



MSPO SURVEILLANCE CERTIFICATION REPORT [YEAR 02] 2021



BBC Group of Plantations

Lot 16433, Junction 5 Commercial Centre, Mile 5, Jalan Tun Hussein Onn,
97000 Bintulu, Sarawak.



BQAS Certification [M] Sdn Bhd

Lot 7823, Sublot 6, 2nd Floor, Block A, King Center,
Simpang Tiga, 93350, Kuching, Sarawak.

Tel: 082 572 043

Email: bqascertification@gmail.com

Website: www.bqas.com.my

Accreditation No: ACB MSPO CB15



MSPO SURVEILLANCE CERTIFICATION REPORT Year 02: 2021



BBC Group of Plantations

BQAS CERTIFICATION [M] SDN BHD [1179994-X]

Ref No: BQ/BBCPLT/SVA2/06/21

Standard: MS 2530-3:2013

Remote Audit

Report Date: 06 08 2021

CERTIFIED ENTITY

MSPO Standards

MS2530-3:2013

General Principles for Plantations & Organized Smallholders

Type of Certification:

Individual

Group

Project Ref No:

BQ/BBCPLT/SVA2/06/21

MSPO Certificate No:

BQAS 001 – 1,2,3,4,5,7,8,9

MSPO Certificate Validity:

01 01 2019 to 31 12 2023

Main Office Address:

Lot 16433, Junction 5 Commercial Centre, Mile 5, Jalan Tun Hussein Onn, 97000 Bintulu, Sarawak.

Contact Person / Job Title:

Mr Leram Sedin

General Manager

Telephone / Mobile:

086 351881

016 8797031

Email / Website:

leram.sedin@bbcgroup.com.my

Contact Person / Job Title:

En Mohamad Firdaus Bin Ibrahim

Internal Auditor

Telephone / Mobile:

086 351881

012-8814524

Email / Website

Mohamad.firdaus@bbcgroup.com.my

CERTIFICATION BODY

BQAS CERTIFICATION [M] SDN BHD [1179994-X]

Office Address:

Lot 7823, Sublot 6, 2n Floor, Block A, Kings' Center, Simpang Tiga, 93350, Kuching Sarawak.

Contact Person / Job Title:

Managing Director

Telephone / Mobile:

+6 082 572043

Lead Auditor:

Wilfred S Landong

Certifier:

Patrick Sibat Sujang

Disclaimer:

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EXECUTIVE SUMMARY

BBC Group of Companies is a large conglomerate based in Bintulu, Sarawak and among others is engaged in owning, developing and managing 8 [eight] Palm Oil Plantations and a Palm Oil Mill. All the palm oil plantations are located in the Bintulu Area, Sarawak.

This is a **Surveillance [Remote] Audit [Year 2]** to assess performance & maintenance of the management system & continued Group Certification of BBC Group of Plantations under the Standard MSPO2530-3:2013 General Principles for Plantations & Organized Smallholders.

For this Surveillance Audit Year 02, the following plantations are audited:

	Name of Plantation	Certified Area	Planted Area	Geo-Coordinates
1	Hong Yet Plantation Sdn Bhd	322.26 HA	315.57 HA	3°03'11.1"N 113°04'34.2"E
2	Almabumi Plantation Sdn Bhd Sungai Estate	2136.85 HA	2002.56 HA	3°03'55.2"N 113°03'34.0" E
3	Almabumi Plantation Sdn Bhd Bukit Estate	2263.15 HA	2095.30 HA	3°01'26.2"N 113°03'47.5"E

The assessment method follows principles of 3P (Paper, Practice & People)

This certification assessment is a sampling process where management systems effectiveness & efficiency are confirmed via an Audit Trail that the Auditor established to make an accurate conclusion.

This Audit which was scheduled earlier to be conducted onsite in Dec, 2020 was forcibly delayed a few times due to compliance requirements of COVID 19 MCO [movement control order] enforced by government authorities of Sarawak & Malaysia. Upon various communications between CB and BBC Group, the planned Onsite Audit was changed to Remote Audit to ensure regulatory compliances to national COVID 19 Pandemic MCO [movement control order] and regulations enforced by the SDMC [Sarawak Disaster Management Committee].

Guidance documents for this Remote Audit is MPOCC Version 3 Updated Circular [22 March 2021]

Guidance on remote audits due to Covid 19 Pandemic Restrictions.

Risk Assessment was conducted and it was determined prior to conducting the audit that BBC Group of Plantations is categorized as **low risk entity** and qualify to be audited remotely.

ICT tools and audit medias in use during this Audit include zoom meetings, google drive for uploading documents, emails, whatsapp chat group for Auditors & Auditees [clients] personnel, postings of realtime photographs evidence and other relevant virtual communication tools etc.



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Remote Audit

Report Date: 06 08 2021

The Remote Surveillance Audit was conducted on 08 – 10 06 2021; 2 Auditors; 6 mandays. The purpose of this Audit is to evaluate the implementation, including effectiveness, and continuous compliance to MSPO requirements of BBC Plantations management systems. Assessments were done system documentation compliance, estates facilities and palm oil cultivation activities & operations. Information & data were systematically gathered & documented from online interviews, realtime photos as evidence & review of documentations and records.

There were only 2 findings classified as OFI [opportunity for improvements] on Criterion 4.4.5: Employment conditions & Criterion 4.5.2: Efficiency of energy use and use of renewable energy. Corrective action report was raised on 11 06 2021 and closed out on 25 07 2021.

During SVA02, the Auditors also determined that actions to be taken on findings in SVA01 had been implemented satisfactorily and in compliance with requirements of the Standards.

The Audit team had assessed that BBC Group of Plantations has continuously complied & conformed to MSPO Certification standards, conditions & requirements.

Conclusively, the Lead Auditor therefore recommended that BBC Group of Plantations Certification under MSPO Standards MS2530-3:2013 Part 3 – General Principles for Plantations & Organized Smallholders to be continued and maintained.

1.0. INFORMATION: CERTIFICATION ASSESSMENT		
1.1.	Type of Certification Assessment <input type="checkbox"/> Initial Certification / Main Audit	
	<input checked="" type="checkbox"/> Annual Surveillance Audit [Year 2]	
	<input type="checkbox"/> Re-certification Audit	
1.2.	Scope of MSPO Certification <input checked="" type="checkbox"/> Production of Sustainable Fresh fruit Bunch from:	
	Total Planted Areas	Total Certified Areas
	BBC Group of Plantations	11,682.49 HA
1.3.	MSPO Standards <input checked="" type="checkbox"/> PART 3: MS2530-3:2013	
1.4.	Maps <input type="checkbox"/> Location	
	[Refer Attachments] <input type="checkbox"/> Boundary	
	<input type="checkbox"/> Topography	
	<input type="checkbox"/> Soil	
	Geographical Coordinates	Refer Information on Certified entity & Executive Summary



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Standard: MS 2530-3:2013

Remote Audit

Report Date: 06 08 2021

2.0. INFORMATION: CERTIFIED ENTITY

1.

INFORMATION		CERTIFIED ENTITY	
Company Name & Registration No:		Hong-Yet Plantation Sdn. Bhd. (1005120W)	
Main Address:		Lot 16433, Junction 5 Commercial Centre, Mile 5, Jalan Tun Hussein Onn, 97000 Bintulu, Sarawak.	
Site Name:		Hong-Yet Plantation Sdn Bhd	
Primary Function:		<input checked="" type="checkbox"/> Plantation/Organized Smallholders	
Site Address:		Block 44 & 45, Lot 19, 33, 83, 86 & 91, Kemena Land District, 97000 Bintulu, Sarawak.	
Management Contact Details			
1.	Name: Amran Bin Alam	Job Title: Estate Manager	
	Mobile: 010-5439126	Tel: 016-8796805	Email: amran.alam@bbcgroup.com.my
2.	Name: Mohamad Firdaus Bin Ibrahim	Job Title: Internal Auditor	
	Mobile: 012-8814524	Tel: 086-351881	Mobile: 012-8814524
Headcount: 19		Local: 10	General Workers: 9 Total: 19
MS 2530-3:2013 General Principles for Plantations & Organized Smallholders			
MPOB License No: 6189 0200 2000		Expiry Date: 30 11 2021	
Scope of Activity: Sell and move Fresh Fruit Bunches (FFB)			
Date of Establishment: 07 06 2012		Geo-Coordinates: 3°03'11.1"N 113°04'34.2"E	
Certified Area: 322.26 HA		Planted Area: 315.57 HA	
FFB Production (actual) 2020: 4,129.02 MT		FFB Production (estimate) 2021: 6,120 MT	
Sources of FFB: Own Estate		Main FFB purchaser: BBC Palm Oil Mill Sdn Bhd	
No of Planting Blocks: 11		No of Palm trees [stand count]: 37,653	
Palm Species: DXP		Age Range of Palm Trees: 2011 - 2019	
Topography: Flat		Soil Type: Shallow Peat & Mineral	
Land Status: Ownership:		<input type="checkbox"/> Rented	<input type="checkbox"/> Own Land <input checked="" type="checkbox"/> Joint Venture
Validity/Date of Certification: 01 01 2019 to 31 12 2023		Other Sustainability Certification: NA	

2.

INFORMATION		CERTIFIED ENTITY	
Company Name & Registration No:		Almabumi Plantation Sdn Bhd (406039-X)	
Main Address:		Lot 16433, Junction 5 Commercial Centre, Mile 5, Jalan Tun Hussein Onn, 97000 Bintulu, Sarawak.	

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Standard: MS 2530-3:2013

Remote Audit

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Site Name:	Sungai Estate		
Primary Function:	<input checked="" type="checkbox"/> Plantation/Organized Smallholders		
Site Address:	Lot 20 & 23, Block 44, Sungai Segan, Kemena Land District, 97000 Bintulu, Sarawak.		
Management Contact Details			
1.	Name: Amran Bin Alam	Job Title: Estate Manager	
	Mobile: 010-5439126	Tel: 016-8796805	Email: amran.alam@bbcgroup.com.my
2.	Name: Mohamad Firdaus Bin Ibrahim	Job Title: Internal Auditor	
	Mobile: 012-8814524	Tel: 086-351881	Mobile: 012-8814524
Headcount: 82	Local: 36	General Workers: 46	Total: 82
MS 2530-3:2013 General Principles for Plantations & Organized Smallholders			
MPOB License No: 531770002000		Expiry Date: 31 07 2022	
Scope of Activity: Sell and move Fresh Fruit Bunches (FFB)			
Date of Establishment: 14 10 1996		Geo-Coordinates: 3°03'55.2"N 113°03'34.0" E	
Certified Area: 2136.85 Ha		Planted Area: 2002.56 Ha	
FFB Production (actual) 2020: 48,347.83 MT		FFB Production (estimate) 2021: 52,000 MT	
Sources of FFB: Own Estate		Main FFB purchaser: BBC Palm Oil Mill Sdn Bhd	
No of Planting Blocks: 47		No of Palm trees [stand count]: 256,284	
Palm Species: HRU		Age Range of Palm Trees: 2007 - 2019	
Topography: Flat, Low-lying & Hilly		Soil Type: Shallow Peat & mineral	
Land Status: Ownership:		<input type="checkbox"/> Rented	<input checked="" type="checkbox"/> Own Land <input type="checkbox"/> Joint Venture
Validity/Date of Certification: 01 01 2019 to 31 12 2023		Other Sustainability Certification: NA	

3.

INFORMATION		CERTIFIED ENTITY	
Company Name & Registration No:		Almabumi Plantation Sdn Bhd (406039-X)	
Main Address:		Lot 16433, Junction 5 Commercial Centre, Mile 5, Jalan Tun Hussein Onn, 97000 Bintulu, Sarawak.	
Site Name:		Bukit Estate	
Primary Function:		<input checked="" type="checkbox"/> Plantation/Organized Smallholders	
Site Address:		Lot 20 & 23, Block 44, Sungai Segan, Kemena Land District, 97000 Bintulu, Sarawak.	
Company Name & Registration No:		Almabumi Plantation Sdn Bhd (406039-X)	
1.	Name: Peter Wan	Job Title: Estate Manager	
	Mobile: 017-8978916	Tel: 016-8796801	Email: peter.wan@bbcgroup.com.my
2.	Name: Mohamad Firdaus Bin Ibrahim	Job Title: Internal Auditor	
	Mobile: 012-8814524	Tel: 086-351881	Mobile: 012-8814524



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Headcount: 108	Local: 42	General Workers: 66	Total: 108
MS 2530-3:2013 General Principles for Plantations & Organized Smallholders			
MPOB License No: 531770002000		Expiry Date: 31 07 2022	
Scope of Activity: Sell and move Fresh Fruit Bunches (FFB)			
Date of Establishment: 14 10 1996		Geo-Coordinates: 3°01'26.2"N 113°03'47.5"E	
Certified Area: 2263.15 Ha		Planted Area: 2095.30 Ha	
FFB Production (actual) 2020: 43,045.33 MT		FFB Production (estimate) 2021: 48,900 MT	
Sources of FFB: Own Estate		Main FFB purchaser: BBC Palm Oil Mill Sdn Bhd	
No of Planting Blocks: 59		No of Palm trees [stand count]: 213,413	
Palm Species: HRU/UP, UP/101, FYG/SK		Age Range of Palm Trees: 2006 - 2019	
Topography: Hilly		Soil Type: Mineral	
Land Status: Ownership:		<input type="checkbox"/> Rented	<input checked="" type="checkbox"/> Own Land
Validity/Date of Certification: 01 01 2019 to 31 12 2023		Other Sustainability Certification: NA	

3.0. ASSESSMENT METHODOLOGY

This certification assessment is a SAMPLING process where management systems effectiveness & efficiency are confirmed via an audit trail that the Auditor established to make an accurate conclusion.

Information gathering	<ul style="list-style-type: none"> ICT tools and audit medias in use during this Audit include zoom meetings, google drive for uploading documents, emails, whatsapp chat group for Auditors & Auditees [clients] personnel, postings of realtime photographs evidence and other relevant virtual communication tools etc.
Data collection	
Assessment method	<p>Paper</p> <ul style="list-style-type: none"> Assessing past implementations from records, reports of the management system <p>Practice</p> <ul style="list-style-type: none"> Assessing current implementation from evidence collection on current practices <p>People</p> <ul style="list-style-type: none"> Assessing future maintenance from interviewing online the auditee personnel on understanding & assessing competencies.

Surveillance Audit		Audit Findings Classification
Term	Meaning	Description
YES	Compliance	<ul style="list-style-type: none"> Fulfilled requirement of audited standard



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OFI	Opportunity for improvements	• Demonstrate conformity. There are, however, improvement opportunity identified that will benefit the organization
NO (minor NC)	Minor non conformity	• Non-compliance to standard requirements or company's SOP; or are issues that when combined, jeopardized the functioning of the system
NO (major NC)	Major non conformity	• Demonstrate absence or total breakdown of system to meet standard requirement, or a number of minor NC against a clause of standard requirements / at a particular area of last assessment that are not effectively addressed will be classified as major NC.

4.0. ASSESSMENT PROCESS

The assessment process was preceded by/with **Risk Assessment of the certified entity** to determine that the Audited Entity qualify to be audited vide **Remote Audit**. BQAS had assessed that surveillance audit 02 of BBC Group of Plantations is classified as **low risk**.

4.1. AUDIT TEAM

Assessment Year	Name	Role
Surveillance Year 02	Wilfred Landong	Lead Auditor
	Duke Ladin	Auditor

4.2. AUDIT PLAN

4.2.1. AUDIT OBJECTIVES

Surveillance Audit Year 02

- Changes to the certified client and its management system
- Verification of continuous management system implementation
- Review of effectiveness of measures arising from the previous audit (if applicable)
- Confirmation of fulfillment of certification requirements
- Enquiries on aspects of certification (Complaints)
- Review of any client's statements with respect to its certified operations (promotional material, website, use of BQAS logos and marks, use of the certificate)
- Customer specific requirements



4.2.2. ASSESSMENT SITES / PROGRAMS / PARAMETERS

MS2530-3:2013 | General Principles for Plantations & Organized Smallholders

4.2.2.1. Assessment Sites

Remote Assessments were performed on:

- Documentations & records
- Estate – field sites / activities
- Estate – processes, stores, waste & water management, workshop and related facilities
- Staff facilities – housing, amenities etc.

4.2.2.2. Assessment Program

Date: 08 – 10 06 21

No of Auditors: 2

No of Mandays: 6

- | | |
|-------|--|
| Day 1 | <ul style="list-style-type: none"> • Opening Meeting • Review Certification Audit Report Year 02 • Documentation Audit / Record Review |
| Day 2 | <ul style="list-style-type: none"> • Estates – facilities review (chemical, schedule waste stores, workshop, etc.) • FFB evacuation • Assessment/review of staff/workers housing & living conditions, facilities & amenities, domestic waste treatment etc. |
| Day 3 | <ul style="list-style-type: none"> • Documentation Audit continued • Closing meeting • Presentation of Audit Checklist / Report |

4.2.2.3. Assessment Parameters

- Evaluate implementation, including effectiveness of the management system
- Information & evidence about conformity to all requirements
- Performance monitoring, measuring, reporting
- Reviewing against key performance objectives & targets
- Performance as regards legal compliance
- Operational control of the client's process
- Internal auditing & Management review
- Management responsibilities for policies
- Links between the normative requirements, policy
- Competence of personnel
- Customer specific requirements
- Traceability of FFB
- Use of PPE / Safety & Health training program



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- Revisit other points/areas of buffer zone, Riparian reserves, boundaries
- Implementation of Policies & procedures at all stores (fertilizer, chemical, schedule waste store)
- Improvements to workers' quarters – health & safety
- Infrastructure / roads & drainage / natural water management
- Continuous improvement plan & implementation
- Implementation of Best practices
- Implementation of environmental management

5.0. SURVEILLANCE ASSESSMENT

5.1. AUDIT REPORT

Standard(s):	<input type="checkbox"/> MS 2530-1	<input type="checkbox"/> MS 2530-2	<input checked="" type="checkbox"/> MS 2530-3
Other Standard and/or Edition:	Nil		

PRINCIPLE 1 MANAGEMENT COMMITMENT & RESPONSIBILITY

Criterion 4.1.1: Malaysian Sustainable Palm Oil (MSPO) Policy

Indicator	Requirement	Compliance	Findings
4.1.1.1	A policy for the implementation of MSPO shall be established.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	BBC Group MSPO Policy established; signed and approved by Managing Director. Date Adopted: 20 October 2017 Date Revised: 16 November 2020 Policy is written in dual language
4.1.1.2	The policy shall also emphasize commitment to continual improvement.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<u>Quote</u> Last paragraph of policy statement Our Mission is to strive for continual improvement by maximizing production through new technologies implementation in order to ensure the continuous production of oil palm product in a sustainable manner. <u>Unquote</u>

Criterion 4.1.2: Internal audit

Indicator	Requirement	Compliance	Findings
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4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence doc ref APSE-SUS-P1-01 BBC had established and documented a 5 years Action Plan for Internal Audit [in accordance to MSPO certification period]
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	IA SOP is documented Ref APSE-SUS-M1-10 00 01/06/2018. Internal Audit Report doc ref IAR/APBE&HYP/20/01 dated 11 11 20 noted. Well documented and evaluated, followed by the identification of strengths and root causes of nonconformities.
4.1.2.3	Report shall be made available to the management for their review.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	IA Report noted to be reviewed on 13th November 2020 in a meeting chaired by the Estate Manager

Criterion 4.1.3: Management review

4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	MR is conducted annually. Evidence noted. Noted in the management review [13 11 2020] minutes of meeting a comprehensive review was conducted on all MSPO principles with various recommendations on improvements and action to be taken.
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Criterion 4.1.4: Continual improvement

4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	The Action Plan for continuous improvement is documented vide doc ref APSE-SUS-P1-02 02 dated 02/01/2021. Consideration of the main social and environmental impact and opportunities of the company is well documented from item 10 to item 27 of the action plan.
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4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology, where applicable, that are available and feasible for adoption.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted in the documented CIP 2020 a system is established. The estate also aimed to obtain the International Sustainability & Carbon Certification (ISCC) for the estate. To ensure Estate operation is based on best agriculture practice Quality check report is carried out daily by the Field conductor and QA/QC Inspector using PMMP system [this is a new technique / technology]
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Training and skills upgrading are comprehensively planned and established in the action plan [CIP] Documented in Point No 1 to 10 of the CIP

PRINCIPLE 2 TRANSPARENCY

Criterion 4.2.1: Transparency of information and documents relevant to MSPO requirements

Indicator	Requirement	Compliance	Findings
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted the estate maintain ✓ REQUESTS & RESPONSES LOGBOOK To record and communicate information requested by the relevant stakeholders
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Lists of publicly available management documents are listed in doc ref APSE-SUS-G2-02 01 dated 01/01/2018 7 documents are listed.

Criterion 4.2.2: Transparency method of communication and consultation



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4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Doc ref APSE-SUS-M2-01 Rev 01 02/01/2020 is the established SOP for Consultation and Communication with the Relevant Stakeholders. Noted and verified.
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Thein Fat Ho, Estate, Senior Asst. Manager is appointed as Communication and Consultation Coordinator.
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders is maintained in doc ref APSE-SUS-G2-03 01 dated 01/01/2018 List revised on 01 01 2020; listed 309 stakeholders

Criterion 4.2.3: Traceability

4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	The standard operating procedure to comply with the requirements for traceability is doc ref APSE-SUS-M2-03 Rev 01 dated 02/01/2020; well documented. Approved by Estate Manager
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	The management had established and put to use Traceability Inspection Report doc ref APSE-SUS-F2-01 dated 01 01 19 in conducting inspections. This complemented the daily work reports of the Field Conductors
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Normawati Binti Mohamed had been appointed as the Estate Traceability Officer since 16 07 2018
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI	The Estate sells its FFB to sister company BBC Palm Oil Mill. Records maintained include Weighbridge



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	<input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Advice ticket & FFB delivery Note. Sample of these are noted as follows ✓ WAT No 906961 dated 17 04 2021 ✓ FFB DN No 87186 dated 17 04 2021
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PRINCIPLE 3 COMPLIANCE TO LEGAL REQUIREMENTS

Criterion 4.3.1: Regulatory requirements

Indicator	Requirement	Compliance	Findings
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Based on evidence submitted All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. All operating licenses are valid
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirement register.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Legal Register (Sungai Estate & Hong-Yet Plantation) - Updated 1st Quarter 2021 listed 32 main laws and regulation related to OPMS [oil palm management system]
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidenced that the legal requirements register is updated as and when there are any new amendments or any new regulations coming into force. Last update was on March 2021
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted that on 13th November 2017 Mohamad Firdaus Bin Ibrahim was appointed as Malaysian Sustainable Palm Oil (MSPO) Legal Coordinator

Criterion 4.3.2: Land use rights

4.3.2.1	The management shall ensure that their oil palm cultivation activities do not	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI	Evidence provided indicate that the oil palm cultivation activities of the 3 plantations do not diminish the land
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	diminish the land use rights of other users.	<input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	use rights of other users [the surrounding communities and adjacent landowners]
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Hong Yet Estate is a JV development with local community landowners and legalized via rental agreement dated 14 08 2018.</p> <p>For the other 2 estates, the land is owned by BBC-Almabumi Sdn Bhd with particulars of land title as follows:</p> <ul style="list-style-type: none"> ✓ Kemena land Lot no 20, Block 44, 40068.8 ha ✓ Land title No: H14-19-03 [1.3] & B9 9/28 ✓ Expiry of lease on 17 11 2063
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Noted from photo evidence given</p> <p>Legal perimeter boundary markers are demarcated and visibly maintained on the ground using Land and Survey approved pegs. Sample peg Boundary No1 @ Geo coordinates N03'03.531' E113'04.346'</p>
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>No evidence of any previous disputes on land acquisition.</p> <p>Noted in documents provided all agreements are fair to both parties and legally enforceable.</p>

Criterion 4.3.3: Customary rights

4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Noted in legal documents provided where lands are encumbered by customary rights, these parcels of land are alienated with no intrusion to the rights of the original landowners.</p>
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4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted various maps an appropriate scale showing extent of recognized customary rights submitted as evidence.
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted that these are all incorporated into terms and clauses of the legally enforceable agreements.

PRINCIPLE 4 SOCIAL RESPONSIBILITY, HEALTH, SAFETY & EMPLOYMENT CONDITIONS

Criterion 4.4.1: Social impact assessment (SIA)

Indicator	Requirement	Compliance	Findings
4.4.1.1	Social impacts should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Social Impact Assessment (SIA) for BBC Plantation Group of Companies was conducted from 4th September 2017 until 2nd October 2017 Noted in the SIA Report that social impacts are identified and plans are implemented to mitigate the negative impacts and promote the positive ones.

Criterion 4.4.2: Complaints and grievances

4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence A system for dealing with complaints and grievances is established and documented; doc ref Complaints & Grievance Procedure APSE-SUS-M4-01 Rev 2 dated 08 06 21
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	This is documented on item 5 of the procedure captioned as COMPLAINTS / GRIEVANCES HANDLING PROCEDURE FLOWCHART



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4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Complaint and suggestion form [in dual language] is noted in Doc No: APSE-SUS-F4-01b; Made available and placed at suggestion box of estate office
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	BBC Plantation communicate to employees and the surrounding communities as follows: Cara Membuat Cadangan / Aduan Kepada BBC Plantation Sdn Bhd <ul style="list-style-type: none"> ✓ Hubungi Hotline: 013-833 2924 (Waktu Pejabat – Hari Kerja) ✓ Emailkan Cadangan / Aduan anda ke admin@bbcgroup.com.my ✓ Masukkan Cadangan / Aduan bertulis anda ke peti cadangan kami yang berdekatan. Sila nyatakan Nama, Tarikh & Masa, No. Tel dan Cadangan & Aduan anda. Borang Cadangan / Aduan juga boleh didapati di pejabat kami yang berdekatan.
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted under 5 b of the COMPLAINTS / GRIEVANCES HANDLING PROCEDURE FLOWCHART All Complaints and Grievances records shall be retained for a minimum of 24 months and be made available to affected stakeholders upon request.

Criterion 4.4.3: Commitment to contribute to local sustainable development

4.4.3.1	Growers should contribute to local development in consultation with the local communities.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI	Noted evidence submitted:
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		<input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	18 CSR programs were implemented and 8 of them were contribution to development with local communities.
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidenced that the following had been effectively communicated and implemented. <ul style="list-style-type: none"> ✓ Occupational Safety & Health Policy signed by MD dated 20 10 17 ✓ Occupational Safety and Health Plan 2021 doc ref APSE-SUS-P4-02 Rev 02 02/01/2021
4.4.4.2	The occupational safety and health plan shall cover the following:		
A.	A safety and health policy, which is communicated and implemented.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence noted: Occupational Safety & Health Policy signed by MD dated 20 10 17 are posted at Notice boards and offices of the estates
B.	b) The risks of all operations shall be assessed and documented	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence: The risks of all operations are assessed and documented vide Risk Assessment Report doc ref JKKP IH 127/171-2 [71]-2017/02 dated 05 02 18; covering the period Feb 2018 – 2023; done by Synergy Consultant.
C.	An awareness and training program which includes the following requirements for employees exposed to pesticides:		
C.1	All employees involved shall be adequately trained on safe working practices; and	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	All employees involved shall be adequately trained on safe working practices Evidence noted



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			<ul style="list-style-type: none"> ✓ Training reports [with attendance list, type training, photos] conducted on 20 09 2019 & 11 10 2019
C.2	All precautions attached to products shall be properly observed and applied.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>All precautions attached to products are properly observed and applied.</p> <p>Evidence given:</p> <p>Safety data sheets covering all products; made available in all stores in the estate</p>
D.	The management shall provide the appropriate personal protective equipment (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).	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Noted evidence as follows:</p> <ul style="list-style-type: none"> ✓ PPE Issuance record forms doc ref APSE-MS-F4-06 ✓ Real time photos of plantation workers at work using PPE
E.	The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Evidence noted:</p> <p>SOP for Chemical Handling (Herbicide & Pesticide) doc ref APSE-SUS-M4-04 Rev 01 02/01/2020</p> <p>SOP contents are in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p>
F.	The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>The management had appointed Chia Yun Foo as the Representative responsible person(s) for workers' safety and health. Appointment letter dated 06 02 2020</p>
G.	The management shall conduct regular two-way communication with their	<input checked="" type="checkbox"/> Compliance	<p>Evidence noted:</p>



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	employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meetings are kept and the concerns of the employees and any remedial actions taken are recorded	<input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<ul style="list-style-type: none"> ✓ MINIT MESYUARAT JKPP SUKU KE-EMPAT (4), 2020 28 Dec 2020; chaired by Estate Manager; attended by 11 other employee representatives ✓ This meeting conducted quarterly
H.	Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence noted: Accident & Emergency Preparedness and Response SOP doc ref APSE-SUS M4-05 Rev 01 dated 02/01/2020
I.	Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence: <ul style="list-style-type: none"> ✓ 17 estate staff are trained 1st Aiders. All attended Refresher Training on 09 -10 01 21 ✓ Ref doc First Aid Kit Inspection Form APSE-SUS-F4-09. Last inspection done on 02 01 2020 ✓ 12 units of First Aid Kit are made available in the estate
J.	Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence noted <ul style="list-style-type: none"> ✓ Records of Accidents are maintained; doc ref APSE-SUS-F4-03 Incident Investigation Form; 1 accident reported on 13 03 20. ✓ MYKKP Report Bagi Kalendar Tahun: 2020 noted to be submitted on 27 01 2021

Criterion 4.4.5: Employment conditions

4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor	Noted evidence <ul style="list-style-type: none"> ✓ Good Social Practices Policy established; approved by
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	harmony. The policy shall be signed by the top management and effectively communicated to the employees.	<input type="checkbox"/> NC - Major	MD on 20 10 2017; policy in dual language
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, color, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence ✓ Employment Policy established; approved by MD on 20 10 2017; policy in dual language
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence ✓ BBC Group subscribe to the Minimum Wage Order [Federal Government Gazette 2020 / 10/10/20] ✓ Sample payslip of AGUSTUS USMAN (AS0701001) HARVESTER Net Pay: 2,012.55 for Mar 21 Socso No.: 20200141 1274
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Not applicable as the Estates do not engage Contractors
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence given: BBC PLANTATION EMPLOYEE REGISTRATION DETAILS UPDATED: 30/4/2021 Noted that all required detailed record of 174 estate employees are accurately and comprehensively documented in the above record.
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor	Noted evidence KONTRAK PENGAJIAN between management and JUWITA TINO [TKI]



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	each and every employee indicated in the employment records.	<input type="checkbox"/> NC - Major	Terms and conditions fair and signed by both parties.
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence <ul style="list-style-type: none"> For office staff punch card system is used as time recording system For field workers the checkroll system is used
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence Doc ref ESTATE WORKING HOURS is spelt out in a memo dated 05 11 2018 signed by the MD; 8 hours/day with lunch and breaks; in compliance with legal regulations Overtime hours are compensated according to prescribed legal rates
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence noted: Payslip for March 2021 of AGUSTUS USMAN (AS0701001) HARVESTER; wages and overtime payments are in compliance with legal regulations
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence submitted Employees are given <ul style="list-style-type: none"> Harvesters' incentive [provisions] Family day social events Bonuses Medical care Etc.
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence given: <ul style="list-style-type: none"> ✓ Real time photos of housing / quarters for staff and workers; noted to be habitable; with basic amenities of treated water and electricity and in compliance with the Workers' Minimum Standards



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			Housing and Amenities Act 1990 (Act 446)
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Sexual Harassment and Violence Policy is established; signed and approved by MD dated 20 10 2018.
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.	<input type="checkbox"/> Compliance <input checked="" type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	There is no documented evidence to suggest whether or not the management disallow or allow workers to form union. Note Suggest a documented management policy be established on this criterion.
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence From the Employee register there is no evidence of child / underage labor being employed in the estate

Criterion 4.4.6: Training and competency

4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training program (appropriate to the scale of the organization) that includes regular assessment of training needs and	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence of compliance: Doc ref APSE-SUS-F4-05 is the document to record training being conducted; record sighted and training report documented / with photos.
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	documentation, including records of training shall be kept.		
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training program in order to provide the specific skill and competency required to all employees based on their job description.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	TNA is documented in doc ref ALMABUMI PLANTATION SDN BHD (SUNGAI ESTATE) & HONG-YET PLANTATION SDN BHD TRAINING NEEDS 2021 dated 02 01 2021; 12 types of training and 12 categories of employees identified.
4.4.6.3	A continuous training program should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence ALMABUMI PLANTATION SDN BHD (SUNGAI ESTATE) & HONG-YET PLANTATION SDN BHD ANNUAL TRAINING PROGRAMME FOR YEAR 2021 14 categories of Training are planned to be conducted for Year 2021; each calendar month will have training program conducted.

PRINCIPLE 5 ENVIRONMENT, NATURAL RESOURCES, BIODIVERSITY & ECOSYSTEM SERVICES

Criterion 4.5.1: Environmental management plan

Indicator	Requirement	Compliance	Findings
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence posted Environment Policy and management plan had been developed, effectively communicated and implemented; signed and approved by MD dated 20 10 2017
4.5.1.2.	The environmental management plan shall cover the following:		
A.	An environmental policy and objectives	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Environment Policy and objectives documented; signed and approved by MD dated 20 10 2017



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B.	The aspects and impacts analysis of all operations.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Noted evidence</p> <p>The aspects and impacts analysis of all operations is documented in the Environmental Management Plan doc ref APSE-SUS-P5-01 Rev 02 02/01/2021</p>
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Noted evidence</p> <p>An environmental improvement plan is documented in doc ref APSE-SUS-P5-02 02 02/01/2021</p>
4.5.1.4	A program to promote the positive impacts should be included in the continual improvement plan.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Noted evidence</p> <p>Programs to promote positive impacts are noted in the continual improvement plan [CIP 2021]</p>
4.5.1.5	An awareness and training program shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Noted evidence</p> <p>This is noted in the ALMABUMI PLANTATION SDN BHD (SUNGAI ESTATE) & HONG-YET PLANTATION SDN BHD ANNUAL TRAINING PROGRAMME FOR YEAR 2021</p>
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Evidence</p> <p>The last meeting held was: MESYUARAT AHLI JAWATANKUASA ALAM SEKITAR UNTUK TAHUN 2020 dated 31 Dec 2020 attended by 11 committee members; chaired by Estate Manager.</p>

Criterion 4.5.2: Efficiency of energy use and use of renewable energy

4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Noted evidence</p> <p>Estate had established a monthly monitoring chart to record trend of diesel consumption. Key indicators noted</p> <ul style="list-style-type: none"> ✓ Baseline value @ 25,000 liters per month
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	fuel, electricity and energy efficiency in the operations over the base period.		✓ Figures indicate consumption trending downwards in 2021 and well below baseline value
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted Evidence All estates had established a Diesel Movement Report which record estimates, budget and actual direct usage of non-renewable energy
4.5.2.3	The use of renewable energy should be applied where possible.	<input type="checkbox"/> Compliance <input checked="" type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	No evidence is posted to indicate any plan on use or application of renewable energy. Note BBC estates may consider use of solar power to generate renewable energy
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	waste products and sources of pollution shall be identified and documented.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Waste Products and Sources of Pollution is well identified and documented in doc ref APSE-SUS-G5-05 Rev 01 01/08/2018
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Waste Management Plan 2021 is developed and implemented; ref doc APSE-SUS-P5-03 Rev 02 02/01/2021
A	Identifying and monitoring sources of waste and pollution	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Sources of waste and pollution in the respective work areas are comprehensively documented in the Waste Management Plan 2021
B.	Improving the efficiency of resource utilization and recycling of potential	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI	Evidence



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	wastes as nutrients or converting them into value-added by-products.	<input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Improving the efficiency of resource utilization and recycling of potential wastes as nutrients are comprehensively documented in the Waste Management Plan 2021
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	SOP on Labelling, Handling, Storage, Transfer and Disposal of Schedule Waste is documented; doc ref APSE-SUS-M5-01 Rev 01 02/01/2020 classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national program on recycling of used HDPE pesticide containers.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence given Documented in 6.2. g) of SOP All empty agrochemical containers shall be cleaned (triple rinse procedure) before storage. In order to prevent misuse, the lid or container cover shall be removed and kept at safe place. If the empty container is not to be used for other purposes (as storage for premix herbicide), where possible to punch hole to puncture and store at designated storage area.
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence SOP on Handling, Storage and Disposal of Common / domestic Waste is documented doc ref APSE-SUS-M5-03 Rev 00 01/06/2018 Domestic wastes are disposed at a landfill / dumpsite located within the plantation. [photo evidence]

Criterion 4.5.4: Reduction of pollution and emission

4.5.4.1	An assessment of all polluting activities shall be conducted, including	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI	Evidence Assessment of all polluting activities is well documented in the
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	greenhouse gas emissions, scheduled wastes, solid wastes and effluent.	<input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Environmental Monitoring Report Almabumi Oil Palm Plantation, Bintulu July – December 2020; including calculations of greenhouse gas emissions
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Action Plan to Reduce Identified Significant Pollutants 2021 is established and is well documented in doc ref APSE-SUS-P5-04 Rev 02 02/01/2021

Criterion 4.5.5: Natural water resources

4.5.5.1.	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Water Management Plan 2021 is established; doc ref APSE-SUS-P5-05 Rev 02 02/01/2021
A	Assessment of water usage and sources of supply.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Monthly water usage records and sources of supply for Almabumi Plantation Sdn Bhd & Hong-Yet Plantation Sdn Bhd is assessed on a monthly basis. Tabulation chart noted. Water consumption trend chart had been recorded since 2016
B	Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Documented in the WMP: item 2: The water quality of river/streams in and around the estate shall be monitored periodically. The water quality shall be maintained and/or improved to Class IIB of the National Water Quality Standard (NWQS) of Malaysia. Relevant parameters to be monitored are PH, dissolved oxygen, biochemical oxygen demand,



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			chemical oxygen demand, total dissolved solid, total suspended solid, ammoniacal nitrogen, nitrate-nitrogen, phosphate, total coliform counts, fecal coliform counts and pesticides/herbicides.
C	Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Evidence</p> <p>Documented in the WMP: item 3: The location of all rainwater harvesting tanks in the staff quarters and line sites should be mapped to record their numbers, types and state of condition. This will enable the Management to institute prompt remedial action whenever any damage or leakages are detected through routine inspection or reported by the occupants of the quarters</p>
D	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along natural waterways within the estate.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Evidence</p> <p>Documented in the WMP: item 4: Rivers that need to have riparian buffer zone should first be identified according to their average width and demarcate for riparian maintenance according to the Department of Irrigation & Drainage guideline Photo evidence of protected riparian zone is noted.</p>
E	Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Evidence noted</p> <p>Action plan has been implemented and achieved the objective whereby:</p> <ul style="list-style-type: none"> The signboard "Rehabilitation of Riparian Reserve" has been placed at strategic reservation zone



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			<ul style="list-style-type: none"> • Heavy under growth such as ferns, grasses spotted along the banks of the river or creek or stream. • All staff and workers aware that to totally stop interline spraying and weeding for areas within the demarcated riparian buffer zones
F	Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	No bore well being constructed in the estates
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	There is no main rivers or waterways passing through an estate.
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Rain water harvesting and drain water harvesting is being practiced in the estate. Photo evidence noted

Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value area

4.5.6.1.	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:		HIGH CONSERVATION VALUE ASSESSMENT had been conducted in 2017 The assessment was carried out using WWF HCV Toolkit for Malaysia.
A	Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Doc ref is noted in Table 1: Findings from HCV Assessment and Recommendations
B	Conservation status (The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare,	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Doc ref is noted in Table 1: Findings from HCV Assessment and Recommendations



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	threatened, or endangered species), that could be significantly affected by the grower(s) activities.		
4.5.6.2.	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence of Action on RTES The HCVA have identified some high conservation value environmental components including Rare, Threatened and Endangered fauna as well as flora species, Riparian Zones, Steep slopes greater than 25 degrees and NCR lands. These HCV components should be preserved as recommended in Table 1 of this report as well as in the Executive Summary.
A	Ensuring that any legal requirements relating to the protection of the species are met.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence These HCV components are to be preserved as recommended in Table 1 of this report as well as in the Executive Summary. Posters of Totally Protected Wildlife species are posted in the estate notice boards
B	Discouraging any illegal or inappropriate hunting, fishing or collecting activities and developing responsible measures to resolve human-wildlife conflicts.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Signages are installed in the estate [No Hunting, No Fishing, Riparian Buffer Zone etc.]. Real time photo evidences are submitted
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence High Biodiversity Value Management Plan 2021 established; ref doc APSE-SUS-P5-06 Rev 02 02/01/2021
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor	Evidence Estate had established SOP on Planting and Replanting; ref doc APSE-SUS-M7-01 Rev 01 02/01/2020



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	specific situations, as identified in regional best practice.	<input type="checkbox"/> NC - Major	
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence These guidelines are documented in Item 4 of the SOP on Planting and Replanting; ref doc APSE-SUS-M7-01 Rev 01 02/01/2020
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence These guidelines are documented in Item 5 of the SOP on Planting and Replanting; ref doc APSE-SUS-M7-01 Rev 01 02/01/2020
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence These guidelines are documented in Item 6 of the SOP on Planting and Replanting; ref doc APSE-SUS-M7-01 Rev 01 02/01/2020

PRINCIPLE 6

BEST PRACTICES

Criterion 4.6.1: Site management

Indicator	Requirement	Compliance	Findings
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence 2 Site management documents noted ✓ SOP Best Management Practice Manual doc ref APSE-SUS-M6-01Rev 01 02/01/2020 ✓ Good Agricultural Practice / BBC Group Agricultural Policy Manual dated 01 11 19
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence Guidelines on this is documented in Section 7. Item 3.2 Planting on Hilly Terrain



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	erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.		In the HBV Assessment recommendation, it is also stated that hilly land with slope rating above 25 degrees are alienated [no planting activities and natural vegetation left undisturbed]
4.6.1.3	A visual identification or reference system shall be established for each field.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Photos [real time] of block markers [with Geo Coordinates] are submitted as evidence. Note Current block markers do not show complete information. Suggest BBC Plantation Group design Block Markers with commonality in all estates; incorporating BBC logo and MSPO logo
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence BBC Group Business management Plan documented; covering the period 2018 – 2022; signed by General Manager and Managing Director.
4.6.2.2	Where applicable, an annual replanting program shall be established. Long term replanting program should be established and review annually, where applicable every 3-5 years.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence Noted Replanting Guidelines & SOP are documented in the GAP Manual dated 01 11 2019 At this point no replanting program is required for all 3 estates
4.6.2.3	The business or management plan may contain:		
A	Attention to quality of planting materials and FFB.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence This is documented in detail in Chapter 1 – 3 of the Good Agricultural Policy Manual 01 11 2019



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B	Crop projection: site yield potential, age profile, FFB yield trends.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence This is documented in detailed in: BUDGET FOR FINANCIAL YEAR ENDING 28TH FEBRUARY 2022 HONG YET PLANTATION SDN BHD FFB OIL PALM PROFIT & LOSS ACCOUNT <ul style="list-style-type: none"> ✓ Yield per ha for 2021 projected @ 19.23MT ✓ Actual yield per ha for 2020 @ 16.45MT
C	Cost of production: cost per ton of FFB.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence This is documented in detailed in: BUDGET FOR FINANCIAL YEAR ENDING 28TH FEBRUARY 2022 HONG YET PLANTATION SDN BHD FFB OIL PALM PROFIT & LOSS ACCOUNT <ul style="list-style-type: none"> ✓ Cost of production per ton [COP] for 2021 estimated at RM190.17 ✓ Actual Cost of production per ton [COP] for 2020 at RM145.19
D	Price forecast	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence This is documented in detailed in: BUDGET FOR FINANCIAL YEAR ENDING 28TH FEBRUARY 2022 HONG YET PLANTATION SDN BHD FFB OIL PALM PROFIT & LOSS ACCOUNT <ul style="list-style-type: none"> ✓ Actual price FFB per ton for 2020 is RM463.75 ✓ Estimated price FFB per ton for 2021 is RM444.89
E	Financial indicators: cost benefit, discounted cash flow, return on investment.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Evidence This is documented in detailed in: BUDGET FOR FINANCIAL YEAR ENDING 28TH FEBRUARY 2022 HONG YET PLANTATION SDN BHD FFB OIL PALM PROFIT & LOSS ACCOUNT



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			<ul style="list-style-type: none"> ✓ Projected profit for 2021 @ RM859,129.00 ✓ Report profit for 2020 @ RM784,644.00
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Evidence</p> <p>Group management noted to meet and review performance every quarterly; and Estate hold progress meeting monthly</p> <p>A system is also in place for BBC HQ to be updated on FFB evacuation performance on a daily basis.</p>
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Evidence</p> <p>Doc ref</p> <p>Piece Rate Wages for Financial Year 2021/2022 APSE-SUS-G4-03 dated 01 03 2021; all products rates / services documented and implemented</p>
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	<p>Submitted evidence</p> <p>Hong Yet SB / G-Planters SB agreement. Noted that the agreement is fair and legally enforceable.</p>
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Not applicable as the Estate do not engage contractor
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Not applicable as the Estate do not engage contractor
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI	Not relevant for this remote Audit



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		<input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.	<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	Noted evidence Work completion report on road maintenance done by BBC Quarry on Jan 2021 signed by Estate Manager

PRINCIPLE 7 DEVELOPMENT OF NEW PLANTING

There is no development of new planting in all the estates in this Audit.

5.2. SUMMARY OF FINDINGS

Table:

Principles	P1	P2	P3	P4	P5	P6	Total
No of NC: Major	0	0	0	0	0	0	0
No of NC: Minor	0	0	0	0	0	0	0
No of OFI: Opportunity for Improvement	0	0	0	1	1	0	2
Total	0	0	0	1	1	0	2

Finding No 1. Principle 4

Criterion 4.4.5: Employment conditions

4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.	<input type="checkbox"/> Compliance <input checked="" type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	There is no documented evidence to suggest whether or not the management disallow or allow workers to form union. Note Suggest a documented management policy be established on this criterion.
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Finding No 2. Principle 5


Criterion 4.5.2: Efficiency of energy use and use of renewable energy

4.5.2.3	The use of renewable energy should be applied where possible.	<input type="checkbox"/> Compliance <input checked="" type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	No evidence is posted to indicate any plan on use or application of renewable energy. Note BBC estates may consider use of solar power to generate renewable energy
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5.3. AUDIT CONCLUSION

	Summary Statement of Auditor	Signature
	<p>The purpose of this Surveillance Audit Year 02 [remote audit] is to evaluate the implementation, including effectiveness, of BBC Group of Plantations management systems and that the requirement of the Standards MS2530-3:2013 is fulfilled.</p> <p>There are 2 findings categorized as OFI [opportunity for improvements]</p> <p>Overall, the OPMS of the 3 estates has fully conformed and complied with the requirements of the Standard and it is recommended that the Certification of BBC Group of Plantations be continuously maintained.</p> <p>Note: The findings are to be closed out as soon as possible.</p>	 Wilfred S Landong Date: 10 06 2021

5.4. ACKNOWLEDGEMENT BY CERTIFIED ENTITY

	Acknowledgement by Auditee	Job Title:	Signature
	This is to acknowledge and confirm the Remote Audit Assessments described in this Report and the Acceptance of the Contents and Findings in the said Audit Report.		 Name: Mohamad Firdaus b. Ibrahim Date: 11//06/2021



MSPO SURVEILLANCE CERTIFICATION REPORT Year 02: 2021



BBC Group of Plantations

BQAS CERTIFICATION [M] SDN BHD [1179994-X]

Ref No: BQ/BBCPLT/SVA2/06/21

Standard: MS 2530-3:2013

Remote Audit

Report Date: 06 08 2021

5.5. CORRECTIVE ACTION REPORTS & CLOSURE

Corrective Action Reports were raised on 10 06 2021

The Corrective Action Reports were closed out by Lead Auditor on 25 07 2021

CAR No 1.

	Certification Body: ACB MSPO 15 MSPO Certification Services	BBC Gr of Plantations	CORRECTIVE ACTION REPORT Remote Surveillance Audit YR 02 Date: 10 06 2021
	Standards: MS 2530-3:2013		CAR No: 1
1.	Findings	To be completed by Auditor	
	Principle: 5	Criterion: 4.4.5.13	
Criterion 4.4.5: Employment conditions			
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.	<input type="checkbox"/> Compliance <input checked="" type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	There is no documented evidence to suggest whether or not the management disallow or allow workers to form union. Note Suggest a documented management policy be established on this criterion
2.	Classification	To be completed by Auditor	
	<input type="checkbox"/> NC 1: Major non-conformity <input type="checkbox"/> NC 2: Minor non-conformity	<input checked="" type="checkbox"/> OFI: Opportunity for improvements	
	Type of follow up	<input checked="" type="checkbox"/> Document review [off-site audit]	<input type="checkbox"/> On-site audit
3.	Confirmation	To be completed by Client	
	Findings & classification are correct	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Date: 11/06/2021	Name: Mohamad Firdaus b. Ibrahim	Job Title: Internal Auditor
4.	Root cause[s] of NC or OFI	To be completed by Client	
	Remarks: Did not refer to the guidelines or elaboration of Indicators to fully understand the requirements stated in MSPO indicator 4.4.5.13		



MSPO SURVEILLANCE CERTIFICATION REPORT Year 02: 2021



BBC Group of Plantations



BQAS CERTIFICATION [M] SDN BHD [1179994-X]

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Standard: MS 2530-3:2013

Remote Audit

Report Date: 06 08 2021

5.	Corrective action taken (s)	To be completed by Client
	Remarks: To established a statement on the freedom to join a trade union and allow workers to have their own representative. Document evidence will be shown to the auditor during the next surveillance audit.	Signature: 
	Date: 21/07/2021 Name: Mohamad Firdaus Job Title: Internal Auditor	
6.	Closure of NC or OFI findings	To be completed by Lead Auditor
	Remarks: Proposed corrective action is noted. Documented evidence [Policy Statement] to be presented before next Surveillance Audit.	Signature
	Action for closing NC or OFI has been implemented and is found acceptable.	
	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
	Date: 25 07 2021	Name: Wilfred S Landong

CAR No 2.

	Certification Body: ACB MSPO 15 MSPO Certification Services	BBC Gr of Plantations	CORRECTIVE ACTION REPORT Remote Surveillance Audit YR 02 Date: 10 06 2021
	Standards: MS 2530-3:2013		CAR No: 2
1.	Findings	To be completed by Auditor	
	Principle:	Criterion:	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.3	The use of renewable energy should be applied where possible.	<input type="checkbox"/> Compliance <input checked="" type="checkbox"/> OFI <input type="checkbox"/> NC - Minor <input type="checkbox"/> NC - Major	No evidence is posted to indicate any plan on use or application of renewable energy. Note BBC estates may consider use of solar power to generate renewable energy
2.	Classification	To be completed by Auditor	
	<input type="checkbox"/> NC 1: Major non-conformity <input type="checkbox"/> NC 2: Minor non-conformity	<input checked="" type="checkbox"/> OFI: Opportunity for improvements	
	Type of follow up	<input checked="" type="checkbox"/> Document review [off-site audit]	<input type="checkbox"/> On-site audit
3.	Confirmation	To be completed by Client	
	Findings & classification are correct	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Date: 11/06/2021 Name: Mohamad Firdaus b. Ibrahim Job Title: Internal Auditor		



MSPO SURVEILLANCE CERTIFICATION REPORT Year 02: 2021



BBC Group of Plantations

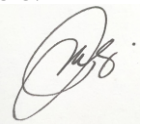

BQAS CERTIFICATION [M] SDN BHD [1179994-X]

Ref No: BQ/BBCPLT/SVA2/06/21

Standard: MS 2530-3:2013

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4.	Root cause[s] of NC or OFI	To be completed by Client
	Remarks: Estate didn't apply the use of renewable energy	
5.	Corrective action taken (s)	To be completed by Client
	Remarks: Management to identify and apply potential of using renewable energy if practical for new techniques or technology. Document evidence will be shown to the auditor during the next surveillance audit.	
	Signature: 	
	Date: 21/07/2021 Name: Mohamad Firdaus Job Title: Internal Auditor	
6.	Closure of NC or OFI findings	To be completed by Auditor
	Remarks:	
	Corrective Action taken is noted. Evidence to be presented before next surveillance Audit	
	Action for closing NC or OFI has been implemented and is found acceptable.	
	Signature 	
	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
	Date: 25 07 2021	Name: Wilfred S Landong



MSPO SURVEILLANCE CERTIFICATION REPORT Year 02: 2021



BBC Group of Plantations

BQAS CERTIFICATION [M] SDN BHD [1179994-X]


Ref No: BQ/BBCPLT/SVA2/06/21

Standard: MS 2530-3:2013

Remote Audit

Report Date: 06 08 2021

6.0. OFFICIAL SIGN OFF

6.1.	Assessment Recommendation by Lead Auditor	
		Signature
	<p>Based on the Findings/Action taken by Auditee/Closures above, BBC Group of Plantations had been able to demonstrate and improved on its continual compliance to and with requirements of the MSPO MS2530-3:2013 Standard: General Principles for Plantations & Organized Smallholders.</p> <p>Therefore, it is recommendation of the Audit team that the Certification of BBC Group of Plantations under MSPO MS2530-3:2013 Standard be maintained.</p>	 Wilfred S Landong Date: 30 07 2021

6.2. ASSESSMENT REVIEW BY TECHNICAL REVIEWER

CERTIFIER: STATEMENT & CONFIRMATION

I/the undersigned, being the Certifier, confirm that I have examined thoroughly all contents of the Report in its' entirety.

I confirm that, to the best of my knowledge the information and conclusions included in this report have been prepared in compliance with the Standards requirements; and done in good faith and that the Lead Auditor recommendations had been based upon this information. I, hereby confirm that, **BBC Group of Plantations** Certification under the Standard MS2530-3:2013 be maintained.

Signed:

Patrick Sibat Sujang
06 08 2021

7.0. CONCLUSION

7.1. CERTIFICATION: BQAS MANAGEMENT

In reference to MS 2530-3:2013, the BQAS Management hereby approved of:

- Issuance of the certificate.
- Issuance of the certificate as soon as implementation of corrective action(s) has been demonstrated.
- Maintenance of the certificate.**
- Maintenance of the certificate as soon as implementation of corrective action has been demonstrated.



7.2. PLAN FOR NEXT SURVEILLANCE AUDIT

SVA 03 – tentatively to be in March, 2022.

8.0. ATTACHMENTS

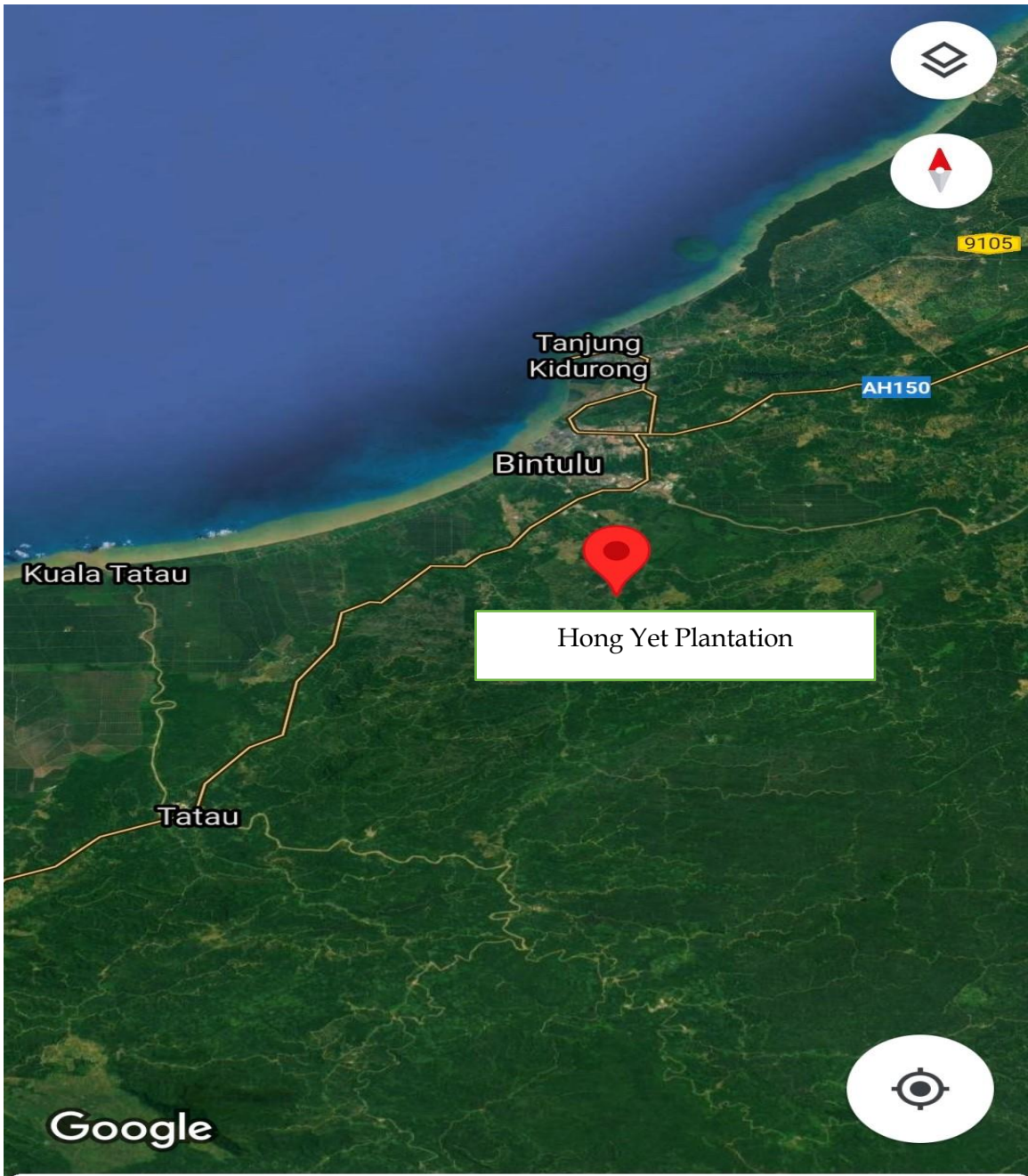
Hong Yet Plantation – Google Location Map

FOOTNOTES

All audit findings are based on a sampling process, targeted towards reliable evidence for effective implementation and compliance of the management system. Where applicable findings and required corrective action were or will be agreed upon with the responsible managers or management representatives, steps have been or will be defined to resolve such non-conformity. Further business aspects may exist, positive or negative, which have not been reviewed by the audit team. It is the organization's responsibility to investigate and evaluate the potential impact and scope of findings, thus continuously ensuring full compliance to the applied standard(s).



HONG YET PLANTATION SDN BHD - GOOGLE LOCATION MAP



3°03'11.1"N 113°04'34.2"E