. The next internal audit scheduled for Sawai Estates will be in October 2018. Also sighted the Internal Audit Itinerary Plan that was prepared by Mr. Kevin Kong.

Management Review -

During the audit, it was found that management review was done at HQ level. The meeting involved by estate management from all regions and also management from HQ. The last management review done at HQ level was on 8th March 2018 to discuss on MSPO Stage 1 Audit. The minute was recorded by Operations Executive, Mr. Ambrose Ho and approved

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Operations Senior Manager, Mr. Abg Benjamin.

Lassa 5 KIV

OFI:

The management could improve better on maintaining document records for future reference.

- 1. Based on the documentation records, it was found the management had conducted several meetings among Lassa 5 Estate Management to discuss on the progress of MSPO implementation. However, some of the documents were not completed e.g meeting minutes were not taken.
- 2. Non-Conformity Report raised from internal audit was not furnished with date of corrective action taken as required. The estate management is required to take corrective action within 30 days to close any Non-Conformance raised by the internal auditor. However, the duration taken could not be verified since the completion date was not provided in the Non-Conformance Report.

Sawai Plantation

Observed based on the MSPO Meeting minutes, the estate management actively reviewing their performance in MSPO implementation. The frequency is once a month and can be more than that if required. The latest meeting conducted was in 20th June 2018.

Continual Improvement -

Tiasa Jaya just finalized a new procedure in managing continual improvement management plan to cater any opportunity for improvement in the future. The procedure was established in 13th April 2018 Ref. No. JTH-MSPO-12-v01. As claimed by the estate management, the procedure is relatively new and still in familiarization phase.

Lassa 5

Currently Lassa 5 Estate had only established Environmental Continual Improvement Plan dated 12th February 2018 Health Safety and Environment Executive, Kiu Kah Siong.

Sawai Plantation

Currently Sawai 3 Estate had only established Environmental Continual Improvement Plan dated 12th February 2018 Health Safety and Environment Executive, Kiu Kah Siong.

Major 1

Principle 4.1.2.2

The internal audit procedures and audit results are available and documented however, root causes of nonconformities not clearly identified.

Based on sampled of nonconformity findings raised during the latest internal audit. The estate management had managed to come out with

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	corrective action to rectify the nonconformity. However, there was no root cause identification had been done before any the corrective action to be made and is agreed upon.
Comment on Principle 2	Transparency of documents relevant to MSPO requirements-
	Lassa 5
	Since the MSPO implementation by the estate. Lassa 5 recorded every correspondence with relevant stakeholders namely "Request and Response Logsheet". All the communications evidences were available during the audit.
	Sawai Plantation
	Sawai 3 maintained records of all request and response from stakeholder in a logsheet. During the time of audit, the records only available for year 2017 as no new request from stakeholder in year 2018.
	Transparent method of communication and consultation-
	MSPO Communication and Consultation procedure was presented during the audit. The procedure was prepared by Plantation Operations Senior Manager, Mr. Stephen Wong Ing Dung and approved by Plantation Operations Acting General Manager, Mr. Geoffrey Ngu Chu Hiong. The date of establishment is 1st April 2016.
	Traceability-
	Procedure for Traceability had been established dated 5 th June 2018 Ref No. JTH-MSPO-02-LS-BM Issue 1 Rev 1. During site visit, it was found the procedure is being practiced accordingly.
	Lassa 5
	A person in charge had been appointed in order to maintain the continuity of traceability practice in the estates. Mr Zahari Bin Suhaili had been appointed for the responsibility for Lassa 5 Estate.
	Sawai Plantation
	A person in charge had been appointed in order to maintain the continuity of traceability practice in the estates. Mdm. Majoren Bangi John had been appointed for the responsibility for Sawai 3 Estate date effective 9 th January 2018.
	Minor 2 Principle 4.2.2.3 The management should identify and assign suitable employees to implement and maintain the traceability system which was not available

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during audit.

A person in charge had been appointed in order to maintain the continuity of traceability practice in the estates. Mr Zahari Bin Suhaili had been appointed for the responsibility for Lassa 5 Estate dated 16th May 2017.

However, the appointed person was transferred to sister estate in May 2018 and no evidence of new appointment on the said responsibility.

Comment on Principle 3

Regulatory Requirements-

Lassa 5

The estate is operating in compliance with the applicable local, state, national and ratified international laws and regulations.

- a. Land Title (Lassa Plantation)
 - 21 300 Ha
- b. Permit Barang Kawalan Berjadual (Diesel, Petrol)
 - Application has been made dated 25th April 2018. Currently pending at Fire Department.
- License for Managing Plantation No. A 575212 validity until 21st Oct 2018.
- d. MPOB Licenses:

FB Production: 530252102000 (Valid until 31st May 2019)

Sawai Plantation

- e. Land Title (Sawai Plantation)
 - 21 300 Ha
- f. Permit Barang Kawalan Berjadual (Diesel, Petrol)
 - Currently Sawai 3 diesel source from Sawai 1 diesel storage.
 Hence the permit bearer is Sawai 1.
- g. License for Managing Plantation No. A 575212 validity until 21st Oct 2018.
- h. MPOB Licenses:

FB Production: 541093002000 (Valid until 31st July 2019)

Land Use Rights-

The current land the plantation operating in is belong to R.H Forest Corporation. Erajaya Synergy Sdn. Bhd has been given authority to develop the area (30050 ha) for oil palm plantation for a maximum period of 25 years. The land was divided into 3 divisions namely Lassa Division (21300 ha), Kabang Division (2700 ha) and Sawai Division (6050 ha). All the details can be seen reflected in an agreement dated 1st December 2003.

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Customary Rights-

There is no issue or encumbered by customary rights in the estates.

The estate will respond according to the Complaints/Grievance Mechanism should any cases arise in future.

Comment on Principle 4

Social Impact Assessment-

Social Impact Assessment (SIA) report is available that contains the followings:

- Introduction
- Site Location and Size
- Land Use
- Human Environment
- List of Stakeholders Nearby the Site
- Stakeholders consultation with local communities (26th January 2018)
- Survey Methodology
- Identify Direct and Indirect Potential Impacts from operation
- Mitigation Plan

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The report showed that the social impact assessment has been conducted internally. In addition, the audit team notes that the assessment has been conducted with consultation with local communities. From record, consultation with surrounding community (Rh Garuka, Rh Selat, Rh Johari, School, clinic etc. was made available).

The consultation with stakeholders were recorded in the month of April 2018.

Sawai Estate

SIA for Sawai estate (2018) was made available at site.

Record on stakeholders internal and external conducted in January 2018. The response from stakeholders are compile in the SIA report. The responsible person for social component is Majoren Bangi Jon

However during assessment on action to be taken, it was noted that

1. Mitigation / enhancement progress for item 1,2,3, 5 & 6 was not available

Complaints and Grievances-

Grievance Procedure is available in the Complaint and Grievances (Ref No.: JTH/ MSPO-03/ Estate BM). In addition, the procedure on work flow

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detailing the Grievance Procedure Mechanism is available in the document.

Details of complaints/grievances, date and details of action taken has been recorded in the "Complaint Record".

Commitment to Contribute to Local Sustainable Development-

The audit team notes that the assessment has been conducted with consultation with local communities.

Among Record of CSR shown during audit:

- 1.Fund raising by estate management: 14th February 2018
- 2.Donation to KEMAS, Kampung Baru Daro: 09 January 2018
- 3.Donation to SK Campuran Daro: 3th January 2018: 3rd January 2018
- 4.Road Repair Rh Geruka: 13th December 2018
- 5.Material supply for bridge construction at Rh Selat: 18th December 2017

Sawai Estate

Among CSR recorded

- 1. Donation Chinese New Year to staff: 7th February 2018.
- 2.Road Construction For Rh Hudson Madut: 4th October 2017
- 3.Material donation for concrete road and community hall Kampung Sawai29th December 2017

Employees Safety and Health-

Lassa 5

Erajaya Synergy (Lassa Plantation) has established a Policy Statement on Environmental; Occupational Safety & Health Policy. The policy has been signed by Dato Wong Sie Young (CEO) on 1st January 2017

The policy is displayed in the Estate Office. The policy has been communicated to all workers through briefing session (muster ground). Training has been conducted Lassa Plantation worker example given Lassa 3 in example briefing for **Ms Marlina** has been conducted on 26th October 2017.

Sawai Estate

Briefing on OSH policy was conducted on 10th August 2017 to all staff and estate workers by designated staff according to their work department.

Person in charge of safety & health is Ms Nur Syahirah Bt Samsul.

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Employment Conditions-

The policy on good social practices has been indicated in the "Good Social Practices Policy" established by the management of Erajaya Synergy Sdn Bhd

Observed that the Policy has been signed by the Chief Executive Officer dated 15 March 2016.

Training and Competency

Observed that all employees are appropriately trained. Summary records of training provided are availabe in the following documents:

- Occupational Safety & Health (OSH) Training Programme and Planned Activities for Year 2018 – recorded all planned related to safety & health
- 2) Estate Training Been Done FY2017/2018 recorded all training conducted for all estate activities.

Details of training conducted for each activity has been recorded in the "Training Report". The report contains information that includes topic covered, the trainer, date and attendees.

For year 2017 (July – December), examples the list of training conducted are as follows:

- 1) Chemical weeding / Slashing- (October 2017)
- 2) Briefing How to Handle Insecticide Chemical (October 2017)
- 3) Harvesting / Pruning / Transport December 2017

All the above training has been conducted training by the MSPO Estate Coordinator & Safety Officer Mr

Minor 3

Principle 4.4.1.1

Social impact are identified and implemented to mitigate the negative impacts are not clearly identified as action taken from stakeholders meeting (issue raised) was not available.

SIA for Sawai estate (2018) was made available at site.

Record on stakeholders internal and external conducted in January 2018. The response from stakeholders are compile in the SIA report. The responsible person for social component is Majoren Bangi Jon.

However during assessment on action to be taken, it was noted that

1. Mitigation / enhancement progress to be done for item 1,2,3, 5 & 6 in the SIA report was not available. There is no indication of follow up on the issue raised by the stakeholders during audit.

Major 4 Principle 4.4.2.2

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The grievances procedure are available however, it was not clear whether it is able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties including the complainants.

Sawai Estate

It was noted that the some grievances form was fill in by the complainant and others assisted by the estate management. During document check, acknowledgement close complain by the complainant was not available still indicating the complaint still ongoing or not.

Complainant : Syahira

Issue raised: High noise by neighbor at night

Action taken; Estate has inform the neighbor on th matter and ensure no repentance.

Complaints by stakeholders during stakeholders meeting was not recorded in the Estate complaints and grievances book. Inside the SOP on grievances, it was clearly mention that any complaint from stakeholders shall be recorded in the complaint book.

Lassa estate

Complainants: Sekolahmenengah Toh Puan Datuk PatinngiHajahNormah

Issue: Student come to school often late via company van.

Date Complaint: 5th April 2018

Action taken: N/A

Record in the Log Book: N/A

Major 5

Principle 4.4.4.2

The occupational safety and health practices are not fully implemented.

 Sawai Estate OSH meeting latest conducted on 25th June 2018 discussing on Workplace report inspection, accident happened but it was also identified that root cause for the accident happened not being discussed, HIRRAC review for accident happened not reviewed and also the site inspection where accident happened not conducted.

Document check Accident : Abdul Rani

Type: Motorcycle accident on the way to workplace (Post 1-Post 2)

Days lost: 78 days

JKKP6 form was submitted to JKKP on 4th April 2018.

However, insurance and wages during this period were paid by the estate management according to his work contract agreement.

2)OSH Meeting dated 24th May agenda mentioned on Accident report but it was found that accident happened in March 2018 (involve 3 days medical leave) not discussed in the report which related to the root cause, avoidance of reoccurrence and revising on HIRRAC related to job affected also not mentioned.

Accident: March 2018

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Name : Muhhamad Akbar Passport : B3516978

Issue : : Workers injured during work (Chisel)

Work days affected: Three (3). Obtain MC from Klinik Kesihatan Daro.

3) First aid kit was available on site (workshop, store etc.) However, during inspection on site, the first aid box medical material was not available accordingly and inventory list for the supposed item in the box are also not available.

Comment on Principle 5

Environmental Management Plan

An environmental policy and management plan is available during site visit and was signed by Dato' Wong Sie Young (CHIEF EXECUTIVE OFFICER), Dated 1st January 2015

Lassa 5

NREB EIA Approval Ref No.: (19) NREB/6-4/252 Dated 11th May 2004, The reference number was quote from "Environmental Monitoring Report (EMR) for The Loba Kabang Oil Palm Plantation Under LPF/0029 at Batang Lassa, Sibu and Mukah Division, Sarawak. Covering period January to March (1st Quarter 2018). Prepared by Ecosol Consultancy Sdn Bhd

Sawai Estate 1

NREB EIA Report/ EIS/ EMP Approval Ref No.: (19) NREB/6-4/252 Dated 11th May 2004, The reference number was quote from the EIA approval certificate. The EIA report was prepared by Ecosol Consultancy Sdn Bhd

Lassa 5 and Sawai Estate 1

In EIA approval stated EMR shall be submit quarterly basis (3 months basis). Based on the file Environmental Monitoring Report (EMR) for Lassa Plantation it was observed the monitoring report was available every quarter start from 1st quarter 2017, 2nd quarter 2017, 3rd quarter 2017 and 4th quarter 2017 (1 year period) which is done by Ecosol Consultancy Sdn Bhd

However, in the EIA Report Approval for this Estate. Control of Water Pollution (e) The analysis on pesticides/ herbicides shall be carried out when the proposed project has been implemented at six (6) months interval and shall include both surface water and sediment analyses.

After cross check with the EMR report for 1st quarter, 2nd quarter 2017, 3rd Quarter 2017 and 4th Quarter 2017 there was no parameter indicate for pesticides/ herbicides. This issue already highlight in stage 1 report and necessary action had been taken by management. And again, for 1st quarter 2018 EMR report covered January to March 2018 the parameter for pesticides/ herbicides analysis available in the EMR. However, after

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crossing check with laboratory certificate report, there was no evidence of the parameter had been analysis.

Sawai Estate 1

NREB EIA Report/ EIS/ EMP Approval Ref No.: (19) NREB/6-4/252 Dated 11th May 2004, The reference number was quote from the EIA approval certificate. The EIA report was prepared by Ecosol Consultancy Sdn Bhd.

Waste Management and Disposal

All waste generated in the oil palm plantation are categorize as below:,

a) Domestic waste,

- Gotong Royong was conducted on 26th June 2018 at Village 7 (J34, E26)
- There was an evidence of providing the garbage bin to every line site.

b) Scheduled waste

It was observed there was Standard Operation Procedures (SOP) regarding the scheduled waste where it was available in the file name Policy, SOP and Safe Work Procedure, File Code: 4.5-L-02-10, in item no. 9 (SOP of the Scheduled Waste. Please refer item 4.5.1.5 as training evidence conducted by HQ office. Since the training had been conducted, it seem the TKI workers not aware regarding this matter. Lack of awareness can be see as per interview conduct t`

c) Miscellaneous waste (solid waste)

The solid waste for this estate was dump into **KEM A Dumping** site

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GPS Reading N 02º29.377" E111º37.082'

It was observed the lassa 5 estate was provide schedule & Solid Waste inventory records and not punctured. Currently, no DOE authorized collectors was appointed due to still in new implementation of this issue.

Sawai Plantation

All waste generated in the oil palm plantation are categorize as below:,

d) Domestic waste,

- Gotong Royong was conducted on 26th June 2018 at staff quarters

27th June 2018 at TKI Village 2,3 and 4)

 There was an evidence of providing the garbage bin to every line site.

e) Scheduled waste

It was observed there was Standard Operation Procedures (SOP) regarding the scheduled waste where it was available in the file name Policy, SOP and Safe Work Procedure, File Code: 6.1-SW0-01-01, in item no. 9 (SOP of the Scheduled Waste. Please refer item 4.5.1.5 as training evidence conducted by estate. Since the training had been conducted.

f) Miscellaneous waste (solid waste)

The solid waste for this estate was dump at Block C4 Phase 3 **Dumping site**

Lassa 5

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It was observed the waste management plan was available in the file WASTE MANAGEMENT PLAN. There was some activity was conduct such as Gotong Royong was conducted on 1st February 2018 at the labour line.

Sawai Plantation

During site visit at scheduled waste store, it was observed inplaced

Reduction of pollution and emission

It was observed there was several pollution during the site visit. The pollution occurred as shown in Table below.

Area	Pollution
Workers camp at Lassa 5	Scheduled waste (m-oil) not properly handling and store
Village 7	Handling of PPE after spraying activity.

Zero Burning Practices

The zero burning policy was sighted at the Lassa 5 estate. However, the format quite different with other policy. Standardize the format easier for implementation.

Major 6

Principle 4.5.1.1

An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be implemented.

In the EIA Report Approval for both Lassa & Sawai Estate., Control of Water Pollution (e) The analysis on pesticides/ herbicides shall be carried out when the proposed project has been implemented at six (6) months interval and shall include both surface water and sediment analyses.

After cross check with the EMR report for 1st quarter, 2nd quarter 2017, 3rd Quarter 2017 and 4th Quarter 2017 there was no parameter indicate for pesticides/ herbicides. This issue already highlight in stage 1 report and necessary action had been taken by management. And again, for 1st quarter 2018 EMR report covered January to March 2018 the parameter for pesticides/ herbicides analysis available in the EMR. However, after crossing check with laboratory certificate report, there was no evidence of the parameter had been analyse.

Comment on Principle 6

Site Management

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Procedures available:

- 1. MSPO Good Agricultural Practice Issue 1 Rev. Prepared by Plantation Operation Manager, Mr. Kevin Kong Nieng Kie. Issue date: 1st April 2016.
- Harvesting
- Pruning & Sanitation
- Manuring
- Weeding
- Pest & Disease
- Water Management
- Roads
- 2. Oil Palm Plantation Agricultural Guideline Ref No: JTH/AG/01. Issue date 16th June 2017
- Pruning and Stacking Fronds
- Tirathaba Bunch Moth Control
- Fertilizer Sampling Procedures
- Palm Row Numbering and Palm Cencus System
- Rat Control
- Soil Mounding for Leaning and Fallen Palms
- Rhinoceros Beetles Control
- Effective Fertilizer Management
- Water Management on Peat
- Foliar Sampling
- Soil Sampling Procedure
- Management on Supply Palm in Mature Area
- Fertilizer Sampling Procedure in Estate Store
- Fertilizer Delivery Storage and Timing of Field Application

Based on observation, both estates apply best practices as per guidelines established

Economic and Financial Viability Plan

Budget for both estates were presented during the time of audit.

The budget included:

- FFB Sale
- LF Sale
- Profit and Loss Statement
- Expenditure and cost

Currently, the management in HQ level in the midst of finalizing the budget for the year 2018 and 2019.

Contractor

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	There are contract agreements with contractors but there is a need to include the special clause on MSPO.
	The list of contractors:
	1) Hong Li Enterprise Co.
	2) Luxrio Sdn Bhd
	3) New Hope Construction Sdn Bhd. For crushing stacking rows
	dated 28 July 2017.
Comment on Principle 7	Nil - No new development

Comment on MS2530-4 Compliance Status:

Comment on Principle 1	Policy on Implementation of MSPO –
	Jaya Tiasa Holdings Berhad has established a policy on sustainable palm oil production. The statement is evident in section "is committed to complying with the requirements of Malaysian Sustainable Palm Oil (MSPO) Standards".
	The policy has been signed by Dato' Wong Sie Young, Chief Executive Officer of Jaya Tiasa Holdings Berhad on 15 March 2016.
	Internal Audit – Noted Jaya Tiasa Holdings Berhad had established MSPO Internal Audit Procedure which is prepared by Plantation Operations Manager, Mr. Kevin Kong Nieng Kie and approved by the Plantation Operations Acting General Manager, Mr. Geoffrey Ngu Chu Hiong. The procedure was established in 1st April 2016.
	The purpose of the procedure was to describe the methods for planning and conducting internal audit.
	Latest Internal audit report was evident during the time of audit. It was conducted from 16 th – 17 th October 2017 which covers from Principle 1 to Principle 6 from the MSPO Standard Part 3. The internal audit was lead Mr. Kevin Kong and assisted by 2 audit members namely, Ling Tek Shii and Ambrose Ho. The next internal audit scheduled for Maxiwealth POM will be in October 2018. Also sighted the Internal Audit Itinerary Plan that was prepared by Mr. Kevin Kong.

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Sampled Internal Audit Findings:

1. No record of Stakeholder Consultation, no appointment letter for person in charge and no stakeholder list.

Management Review -

Sighted the meeting minute of management review. Latest management review conducted was on 10th November 2017.

From the meeting minute, sighted the management had discussed on the internal audit findings raised.

All the corrective action had been carried out within 30 days as per organization's Internal Audit Procedure

Continual Improvement -

The mill has established action plan for continual improvement on social, safety and health and environmental impact of the company.

Action plan evidence during the audit is as below:

- a. Social Impact Assessment (SIA)
 - Introduction
 - Site Location and Size
 - Land Use
 - Human Environment
 - List of Stakeholders Nearby the Site
 - Survey Methodology
 - Identify Direct and Indirect Potential Impacts from operation
 - Mitigation Plan
 - Monitoring and Review

b. HIRARC

- Introduction
- Risk assessment
- Control Measures

Tiasa Jaya just finalized a new procedure in managing continual improvement management plan to cater any opportunity for improvement in the future. The procedure was established in 13th April 2018 Ref. No. JTH-MSPO-12-v01. As claimed by the estate management, the procedure is relatively new and still in familiarization phase.

Major 7

Principle 4.1.2.2

The internal audit procedures and audit results were available however, root causes of non-conformities was not clearly identified.

Based on the sampled Nonconformity findings raised during the latest internal audit. The Mill management had managed to come out with corrective action to rectify the Nonconformity. However, there was no root cause identification had been done before the corrective action is

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	agreed upon.
Comment on Principle 2	Transparency of documents relevant to MSPO requirements — Since the MSPO implementation by the mill. It recorded every correspondence with relevant stakeholders namely "Request and Response Logsheet". All the communications evidences were available during the audit.
	<u>Transparent method of communication and consultation</u> – MSPO Communication and Consultation procedure was presented during the audit. The procedure was prepared by Plantation Operations Senior Manager, Mr. Stephen Wong Ing Dung and approved by Plantation Operations Acting General Manager, Mr. Geoffrey Ngu Chu Hiong. The date of establishment is 1st April 2016.
	Traceability – An SOP of traceability had been established by Maxiwealth Holdings Sdn Bhd namely FFB CPO PK Traceability Procedure Issue 1 – Rev 1. It was established on 1st September 2017 by Administration Executive, Caroline Sudan Ak Gayang and approved by the mill manager.
Comment on Principle 3	Regulatory requirements – Legal Register was sighted available during the time of audit. it was last updated on 6 th February 2018 by Mr. Ting Kang Huat. However, from the legal register the status of compliance was not completed.
	Appointment Letter for Legal Person in Charge: Mr. Wong Soon Yong Effective date: 6 th November 2017
	Current practice, any changes in laws and regulations will be monitored at HQ Level by Mr. Ting Kang Huat. He will then review and update legal register at least once a year or when needed and disseminate to the operating units.
	Legal land use rights – Mill shares the same land title as Lassa Divisions LPF/0029. Below is the breakdown
	Total hectare: 30050 ha. Mill Hectare: 135.85 ha.
	The mill is located within Lassa 3 Estate division.
Comment on Principle 4	Social Impact Assessment – Maxiwealth Palm Oil Mill (MPOM) has presented the Social Impact Assessment dated 2018
	Social Impact Assessment (SIA) report is available that contains the

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followings:

- Introduction
- Site Location and Size
- Land Use
- Human Environment
- List of Stakeholders Nearby the Site
- Survey Methodology
- Identify Direct and Indirect Potential Impacts from operation (negative and positive)
- Mitigation Plan
- Monitoring and Review
- Appendix 1: Stakeholders list
- Appendix 2 : Stakeholders meeting update)

MWPOM stakeholders meeting with smallholders was conducted on 23 November 2017.

Attended by:

1) 18 Smallholders from surrounding area

Among issue discuss during the meeting

- 1.Mill FFB Grading Management
- 2. Sustaianbility Practices
- 3. Environment Component

Commitment to contribute to local sustainable developments -

Positive impacts are in term of job employment given to the communities in term of contractor, supplier and staff.

Besides that, mill also gave training to the smallholders in term of best practices, pest management and quality management for fresh fruit bunches. Interview from smallholder confirm on the activities done by the mill management.

Several mill staff was recorded from Rh Selat, Rh Geruka and nearby area.

Several CSR record sighted

- 1.Contribution to School (SK Campuran Daro): 7th April 2017
- 2.Labour day celebration (June 2017/2018))
- 3. School contribution (SK Hijrah Badong Daro) 23 August 2017

Employees health and safety -

Observed that the occupational safety and health plan covers the followings:

 a) A Policy Statement on Environmental, Occupational Safety & Health dated 1st January 2017 signed by CEO. The policy is displayed in the mill Office.

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- b) All operation risk were assessed and documented in the HIRARC Form. The risk assessment has been updated on 15th February 2018. Next review of the HIRARC will be on next year or deem necessary.
- c) Safety trainings for employees exposed to pesticides have been conducted; records of the training were available in **Workers Training Records** (2017/2018). Example of safety training conducted as below:
- d) The risk of all operations shall be assessed and documented. :. In each of the station identified, the following is tabulated :
 - 1. Hazard Identification
 - 2.Risk analysis
 - 3. Risk control

HIRARC Document for Maxiwealth Palm Oil Mill

During mill site visit, it was identified that PPE has been provided and mill workers are wearing appropriate PPE. The PPE usage as per according to the mill HIRARC.

a) The following are some of the training conducted for employees exposed to chemicals used at the palm oil mill and that the employees involved are adequately trained on safe working practices:

The Mill Operating Procedure & Safety Procedure Trainings:

a) AESP Refresh / Fire Training Trainer: JKKP Safeware Marketingb) SOP Welding Hearing / Welding

Trainer: Pn Asmarina

c) LOTO

Trainer: Mr Abdul Karim

d) Laboratory Training

Below are the personnel listed for the following competency:

Name	Competency
Mr Gan Kok Chuan	2 nd grade Steam engineer, AESP
Mohd Adress bin Moss	Diploma Milling
	Technology
Mohd Khairul Niza	Confined Space
Norhafiz	Confined Space
Asmarina	Confined Space
Mohd Sharil	Stim Gred
	Engineer Grad

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	2		
Pn Marita John	First Aiders		
Pn Masthura			
En Nor Affendi			
Mohd Shahril			

b) The management has provided the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).

Visit to the mill generally indicate that workers were using safety helmets and safety boots.

However, it also found several employee are not wearing proper PPE in Mill operation:

- 1. At the high noise area, one worker founded not wearing ear plug
- 2.Boiler chemical mixture are found not wearing proper PPE according to chemical use at the boiler (In the SDS, apron, google are to be use)
- 3.Laboratory assistant not wearing proper hand glove
- 4.FFB grader at ramp not wearing vest / hand gloves

Boundary Noise Exposure Monitoring report was made available for MTPOM

Document No: RSSB/17/009 Rev 1

c) The management has established the Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. Copy was sighed as Hardcopy.

Maxi Palm Oil Mill document for safe handling procedure:

It include the Safe precaution before and after and during when handling chemical especially at laboratory

Safe Operating procedure at Mill:

Document No 19 mentioned on chemical handling, application and procedure.

However, it was sighted at mill laboratory, several chemical was not properly stored and lack of safe management on this material (corrosive, flammable material)

The management has established a OSH Committee headed by the Mill Manager in

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Employment conditions -

The policy on good social practices has been indicated in the "Human Right Policy" was established.

Observed that the Policy has been signed by the Chief Executive Officer.

Training and competency -

The plan known as 'Annual Training Programme 2017 / 2018 ' cover the following:

There are several topics listed that include:

- 1) Policy
- 2) SOP3) New workers induction
- 4) Grading skills
- 5) Register of chemical Hazardous & chemical handling
- 6) HIRARC
- 7) ERP
- 8) First Aid Training
- 9) Confined space (refreshed)

The training conducted: June 2017- June 2018

Minor 8

Principle 4.4.2.4

Employees and surrounding communities should be made aware of grievances procedure, complaint form and how to convey any grievances.

Conducted briefing on how to fill the complaint form for stakeholder.

(APPENDIX B03 - Briefing attendance)

(APPENDIX B04- Photo of briefing to smallholder)

Major 9

Principle 4.4.4.2

Safety and health Practices are not fully implemented.

It was identified several employee are not wearing proper PPE in Mill operation

- 1. At the high noise area, one worker founded not wearing ear plug
- 2.Boiler chemical mixture are found not wearing proper PPE according to chemical use at the boiler (In the SDS, apron, google are to be use)
- 3.Laboratory assistant not wearing proper hand glove
- 4.FFB grader at ramp were sighted not wearing vest / hand gloves during work at ramp

Comment on Principle 5

Environmental management programme -

The management has provided Health Safety & Environment Policy Statement which sign by top management Dato' Wong Sie Young (Chief Executive Officer) dated 1st January 2017.

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The policy commits to achieve environmental sustainability by

- Developing and improving health, safety and environment (HSE) programs and procedures to ensure compliance with all applicable laws and regulations.
- 2. Protecting the safety and health of all members of the company and others who may be affected by the work carried out.
- 3. Preventing work-related fatalities, disabilities, injuries, ill health, diseases, property and environmental damage and near misses.
- 4. Providing all types of pollution by establishing and implementing the necessary environmental programs.
- 5. Preventing all types of pollution by establishing and implementing the necessary environmental programs.
- 6. Ensuring that employees and their representatives are consulted and encouraged to participate actively in all matters related to HSE.
- 7. Identifying and providing relevant training to enable employees to perform their work safely and efficiently while ensuring environmental impacts are minimized.
- 8. Communicating the policy to all employees, interested parties and persons working for or on behalf of the company.
- 9. Continually improving the performance of the HSE management system.

The management had taken necessary action to review the policy to ensure applicable for current condition. However, checklist for review the policy is not applicable, since it already update from 2015 to 2017. It seem not proper way to review and acknowledge the policy.

Observation 1

The management has provided continual improvement plan for Lassa CPO Mill for 2017-2019. The management

For improvement plan, time frame given to accommodate this plan is until December 2019.

Item incorporate in the plan are

1. Decanter cake disposal: Degraded/ decompose decanter cake to be mixed with bunch ash, boiler ash and sludge cake from belt to produced organic fertilizer for estate usage.

Evidence: The record of bunch ash was available since 2016 to till May 2018. The document record can be verified in file Bunch Ash Production & Dispatch/ Sells.

2. To install functional flow meter at domestic pipeline to quantify the daily water usage.

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10. To Install flow meter at Water Treatment Plan (WTP) for raw water inlet to quantify the amount of raw water treated at WTP daily

Evidence: the management has shown the record of daily water reading for raw water, domestic, process and boiler since May 2018. It can be verified in Water Management Plan File

Efficiency of energy use and use of renewal energy -

The management has provided Improvement Plan which included biogas project to capture biogas for power generation and to reduce the release of methane gas into atmosphere (2018 Improvement plan)

Water consumption record

The water consumption was available March 2018 the record show

January: 36,910 m³ February: 35,440 m³ March: 29,384 m³ April : 34,380 m³ May : 29,684 m³

The management provides

- 1. Monthly water consumption record
- 2. Total water supplied to workers quarters, after installation of meter the records was available start from

March: 3,585 m³ April: 4,119 m³ May: 4,450 m³

- 3.Domestic water usage record and sampling analysis (once a year with latest domestic water sampling was on 3rd March 2017)
- BP Laboratory Kuching will analysis by year 2018.
- 4. Based on interview with maintenance department the latest Water Tank Cleaning Record was on 2014.

Waste management and disposal -

The management had taken necessary action by identified the all waste products and sources of pollution. Types of waste that had been identified list as below:

Domestic waste

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- 2) Scheduled waste
 - SW 305 Spend lubricant Oil
 - SW 102 Waste batteries
 - SW 306 Spend hydraulic oil
 - SW 409 Disposed contaminated containers, drums or bags
 - SW 410 Rags, plastics, filters contaminated with scheduled wastes
 - SW 404 Clinical wastes)
- 3) Miscellaneous waste (Solid wastes)
 - Used tyres
 - Scrap metal
- 4) Industrial Waste
 - Palm Kernel Shell (PKS)
- 5) Empty Fruit Bunches (EPBs)
- 6) Palm Oil Mill Effluent (POME)
- 7) Decanter Cake
- 8) Palm Press Fibre (PPF)

CHRA: 22nd September 2015, conducted by Renny Ong (CHRA Assessor: JKKP HIE 127/171-2(179), Company Alphine Consultant Sdn Bhd (Co.no: 1015157-T)

b) The Management provided map on Rubbish Pits Location (update 10/12/2017). However, the location of dumping site is close to the main river (Batang Lassa). Since dumping site is peat area, the leachate to the surrounding area may occur and pollute the water source. If this situation not take action the damage to the environment surrounding may accumulate and damage the ecosystem. The management should consider the appropriate location or method to disposed domestic waste properly.

Reduction of pollution and emission -

The management has provided:

Environment Monitoring report (stack- latest 2nd Half 2017)
 Stack Emission (Boiler No.2) and Incinerator (No.1 and No.2)
 Monitoring Report. However, some of syarat-syarat pematuhan not implemented such as Pengurusan/ Kawalan, Pencemaran Udara item.no 18:

Perlepasan kelegapan asap hitam dari cerobong hendaklah tidak melebihi had yang ditetapkan dibawah Peraturan 12, Peraturanperaturan Kualiti Alam Sekeliling (Udara Bersih) 2014

Natural water resources -

It was observed the water management plan was available in Water Management Plan file 2018. The report covers water extraction from industrial and domestic uses and wastewater discharges. The plan has been developed in compliance with regulatory requirement that needs to be followed by mill in order for better water conservation, utilization and control of water pollution in the oil palm mills.

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The accredited laboratory was appointed to analysis the drinking water and will start within this year 2018.

The monitoring of the implementation of water management plan is overall done by the mill Manager.

Major 10

Principle 4.5.3.1

Not all waste products and sources of pollution are been identified and documented.

The management had taken necessary action by identified the all waste products and sources of pollution. Types of waste that had been identified list as below

- 1. The code for SW 312 Only residue from automotive workshop, service station oil or grease interceptor not include in the identified pollution.
- 2. Inventory schedule waste are not included clinical waste and laboratory waste
- 3. Waste in laboratory is founded not properly labelled
- 4.Schdule waste are found exceed the limit for the internal storage (more than 180 days)

Comment on Principle 6

Mill management -

Procedures available:

1. Good Milling Process covering General Process, Ramp Operation, Sterilization, Threshing, EFB Pressing, EFB Discharge, Digestion & Pressing, Oil Clarification, CPO Storage, Kernel Recovery, PK Storage, Boiler and Engine House Operation and Maintenance prepared by Mill Manager, Mr. Abdul Karim Bin Sahni and approved by COO Milling Operation, Mr. Teoh Kheng Hock. The document was last updated on 2nd April 2018.

Apart from that, Safety Standard Operation Procedure had also been established by the Safety Executive, Pn. Asmarina Binti Asim.

Transparent and fair pricing dealing -

The mill management receives FFB from internal estate and also from smallholder.

Total registered with Lassa CPO mill list as below:

- 1.) Lassa plantation
- 2.) Kabang plantation
- 3.) Eastern Eden Plantation
- 4.) Daro Jaya Plantation
- 5.) Lepah Plantation
- 6.) Sawai Plantation
- 7.) Adit Anak Robinson Nyengau
- 8.) Drahman Bin libak
- 9.) Ja'par Bin Saibin
- 10.) Mohamad Bin Busman

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- 11.) Selat anak Nyanggau
- 12.) Solhi Bin Salleh
- 13.) Sudir Bin Drahman
- 14.) Tradewinds Tanjung Alan 1 Plantation Sdn Bhd
- 15.) Tradewinds Tanjung Alan 2 Plantation Sdn Bhd
- 16.) Wahab Bin Rebi

Pricing mechanism:

According to the SOP Accountant HQ , the pricing mechanism for Lassa CPO Mill for smallholder FFB crops are ;

- 1.The smallholder price is calculated with reference to MPOB published CPO,PK and CPKO prices
- 2.Oil extraction rate and kernel extraction rate for each grading will be considered
- 3.FFB prices will be less with processing fee deduction 9in line with industry practices and market rate)

Sales and purchase agreements

Only available for main contributor for the mill. The main contributor list as below:

External

- 1) Ladang Tanjung Alan 1
- 2) Ladang Tanjung Alan 2
- 3)

Contractor -

The management has provided list of contract and the job as mention below

- 1. Fire extinguisher services
- 2.Air Con services
- 3.Canteen services

Findings from contractor compliances to MSPO, within the contract agreement, it is founded that availability of compliances with MSPO by the contractor.

Example: Contract Document Emo Industrial Supplies Sdn Bhd clause 18 on Company's Policies, Guidelines and Procedures etc, mentioned on the contractor aware with the company requirement on MSPO and any related sustainability policy.

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7. Nonconformities

MS2530-3:2013 Part 3 and MS2530-4:2013 Part 4

NonConformity	N° 1 of 10		Major 1			
	Date Recorded>	28 th June 2018	Due Date>	28 th August 2018	Date Closed>	24 th August 2018
Department / Function:	Administrativ	ve	Standard Ref		MSPO 2350-Part 3 4.1.2.2	
Document Ref.:	Criterion 1: In	nternal Audit	Issue / Rev. S	Status:	Closed	
Details of Nonconformity:		audit procedures and in proced			nd documer	nted however,
Objective Evidence:	estate mana	Based on sampled of nonconformity findings raised during the latest internal audit. The estate management had managed to come out with corrective action to rectify the nonconformity. However, there was no root cause identification had been done before any the corrective action to be made and is agreed upon.				n to rectify the
Close-out evidence:	 Introduce new form, Corrective Action Requisition Form (CAR) to document recauses identification before corrective action to be made and is agreed upon to rectithe non-conformity findings raised. (APPENDIX1 – CAR Form implemented at Lassa Estate) (APPENDIX 2 – CAR Form implemented at Sawai Estate) Conduct awareness training for management team about CAR form requirement. (APPENDIX 3 – Training Conducted at Lassa Estate) (APPENDIX 5 – Photo on training at Lassa Estate) 				d upon to rectify	
	(APPENDIX 6 – Training Attendance at Sawai Estate) (APPENDIX 7 – Photo on training at Sawai Estate)					

NonConformity	N° 2 of 10				Minor 2	
	Date Recorded>	28 th May 2018	Due Date>	28 th Feb 2019	Date Closed>	24 th August 2018
Department / Function:	Administrative		Standard Ref.: Indicator		MSPO 2350-Part 3 4.2.2.3	
Document Ref.:	Criterion 2: Transparent method of communication and consultation		Issue / Rev. Status:		Closed	
Details of Nonconformity:		The management should identify and assign suitable employees to implement and maintain the traceability system which was not available during audit.				
Objective Evidence:	practice in th	A person in charge had been appointed in order to maintain the continuity of traceability practice in the estates. Mr Zahari Bin Suhaili had been appointed for the responsibility for Lassa 5 Estate dated 16 th May 2017.				

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	However, the appointed person was transferred to sister estate in May 2018 and no evidence of new appointment on the said responsibility.
Close-out evidence:	Mr. Matthew Biju Bin Jeffery John had been appointed as new Traceability in-charge in Lassa 5 Estate and letter of appointment is dated 2 July 2018. (APPENDIX 8).

NonConformity	N° 3 of 10				Minor 3	
	Date Recorded>	28 th May 2018	Due Date>	28 th Feb 2019	Date Closed>	24 th August 2018
Department / Function:	Administrativ	/e	Standard Ref Indicator	:	MSPO 2350 4.4.1.1)-Part 3
Document Ref.:	Criterion 4: S Assessment	ocial Impact	Issue / Rev. S	Status:	Closed	
Details of Nonconformity:	Social impact are identified and implemented to mitigate the negative impacts are not clearly identified as action taken from stakeholders meeting (issue raised) was not available.					
Objective Evidence:	SIA for Sawai estate (2018) was made available at site. Record on stakeholders internal and external conducted in January 2018. The response from stakeholders are compile in the SIA report. The responsible person for social component is Majoren Bangi Jon However during assessment on action to be taken, it was noted that 1. Mitigation / enhancement progress to be done for item 1,2,3, 5 & 6 in the SIA report was not available. There is no indication of follow up on the issue raised by the stakeholders during audit.					
Close-out evidence:	Produced SIA management action plan to mitigate the social issue. (APPENDIX 09 – SIA Management Plan for local communities) (APPENDIX 10 – SIA Management Plan for Workers)					

NonConformity	N° 4 of 10		Major 4			
	Date Recorded>	28 th June 2018	Due Date>	28 th Aug 2018	Date Closed>	24 th August 2018
Department / Function:	Administrative		Standard Ref.: Indicator		MSPO 2350-Part 3 4.4.2.2	
Document Ref.:	Criterion 4: Complaints and Grievances		Issue / Rev. Status:		Closed	
Details of Nonconformity:	_	The grievances procedure are available however, it was not clear whether it is able to esolve disputes in an effective, timely and appropriate manner that is accepted by all				

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	parties including the complainants.
Objective Evidence:	Sawai Estate It was noted that the some grievances form was fill in by the complainant and others assisted by the estate management. During document check, acknowledgement close complain by the complainant was not available still indicating the complaint still ongoing or not. Complainant: Syahira Issue raised: High noise by neighbor at night Action taken; Estate has inform the neighbor on the matter and ensure no repentance. Complaints by stakeholders during stakeholders meeting was not recorded in the Estate complaints and grievances book. Inside the SOP on grievances, it was clearly mention that any complaint from stakeholders shall be recorded in the complaint book. Lassa estate Complainants: Sekolahmenengah Toh Puan Datuk PatinngiHajahNormah Issue: Student come to school often late via company van. Date Complaint: 5th April 2018 Action taken: N/A Record in the Log Book: N/A
Close-out evidence:	For Sawai Estate: 1. Complainant is satisfied with action taken by management and agreed to close the case. (APPENDIX 11) 2. Updated complaint and grievance logsheet (APPENDIX 12) 3. Memo issued – Not allow to make high noise at quarter after 9pm (APPENDIX13) For Lassa Estate: 1. Letter reply to Sekolah Menengah Toh Puan Datuk Patinggi Hajah Normah (APPENDIX 14) 2. Internal memo inform respective estate (APPENDIX 15) 3. Memo to van driver & parent about the changing of schedules for fetching student. (APPENDIX 16) 4. Complaint and Grievances logs (APPENDIX 17)

NonConformity	N° 5 of 10		Major 5				
	Date Recorded>	28 th June 2018	Due Date>	28 th Aug 2018	Date Closed>	24 th August 2018	
Department / Function:	Administrati	Administrative		Standard Ref.: Indicator		MSPO 2350-Part 3 4.4.4.2	
Document Ref.:		Criterion 4: Employees Safety and Health		Issue / Rev. Status:			

Job n°:	MY05004	Report date:	24.09.2018	Visit Type:	Main	Visit n°:	1
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Details of Nonconformity:	The occupational safety and health practices are not fully implemented.
Objective Evidence:	1) Sawai Estate OSH meeting latest conducted on 25 th June 2018 discussing on Workplace report inspection, accident happened but it was also identified that root cause for the accident happened not being discussed, HIRRAC review for accident happened not reviewed and also the site inspection where accident happened not conducted.
	Document check Accident : Abdul Rani
	Type: Motorcycle accident on the way to workplace (Post 1-Post 2) Days lost: 78 days
	JKKP6 form was submitted to JKKP on 4 th April 2018. However, insurance and wages during this period were paid by the estate management according to his work contract agreement.
	2)OSH Meeting dated 24 th May agenda mentioned on Accident report but it was found that accident happened in March 2018 (involve 3 days medical leave) not discussed in the report which related to the root cause, avoidance of reoccurrence and revising on HIRRAC related to job affected also not mentioned.
	Accident : March 2018
	Name : Muhhamad Akbar Passport : B3516978
	Issue : : Workers injured during work (Chisel)
	Work days affected: Three (3). Obtain MC from Klinik Kesihatan Daro.
	3) First aid kit was available on site (workshop, store etc.) However, during inspection on site, the first aid box medical material was not available accordingly and inventory list for the supposed item in the box are also not available.
Close-out evidence:	For Sawai estate:
evidence.	Root cause of Abdul Ranihas's accident case had been discussed in OSH meeting on 4 July 2018. (APPENDIX 18)
	 Conduct site inspection for accident on reported accident case (APPENDIX 19) Conduct safety discussion of HIRARC for Pemanduan Berhemah (APPENDIX 20) HIRARC revised (APPENDIX 21)
	For Lassa Estate :
	Root cause of Muhhamad Akbarhas's accident had been in OSH meeting in 2018. (APPENDIX 22)
	 Revised HIRARC for job which was affected. (APPENDIX 23) Training of HIRARC with related workers (APPENDIX 24, APPENDIX 25)
	For First aid box:
	Medical material has been refilled accordingly. (APPENDIX 26)
	eport date: 24.09.2018 Visit Type: Main Visit nº: 1

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2.	Inventory list provided (APPENDIX 27)
3.	Training on handling of First Aid Kit (APPENDIX 28)

NonConformity	N° 6 of 10		Major 6	Major 6				
	Date Recorded>	28 th June 2018	Due Date>	28 th Aug 2018	Date Closed>	24 th August 2018		
Department / Function:	Administrative		Standard Re Indicator	f.:	MSPO 235 4.5.1.1	0-Part 3		
Document Ref.:	Criterion 4: E Management	nvironmental t Plan	Issue / Rev. Status: Closed					
Details of Nonconformity:			•	•	with the relev	ant country and		
Objective Evidence:	The analysis been implement and After cross of and 4th Quaralready highly And again, for pesticides	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be implemented. In the EIA Report Approval for both Lassa & Sawai Estate., Control of Water Pollution (e) The analysis on pesticides/ herbicides shall be carried out when the proposed project has been implemented at six (6) months interval and shall include both surface water and sediment analyses. After cross check with the EMR report for 1st quarter, 2nd quarter 2017, 3rd Quarter 2017 and 4th Quarter 2017 there was no parameter indicate for pesticides/ herbicides. This issue already highlight in stage 1 report and necessary action had been taken by management. And again, for 1st quarter 2018 EMR report covered January to March 2018 the parameter for pesticides/ herbicides analysis available in the EMR. However, after crossing check with laboratory certificate report, there was no evidence of the parameter had been analyse.						
Close-out evidence:	•	ion from EMR cor report – Herbicid	`	,	PENDIX 30 ,	APPENDIX		

NonConformity	N° 7 of 10		Major 7				
	Date Recorded>	28 th June 2018	Due Date>	28 th August 2018	Date Closed>	24 th August 2018	
Department / Function:	Administrative		Standard Ref.: Indicator		MSPO 2350-Part 4 4.1.2.2		
Document Ref.:	Criterion 1: Internal Audit		Issue / Rev. Status:		Closed		
Details of	The internal	The internal audit procedures and audit results were available however, root causes of non-					

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Nonconformity:	conformities was not clearly identified.
Objective Evidence:	Based on the sampled Nonconformity findings raised during the latest internal audit. The Mill management had managed to come out with corrective action to rectify the Nonconformity. However, there was no root cause identification had been done before the corrective action is agreed upon.
Close-out evidence:	Introduce new form, Corrective Action Requisition Form (CAR) to document root causes identification before corrective action to be made and is agreed upon to rectify the non-conformity findings raised. (APPENDIX B01 – CAR Form implemented) (APPENDIX B02 – Root Cause Analyse)

NonConformity	N° 8 of 10		!		Minor 8			
	Date	28 th June 2018	Due Date>	28 th Feb 2019	Date	24 th August		
	Recorded>				Closed>	2018		
Department /	Administrativ	/e	Standard Ref	.:	MSPO 2350	-Part 4		
Function:			Indicator		4.4.2.4			
Document Ref.:	Criterion 2: C Grievances	complaints and	Issue / Rev. Status:		Issue / Rev. Status: Closed			
Details of Nonconformity:	Employees and surrounding communities should be made aware of grievances procedure, complaint form and how to convey any grievances.							
Objective Evidence:	unsure with t	view with the stal he complaint form ::TrSelat (FFB Sup	and how to fill	, .	auditor found	d that they are		
Close-out evidence:	Conducted briefing on how to fill the complaint form for stakeholder. (APPENDIX B03 – Briefing attendance) (APPENDIX B04– Photo of briefing to smallholder)							

NonConformity	N° 9 of 10		Major 9			
	Date Recorded>	28 th June 2018	Due Date>	28 th August 2018	Date Closed>	24 th August 2018
Department / Function:	Administrative		Standard Ref.: Indicator		MSPO 2350-Part 4 4.4.4.2	
Document Ref.: Criterion 1: Employees Safety and Health		Issue / Rev. S	Status:	Closed		

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Details of Nonconformity:	Safety and health Practices are not fully implemented.
Objective Evidence:	It was identified several employee are not wearing proper PPE in Mill operation
	1. At the high noise area, one worker founded not wearing ear plug
	2.Boiler chemical mixture are found not wearing proper PPE according to chemical use at the boiler (In the SDS, apron, google are to be use)
	3.Laboratory assistant not wearing proper hand glove
	4.FFB grader at ramp were sighted not wearing vest / hand gloves during work at ramp
	Action taken:
Close-out evidence:	To analyse root cause (APPENDIX B05 – Root Cause identification chart) Conduct briefing on BBE requirement for Lob workers. (ABBENDIX B06)
evidence.	2. Conduct briefing on PPE requirement for Lab workers. (APPENDIX B06)3. Conduct briefing on chemical handling for Lab workers (APPENDIX B07)
	4. Program for briefing on safety using PPE for workers (APPENDIX B08)
	5. Attendance of briefing on safety using PPE for workers (APPENDIX B09, APPENDIX B10, APPENDIX B11)
	4. Practice using PPE (APPENDIX B12)

NonConformity	N° 10 of 10		Major 10	Major 10			
	Date Recorded>	16 th May 2018	Due Date>	16 th August 2018	Date Closed>	24 th August 2018	
Department / Function:	Administrativ	re	Standard Rei	:: ::	MSPO 235 4.5.3.1	60-Part 4	
Document Ref.:	Criterion 3: Waste management and disposal		Issue / Rev. Status:		Closed		
Details of Nonconformity:	Not all waste	products and sou	urces of pollution	n are been iden	tified and doc	umented.	
Objective Evidence:	The management had taken necessary action by identified the all waste products and sources of pollution. Types of waste that had been identified list as below 1. The code for SW 312 Only residue from automotive workshop, service station oil or grease interceptor not include in the identified pollution. 2. Inventory schedule waste are not included clinical waste and laboratory waste 3.Waste in laboratory is founded not properly labelled 4.Schdule waste are found exceed the limit for the internal storage (more than 180 days)						
Close-out evidence:	Action taken: 1. SW312 i	s included in Sche	eduled waste ir	ventory (APPEN	IDIX B13)		
	 Clinical waste included in inventory (APPENDIX B14) For the Hexane Waste and Iso octane Waste that highlighted in the audit, it has developed a SOP – Penjanaan Semula Hexane dan Iso Octane (melalui Kaedah 						

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Penyulingan) for proper handling and disposal of both of these Laboratory waste and inventory log record produced (APPENDIX B15, APPENDIX B16)

- 4. Waste laboratory is properly labelled (APPENDIX B17)
- 5. Scheduled waste disposed record (APPENDIX B18, APPENDIX B19)

8. General Observations & Opportunities for Improvement

Positive Observations:

- The support from Erajaya Synergy Sdn Bhd personnel, especially the ground staff contribute to the smoothness and successful of the audit process.
- The spirit of unity and enthusiasm of the personnel towards achieving MSPO certification is impressive.
- The unit has dedicated staffs who are assets to the company. Their cooperative, knowledgeable and hospitability are commendable
- Organised documentation & highly commitment towards certification

Important Observations and Opportunities for Improvements:

- The root causes of nonconformities should be clearly identified and tackle in appropriate method.
- The management should appoint suitable person to implement and maintain the traceability system to ensure all document recorded.
- Action taken on complaints and grievance by stakeholders should be highlight and discuss.
- Safety and health practices should be fully implemented.
- All waste products and sources of pollution are been identified and documented accordingly.

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Appendix 1

Multi -Site Address List

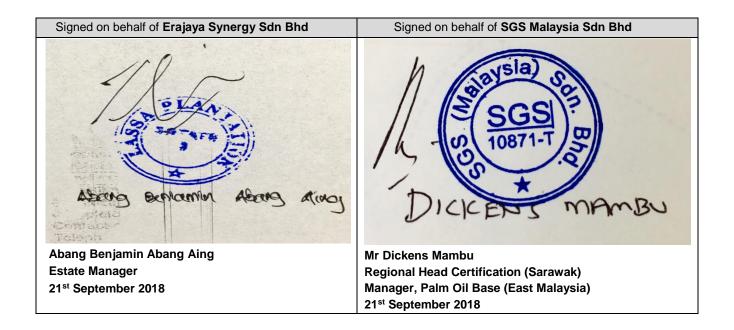
Site name / Address	Audit Dates	Activities at this site		
Kabang Plantation, LPF 0029, Kabang Division, 96000 Mukah, Sarawak.	26 th June 2018	Harvesting, Manuring and Weeding		
Sawai Plantation,_LPF 0029, Sawai Division, 96000 Sibu, Sarawak	28 th June 2018	Harvesting, Manuring and Weeding		
Maxiwealth Holdings Sdn Bhd, Lassa CPO Mill, Lassa Plantation, LPF 0029, Lassa Division, Mukah, Sarawak.	27 th June 2018	Processing of FFB		

Appendix 2: List of Stakeholders Interviewed

Stakeholder	Type of Stakeholder	Issues raised	Comments/Action Taken
Adit Anak Robinson Smallholder (FFB)	External	Currently no issues arise	He aware regarding the MSPO implementation and try to adopt with the situation
Wilson Nulau anak Jis	Internal	No issue arise	He aware regarding implementation of MSPO requirements on site.
Sabri Bin Rahmat	Internal	No issue arise	He aware regarding implementation of MSPO requirements on site.

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