

## Assessment Report

Date: 12 August To 13 August

2024

[**Disclaimer**: The audit report has been generated to reflect the compliance of the company toward the MSPO standard and every criterion's have been in every effort taken to ensure the accuracy of the assessment and reporting produced. As the assessment is been carried out based on sampling, certain areas or processes may not be able to verified on its compliances.]

MSPO 2530:2013 Part 3

ATLAS PLANTATIONS SDN BHD (GROUP) 1) Atlas Paloh Rubber Estate 2) Atlas Pagoh Muar Estate
MYMS2194703 EXPIRE 13/02/2024
12 JALAN BUKIT GEDONG, 75050 MELAKA.
MS24SM023
GROUPING
ON-SITE VERIFICATION (FIELD VISIT & DOCUMENTATION)
SURVEILLANCE If surveillance No.1

Thank you for your trustful cooperation during our audit of your organization. This report has been prepared of every effort to ensure the accuracy of the information recorded. The assessment is based on sampling on the records, practice, documents and personnel; therefore, the final results of the assessment is of representative towards the system implementation of the organization. This report is generated to record as much of the system implementation but may still limited due to the sampling. This report details the assessment results including strengths, opportunities, and weaknesses. These results were presented to your management at the closing meeting of the audit. You can use these results to improve the effectiveness of your management system. We look forward to continuing our partnership towards sustainable business success. This report has been prepared in compliance to the ISO 17021:2011 requirements.

To ensure the next assessment will be carry out in compliance to the ISO 17021:2011, please remember to immediately notify CARE Certification International about any significant change to your company at any point of time. Together we will then coordinate appropriate measures to maintain your current certification. Such circumstances include, for example, changes relating to the legal, commercial, organizational status or ownership, organization and management (e.g. key managerial, decision making or technical staff), contact address and sites, scope of operations under the certified management system, and major changes to the management system and processes. Together we CARE and will then ensure the smoothness of the upcoming assessment. Thank you for your persistence of support.

	Signed for on behalf of CCI	Signed for on behalf of client
Sign	A	
		Name:
		Designation:
Name	Aliff Abu Hurairah Abas	Company stamp
Date	13 August 2024	
Email	admin@cciglobe.com; w.hidney@cciglobe.com	
Fax no	038073 2688	

#### Confidentiality:

The Auditor shall not at any time during his/her assignment or after the completion of his/her assignment disclose to any person any information on business dealings practice or affairs of the establishment or the establishment's clients or any other matters which may come to the knowledge of the auditor by reason of his/her assignment. The Auditor agrees that the material term of this assignment is to keep all Confidential Information absolutely confidential and to protect its release to unauthorized party. The Auditor agrees not to divulge, reveal, report or use any of the Confidential Information which the Auditor has obtained or which was disclosed to the Auditor by the Client as result of the assessment for purposes other than to fulfil the audit objective.

#### Together, we CARE.

#### Section A Previous Audit Result

The result of the last audit system has been reviewed, in particular to ensure appropriate correction and corrective action has been implemented to address any nonconformities identified. This review has concluded that:

$\boxtimes$	No nonconformities have been raised during last assessment.
	Any nonconformities identified during last previous audit have been corrected and the corrective action
	continuous to be effective.
	The management system has not adequately addressed non conformity identified during previous
	audit activities and the specific issue has been re-defined in the nonconformity section of this report.

#### Section B Conclusion

The audit team conducted a process-based audit focusing on significant aspects/risk objectives required by the standard(s). The audit methodology used is based on 3P which were People, Paper and Practice. The audit team concludes and express

- CONGRATULATION and has
- CONGRATULATION however some processes need to address non-compliance(s) but others has
- SORRY and the organization has not established and maintained its management system in line with the requirements of the standard and
- $\boxtimes$  demonstrated
- not demonstrated

the ability of the system to systematically achieved agreed requirements within the scope of the organizations.

Base on the record, there is/are <u>5</u> unresolved issue. Therefore, the audit team recommends that based on the results of this audit and the system's demonstrated state of development and maturity, management system certification be:

- Granted (initial certification or recertification)
- Granted upon the acceptance of the noncompliance(s)
- Continued (surveillance)
- Continued (surveillance) upon the acceptance of the noncompliance(s)
- Withheld
- Suspend until satisfactory corrective action(s) is completed
- Others (please specify)

#### NOTE:

The assessment and recommendation for the initial or continue was based on random samples and therefore nonconformities may exist which have not been identified. All the pages should be attached if the organization wishes to copy and delivered to the interested party.

#### Section C (For Recertification only)

1	The company has demonstrated effective implementation and maintenance/improvement on its	🗌 Yes 🗌 No
	management system	
2	The internal audit program has been fully implemented and demonstrates its effectiveness as a	🗌 Yes 🗌 No
	tool for maintaining and improving the management system.	
3	The management review process demonstrates its capability to ensure the continuing suitability,	🗌 Yes 🗌 No
	adequacy and effectiveness of the management system	
4	Throughout the audit process, the management system demonstrates overall conformance with	🗌 Yes 🗌 No
	the requirements of the audit standard	

#### Section D Auditor and Auditees Names

CCI Assessors	Attendance during opening and closing meeting		
Team leader	Name	Designation	
Aliff Abu Hurairah Abas	Mr Azman Bin Abdul Halil	Atlas Paloh Rubber Estate	
Team member		Manager Atlas Paloh Rubber Estate Field	
Azman Daud	Yoharajen A/L Retnan	Staff	
Trainee auditor	Ms Raji A/P Vijayan	Atlas Paloh Rubber Estate	
	Mr Wong Wuey Wuen	Atlas Pagoh Muar Estate Manager	
Observer	Mr. Mohd Jeffri Bin Salih	Atlas Pagoh Muar Estate Field	
		supervisor	

#### Section E Audit Process Matrix

#### Next Audit Matrix (legend " $\boxtimes$ " plan to cover & covered, " $\square$ " for uncover)

Planned month & year	6/2023	8/2024	6/2025	6/2026	6/2027
Internal Audits	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$
Stakeholder consultation / survey	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$
Use of logo		$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$
Follow-up from previous audit finding		$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$
4.1 Management Commitment & Responsibility					
4.1.1 MSPO Policy	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$
4.1.2 Internal audit	$\square$	$\square$	$\boxtimes$	$\square$	$\square$
4.1.3 Management Review	$\square$	$\square$	$\boxtimes$	$\square$	$\square$
4.1.4 Continual Improvement	$\square$	$\square$	$\square$	$\square$	$\square$
4.2 Transparency		-		-	-
4.2.1 Transparency of information and documents relevant to MSPO requirements	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$
4.2.2 Transparent method of communication and consultation		$\boxtimes$	$\boxtimes$		$\boxtimes$

4.2.3 Traceability	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\square$
4.3 Compliance to legal requirements	_		_	-	
4.3.1 Regulatory requirements	$\boxtimes$	$\square$	$\boxtimes$	$\boxtimes$	$\boxtimes$
4.3.2 Land use rights	$\boxtimes$	$\bowtie$	$\boxtimes$	$\boxtimes$	$\boxtimes$
4.3.3 Customary rights	$\boxtimes$	$\square$	$\boxtimes$	$\square$	$\boxtimes$
4.4 Social responsibility, health, safety and employment of	ondition				
4.4.1 Social impact assessment (SIA)	$\boxtimes$	$\bowtie$	$\boxtimes$	$\boxtimes$	$\boxtimes$
4.4.2 Complaints and grievances	$\boxtimes$	$\square$	$\boxtimes$	$\boxtimes$	$\boxtimes$
4.4.3 Commitment to contribute to local sustainable development	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\bowtie$	$\boxtimes$
4.4.4 Employees safety and health	$\boxtimes$	$\square$	$\boxtimes$	$\boxtimes$	$\boxtimes$
4.4.5 Employment conditions	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\boxtimes$
4.4.6 Training and competency	$\boxtimes$	$\square$	$\boxtimes$	$\square$	$\boxtimes$
4.5 Environment, natural resources, biodiversity and ecos	system service	es			
4.5.1 Environmental management plan	$\boxtimes$	$\square$	$\square$	$\bowtie$	$\boxtimes$
4.5.2 Efficiency of energy use and use of renewable energy				$\boxtimes$	$\boxtimes$
4.5.3 Waste management and disposal			$\boxtimes$	$\boxtimes$	$\boxtimes$
4.5.4 Reduction of pollution and emission	$\boxtimes$			$\boxtimes$	$\boxtimes$
4.5.5 Natural water resources	$\boxtimes$	$\square$	$\boxtimes$	$\square$	$\boxtimes$
4.5.6 Status of rare, threatened, or endangered species					
and high biodiversity value area		$\boxtimes$		$\boxtimes$	$\boxtimes$
4.5.7 Zero burning practices	$\boxtimes$	$\square$	$\square$	$\bowtie$	$\boxtimes$
4.6 Best Practices	-	-	_	-	_
4.6.1 Site management	$\boxtimes$	$\square$	$\boxtimes$	$\square$	$\boxtimes$
4.6.2 Economic and financial viability plan	$\boxtimes$	$\square$	$\boxtimes$	$\square$	$\boxtimes$
4.6.3 Transparent and fair price dealing	$\square$	$\square$	$\square$	$\bowtie$	$\boxtimes$
4.6.4 Contractor	$\boxtimes$	$\square$	$\square$	$\bowtie$	$\boxtimes$
4.7 Development of new planting					
4.7.1 High biodiversity value	🗆 NA	🗌 NA	🗆 NA	🗆 NA	🗌 NA
4.7.2 Peat land	🗆 NA	🗌 NA	🗆 NA	🗆 NA	🗌 NA
4.7.3 Social and Environmental Impact Assessment	🗆 NA	🗆 NA	🗆 NA	🗆 NA	🗆 NA
4.7.4 Soil and topographic information	🗆 NA	🗆 NA	🗆 NA	🗆 NA	🗌 NA
4.7.5 Planting on steep terrain, marginal and fragile soils	🗆 NA	🗆 NA	🗆 NA	🗆 NA	🗆 NA
4.7.6 Customary land	🗆 NA	🗌 NA	🗆 NA	🗌 NA	🗌 NA
Group Member Audit Matrix (GROUPING Certification)	6/2023	8/2024	6/2025	6/2026	6/2027
Atlas Paloh Rubber Estate	$\boxtimes$	$\boxtimes$	$\boxtimes$	$\bowtie$	$\boxtimes$
Atlas Pagoh Muar Estate				$\boxtimes$	$\boxtimes$

#### Assessment man days for the next assessment: 7 md. Recertification: <u>4/2028</u> NOTE:

(i) Recertification should be carried out minimum 2 months prior to the expiry of the certificate

(ii) The Audit Programme shall include Stage 1 and Stage 2 audit, surveillance audits in the first, second, third and fourth years, and a recertification audit in the fifth year prior to expiration of certification.

(iii) The recommended minimum on-site audit duration for individual and group certification respectively, which includes the opening meeting, site auditing, document verification, and closing meeting as documented in ACB – OPMC 2, Issue 2, 04 September 2020.

(iv) Additional auditor days may be required for conducting post audit follow-up activities, such as verification on major non-conformities raised or addressing of any contentious stakeholder issues.

#### Section G Audit Summary

# Summary of Area Audited BUSINESS AREAS DETAILS OF AUDITED SUMMARY Auditor Date Time AA, AZM 12 August 2024 9.00am Opening Meeting introduction of the participants, including an outline of their roles; b) confirmation of the scope of certification;

 confirmation of the audit plan (including type and scope of audit, objectives and criteria), any changes, and other relevant arrangements with the client, such as the date and time for the closing meeting, interim meetings between the audit team and the client's management;

- d) confirmation of formal communication channels between the audit team and the client;
- e) confirmation that the resources and facilities needed by the audit team are available;
- f) confirmation of matters relating to confidentiality;
- g) confirmation of relevant work safety, emergency and security procedures for the audit team;
- h) confirmation of the availability, roles and identities of any guides and observers;
- i) the method of reporting, including any grading of audit findings;
- j) information about the conditions under which the audit may be premature terminated;
- confirmation that the audit team leader and audit team representing the certification body is responsible for the audit and shall be in control of executing the audit plan including audit activities and audit trails;
- I) confirmation of the status of findings of the previous review or audit, if applicable;
- m) methods and procedures to be used to conduct the audit based on sampling;
- n) confirmation of the language to be used during the audit;
- o) confirmation that, during the audit, the client will be kept informed of audit progress and any concerns;
- p) opportunity for the client to ask questions.

Auditor	Date	Time
AA, AZM	13 August 2024	5.00pm

**Closing Meeting** 

a) informing the client that the audit evidence collected was based on a sample of the information; thereby introducing an element of uncertainty

- b) the method and timeframe of reporting, including any grading of audit findings;
- c) the certification body's process for handling nonconformities including any consequences relating to the status of the client's certification;
- d) the timeframe for the client to present a plan for correction and corrective action for any nonconformities identified during the audit;
- e) the certification body's post audit activities;
- f) information about the complaint handling and appeal processes.
- g) any diverging opinion that are not resolved.
- h) opportunity for the client to ask questions.

#### **Executive Summary**

CARE Certification International (M) Sdn Bhd (CCI) is first private certification body originating from Malaysia, that been accredited by Standard Malaysia under the purview of Ministry of Science, Technology and

Innovation (MOSTI). CARE Certification International have been fully complying to ISO 17021. The company is established with CARE of the needs of system certification and training in mind and is one of the leading multi-sector certification body in Malaysia.

CARE Certification International (M) Sdn Bhd (CCI) has vast experience in conducting audits related to MSPO certification. It has certified more than hundred palm oil estates throughout Malaysia. CCI has obtained accreditation from Standards Malaysia for its MSPO certification scheme, holding certificate No. MSPO 28122017 CB 06 since 28 December 2017.

This assessment was conducted on 12-13 August 2024 The audit plan is included as Appendix 2 of this report. The approach to the audit was to treat the company as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 MSPO Part 3: General principles for oil palm plantations and organized smallholder was used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment. The computation of the sampling size is elucidated by the following formula as per table below.

This report will be externally reviewed by MSPO approved Peer Reviewer prior to certification decision by CARE Certification International (M) Sdn Bhd. CCI does not provide any advice on compliance with any legislation, regulation, or standards. All audit reports and other documentation provided by the company, are given in good faith and in reliance on the accuracy and completeness of the information provided by the client. No responsibility is accepted to any third party that may rely in whole or in part on the content of this report, to the extent permitted by Law.

A list of Stakeholders contacted is included in this report which been interviewed through phone call for this desktop assessment. The assessment findings for this SAV 1 are detailed in last section of this assessment report.

	Audit Findings	
1	OFI: 4.2.2.3	OFI
	Atlas Paloh Rubber Estate	
	Referring to the list of stakeholders provided, it was found that the list is	
	inadequate as related government agencies and neighbouring community is	
	not listed by the management. Will be verified during next assessment.	
2	OFI: 4.3.1.3 Atlas Pagoh Muar Estate and Atlas Paloh Rubber Estate Review of the legal register as cited in 4.3.1.2 confirms that several legal requirements are not updated by the management. The updated list will be verified during next assessment.	OFI
3	OFI: 4.4.1.1	OFI
	Atlas Pagoh Muar Estate and Atlas Paloh Rubber Estate	
	It was found that the social impact assessment report provided by	
	management is expired in 2023. The management to update the SIA report	
	for the incoming MSPO 2.0 certification during next assessment.	
4	OFI: 4.4.4.2 b	OFI
	Atlas Paloh Rubber Estate and Atlas Pagoh Muar Estate	
	During the interview with the female workers (rat baiting operation), there is one case of motorcycle accident occurred which is they are fallen from motorcycle on the way to the working field. Verification has been done thru the HIRARC record, however there is no updated HIRARC has been assessed for motorcycle riding in the estate.	

5	OFI: 4.4.6.3	OFI
	Training evaluations are available for Polisi Keselamatan dan Kesihatan	
	Dalam Pekerjaan on 10/5/2024 for Atlas Paloh Rubber Estate and Latihan	
	Meracun Tikus for Atlas Pagoh Muar Estate on 16/7/2024. How ever only	
	one training evaluation available instead of four participants (Atlas Paloh	
	Rubber Estate) and only one training form evaluation available instead of	
	two participants (Atlas Pagoh Muar Estate).	
6	OFI: 4.5.1.2	OFI
	Atlas Paloh Rubber Estate	
	Both estate management had provided the documented EAIA. However, the	
	report can be further improved by adding assessment on labor quarters,	
	ramp, diesel skid tank and water pump used for extraction.	
7	OFI: 4.5.3.3	OFI
	Atlas Paloh Rubber Estate	
	The management has maintained and provided the empty fertilizer beg	
	record as seen during audit day. However, the inventory record for empty	
	pesticide container are not maintained by the management.	
8	OFI: 4.5.6.1a	OFI
	It was found that the Biodiversity report provided by management is expired	
	in 2023. The management to update the Biodiversity report for the incoming	
	MSPO 2.0 certification during next assessment.	
9	OFI: 4.6.4.2	OFI
	Atlas Pagoh Muar Estate	
	The management has provided the contract agreement with the appointed contractor, R. Murugan A/L D. Paramasivam. However, the agreement was	
	found to be expired on 30 September 2023. Though there is still no issue at	
	point of audit, the management to provide latest agreement with the	
10	contractor.	
10	NC Minor: 4.3.1.1 Atlas Pagoh Muar Estate and Atlas Paloh Rubber Estate	MINOR NONCONFORMI
	Both estates management are not in compliance against the following legal	
	requirement:	
	i. No OSH Coordinator was appointed as required under Section 29a OSHA	
	1994 (Amendment) 2022.	
	ii. No Identification of excessive noise has been assessed toward noise at	
	working area as required under Regulation 3: Identification of Excessive	
	Noise/OSH Noise Exposure Regulation 2019	
	Atlas Delah Dukhar Estata	
	Atlas Paloh Rubber Estate	
	It was observed during site visit that the workers are paid to obtain clean	
	water for drinking via water vending machine located at the estate office. It	
	is also found that the permit in writing by Director General of Labor	
	Department for water extraction are not obtained by the management. These	
	are against the Regulation 6 $(1)$ (a) Employees' Minimum Standards Of	
	Housing, Accommodations And Amenities Act 1990 (amended 2021) which	
	stipulated that "or where the Director General so permits in writing, to	
	provide free and adequate supply of potable piped water drawn from any	

	other source which shall be filtered and treated in a manner approved by	
	the Director General"	
11	NC Minor: 4.4.4.2 e	MINOR NONCONFORM
	Atlas Paloh Rubber Estate and Atlas Pagoh Muar Estate	
	No chemical training has been conducted for the past 24 months for chemical handling storage and rat baiting activities as per USECHH	
	Regulation 2000 Part VII Section 22 which stated that Information,	
	Instruction and Training (3) The employer shall review and conduct the	
12	training programme (a) at least once in two years. NC Minor: 4.4.4.2 i	MINOR NONCONFORM
	Atlas Paloh Rubber Estate:	
	Mr Zhaahirul bin Tukimin has been attended First Aid at Workplace on	
	8/1/2019 to 9/1/2019 with ST. John Ambulance. How ever the certificate	
	validity is valid for three (3) year from the date issued $(9/1/2019)$ which is	
	over No refresh training has been planned or conducted as per The	
	Occupational Safety and Health Act 1994 (Amendment) 2022, 4.4.2 The	
	Need for Refresher Training First-aiders need to undergo a recognized	
	course (appendix 1) once every three (3) years.	
	Atlas Pagoh Muar Estate:	
	First aider not available as per The Occupational Safety and Health Act	
	1994 Section 15(1) of the Occupational Safety and Health Act 1994 (Act	
	514) provides that every employer and the self-employed person must	
	ensure, so far as is practicable, the safety, health and welfare at work of all	
	his employees. The provision of first-aid facilities and first-aiders is in	
	compliance with the welfare component of this general duty of employers	
40	and self-employed persons.	
13	NC Minor: 4.4.5.3	MINOR NONCONFORM
	Atlas Paloh Rubber Estate	
	The management failed to complying with applicable legislation regarding	
	Employment Injury Scheme for foreign workers for employee sample 1 #ID	
	GW19 (Passport no. : C81786**). This refer to the payment slip for the	
	employee in July 2024 where record of contribution to SOCSO by	
	management has allocated. This is not compliance to Employees's Social	
	Security (Amendement 2019) Act 1969 where the deduction was not	
14	deducted from the total wages he earned for this particular month.	MINOR NONCONFORM
14	NC Minor: 4.5.3.3	
	Atlas Paloh Rubber Estate	
	The management has generated Schedule Waste, the empty fertilizer beg as	
	seen during audit day. The latest disposal was amounted 7,600 begs, dated	
	on 10 August 2024. However, the disposal was not made according to the	
	Regulation 8(1) Schedule Waste Regulation 2005.	

The assessment has been assessed and summary of the findings by Principle and Criteria – MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders.

Sampling Calculation							
	In	itial	Surveillance	-			
Entity	Stage 1			Recertification			
Oil palm estate (40.47 - 100 ha)	1	1.5	2	2			
Oil palm estate (101 - 500 ha)	1	3	3	3			
Oil palm estate (500 ha onwards)	2	3	4	4			
Oil mill	2	3	3	3			

Table 1: Recommended minimum on-site audit durations (man-days) for each Operating Unit

#### Conclusion:

A total of 2 estates were randomly sampled for this round of assessment. This is GROUPING Certification.

(i) Main Assessment Visit (MAV):

(ii) Surveillance Assessment Visit (SAV):

=		$2 = 1.5 \sqrt{2 \times 0.6}$
_	N	$2 - 1.3 \sqrt{2} \times 0.0$

#### NOTE:

The details in above tables are developed to provide sufficient time under normal circumstances to adequately carry out auditing of a management unit against the certification standards for oil palm management under the MS 2530: Part 3; "General principles for oil palm plantations and organised smallholders". However, the time allocated to the various locations of complex audits must be documented to justify the allocated audit durations. The audit duration is calculated on the basis of 8 hours per day. Audit working days will be calculated to the nearest full or half day.

#### Summary of Assessment

The assessor(s) concluded that, based on all objective evidences reviewed, observed and discovered during this round of assessment, the Company Does Comply to the MS 2530: Part 3; "General principles for oil palm plantations and organised smallholders" standards and requirements. The following finding(s) were identified:

		Number of Finding (s)						
CATEGOR	Ŷ	P1	P2	P3	P4	P5	P6	P7
Major Nonconf	ormity							
(Major NC	R)							
Minor Nonconformity				1	2	1		
(Minor NC	R)			1	3			
Observation (	OBS)							
Opportunity	for		4	4	0	2	4	
improvement	(OFI)		T	1	3	3		
	1							
PRINCIPLE 1	The clie	nt has der	nonstrated	an accepta	ble degree	of commitn	nent in emb	oracing the
	MSPO s	standard re	equirements	in its enti	rely through	n continuou	is internal o	compliance

	assessment as well as bolstering managerial and operational improvements continually.
	The client is able to maintain its transparency and efficiency in communicating data and
PRINCIPLE 2	information internally and/ or externally. The client has also established an effective
	system in upholding the traceability elements across its daily operations.
	Review of documents and physical observations during the audit stint indicated that the
PRINCIPLE 3	client is aware and abide all governing rules and regulations (with several exceptions, if
	applicable) pertaining its daily operations throughout.
	The client has demonstrated its ability in providing substantial amount of considerations
PRINCIPLE 4	towards the welfare of all stakeholders. The general and specific wellbeing of its
	employees (and contractors' employees) were also being sufficiently accounted for.
	It is evident that the Client has established a considerably holistic approach and plans in
PRINCIPLE 5	mitigating all potential negative environmental impacts arising from its oil plam
	plantation activities; while simultaneously enhancing the positive impacts.
	The Client has proved that all operations are governed by certain sets of procedures
	(with several exceptions, if applicable). Additionally, the Client was able to demonstrate
PRINCIPLE 6	its commitment in upholding proper governance against its business directions as well
	as contract management.
PRINCIPLE 7	NAP

#### NOTE:

By the virtue of random sampling approach, there may exist chances of non-conformities not being identified during the assessment. Such occurrence shall therefore not be related with the assessor's competency and integrity in any way.

Stakeholder Consultation					
List of Stakeholders		Position			
Interviewed					
Inputs					
Management Response					
Audit Team Conclusion	No external stakeholders consultation	on was conducted during this assessment.			

#### NOTE:

With reference to ABC- OPMC 4 Issue 2 dated 04 September 2020. Whenever deemed applicable, stakeholder consultation/ interview may be held in order to obtain the internal and external stakeholders' inputs on the Company's compliance towards the MSPO standards and stakeholders' views on areas where the Company could improve. Such consultation will be conducted professionally and in absolute isolation from the Company officials. All comments made by the stakeholders will be recorded and presented in this assessment report.

#### Competency Criteria of Audit Team

With reference to ABC- OPMC 1 Issue 2 dated 04 September 2020. This assessment has been conducted by the following approved assessor(s) which hold sufficient qualifications and experiences to conduct MSPO Assessment. CARE Certification International (M) Sdn Bhd holds copies of educational qualifications, certificates and audit logs for each of the audit team members. Summary of the Assessor's credentials are as follows:

Criteria	Requirement	Lead Auditor	Auditor
Education	Post-secondary education, college or university	Aliff Abu Hurairah Abas holds a Master of Science (Hons)	Certified from the Vocational College Kangar Perlis in
	diploma/degree in one of the	Plantation Industry	Electrical Installation and

	following i. Agriculture; ii. Science & Technology (e.g., Environmental Sciences, Life Sciences, Geological Sciences, Natural Sciences,); iii. Engineering, Process Technology; iv. Energy Management, Quality Management; v. Social Sciences and/or Anthropology; vi. Business Management; or vii. Other relevant related fields	Management from Mara University of Technology (UiTM) Shah Alam	Maintenance (Domestic and Industrial). Currently, he is enrolled for degree of Bachelor Executive Occupational Safety and Health at KTAC College, Kuala Lumpur.
Work Experience	Lead: At least five (5) years of work experience in the oil palm sector or related fields such as social, health, safety and environment Auditor: <b>Post Secondary education:</b> At least ten (10) years of work experience in the oil palm sector or related fields such as social, health, safety and environment <b>Tertiary education:</b> At least three (3) years of work experience in the oil palm sector or related fields such as social, health, safety and environment	He has more than 7 over years of experience in oil palm industry in which, previously working with MPOB as Research Officer and UiTM Jengka, Pahang as a lecturer under Faculty of Plantation and Industry Management. Currently a freelance MSPO Lead Auditor/Auditor and a consultant.	With 36 years of experience in various industrial sector includes chemical manufacturing process, food manufacturing process and trading with highly standard for health, safety and environmental practices.
Training	<ul> <li>i) Attended the MS 2530 series of standards training or other auditor competency trainings endorsed by MPOCC or MPOB (pre-2016).</li> <li>ii) shall have undergone 40 hours of accredited <b>OR</b> 40 hours of lead auditor course either in Quality Management Systems (QMS) or Environmental Management Systems (EMS) or Occupational, Health and Safety Management Systems (OSH)</li> </ul>	He has successfully obtained competency of Lead Auditor courses for Malaysian Sustainable Palm Oil (MSPO 2530:2013) and Auditor/ Lead Auditor Integrated Management System (IMS) (ISO 9001:2015 & ISO 14001:2015) course. Furthermore, he also is a qualified MPOB Code of Practice (CoP) Lead Auditor.	MSPO Lead Auditor – MPOCC Cert. No: SA19-43. IMS Lead Auditor ISO 9001:2015 & ISO 14001:2015 – Cert. No: ASCB/039/19. (8593) OSH Coordinator – Cert. No: MSOSH 14977).

Audit	Conducted at least three (3) MSPO or equivalent sustainability certification audits as Lead Auditor-in-training with a minimum of fifteen (15) man-days under the direction and guidance of a qualified Lead Auditor for MSPO or equivalent sustainability certification schemes within the last two (2) years. Auditor: Conducted a minimum four (4) on-site audits for a total of at least 20 man-days of audit experience as an auditor-in-training under the direction and guidance of a qualified Lead Auditor for MSPO or equivalent sustainability certification schemes within the last two (2) years.	He had successfully completed more than 150 man-days assessment as MSPO Auditor within the last 3 years. Apart of MSPO audit, he also had performed MPOB Code of Practices (CoP) for Oil Palm Nursery (CoPN), Code of Good Agricultural Practices (CoGAP) and Code of Good Milling Practices CoPM) certification under MPOB since 2013.	Conducted more than 250 man days of MSPO Standards from MS2530-2: 2013, MS2530-3: 2013 and MS2530-4:2013 as Lead Auditor and Auditor.
Gene	ral A good knowledge in handling and evaluating sources of information and data. Able to communicate in Bahasa Malaysia or any other local language	Able to communicate in Bahasa Malaysia and English Language.	Have a good knowledge in handling and evaluating sources of information and data. Able to communicate in Bahasa Malaysia and English language.

#### Details of Certified Entity (Grouping Certification)

#### 1. ESTATE INFORMATION:

#### Category of the listed organisation is Estate

	0				
NAME OF UNIT	MPOB LICENSE	LOCATION	GPS	CERTIFIED	PLANTED
	NO	Lookinen	COORDINATES	AREAS (HA)	AREAS (HA)
Atlas Pagoh Muar	502155602000	Pagoh, Muar, Johor.	2.116000,	199.00	192.88
Estate			102.798139		
Atlas Paloh	502155602000	Yong Peng, Johor.	2.10472,	640.33	633.69
Rubber Estate			103.14361		
Other Sustainab	ility Certification	NIL			

#### Note:

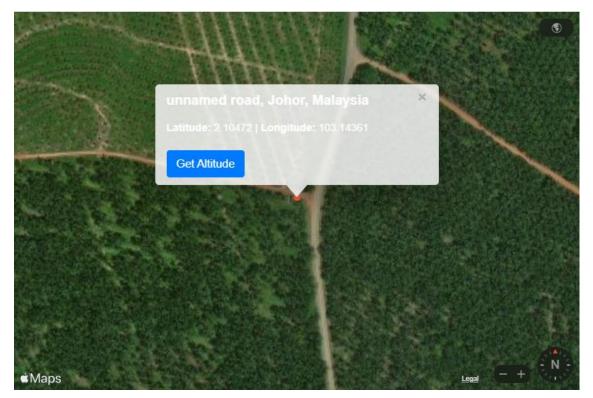
(i) Maps showing geographical location, with close-up of the certified estates are attached as in Appendix 1 of this report.(ii) With reference to Circular MPOCC dated 2 April 2021

#### 2. AREA STATEMENT AND FFB FORECAST:

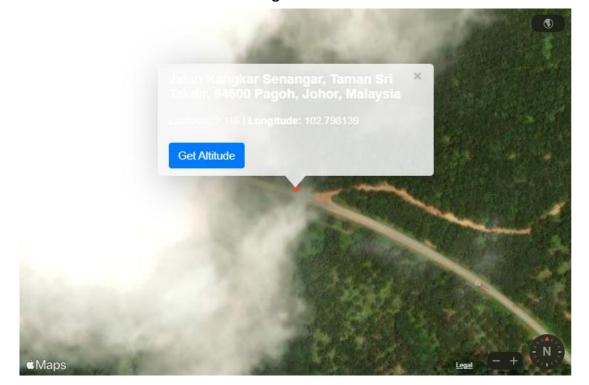
#### Category of the listed organisation is Estate

CERTIFIED AREA (HA)	PLANTED AREA (HA)	<b>FFB TON/ YEAR</b> (2023)	YIELD TON/ YEAR
199.00	192.88	4,665.43	24.19
640.33	633.69	9,469.03	14.94
839.33	826.57	14,134.46	17.1
	AREA (HA) 199.00 640.33	AREA (HA)         AREA (HA)           199.00         192.88           640.33         633.69	AREA (HA)         AREA (HA)         (2023)           199.00         192.88         4,665.43           640.33         633.69         9,469.03

#### Appendix 1: Location and Field Map Atlas Paloh Rubber Estate



#### Atlas Pagoh Muar Estate



#### Appendix 2: Audit Plan

: Mr Edwin Chee (012-602 7282) : Atlas Plantations Sdn Bhd (Group) : 12 Jalan Bukit Gedong, 75050 Melaka Attention to Client name

Address



#### Audit Plan for: Surveillance Assessment Visit1 (Year2024)

Audit objective: Α.

To ensure that all elements of the proposed scope of registration and entire requirements of the management standard are effectively addressed by the client.

Determination of the conformity of the company's management system Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. В. С.

Job code Scope of cert.	MS24SM023 Part 3 : Provision Of Planting And Harvesting Of Fresh Fruit Bunches (FFB) By Oil Palm Plantation	Lead auditor Team member	Mr Aliff Abu Hurairah (AA) Mr Nor Azman Bin Daud (AZM)
Management std	MS2530:2013 Part 3	Trainee Auditor	· · · · · · · · · · · · · · · · · · ·
Revised No.	01	Witness Auditor	

Audit scope

- The assessment will be carried out on the client's MSPO management system documentation a)
- Reviewing the client's status and understanding regarding requirements of the MSPO standard, in particular with respect to the identification of key performance of significant aspects, processes, objectives and operation of the management system; To collect necessary information regarding the scope of the MSPO management system, processes and location(s) of the client, and related statutory and regulatory aspects and compliance (e.g. quality, environmental, legal aspects of the client's operation, associated risks, etc); b)
- c)

Date	Time	Assessor	Business area / process	Operation	Clause
12 August 2024 Day 1	0930	ALL	Introduction by client Opening meeting		
	1000	ALL	Site Visit : ATLAS PALOH RUBBER ESTATE	Fertiliser store, SW Store, Chemical store, harvesting, spraying, line site. Office, stakeholder premises	

		ALL	Stakeholder consultation	Office	
		AA	Document review: Principle 1: Management commitment & responsibility - Criterion 1: Malaysian Sustainable Palm Oil (MSPO) Policy - Criterion 2: Internal audit - Criterion 3: Management review - Criterion 4: Continual improvement	Office	4.1 4.1.1 4.1.2 4.1.3 4.1.4
		AZM	Principle 2: Transparency     Criterion 1: Transparency of information and documents relevant to     MSPO requirements     Criterion 2: Transparent method of communication and consultation     Criterion 3: Traceability	Office	4.2 4.2.1 4.2.2 4.2.3
12	230		LUNCH		
1:	330	ALL	Stakeholder consultation	Stakeholder premises	
		AA	Principle 3: Compliance to legal requirement       Criterion 1: Regulatory requirements         Criterion 2: Land use rights       Criterion 3: Customary land rights	Office	4.3 4.3.1 4.3.2 4.3.3
		AZM	Principle 4: Social responsibility, health, safety and employment condition     Criterion 1: Social impact assessment     Criterion 2: Completints and grievances     Criterion 3: Commitment to contribute to local sustainable     development     Criterion 4: Employees safety and health     Criterion 5: Employment conditions     Criterion 6: Training and competency	Office	4.4 4.4.1 4.4.2 4.4.3 4.4.4 4.4.5 4.4.6
		AA	Principle 5; Environment, natural resources, biodiversity and ecosystem services           - Criterion 1: Environmental management plan           - Criterion 2: Efficiency of energy use and use of renewable energy           - Criterion 3: Waste management and disposal           - Criterion 4: Reduction of pollution and emission including greenhouse	Office	4.5 4.5.1 4.5.2 4.5.3 4.5.4

			gas Criterion 5: Natural water resources Criterion 6: Status of rare, threatened, or endangered species and high biodiversity value area Criterion 7: Zero burning practices		4.5.5 4.5.6 4.5.7
		AZM	Principle 6: Best practices - Criterion 1: Site management - Criterion 2: Economic and financial viability plan - Criterion 3: Transparent and fair price dealing - Criterion 4: Contractor	Office	4.6 4.6.1 4.6.2 4.6.3 4.6.4
<b>13 August 2024</b> Day 2	0930	ALL	Introduction by client Opening meeting		
	1000	ALL	Site Visit : ATLAS PAGOH MUAR ESTATE	Fertiliser store, SW Store, Chemical store, harvesting, spraying, line site. Office, stakeholder premises	
		ALL	Stakeholder consultation	Office	
		AA	Document review:           Principle 1: Management commitment & responsibility           - Criterion 1: Malaysian Sustainable Palm Oil (MSPO) Policy           - Criterion 2: Internal audit           - Criterion 3: Management review           - Criterion 4: Continual improvement	Office	4.1 4.1.1 4.1.2 4.1.3 4.1.4
		AZM	Principle 2: Transparency           Criterion 1: Transparency of information and documents relevant to MSPO requirements           Criterion 2: Transparent method of communication and consultation           Criterion 3: Traceability	Office	4.2 4.2.1 4.2.2 4.2.3
	1230		LUNCH		
	1330	ALL	Stakeholder consultation	Stakeholder premises	
		AA	Principle 3: Compliance to legal requirement	Office	4.3
			Criterion 1: Regulatory requirements     Criterion 2: Land use rights     Criterion 3: Customary land rights		4.3.1 4.3.2 4.3.3
		AZM	Principle 4: Social responsibility, health, safety and employment condition     Criterion 1: Social impact assessment     Criterion 2: Completints and grievances     Criterion 3: Commitment to contribute to local sustainable     development     Criterion 4: Employees safety and health     Criterion 4: Employment conditions     Criterion 6: Training and competency	Office	4.4 4.4.1 4.4.2 4.4.3 4.4.4 4.4.5 4.4.6
		AA	Principle 5; Environment, natural resources, biodiversity and ecosystem services         - Criterion 1: Environmental management plan         - Criterion 2: Efficiency of energy use and use of renewable energy         - Criterion 3: Waste management and disposal         - Criterion 4: Reduction of pollution and emission including greenhouse gas         - Criterion 5: Natural water resources	Office	4.5 4.5.1 4.5.2 4.5.3 4.5.4 4.5.5
		AZM	<ul> <li>Criterion 6: Status of rare, threatened, or endangered species and high biodiversity value area</li> <li>Criterion 7: Zero burning practices</li> <li>Principle 6: Best practices</li> <li>Criterion 1: Site management</li> <li>Criterion 2: Economic and financial viability plan</li> <li>Criterion 3: Transparent and fair price dealing</li> <li>Criterion 4: Contractor</li> </ul>	Office	4.5.6 4.5.7 4.6 4.6.1 4.6.2 4.6.3 4.6.4
		ALL	Report Preparation		
				1	1

Times are approximate and will be confirmed at the opening meeting prior to commencement of the audit.

Auditors reserve the right to change or add to the elements listed before or during the audit depending on the results of on-site investigation.
A private place for preparation, review and conferencing is requested for the auditor's use.
Ensure that the appropriate auditees are available according to the audit schedule.

- Availability of guides for the auditors.
  Prepare necessary PPE (if required) for plant visit.

:

Please inform CCI if there is any objection or conflict of interest related to any of the above team members. You are invited to review the team members and, if necessary advise CCI of any conflict of interest. Please contact Managing Director (fleming@cciglobe.com) and Shahziela.othman@cciglobe.com MSPO Planner of CCI directly for any objection.

#### Section F General Information

General	
Audit objectives	To verify that the system initial implementation is in accordance to requirements of the standard adopted. To verify that the system implementation is continuously in accordance to the requirements of the standards adopted.
	To verify that the system implementation is continuously after and in fifth years of implementation is in accordance to the standards adopted. Other, (please specify)
Integrate Assessment	No
Applicable National Standards	MS ISO/IEC 17021-1:2015, ACB-OPMC 1, ACB-OPMC 2, ACB-OPMC 3 & ACB-OPMC 4 and MS 2530-3:2013
Issue of certificate	YES - changes in Estate information

Scope of Certification	
Scope of certification in English	Provision of Planting and Harvesting of Fresh Fruit Bunch (FFB)
	by Oil Palm Plantation
Requirement not being applicable	4.7 - Development of new planting
Justification	No new planting or land conversion as day of audit.
Other language than above	NA
Changes from Previous registration	No
Extension/changes of scope date	NA

Contact Details	
Management Representative	Mr Edwin Chee Teng Heng
Alternate contacts	Mr Azman Abdul Halil (Atlas Paloh) - 0197262083
	Mr Mohd Jeffri Salih (Atlas Pagoh) - 01125428648
Management Representative contact no.	Mr Edwin Chee Teng Heng - 012-602 7282
E-mail address	edwinchee@atlasice.com.my;
	mohdjeffrisalih@gmail.com; atlaspalohestate@gmail.com
Fax Number	06-2842 987
Fixed Line Number	06-2824 290
No of Group Members / SPOC	2

	Risk Assessment (Applicable for Remote Audit ONLY)						
Date	of Remote Audit: Name of Auditor/	′s:					
A. N	Anagement Responsibility	No =	1 Yes	s = 0			
No	Questionnaire	No	Yes	Rating	Remark		
1	Has the company have a management person						
	responsible for the sustainability issues?						
2	Has the company conducted the internal audit?						
3	Has the company organized Management review meeting?						
4	Has the company provided transparent information						
	on the company's operations for the public access?						
5	Has the company kept real time monitoring records						
	of the estate/mill operation activities?						
В. 5	(FFB/CPO sales record)	No =	1 Vo	s = 0			
No	Questionnaire	No	Yes	Rating	Remark		
1	Has the company have a policy covering the		103	Raung	Keinark		
1	following - respect for human right, - no forced						
	labour, - no child labour, - working condition, - wages						
	& benefits, - non-discrimination, - freedom of						
	association and collective bargaining						
	*Please refer to Principle 4 Criteria 5 Indicator 14						
	(MSPO Standard)						
2	Has the site established a management system in						
	place to manage the social issue policies described						
	in question 1?						
3	Has the company resolved any complaints or						
	grievances received from the stakeholder?						
4	During this pandemic of COVID 19, has the company $% \left( {{\left( {{{\rm{D}}} \right)}_{{\rm{D}}}}} \right)$						
	established any guideline or $\ensuremath{SOP}\xspace\ensuremath{s}$ as to follow the						
	Majlis Keselamatan Negara (MKN) requirement? Are						
	the SOPs updated to the latest standard?						
		No = 0 Yes = 1					
No	Questionnaire	No	Yes	Rating	Remark		
5	Has the company received any complaint from stakeholder?						
6	Is there is any COVID 19 cases in the premise area?						
C. E	conomic Aspect	No =	1 Yes	s = 0			
No	Questionnaire	No	Yes	Rating	Remark		
1	Has the company have long term financial						

	management plan?				
2	Is there a system in place to monitor the implementation of the management plan?				
D.	Environment Aspect	No =	0 Yes	s = 1	
No	Questionnaire	No	Yes	Rating	Remark
<b>No</b> 1	Questionnaire Is there any endangered, rare and threatened	No	Yes	Rating	Remark
	•	No	Yes	Rating	Remark

#### Additional Verification for operational sites:

Remark: If the rating for this area shown double High risk been tick, remote audit will not be proceeded. However, if the rating were click double Low or Low and High consideration for remote audit may be proceed depending on the total risk rating scored.

1	How many nonconformity has / nonconformities have			
	been raised during the previous audit?			
	* If more than 3 major nonconformities or total	LOW	HIGH	
	nonconformities are more than 10 findings, please tick			
	High risk column.			
2	Have the previous nonconformities been adequately			
	resolve with sufficient evidence?	LOW	HIGH	
	* If yes please click LOW			

Decision/ Justification Total Score
-------------------------------------

Total score between 0-4 :	Total score between 5-9:	Total score between 10 and
Low Risk	Medium Risk	above <b>: High Risk</b>

To be filled by Auditor: Methods and Techniques of MSPO Audit Processes being conducted via Select Please specify for Others

#### NOTE:

With reference to Guidance on Remote Audits due to Covid-19 Pandemic Restrictions, Version 3 Updated Circular (22 March 2021)

AUDIT CHECKI							
Verification of	previous visi	t					
Certificate Nur	nber	MYMS2194703		Expiry	/ Date		
Stage of Previous Audit		Re-Certification		Date of Audit		14-1	.7 August 2023
No of Findings	;	1 Non-Conformar	nce/s	4 Observation/s			
Status/ Rema	rk	-					
Verification of	MSPO Logo	I					
There was no	misused of N	ISPO logo at point o	of audit				
P1: Managem	ent Commitm	ent & Responsibili	ty				
Criterion 1	Malaysian	Sustainable Palm	Oil (MSPO) Policy				
Indicator	Requireme						Findings
4.1.1.1	· ·		on of MCDO shall b		aliched		-
+.1.1.1	A policy to	r the implementation	Shorwspo shall t	e estat	nisnea		Conformity
all requiremen	ts and princi	e Kim Hoon. The M ples of MSPO stand nmunicated to its p	dard. It was verifie	d that t	he policies ha	as been ac	dequately display
	municated to	employees and su	-				-
No changes fro	municated to	employees and su	irrounding commu	nities d	uring briefing	g sessions	-
No changes fro 4.1.1.2 Based on the J	municated to om previous a The policy policy, the ma	employees and su	irrounding commu ize commitment to ng towards continu	nities d contin ual impi	uring briefing ual improven rovement as	sessions nent. stated bel	Conformity
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		Internal audit rep	Estate	oh Rubber	Mr Wong Wuey Wuen	18 July 20		
			Atlas Pag Estate	oh Muar	Mr Wong Wuey Wuen	17 July 20	024	
4.1.:	2.3	Report shall be ma	ade available to	the manage	ement for their re	view.	Conformity	
Verif	fied the follo	owing records are av	ailable to the m	anagement	for their review:		I	
a.Int	ternal Audit	Plan						
b.Int	ternal Audit	Report						
c.Int	ernal Audit	Checklist						
Crite	erion 3	Management Revie	ew					
Indic	cator	Requirement					Findings	
4.1.:		The management s adequacy and effe implementation of modification.	ctiveness of the MSPO and deci	requiremen de on any c	nts for effective hanges, improver	nent and	Conformity	
The	manageme	nt had carried out m	nanagement rev	iew meeting	g as seen in the b	elow:		
	Document	Estate	Date	Chairma	an No of attendees	Matter	rs discussed	
	Minutes of	Atlas Paloh Rubber	Date 26 April 2024	Chairma Mr Chin C Chow	hon 6	Safety signa Add more fir Safety helm		
		Atlas Paloh Rubber Estate	26 April	Mr Chin C	hon 6	Safety signa Add more fir Safety helm Maintenanc SIA ERT Organiz Buffer zone SDS	re extinguishers et compliance e of estate road ation	
	Minutes of meeting, Vanagemen	Atlas Paloh Rubber Estate It Atlas Pagoh	26 April 2024	Mr Chin C Chow Mr Ong /	hon 6	Safety signa Add more fir Safety helm Maintenanc SIA ERT Organiz Buffer zone	re extinguishers et compliance e of estate road ation	
	Minutes of meeting, Vanagemen	Atlas Paloh Rubber Estate	26 April 2024 12 July 2024	Mr Chin C Chow Mr Ong /	hon 6	Safety signa Add more fir Safety helm Maintenanc SIA ERT Organiz Buffer zone SDS	re extinguishers et compliance e of estate road ation	
Crite	Minutes of meeting, Managemen Review	Atlas Paloh Rubber Estate It Atlas Pagoh	26 April 2024 12 July 2024	Mr Chin C Chow Mr Ong /	hon 6	Safety signa Add more fir Safety helm Maintenanc SIA ERT Organiz Buffer zone SDS	rges re extinguishers et compliance e of estate road ration poard	
Crite	Minutes of meeting, Managemen Review erion 4	Atlas Paloh Rubber Estate Atlas Pagoh Muar Estate Continual improver Requirement The action plan for of the main social	26 April 2024 12 July 2024 ment	Mr Chin C Chow Mr Ong <i>i</i> Hoe	an attendees hon 6 Ah 2 all be based on co	Safety signa Add more fir Safety helm Maintenanc SIA ERT Organiz Buffer zone SDS Safety signb	re extinguishers et compliance e of estate road ation	
Crite Indic 4.1.4	Minutes of meeting, Managemen Review erion 4 cator 4.1	Atlas Paloh Rubber Estate Atlas Pagoh Muar Estate Continual improver Requirement The action plan for	26 April 2024 12 July 2024 ment continual impro	Mr Chin C Chow Mr Ong / Hoe	an     attendees       hon     6       Ah     2       all be based on coand opportunities	Safety signa Add more fir Safety helm Maintenanc SIA ERT Organiz Buffer zone SDS Safety signb	re extinguishers et compliance e of estate road ation board Findings Conformity	
Crite Indic 4.1.4	Minutes of meeting, Managemen Review erion 4 cator 4.1 continual in	Atlas Paloh Rubber Estate Atlas Pagoh Muar Estate Continual improve Requirement The action plan for of the main social company.	26 April 2024 12 July 2024 ment continual impro and environmer	Mr Chin C Chow Mr Ong <i>i</i> Hoe ovement sha Ital impact a as reviewed	an     attendees       hon     6       Ah     2       all be based on created opportunities       and opportunities	Safety signa Add more fir Safety helm Maintenanc SIA ERT Organiz Buffer zone SDS Safety signb	re extinguishers et compliance e of estate road ation board Findings Conformity ment dated 1	
Crite India 4.1.4	Minutes of meeting, Managemen Review erion 4 cator 4.1 continual in Jary 2024. I	Atlas Paloh Rubber Estate Atlas Pagoh Muar Estate Continual improver Requirement The action plan for of the main social company.	26 April 2024 12 July 2024 ment continual impro and environmer both estates we the Company is	Mr Chin C Chow Mr Ong / Hoe	anattendeeshon6Ah2all be based on co and opportunitiesI and verified by e procure its best e	Safety signa Add more fir Safety helm Maintenanc SIA ERT Organiz Buffer zone SDS Safety signb	re extinguishers et compliance e of estate road ation board Findings Conformity ment dated 1 hually improving th	

2. Ensure employees are paid according to the law and regulation

3. Ensure basic amenities are supplied to workers in the estate

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,	Conformity
It was noted as	where applicable, that are available and feasible for adoption.	luctry standards or
	incorporated into the above-mentioned plan for consideration and deliberation.	-
	er indicated that adopting new methodologies, techniques or technologies is eco	
	feasible at present. However, the Company is open and ready to accept such as	similation once the
situation deem		
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	Conformity
	(where applicable) shall be established.	Comornity
As per 4.1.4.2		
·		
P2: Transpar	ency	
Criterion 1	Transparency of information and documents relevant to MSPO requirements	
Indicator	Requirement	Findings
4.2.1.1	The management shall communicate the information requested by the	
	relevant stakeholders in the appropriate languages and forms, except those	Conformity
	limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.	
The managem	ent had established, maintained and documented the "Prosedur Komunikasi da	n Informasi" and
_	angani Aduan dan Rungutan". The management has adopted an open and trans	
	n and consultation when dealing with relevant parties e.g. its workers, governme	-
		ant agencies,
contractors by	personal invitation to attend the internal and externals' consultation meetings.	
Observed durir	ng site visit, Suggestion and Feedback Form and 'Peti Aduan' are available in the	office
4.2.1.2	Management documents shall be publicly available, except where this is	
7.2.1.2	prevented by commercial confidentiality or where disclosure of information	Conformity
	would result in negative environmental or social outcomes.	
Communicatio	n procedure was applicable to all estate. Sighted the communication were divide	ed into two
categories exte	ernal and internal. For internal normally the interaction between employee and e	mployer through
interview (face	to face, e-mail, letter and suggestion form. All the information regarding compared	ny activities can be
review by exter	nal parties such as stakeholder and society through google drive. Sighted Refer	ence Document List
Example public	cly documents listed:	
1. Internal mer	no and external memo.	
2. Managemer	nt minute of meeting	
3. Minute of sa	afety and health committee	
4. Comment fr	om external stakeholder	
5. Complaint Ir	nvestigation report.	
-	utgoing and incoming information.	
7 Lond tittle	•	

- 7. Land tittle
- 8. Safety and health plan
- 9. Environmental impact assessment
- 10. Pollution prevention plan
- 11. Complaint and grievance
- 12. Procedure for communication
- 13. Continues Improvement plan.

#### 14. List of stakeholder

15. Human right policy

Criterion 2	Transparent method of communication and consultation	
Indicator	Requirement	Findings
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders	Conformity

The management had established, maintained and documented the "Prosedur Komunikasi dan Informasi" and "Prosedur Menangani Aduan dan Rungutan".

4.2.2.2	A management official shall nominated officials at the operating unit	
	responsible for issues related to indicator 1 (4.2.2.1)	Conformity

The management had retained the appointment of persons responsible for communication for both estates as below:

Estate	Document	Name of PIC	Date appointed
Atlas Paloh Rubber Estate	Appointment latter	Mr Zhaahirul Tukimin	1 January 2024
Atlas Pagoh Muar Estate	Appointment letter	Mr. Mohd Jeffri Salleh	1 January 2024

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	OFI
	properly maintained.	

The management of both estates had prepared, maintained and documented the list of stakeholders as seen below:

Document	Estate	Supplier	Buyer	Contractor	Government agency	Neighbouring community
		Chong Fatt	Kluang Oil	Ghan Ser Heng		
		Hardware	Palm	(Harvesting		
		and Trading	Processing	and Spraying		
	Atlas Paloh		Sdn Bhd	contractor)		
	Rubber Estate	AA Fire				
	_01010	Protection	Bell Palm			
			Resources			
list of			Sdn Bhd			
List of stakeholders		Hup Tyre	Mill Prosper	P Murughan	ВОМВА	SDG
slakenoiders		Hardware	Palm Oil Sdn	A/L D.	POLICE	Pengkalan
		Sdn Bhd	Bhd	Paramasivam	МРОВ	Bukit
	Atlas Darah				BAKAJ	
	Atlas Pagoh		Kilang Sawit		JPA	Kg Jayor
	Muar Estate		Bukit Pasir			
			Sdn Bhd			Hoom &
						Boom Sdn
						Bhd

Seen also the communication records between both estates and stakeholders as below:

Estate: Atlas Paloh Rubber Estate

Record: Minutes of meeting, stakeholders consultation

Date: 24 May 2024

No of attendees: 10

External stakeholders attended:

- 1. Ladang Mados
- 2. Contractor
- 3. Smallholder

#### OFI: 4.2.2.3

Atlas Paloh Rubber Estate

Referring to the list of stakeholders provided, it was found that the list is inadequate as related government

agencies and neighbouring community is not listed by the management. Will be verified during next assessment.

Criterion 3	Traceability				
Indicator	Requirement	Findings			
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).	Conformity			
This company h	This company had established and maintained the documented the Traceability Procedure to ensure the origin of				
palm product ca	palm product can be documented, verified and information maintained across the supply chain. Several records				
are to be maintained by the management such as:					
a. Infield weighbridge ticket					
b. External wei	b. External weighbridge ticket				

#### 4.2.3.2

### The management shall conduct regular inspections on compliance with the established traceability system

Conformity

Both estates had maintained the following records for traceability, signed and verified by management. Sample as
shown below:

Estate	Document	Ref no	Date	Field	Nett weight
Atlas Paloh	Internal weighbridge	P017155	22 June 2024	2015/11	2,740kg
Rubber Estate	ticket	P017558	30 July 2024	2018/5	1,520kg

4.2.3.3

The management should identify and assign suitable employees to implement and maintain the traceability system

Conformity

The management had retained the appointment of persons responsible for traceability as shown below:

Estate	Document	Name of PIC	Date appointed
Atlas Paloh Rubber Estate	Appaintment latter	Ms Raji A/P Vijayan	1 January 2024
Atlas Pagoh Muar Estate	Appointment letter	Mr Mohd Jeffri Bin Salih	1 January 2024

	~	~		
4	.2	.З	.4	

Records of sales, delivery or transportation of FFB shall be maintained.

Conformity

Both estates had maintained the FFB delivery records as shown in sample below:

Estate	Document	Date	Nett weight	Buyer
			560.91mt	Bell Palm Resources Sdn
Atlas Paloh		2024	500.91m	Bhd
Rubber Estate	FFB Production	31 July 2024	695.86mt	Kluang Oil Palm Processing
	statement	51 July 2024	095.80111	Sdn Bhd
Atlas Pagoh Muar		July 2024	519.41mt	Kilang Sawit Bukit Pasir
Estate		June 2024	405.47mt	Kilang Sawit Bukit Pasir

#### P3: Compliance to legal requirements

Criterion 1	Regulatory requirements			
Indicator	Requirement	Findings		
4.3.1.1.	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations	OFI		

Seen the applicable permit/license/receipt of estate legal compliance as shown below:

#### Estate: Atlas Paloh Rubber Estate

Permit/ License/ Receipt	Ref no:	Valid until:	Remark:
MPOB License	501270102000	31 March 2025	Total area: 637.52 ha
Quit rent	Lot no: 1589		Paid on 3 April 2024
Levy KASTAM	MS020627 MS018079		Stamped on 11 July 2024 Stamped on 19 June 2024
Weighbridge inspection	E275951		Inspected on 11 July 2024
Diesel permit	PBK 0001/2011	17 March 2025	Quantity: 9,000L
Workers work permit	C8178681	14 Nov 2024	Own workers

	C8175929	2 May 2025	Own workers
	C6777204	14 Nov 2024	Own workers
Water extraction permit (BAKAJ)	07/A/BP/122	31 December 2024	Quantity: 22 m3/day

Estate: Atlas Pagoh Muar Estate

Permit/ License/ Receipt	Ref no:	Valid until:	Remark:
MPOB License	502155602000	31 January 2025	192.88 ha
Quit rent	Lot no: 2752		Paid on 18 March 2024
Levy KASTAM	MS022983		Stamped on 8 Aug 2024
	MS019713		Stamped on 8 July 2024
Diesel permit	SKK 1030	24 May 2024	Quantity: 100L/day
Weighbridge inspection	B2168220		Inspected on 8 May
			2024
Workers work permit	E4483834	9 May 2025	Own workers
	C9506263	6 October 2024	Own workers
	C8181538	9 May 2025	Own workers

The estate's diesel permit is espired on 24 May 2024. The management is in midst of renewing the permit as seen in the letter dated 9 July 2024, ref no: (PK)R2024MUR8171.

The estate currently is in the process of obtaining the Permit from BAKAJ, as seen in the letter dated 20 May 2024, ref no: SUKJ.BAKAJ:700-20

NC Minor: 4.3.1.1

Atlas Pagoh Muar Estate and Atlas Paloh Rubber Estate

Both estates management are not in compliance against the following legal requirement:

i. No OSH Coordinator was appointed as required under Section 29a OSHA 1994 (Amendment) 2022.

ii. No Identification of excessive noise has been assessed toward noise at working area as required under

Regulation 3: Identification of Excessive Noise/OSH Noise Exposure Regulation 2019

Atlas Paloh Rubber Estate

It was observed during site visit that the workers are paid to obtain clean water for drinking via water vending machine located at the estate office. It is also found that the permit in writing by Director General of Labor Deparment for water extraction are not obtained by the management. These are against the Regulation 6 (1) (a) Employees' Minimum Standards Of Housing, Accommodations And Amenities Act 1990 (amended 2021) which stipulated that "or where the Director General so permits in writing, to provide free and adequate supply of potable piped water drawn from any other source which shall be filtered and treated in a manner approved by the Director General"

4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register	Conformity			
The management has adequately listed the laws applicable to its operation which included Acts and Regulations					
relevant to the management's operations. The following were sampled from the list:					
Document : List	Document : List of Legal Register				
Identified legal	Identified legal list :				
1. Occupational	Safety & Health Act, 1994				

Employment Act 1955     Employees' Social Security (Amendment) Act 2016     Children and Young Persons (Employment) (Amendment) Act 2019     Minimum Wages Order 2022     Environmental Quality Act 1974     S.1.3     The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.     OFI     OF	2. USECHH Reg	gulation 2000					
Employees' Social Security (Amendment) Act 2016     Children and Young Persons (Employment) (Amendment) Act 2019     Minimum Wages Order 2022     Environmental Quality Act 1974     Salas     The legal requirements register shall be updated as and when there are any     new amendments or any new regulations coming into force.     OFI     OFI		-					
A. Children and Young Persons (Employment) (Amendment) Act 2019   B. Minimum Wages Order 2022   C. Environmental Quality Act 1974   Image: Solution of the legal requirements register shall be updated as and when there are any new mendments or any new regulations coming into force.   OFI   FI: 4.3.1.3   The legal requirements register shall be updated as and when there are any new regulations coming into force.   OFI   FI: 4.3.1.3   Utas Pagoh Muar Estate and Atlas Paloh Rubber Estate   Leview of the legal register as cited in 4.3.1.2 confirms that several legal requirements are not updated by the nanagement. The updated list will be verified during next assessment.   I.3.1.4   The management should assign a person responsible to monitor compliance and update the hanges in regulatory requirements.   Images in regulatory requirements as shown below: <b>Estate Document Name of PIC Date appointed</b> Atlas Pagoh Muar Estate Appointment letter Mr Azman Abd Halii 1 January 2022 Therein 2 Land used right <b>Mark State Mark State Mark State Mark State Document Name of PIC Date appointed Minessent Appointment letter</b> Mr Azman Abd Halii <b>1 January 2022 Mirk Mohd Jeffri Bin Salih 1 January 2023 Mirk He Management shall ensure th</b>							
Attas Paloh Rubber Estate       Document       Name of PIC       Date appointed         Attas Paloh Rubber Estate       Appointment letter       Mr Azman Abd Halii       1 January 2022         Arterion 2       Land used right       Findings       Findings         Ass.2.1       The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users       Findings         Attas Paloh Rubber Estate       Document       Mr Azman Abd Halii       1 January 2022         Artes Paloh Rubber Estate       Appointment letter       Mr Azman Abd Halii       1 January 2022         Attas Paloh Rubber Estate       Appointment letter       Mr Azman Abd Halii       1 January 2022         Artes Paloh Rubber Estate       Appointment tetter       Mr Azman Abd Halii       1 January 2022         Artes Paloh Rubber Estate       Appointment tetter       Mr Azman Abd Halii       1 January 2022         Artes Paloh Rubber Estate       Appointment tetter       Mr Azman Abd Halii       1 January 2022         Arter Estate       Document       Name of PIC       Date appointed         Attas Paloh Rubber Estate       Appointment letter       Mr Azman Abd Halii       1 January 2022         Artes Audo Rubber Estate       Appointment shall ensure that their oil palm cultivation activities do not       Conformity		-	,				
Environmental Quality Act 1974         Image: State		-		,			
Image: Signal and the set of the se		-					
new amendments or any new regulations coming into force.         OFI           VFI: 4.3.1.3         Utas Pagoh Muar Estate and Atlas Paloh Rubber Estate         Review of the legal register as cited in 4.3.1.2 confirms that several legal requirements are not updated by the hanagement. The updated list will be verified during next assessment.         Conformity           4.3.1.4         The management should assign a person responsible to monitor compliance and update the changes in regulatory requirements.         Conformity           he management had retained the appointment of persons responsible to monitor compliance and update the hanges in regulatory requirements as shown below:         Document         Name of PIC         Date appointed           Atlas Paloh Rubber Estate         Appointment letter         Mr Azman Abd Halii         1 January 2022           Atlas Paloh Rubber Estate         Appointment letter         Mr Azman Abd Halii         1 January 2022           Atlas Paloh Rubber Estate         Appointment letter oil palm cultivation activities do not diminish the land use rights of other users         Conformity           .3.2.1         The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users         Conformity           .3.2.2         The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.         Conformity           .3.2.2         The management shall provide documents showing legal ownership or lease, history of	4.3.1.3			all be updated as and when	there are	any	
Estate and Atlas Paloh Rubber Estate         teview of the legal register as cited in 4.3.1.2 confirms that several legal requirements are not updated by the nanagement. The updated list will be verified during next assessment.         Image: Imag		-		-		- <b>,</b>	OFI
Eview of the legal register as cited in 4.3.1.2 confirms that several legal requirements are not updated by the nanagement. The updated list will be verified during next assessment.         I.3.1.4       The management should assign a person responsible to monitor compliance and update the changes in regulatory requirements.       Conformity         I.3.1.4       The management should assign a person responsible to monitor compliance and update the changes in regulatory requirements.       Conformity         I.3.1.4       The management should assign a person responsible to monitor compliance and update the hanges in regulatory requirements.         Estate       Document       Name of PIC       Date appointed         Atlas Pagoh Muar Estate       Appointment letter       Mr Azman Abd Halil       1 January 2022         Atlas Pagoh Muar Estate       Appointment letter       Mr Azman Abd Halil       1 January 2022         The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users       Conformity         Saace of its legal boundary stones surrounding its establishment. Comparets a perimeter trenches and terrain boundary as marker to segregate their lands from surrounding neighbout         I.3.2.2       The management shall provide documents show	OFI: 4.3.1.3						
Intermanagement. The updated list will be verified during next assessment.         I.3.1.4       The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.       Conformity         he management had retained the appointment of persons responsible to monitor compliance and update the hanges in regulatory requirements as shown below:       Conformity         Estate       Document       Name of PIC       Date appointed         Atlas Paloh Rubber Estate       Appointment letter       Mr Azman Abd Halil       1 January 2022         Atlas Paloh Rubber Estate       Appointment letter       Mr Azman Abd Halil       1 January 2022         Ariterion 2       Land used right       Findings         hdicator       Requirement       Findings         i.3.2.1       The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users       Conformity         i.was noted that the Management is aware of its legal boundary stones surrounding its establishment. Comparets a perimeter trenches and terrain boundary as marker to segregate their lands from surrounding neighbour         i.3.2.2       The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.       Conformity         terified the document showing legal ownership as per land title below:       Istate: Atlas Paloh Rubber Estate       Mrea       Land use<	-						
Image: Sign and the set of the set					rements ar	ire not	updated by the
and to track and update the changes in regulatory requirements.       Conformity         The management had retained the appointment of persons responsible to monitor compliance and update the hanges in regulatory requirements as shown below: <b>Name of PIC Date appointed</b>	management.	The updated lis	st will be verified durin	g next assessment.			
and to track and update the changes in regulatory requirements.       Conformity         The management had retained the appointment of persons responsible to monitor compliance and update the hanges in regulatory requirements as shown below: <ul> <li>Estate</li> <li>Document</li> <li>Name of PIC</li> <li>Date appointed</li> <li>Atlas Paloh Rubber Estate</li> <li>Appointment letter</li> <li>Mr Azman Abd Halil</li> <li>1 January 2022</li> <li>Atlas Paloh Nuar Estate</li> <li>Appointment letter</li> <li>Mr Mohd Jeffri Bin Salih</li> <li>1 January 2022</li> <li>Triterion 2</li> <li>Land used right</li> </ul> <ul> <li>Gonformity</li> <li>Findings</li> <li>3.2.1</li> <li>The management is aware of its legal boundary stones surrounding its establishment. Comparets a perimeter trenches and terrain boundary as marker to segregate their lands from surrounding neighbout</li> <li>a sequence the advect showing legal ownership or lease, history of land tenure and the actual use of the land.</li> </ul> <ul> <li>Conformity</li> <li>Conformity</li> <li>Conformity</li> </ul> <ul> <li>Conformity</li> <li>Conformity</li> <li>Conformity</li> <li>Conformity</li> <li>Conformity</li> </ul> <ul> <li>Management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</li> <li>Conformity</li> <li>Conformity</li> <li>Conformity</li> <li>Conformity</li> <li>Conformity</li> <li>Conformity</li> <li>Conformity</li></ul>	4.3.1.4	The manage	ment should assign a	person responsible to monit	or complia	ance	
Estate       Document       Name of PIC       Date appointed         Atlas Paloh Rubber Estate       Appointment letter       Mr Azman Abd Halii       1 January 2022         Atlas Pagoh Muar Estate       Appointment letter       Mr Azman Abd Halii       1 January 2022         Wr Mohd Jeffri Bin Salih       1 January 2022         Sriterion 2       Land used right       Findings         Indicator       Requirement       Findings         I.3.2.1       The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users       Conformity         It was noted that the Management is aware of its legal boundary stones surrounding its establishment. Comparets a perimeter trenches and terrain boundary as marker to segregate their lands from surrounding neighbout       Conformity         I.3.2.2       The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.       Conformity         'erified the document showing legal ownership as per land title below:       :state: Atlas Paloh Rubber Estate       Mrea         HSD No       Lot no       Area       Land use         93372       1589       1035.5889 ha       Oil Palm							Conformity
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Estate:Atlas Pagoh Muar Estate	Atlas Pagoh M Criterion 2 Indicator 4.3.2.1 It was noted th sets a perimete 4.3.2.2 Verified the doo Estate: Atlas Pa State: Atlas Pa 933 111	Land used ri         Requiremen         The manage         diminish the         at the Manage         er trenches and         The manage         lease, histor         cument showir         aloh Rubber Es         No         72         17	ght t ment shall ensure that and use rights of othe ement is aware of its le d terrain boundary as r ment shall provide doo y of land tenure and th ng legal ownership as p state Lot no 1589 691	t their oil palm cultivation ac er users gal boundary stones surrou marker to segregate their lan cuments showing legal owne he actual use of the land. Der land title below: Area 1035.5889 ha	nding its eands from s	o not establis surrou Lan Oil	Findings Conformity shment. Compar nding neighbour Conformity
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4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	Conformity
	hat the Management is aware of its legal boundary stones surrounding its establiter trenches and terrain boundary as marker to segregate their lands from surrou	
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).	Conformity
	with the Management Representative and verification of complaints / communica no land ownership dispute arose thus far.	ition records
Criterion 3	Customary rights	
Indicator	Requirement	Findings
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.	Conformity
Estate operat	ion is not under customary right land.	
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available	Conformity
Estate operat	ion is not under customary right land.	1
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	Conformity
Estate operat	ion is not under customary right land.	
P4: Social R	esponsibility, Health, Safety and Employment Condition	
Criterion 1	Social impact Assessment (SIA)	
Indicator	Requirement	Findings
4.4.1.1	Social impacts should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones	OFI
•	Audit report and Management Plan was documented for all of the company by ea , updated in January 2019. The social impacts were assessed using the following	
1. Identification	on and analysis of stakeholders	
2. Questionna	ires	
3. Consultatio	n of stakeholders	
_	nent has established a summary of social impact and opportunities in the compare and to promote positive opportunities.	ny and to plan actio
to mugate the	e negative impact and to promote positive opportunities.	

The management plan concluded several aspects of management commitment and responsibility, transparency, compliance to legal requirements, social responsibility, environment responsibility and best practices. Time frame for mitigation and person in-charge to monitor the plan is evident in the report. Sighted Borang Kaji Selidik Untuk Penilaian Impak Sosial, which were conducted against all relevant stakeholders.

Verified the company has update the status for the social management plan and continual improvement plan on date 01/01/2023.

OFI: 4.4.1.1

It was found that the social impact assessment report provided by management is expired in 2023. The management to update the SIA report for the incoming MSPO 2.0 certification during next assessment.

Criterion 2	n 2 Complaints and grievances			
Indicator	Requirement	Findings		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented	Conformity		

Checked and verified the "Buku Rekod Aduan" and "Complaint Forms". As to date, it was noted that there are no complaints reveiced from the relevant parties. Sighted the procedure to resolve issues or complaint were stated in Procedure for Consultation and Communication dated on 1/7/2018. Sighted inside the procedure the management will response within 2 weeks from the date receive of complaints.

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.	Conformity

The management's Complaint Procedure and Grievance Procedure have spelt out the mechanism of receiving and resolving the complaints and grievances from internal and external stakeholders.

Atlas Paloh Rubber Estate:

Verified there are few complaints lodge in form "Complaint Form" with content date of complaint, came of complainer, item complaint and signature of complainer.

Sample for Borang Aduan, date 20/6/2024 by Kapi was properly recorded as Pos Pengawal pintu masuk ke ladang tutup terlalu awal iaitu jam 9.30pm. The response was replied by the management under status of "DONE".

Atlas Pagoh Muar Estate:

There is no complaint received since the MSPO execution.

4.4.2.3	A complaint form should be made available at the premises, where	
	employees and affected stakeholders can make a complaint.	Conformity

Complaint forms are available at the site office in Atlas Paloh Rubber Estate and Atlas Pagoh Muar Estate.

4.4.2.4	Employees and the surrounding communities should be made aware that	
	complaints or suggestions can be made any time	Conformity

Sighted the awareness on complaint procedure had been brief during stakeholder meeting and also given memo to the stakeholder.

Workers and external stakeholders who were interviewed by the auditors confirmed that they are aware of the complaints and grievances procedure and how to channel their grievances.

4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.	Conformity
Checked and v	erified the "Buku Rekod Aduan" and "Complaint Forms". As to date, it was noted	that there are no

complaints received from the relevant parties. Sighted the procedure to resolve issues or complaint were stated in Procedure for Consultation and Communication dated on 1/7/2018. Sighted inside the procedure the management will response within 2 weeks from the date receive of complaints. During the time of audit, there has

been no complaint received from any stakeholders.

Total number of complaints have been recorded for the past 24 months is 11 complaints.

There is no complaint received since the MSPO execution for Atlas Pagoh Muar Estate for the past 24 months has been recorded.

Crite	rion 3	Commitment to contribute to local sustainable development		
Indic	ator	Requirement Findings		
4.4.3	3.1	Growers should contribute to local development in consultation with the		
		local communities.	Conformity	

Verified CSR based on interview with management, documented evidence and interview with the workers. Sample for:

Atlas Pagoh Muar Estate

1. Donatiaon to estate's temple in September 2023

2. Donation for Indian temple RM1,000.00

3. Donation to communities of Kg Jayor amounted RM200.00

Atlas Paloh Rubber Estate:

Sponsored crusher run 41 tons amounted RM 1,802.24 for smallholder road maintenance at Kg Kangkar Baru.

Criterion 4	Employees safety and health	
Indicator	Requirement	Findings
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented	Conformity

The management has established a policy on Occupational Safety & Health endorsed by the respective company's director as follow on 28/01/2015 (Atlas Plantations Sdn Bhd) and 01/07/2018 (Atlas Group of Companies). The policy has been effectively communicated to the employee based on the interview conducted on-site.

Sighted also safety and health awareness training were include in the Training program for year 2024 on 10/5/2024.

Seen the OSH policy communicated:

1. The OSH policy sighted by display at the office notice board,

2. Briefing during Safety Training to the workers (records sighted)

3. Communicated to workers during training for Staff and contractor

Verified the attendance list of 4 participants from Atlas Paloh Rubber Estate as Budi, Salkiah, Mujip and Jalani. Briefing has been conducted by Mr. Azman bin Abd Halil. Training evaluation are available.

Verified the attendance list of 7 participants from Atlas Pagoh Muar Estate as Muhamad Arif Aiman, Tuminah bintih Saleh, Moin, Mahabob bin Bakru, Mohd Jalaini, Abdul Mutalib, Tahirudin Reni and Sahwin in July 2024. Training has been conducted by Mr. Mohd Jeffri bin Salih. Training evaluation are available.

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	Conformity
a) Seen the OSI	I policy has been communicated:	
1.I The OSH pol	icy sighted by display at the office notice board,	

2. Briefing during Safety Training to the workers (records sighted)			
b) The risks of all operations shall be assessed and documented	OFI		
The management has established and updated HIRARC on 17/07/2022. The next review will be is any new work process or incident. The identification of hazards and control of risk covers the the estate: 1. Loading ramp 2. Pruning 3. Transportation to workplace 4. Chemical spraying 5. Diesel storage 6. Harvesting 7. Manuring 8. Office 9. Premixing of chemical 10. Security 11. Storage of chemical and pesticides 12. Storage of tools and equipment 13. Wording			
<ul> <li>13. Weeding</li> <li>OFI: 4.4.4.2 b</li> <li>Atlas Paloh Rubber Estate and Atlas Pagoh Muar Estate:</li> <li>During the interview with the female workers (rat baiting operation), there is one case of motor occurred which is they are fallen from motorcycle on the way to the working field. Verification has the HIRARC record, however there is no updated HIRARC has been assessed for motorcycle ride</li> </ul>	as been done thru		
<ul> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</li> <li>i) all employees involved shall be adequately trained on safe working practices; and</li> <li>ii) all precautions attached to products shall be properly observed and applied.</li> </ul>	Conformity		
Training plan on chemical handling, first aid training and firefighting was sighted in the company's Annual Training Plan.			
Atlas Paloh Rubber Estate 1) Manuring training - 13/07/2024 2) Spraying training - 11/07/2024			
Atlas Pagoh Muar Estate As Jadual Latihan Pekerja Ladang Atlas Pagoh Muar Tahun Jan - Dec 2024, the training as below: 1) Spraying spraying - 10/7/2024 2) Rait bait training - 16/7/2024			

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).	Conformity
Based on the observation for harvesting operation at in the field, PPE was adequately used by I management has also maintained PPE an issuance record was sighted in the estate. Noted the issuance has been made available and maintained.	
- Atlas Paloh Rubber Estate: latest issuance on 17/7/2024 for Awalludin, Yogi, Dani, Ariah and issuance is apron, hand glove and mask N95.	Andrian, PPE
- Atlas Pagoh Muar Estate: latest issuance on 14/5/2024 for Moin, Tuminah and Mahabod (rul	bber glove)
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.	Nonconformity
Checked and verified the SOP for "Chemical Handling", "Chemical Storage", "Spill Handling" with Operation Manual, established on $1/7/2018$ . Virtual Site walkabout to the chemical store cond	
are appropriately displayed.	
Checked and verified that the CHRA were done for: - Atlas Pagoh Muar Estate on 18/7/2018, DOSH Registration No.: HQ/16/ASS/00/13 - Atlas Paloh Rubber Estate on 17/7/2023, DOSH Registration No.: HQ/16/ASS/00/13	
The recommendation made by assessor such: 1) Provide standard operating procedure for all unit - Complete	
2) Relocate the chemical store away from office building - Complete	
<ul><li>3) Bring along clean water during spraying - Complete</li><li>4) Training - Complete</li></ul>	
5) Medical surveillance - Complete	
Noted the re-assessment for CHRA has been on going as verified the quotation received and vis assessor.	siting program by
Sighted evidence from site visit in Block 6:	
Sufficient Warning signs installed at all critical areas (pesticides stores, Lubricant store, Fertiliz area, field area)	er store, pre-mixing
Workers interview- Understand the correct working procedure. Received adequate work and sa baiting workers)	fety training (rat
Verified the SDS attached with to the product and chemical register updated the chemical used 1) Cypermetrin (Amine) 2) MSMA Diuron (Monex)	d in the estate such :
3) Glufosinate Ammonium (Ken-Up) & etc.	
Medical surveillance undergone by exposed employee, verified as below:	

Atlas Paloh Rubber Estate - 2 exposed workers have undergone for medical surveillance at Poliklinik Intan on 18/7/2024 as refer to report date 6/8/2024 by OHD Registration No: HQ/08/DOC/00/468 and HQ/08/DOC/00/469. Certificate of fitness has been issued to Abdul Mujjip and Mohamed Saleh

Atlas Pagoh Muar Estate - 2 exposed worker have undergone at Klinik Pagoh on 25/07/2024 as refer to report DOSH REG NO HQ/21/DOC/00/00740. Certificate of fitness has been issued Mohd Arif Aeiman bin Razali and Muin.

NC Minor: 4.4.4.2 e

Atlas Paloh Rubber Estate and Atlas Pagoh Muar Estate

No chemical training has been conducted for the past 24 months for chemical handling storage and rat baiting activities as per USECHH Regulation 2000 Part VII Section 22 which stated that Information, Instruction and Training (3) The employer shall review and conduct the training programme (a) at least once in two years.

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.

Conformity

Verified the management has appoint responsible person for workers' safety and health. As interviewed with appointed person, the knowledge and access to latest national regulations are confirmed. The appointed letter as below:

Atlas Paloh Rubber Estate - Mr Azman Abdul Halil, effective on 01/01/2022 Atlas Pagoh Muar Estate - Mr Jefri Bin Mohd Salih, effective on 01/01/2022

g) The management shall conduct regular two-way communication with their 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.

Conformity

Verified Atlas Paloh Rubber Estate has total of employee more than 40. The latest safety meeting was conducted on 21/6/2024 at Pejabat Ladang Getah Atlas Pagoh with 9 employees.

Atlas Pagoh Muar Estate. Noted the frequency of meeting, the agenda attached with invitation letter and the safety health committee were formed adequately.

It was noted that the safety meeting was held as refer the recent meeting conducted on quarterly basis 09/06/2023, 17/03/2023 (Atlas Paloh Rubber Estate), and yearly basis 08/01/2023 (Atlas Pagoh Muar Estate), 25/07/2023 (CTT Development Sdn Bhd) attended by employer and employee representative.

h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.

Checked and verified the "Emergency Procedure" and "Pelan Tindakan Kecemasan" for both estates, which included the following activities:

- 1. Meracun
- 2. Memotong Buah
- 3. Pekerjaan Am dan Sebagainya
- 4. Traktor & Pemandu Lori
- 5. Stor Racun

6. Stor Baja

7. Kebakaran

8. Hakisan Tanah

Also noted that the management has established an Emergency Response Committee, whom are responsible for the ERP in the estate. Verified that the evacuation plan in the event of emergency were adequately displayed at the office, notice board and worker quarters.

From Site visit sighted evidences such as the followings:

i- Emergency Eye wash and shower is available

ii- Emergency response plan available at all critical area (pesticides store, lubricant stores, fertilizer store, etc.).

Spillage kit available in the chemical store.

iii- Safety Briefing Provided to the Visitors

iv- Emergency Assembly Point Available near the office.

- v- Fire Extinguishers are available at chemical and fertilizer store, office, workshop, workers quarters.
- vi- Workers interview- understood the emergency response plan process.
- vii- Emergency contact Number is available at worksite

viii. Spillage kit available in the chemical store.

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	Nonconformity

Verified the first aid box were contained with approve content of first aid kits. Verified record of usage of first aid kit were properly observe by management as seen in the first aid kit issuance record.

The company has trained their employee on first aid as following:

Atlas Paloh Rubber Estate:

Mr Zhaahirul bin Tukimin has been attended First Aid at Workplace on 8/1/2019 to 9/1/2029 with ST. john Ambulance. However the certificate validity is valid for three (3) year from the date issued (9/1/2019) which is over.

NC Minor: 4.4.4.2 i

Atlas Paloh Rubber Estate:

Mr Zhaahirul bin Tukimin has been attended First Aid at Workplace on 8/1/2019 to 9/1/2019 with ST. John Ambulance. How ever the certificate validity is valid for three (3) year from the date issued (9/1/2019) which is over No refresh training has been planned or conducted as per The Occupational Safety and Health Act 1994 (Amendment) 2022, 4.4.2 The Need for Refresher Training First-aiders need to undergo a recognized course (appendix 1) once every three (3) years.

Atlas Pagoh Muar Estate:

First aider not available as per The Occupational Safety and Health Act 1994 Section 15(1) of the Occupational Safety and Health Act 1994 (Act 514) provides that every employer and the self-employed person must ensure, so far as is practicable, the safety, health and welfare at work of all his employees. The provision of first-aid facilities and first-aiders is in compliance with the welfare component of this general duty of employers and self-employed persons.

j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.		Conformity
Atlas Paloh Rub	ber Estate	
Verified notifica date: on 31/01	tion of accident cases submit through JKKP8 form manually. No accidents repo /2024.	orted, submission
Atlas Pagoh Mu Verified notifica date: on 31/01	tion of accident cases submit through JKKP8 form manually. No accidents repo	orted, submission
Criterion 5	Employment conditions	
Indicator	Requirement	Findings
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees	Conformity
The manageme	nt has established and maintained a "Human Resource & Social Policy", dated	01/07/2018. The
policy was cont	ained of the management's commitment to the following	
1. Comply with	the Employment Act 1955, Undustrial Relation ACt 1967 etc	
2. Provide equa	I opportunity and teatment to all employees	
3. Employee re	nuneration and employment terms and conditions	
4. Prevent all fo	orms of sexual harrasment	
Sighted policy v	vas communicated during the morning briefing, display at the office and other s	trategic plase within
the estate com	pund.	
- All policies we	re displayed at the office and workers Quarters.	
- Results of the	interview with all workers at respective estates:	
- No complaints	from the workers.	
- The workers s	atisfied with current working and living conditions in the plantation	
	s are above 18 years old.	
- Passport were their passport a	kept in office for safety purpose (willingly written and verbal approved by worke at any time.	ers). Workers can get
4.4.5.2	The management shall not engage in or support discriminatory practices	
	and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.	Conformity
The manageme	nt's commitment towards preventing discriminatory and promoting equality is e	vident in the
"Human Resou	rce & Social Policy. Refer to 4.4.5.1. The policy clearly stated will not support an	y discrimination
practice and pr	ovide equal opportunity to all workers and employee.	
Site visit and in	terview sighted no any discriminatory were sighted and all employee are treated	d equally by
providing the sa	alary and other benefits as per workers contract agreement.	
Site visit and interview sighted no any discriminatory were sighted and all emplyee are treated equally by provide		
the living quarter, salary and other benefits as per workers contract agreement.		
Sampled evidence list of workers are 1 local male and 1 local female and 2 Indonesian male.		
All of the sample above shows:		
- No complaints	from the workers.	

- Workers were	given suitable job according to the Plantation requirements and workers skills.	
- Training provid	led based on work competency requirements	
- All workers enj	oy the same scale of pay and provided with equal housing and work facilities	
- No restriction	for workers to practices their religious activities	
- Prayer areas p	rovided (surau)	
- It is clearly no	forced labor sighted at estate	
-	e has an employment contract either local or foreigner	
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.	Nonconformity
Documentation	and conditions of pay for foreign workers hired at the estates audited are availa	able for verification.
Employment ag	reement with foreign workers, stated duration of contract, job scope, working ho	ours, remuneration,
benefits, holida	ys and occupational safety & health requirements. Pay slips are available for ve	rification showed
the workers we	e able to earn living wage that meet the Minimum Wages Order (Amendment) 2	022.
Atlas Paloh Rub	ber Estate	
Verified the ma	nagement has ensure the employee payment met the minimum wages order an	d as agreed price.
	documents for salary in July 2023 for worker sample:	-
(i) Passport nun	nber #C81786** (foreign general worker) as below:	
- Checkroll Worl	ker Attendance - 25 days work (Daily rate RM57.69/day)	
- Payslip - Paid o	on 05/07/2023 with nett RM12**.00 (deduction advance)	
(ii) I/C number i	#830921****** (local general worker) as below:	
- Checkroll Worl	ker Attendance - 14 days work and (Daily rate RM57.69/day)	
	on 05/07/2023 with nett RM5**.00 (deduction advance, SOCSO, EPF, EIS)	
Atlas Pagoh Mu	ar Estate	
Verified the ma	nagement has ensure the employee payment met the minimum wages order an	d as agreed price.
Verified the few	documents for salary in July 2024, sample as:	
(i) Passport nun	nber #C05009** (foreign general worker) as below:	
- Piece rate Wor	ker Attendance -	
- Payslip - Paid o	on Jul 2024 with gross RM1,8**.00 (deduction advance)	
	CSO contribution made by employer for employment injury scheme	
(ii) I/C number i	#0000527**06**** (local general worker) as below:	
	ker Attendance - 27 days work and 2 days annual leave (Daily rate RM57.69/da	ay)
	n of July 2024 with total salary RM15**.00 (deduction advance, SOCSO, EPF, E	
NC Minor: 4.4.5	.3	
Atlas Paloh Rub		
	nt failed to complying with applicable legislation regarding Employment Injury So	cheme for foreign
_	bloyee sample 1 #ID GW19 (Passport no. : C81786**). This refer to the paymer	_

employee in July 2024 where record of contribution to SOCSO by management has allocated. This is not<br/>compliance to Employees's Social Security (Amendement 2019) Act 1969 where the deduction was not deducted<br/>from the total wages he earned for this particular month.4.4.5.4Management should ensure employees of contractors are paid based on<br/>legal or industry minimum standards according to the employment contract<br/>agreed between the contractor and his employeeConformityRefer to 4.4.5.3 and 4.4.5.9. Pay slips are available for verification showed the workers were able to earn livingConformity

wage that met the Minimum Wages Order (Amendment) 2022. Sampled evidence list of workers under contractors are 2 local men. All of the sample above shows:

- No complaints from the workers.
- Workers were given suitable job according to the Plantation requirements and workers skills.
- Training provided based on work competency requirements
- All workers enjoy the same scale of pay and provided with equal housing and work facilities
- No restriction for workers to practices their religious activities
- Prayer areas provided (surau)
- It is clearly no forced labor sighted at estate
- Each employee has an employment contract either local or foreigner

Atlas Pagoh Muar Estate

Sample for Moin (General worker), verify salary slip for July 2024.

Atlas Paloh Rubber Estate

Sample for Riyaani and Anti (general worker), verify salary slip for July 2024.

4.4.5.5	The management shall establish records that provide an accurate account	
	of all employees (including seasonal workers and subcontracted workers on	Conformity
	the premises). The records should contain full names, gender, date of birth,	Comonnity
	date of entry, a job description, wage and the period of employment.	

List of employees (local and foreigner) was sighted in the estate, containing details on workers' full name, date of birth, gender, address, identity card/ passport number, date joining and job description.

- Atlas Paloh Rubber Estate latest update on 1/8/2024

- Atlas Pagoh Muar Estate latest update on 1/8/2024

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 each and every employee indicated in the employment records

Checked and verified the employment agreement between the estate and the workers. The agreements were done in a transparent and fair manner, containing the contractual periods, notice of termination, annual leave, working hour, holidays etc. All the employment agreements were signed by both employee and employer.

- Atlas Paloh Rubber Estate latest update on  $1\!/8\!/2024$ 

- Atlas Pagoh Muar Estate latest update on 1/8/2024

4.4.5.7 The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.		working nous and overtime transparent for both employees and employer.			
	4.4.5.7	The management shall establish a time recording system that makes			

The time recording for employees for working hours and overtime are recorded within the Checkroll Worker Attendance, Summary of Pay for Foreign Worker, Payslip, Summary Payment. As stated inside the contract

agreement between employee and the employer shown the working hours are complying with amendment 2022,

	ct with less than total working hour 45hour/week.	
The time area		office to
	ling was kept in the checkroll book, maintained by supervisor, then sent to town	office to
	checkroll sheet for the salary payment calculation.	
	nterview show that workers understood and aware the working hours.	
	at the records of working hours marked for attendance records on roll call briefi	ng and recorded in
Check Roll Boo		
- The Working h	ours is are displayed at the office notice board:	
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	Conformity
Verified if there	is any over time of work offer by management, the record of over time for the pa	articular month will
appear inside t	ne payslip. The calculation of over time were based on daily rated wages as per	legal requirement.
	ne contract agreement, the working hour for each worker are 45hour/ week and	
Rest day, Public	c holiday, wages rate, Overtime accordance Employment Act 1955 (Amendment	2022).
The sampled pa	ayslips confirms that the working hours and breaks are observed accordingly by	the management.
The calculation	over time rate is 1.5 for work during normal day.	
Site visit and in	terview show that workers understood and aware the working hours.	
- It is verified th	at the records of working hours marked for attendance records on roll call briefi	ng and recorded in
- It is verified th Check Roll Boo	at the records of working hours marked for attendance records on roll call briefi	ng and recorded in
Check Roll Boo - The Working h	at the records of working hours marked for attendance records on roll call briefi	ng and recorded in
Check Roll Boo - The Working h	at the records of working hours marked for attendance records on roll call briefi k. ours is are displayed as agreed in contract employement.	ng and recorded in Conformity
Check Roll Boo - The Working h - Public holiday 4.4.5.9	at the records of working hours marked for attendance records on roll call briefi k. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line	Conformity
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove	at the records of working hours marked for attendance records on roll call briefi k. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements	Conformity the employee.
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove Wages and ove	at the records of working hours marked for attendance records on roll call briefic. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements r time hour and rate can be found inside the pasylip and clearly transparent to t	Conformity the employee. ollective agreements.
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove Wages and ove During audit, re	at the records of working hours marked for attendance records on roll call briefic. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements r time hour and rate can be found inside the pasylip and clearly transparent to t rtime payment documented on the pay slips in line with legal regulations and col	Conformity the employee. ollective agreements. vertime rate. The
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove Wages and ove During audit, re	at the records of working hours marked for attendance records on roll call briefic. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements r time hour and rate can be found inside the pasylip and clearly transparent to t rtime payment documented on the pay slips in line with legal regulations and collective fer the contract agreement was made. It was mentioned the basic salary and ow ment between employer and employee have been signed. Sighted the evidence	Conformity the employee. ollective agreements. vertime rate. The
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove Wages and ove During audit, re Contract Agreen 1. Daily worker	at the records of working hours marked for attendance records on roll call briefic. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements r time hour and rate can be found inside the pasylip and clearly transparent to t rtime payment documented on the pay slips in line with legal regulations and collective fer the contract agreement was made. It was mentioned the basic salary and ow nent between employer and employee have been signed. Sighted the evidence checkroll	Conformity the employee. ollective agreements. vertime rate. The
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove Wages and ove During audit, re Contract Agreen 1. Daily worker 2. Worker's pay	at the records of working hours marked for attendance records on roll call briefic. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements r time hour and rate can be found inside the pasylip and clearly transparent to t rtime payment documented on the pay slips in line with legal regulations and collective fer the contract agreement was made. It was mentioned the basic salary and ow nent between employer and employee have been signed. Sighted the evidence checkroll	Conformity the employee. ollective agreements. vertime rate. The
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove Wages and ove During audit, re Contract Agreen 1. Daily worker 2. Worker's pay 3. Contract Agreen	at the records of working hours marked for attendance records on roll call briefic. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements r time hour and rate can be found inside the pasylip and clearly transparent to t rtime payment documented on the pay slips in line with legal regulations and col fer the contract agreement was made. It was mentioned the basic salary and ow ment between employer and employee have been signed. Sighted the evidence checkroll slip	Conformity the employee. ollective agreements. vertime rate. The of document below:
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove Wages and ove During audit, re Contract Agreen 1. Daily worker 2. Worker's pay 3. Contract Agreen	at the records of working hours marked for attendance records on roll call briefic. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements r time hour and rate can be found inside the pasylip and clearly transparent to t rtime payment documented on the pay slips in line with legal regulations and col fer the contract agreement was made. It was mentioned the basic salary and over nent between employer and employee have been signed. Sighted the evidence checkroll slip	Conformity the employee. ollective agreements. vertime rate. The of document below:
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove Wages and ove During audit, re Contract Agreen 1. Daily worker 2. Worker's pay 3. Contract Agreen Sighted that the 4.4.5.10	at the records of working hours marked for attendance records on roll call briefic. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements r time hour and rate can be found inside the pasylip and clearly transparent to the rtime payment documented on the pay slips in line with legal regulations and col- fer the contract agreement was made. It was mentioned the basic salary and own nent between employer and employee have been signed. Sighted the evidence checkroll slip eement Between employer and employee e wages of workers are in line with the Minimum Wages Act 2022 (Ammendment 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	Conformity the employee. ollective agreements. /ertime rate. The of document below: nt).
Check Roll Boo - The Working h - Public holiday 4.4.5.9 Verified the ove Wages and ove During audit, re Contract Agreen 1. Daily worker 2. Worker's pay 3. Contract Agreen Sighted that the 4.4.5.10	at the records of working hours marked for attendance records on roll call briefi k. ours is are displayed as agreed in contract employement. has been displayed at office for employee reference. Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements r time hour and rate can be found inside the pasylip and clearly transparent to t rtime payment documented on the pay slips in line with legal regulations and col- fer the contract agreement was made. It was mentioned the basic salary and ov- ment between employer and employee have been signed. Sighted the evidence checkroll slip eement Between employer and employee e wages of workers are in line with the Minimum Wages Act 2022 (Ammendmen 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 to the employment agreement sampled in 4.4.5.6, the social benefit provided b	Conformity the employee. ollective agreements. /ertime rate. The of document below: nt).

2. Bonus		
3. Electricity &	water	
4. Free living o	quarters	
& 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.	Conformity
Atlas Paloh Ru	ibber Estate & Atlas Pagoh Muar Estate	
Both estates p basic amenitie	provides accommodation to these casual workers at site. The houses were found es.	to be habitable with
-	quarters are provided and are constructed of permanent materials which include the houses are supplied with free water and electricity. Weekly living quarters ins rring the audit	
Atlas Paloh Ru Latest housing Bangunan 20	g inspection on 5/8/2024, 25/7/2024 and 18/7/2024 as recorded in Jadual Pe	emeriksaan
Atlas Pagoh M Latest housing 2024 4.4.5.12	g inspection on 5/8/2024, 18/7/2024 and 4/7/2024 as recorded in Jadual Pen The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace	neriksaan Bangunar Conformity
	ent's commitment towards preventing sexual harassment and violence at workpl urce & Social Policy. Refer to 4.4.5.1.	ace is evident in the
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.	Conformity
Noted that the	e management respect the right of the employee to form or join trade union as sta	ated within the
"Human Reso Union.	urce & Social Policy" where the management is complying to the Industrial Act 19	67, Part II Trade
Interview with	the employees showed that there is no restriction for them to join any trade unio	

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.	Conformity
Refer to the e	ung labours were observed in the field nor any documents. mployee register list database, which has the information about date of birth and 8 years of age at the point of recruitment. From site visit sighted no underage wo	
Criterion 6	Training and competency	
Indicator	Requirement	Findings
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.	Conformity
The managen	nent has established a training program for FY2024, containing the following topic	cs:
<ol> <li>2) PPE (Perso</li> <li>3) Spraying tr</li> <li>4) Manuring t</li> <li>5) Harvesting</li> <li>6) Emergency</li> <li>7) Biodiversity</li> <li>8) First aid tra</li> </ol>	of pesticide and PPE training - 11/07/2024 nal Protective Equipment) training - 15/5/2024 aining - 11/7/2024 raining - 13/7/2024 training - 14/7/2024 response training - 15/5/2024 / training - 14/5/2024 aining - 15/7/2024	
	luar Estate reness training - 06/06/2024 ntal training - 04/07/2024	
3) Prohibition	of open Burning - 04/7/2024	
, .	raining - 8/07/2024	
5) Spraying - 2		
<ul><li>7) Harvesting</li><li>8) Safety trair</li></ul>	aining - 164/07/2024 training - 04/07/2024 ning - 04/03/2022 assment - 16/5/2024	

planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.       Conformity         Verified training needs analysis year 2024 for both estates were done as per training matrix table for each category and level of employee. The requirment of training will be based on training evaluation done after training completion.       OFI         4.4.6.3       A continuous training programme 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.       OFI         The training programmed was shown as per 4.4.6.1.       Verified the Training Plan 2024 and sighted listed a training related to safety and environment such as Safety Awareness Training. SOP Spraying, Manuring and Vehicle Training. The implementation of the Training Plan was sighted as per Training Records which consists of: (i) Type of training (ii) Month planned (iii) Status of training (actual implemented)       Sighted evidence to show that the post training evaluation was conducted for employees who has undergone training as required under Training Procedure.         OFI: 4.4.6.3       Training Records which consists of: (i) Type of training (actual implemented)         Sighted evidence to show that the post training evaluation was conducted for employees who has undergone training evaluations are available for Polisi Keselamatan dan Kesihatan Dalam Pekerjaan on 10/5/2024 for Atias Paloh Rubber Estate and Latihan Meracun Tikus for Atias Pagoh Muar Estate on 16/7/2024. How ever only one training evaluation available instead of four participants (Atias Pagoh Muar Estate) and only one training form evaluation available			
and level of employee. The requirment of training will be based on training evaluation done after training completion.           4.4.6.3         A continuous training programme 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.         OFI           The training Plan 2024 and sighted listed a training related to safety and environment such as Safety Awareness Training SOP Spraying. Manuring and Vehicle Training. The implementation of the Training Plan was sighted as per Training Records which consists of: <ul> <li>(i) Type of training</li> <li>(ii) Mont planned</li> <li>(iii) Status of training (actual implemented)</li> </ul> <li>Sighted evidence to show that the post training evaluation was conducted for employees who has undergone training as required under Training Procedure.</li> <li>OFI: 4.4.6.3</li> <li>Training evaluations are evailable for Polisi Keselamatan dan Kesihatan Dalam Pekerjaan on 10/5/2024 for Atlas Paloh Rubber Estate and Latihan Meracun Tikus for Atlas Pagoh Muar Estate) and only one training form evaluation available instead of four participants (Atlas Paloh Rubber Estate) and only one training form evaluation available instead of two participants (Atlas Pagoh Muar Estate).</li> <li>PB Environment, Natural Resources, Biodiversity and Ecosystem Services</li> <li>Conformity and state environmental management plan in compliance with the relevant country and state environmental laws shall be developed, conformity effectively communicated and implemented.</li> <li>The company had established and maintained the documented the Environmental, Natural Resources, Biodiversity and Ecosystem Policy, dated 1,1/U 2018 which was endorsed by Directors; Mr Chee Kim Hoon. The policy was seen displayed at the estate office.</li> <li>Based on t</li>	4.4.6.2	planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	
ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.     OFI       The training procession as per 4.4.6.1.     Verified the Training Plan 2024 and sighted listed a training related to safety and environment such as Safety Awareness Training, SOP Spraying, Manuring and Vehicle Training. The implementation of the Training Plan was sighted as per Training Records which consists of: (i) Type of training (ii) Month planned (iii) Status of training (actual implemented)     Sighted evidence to show that the post training evaluation was conducted for employees who has undergone training as required under Training Procedure.       OFI: 4.4.6.3     Training evaluations are available for Polisi Keselamatan dan Kesihatan Dalam Pekerjaan on 10/5/2024 for Atlas Paloh Rubber Estate and Latihan Meracun Tikus for Atlas Pagoh Muar Estate on 16/7/2024. How ever only one training evaluation available instead of four participants (Atlas Paloh Rubber Estate) and only one training form evaluation available instead of two participants (Atlas Paloh Rubber Estate) and only one training form evaluation available instead of two participants (Atlas Paloh Rubber Estate) and only one training form evaluation available instead of two participants (Atlas Paloh Rubber Estate).     Conformity       P5     Environmental management plan Indicator     Findings       A.5.1.1     An environmental management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.     Conformity       The environmental management plan shall cover the following: a) An environmental management plan shall cover the following: b) The aspects and impacts analysis of all operations     OFI <td>-</td> <td></td> <td></td>	-		
Verified the Training Plan 2024 and sighted listed a training related to safety and environment such as Safety Awareness Training, SOP Spraying, Manuring and Vehicle Training. The implementation of the Training Plan was sighted as per Training Records which consists of: (i) Type of training (iii) Month planned (iiii) Status of training (actual implemented) Sighted evidence to show that the post training evaluation was conducted for employees who has undergone training as required under Training Procedure. OFI: 4.4.6.3 Training evaluations are available for Polisi Keselamatan dan Kesihatan Dalam Pekerjaan on 10/5/2024 for Atlas Paloh Rubber Estate and Latihan Meracun Tikus for Atlas Pagoh Muar Estate on 16/7/2024. How ever only one training evaluation available instead of four participants (Atlas Paloh Rubber Estate) and only one training form evaluation available instead of two participants (Atlas Pagoh Muar Estate). P5 Environment, Natural Resources, Biodiversity and Ecosystem Services Criterion 1 Environmental management plan Indicator Requirement 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. The company had established and maintained the documented the Environmental, Natural Resources, Biodiversity and Ecosystem Policy, dated 1 July 2018 which was endorsed by Directors; Mr Chee Kim Hoon. The policy was seen displayed at the estate office. Based on the interview session with the sample employees, they have awareness on the Company Environmental policy. 4.5.1.2 The environmental management plan shall cover the following: a) An environmental policy and objectives. b) The aspects and impacts analysis of all operations a) Refer to 4.5.1.1 b) Both estates management had established and maintained the documented "Penilaian Aspek & Impak Alam Sekitar' for Estate activities such as: 1. Chemical spraying	4.4.6.3	ensure that all employees are well trained in their job function and	OFI
Criterion 1       Environmental management plan         Indicator       Requirement       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.       Conformity         The company had established and maintained the documented the Environmental, Natural Resources, Biodiversity and Ecosystem Policy, dated 1 July 2018 which was endorsed by Directors; Mr Chee Kim Hoon. The policy was seen displayed at the estate office.       Based on the interview session with the sample employees, they have awareness on the Company Environmental policy.         4.5.1.2       The environmental management plan shall cover the following: <ul> <li>a) An environmental policy and objectives.</li> <li>b) The aspects and impacts analysis of all operations</li> <li>OFI</li> </ul> a) Refer to 4.5.1.1       b) Both estates management had established and maintained the documented "Penilaian Aspek & Impak Alam Sekitar" for Estate activities such as:	Verified the Trai Awareness Train sighted as per T (i) Type of trainin (ii) Month plann (iii) Status of trai Sighted evidend training as required OFI: 4.4.6.3 Training evaluat Paloh Rubber Est training evaluat	ning Plan 2024 and sighted listed a training related to safety and environment ning, SOP Spraying, Manuring and Vehicle Training. The implementation of the T training Records which consists of: ng ed nining (actual implemented) et o show that the post training evaluation was conducted for employees who h ired under Training Procedure. tions are available for Polisi Keselamatan dan Kesihatan Dalam Pekerjaan on 1 state and Latihan Meracun Tikus for Atlas Pagoh Muar Estate on 16/7/2024. H ion available instead of four participants (Atlas Paloh Rubber Estate) and only o	Training Plan was has undergone .0/5/2024 for Atlas How ever only one
Indicator       Requirement       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.       Conformity         The company had established and maintained the documented the Environmental, Natural Resources, Biodiversity and Ecosystem Policy, dated 1 July 2018 which was endorsed by Directors; Mr Chee Kim Hoon. The policy was seen displayed at the estate office.       Based on the interview session with the sample employees, they have awareness on the Company Environmental policy.         4.5.1.2       The environmental management plan shall cover the following: a) An environmental policy and objectives. b) The aspects and impacts analysis of all operations       OFI         a) Refer to 4.5.1.1       b) Both estates management had established and maintained the documented "Penilaian Aspek & Impak Alam Sekitar" for Estate activities such as:       1. Chemical spraying			
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.       Conformity         The company had established and maintained the documented the Environmental, Natural Resources, Biodiversity and Ecosystem Policy, dated 1 July 2018 which was endorsed by Directors; Mr Chee Kim Hoon. The policy was seen displayed at the estate office.       Based on the interview session with the sample employees, they have awareness on the Company Environmental policy.         4.5.1.2       The environmental management plan shall cover the following: a) An environmental policy and objectives. b) The aspects and impacts analysis of all operations       OFI         a) Refer to 4.5.1.1       b) Both estates management had established and maintained the documented "Penilaian Aspek & Impak Alam Sekitar" for Estate activities such as: 1. Chemical spraying       Conformity			Findings
and Ecosystem Policy, dated 1 July 2018 which was endorsed by Directors; Mr Chee Kim Hoon. The policy was seen displayed at the estate office. Based on the interview session with the sample employees, they have awareness on the Company Environmental policy. 4.5.1.2 The environmental management plan shall cover the following: a) An environmental policy and objectives. b) The aspects and impacts analysis of all operations OFI a) Refer to 4.5.1.1 b) Both estates management had established and maintained the documented "Penilaian Aspek & Impak Alam Sekitar" for Estate activities such as: 1. Chemical spraying	4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed,	
policy.       The environmental management plan shall cover the following:       OFI         a) An environmental policy and objectives.       OFI         b) The aspects and impacts analysis of all operations       OFI         a) Refer to 4.5.1.1       Both estates management had established and maintained the documented "Penilaian Aspek & Impak Alam Sekitar" for Estate activities such as:       1. Chemical spraying	and Ecosystem	Policy, dated 1 July 2018 which was endorsed by Directors; Mr Chee Kim Hoon	-
a) An environmental policy and objectives.       OFI         b) The aspects and impacts analysis of all operations       OFI         a) Refer to 4.5.1.1       Both estates management had established and maintained the documented "Penilaian Aspek & Impak Alam Sekitar" for Estate activities such as:         1. Chemical spraying	Based on the in policy.	terview session with the sample employees, they have awareness on the Comp	any Environmental
<ul> <li>b) Both estates management had established and maintained the documented "Penilaian Aspek &amp; Impak Alam</li> <li>Sekitar" for Estate activities such as:</li> <li>1. Chemical spraying</li> </ul>	4.5.1.2	a) An environmental policy and objectives.	OFI
Sekitar" for Estate activities such as: 1. Chemical spraying	a) Refer to 4.5.	1.1	
Sekitar" for Estate activities such as: 1. Chemical spraying	b) Both estates	management had established and maintained the documented "Penilaian Asp	ek & Impak Alam
1. Chemical spraying		-	
	-		

- 3. Harvesting
- 4. Manuring application

OFI: 4.5.1.2

Atlas Paloh Rubber Estate

Both estate management had provided the documented EAIA. However, the report can be further improved by adding assessment on labor quarters, ramp, diesel skid tank and water pump used for extraction.

1.5.1.	3		mental improvement	. –	-		
		promote th monitored.	e positive ones, sha	ll be developed, e	ffectively imp	plemented and	Conformity
oth e	estates ha		ed and documented	the environmental	manageme	nt plan incorpor	ated in EAIA cited ir
		en in sample					
			mprovement Prograr	nme			
-		uring applica	ation				
	plan: ntrol fertil	izer applicat	ion				
			g on field erosion cor	ntrol as outlined in	Agricultural	Manual	
			od practices associat		torage and a	application	
			in accurate record of				
.5.1.4	4		me to promote the pe mprovement plan	ositive impacts sn	ould be inclu	ided in the	Conformity
sper	4.5.1.2b						
. 60.							
.5.1.	5	An awaren	ess and training prog	gramme shall be c	stabliched	ind	
	0		ed to ensure that all				
			of the environmenta	· ·			Conformity
			g towards achieving				
oth e	estates ha	id conducted	d a training related to	o environment as	shown below	/:	
	E	state	Document	Date	Торі	c	Trainer
	Atlas Pa Estate	aloh Rubber	<b>-</b> · · · ·	15 July 2024 15 April 2024	Environme briefing	ental Mr Azr	man Abd Halil
	Atlas Pa Estate	agoh Muar	Training record	4 July 2024	Environme	ental Mr	Mohd Jeffri
				1	1		
.5.1.0	6	Managomo	ent shall organize reg	sular montings wit	homplovoos	whore their	
	0	-	bout environmental				Conformity
was	noted tha	at the Manag	gement has conducte	ed a meeting to di	scuss on env	vironmental ma	tters as shown belo
	Fotot		Document	Ohei	mon	Data	No of
	Estate	Б 	Document	Chair		Date	attendees
Atlas Paloh Rubber				Chin Cho	on Chow	19 April 202	4 7
Estate Atlas Pagoh Muar			Minutes of meetin	~			

Criterion 2	Efficiency of energy use and use of renewable energy	
Indicator	Requirement	Findings
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 fuel, electricity and energy efficiency in the operations over the base period.	Conformity

Both estates management had monitor the consumption of non-renewable energy for both diesel and electricity usage by maintaining the baseline value on monthly basis. The average of actual consumption by management as shown below:

Document: Monthly diesel and electricity usage

Estate	Month	Electricity consumed (kWH)	Diesel consumed (L)
Atlas Paloh Rubber	June	5,471.56kWh	1,945L
Estate	July	7,124.08kWh	2,010L
Atlas Pagoh Muar	June	3,924kWh	294L
Estate	July	1,628kWh	435L

	The oil palm premises shall es energy for their operations, in energy efficiency of their oper contractors, including all trans	Conformity		
	had estimated their non renewab lonthly diesel and electricity usage	le energy consumption FY202		ence below:
	Estate	Electricity estimate (kWH)/	Diesel estimate (	(L)/
	Atlas Dalah Dubhay Estata	month	month	
	Atlas Paloh Rubber Estate	8,000kWh	2,600L	
	Atlas Pagoh Muar Estate	5,000kWh	700L	
4.5.2.3	The use of renewable energy	should be applied where possi	ble	Conformity
	ration and document review confi the day of audit	rm that the Management does	not harness any fo	orms of renewable
Criterion 3	Waste management and disp	osal		The allowed
Indicator 4.5.3.1	All waste products and source documented.	es of pollution shall be identifie	d and	Findings Conformity
4.5.3.2		avoid or reduce pollution shall	be developed	
	for: a) Identifying and monitoring b) Improving the efficiency of	management plan should inclu g sources of waste and pollution of resource utilization and recycl	on. cling of potential	Conformity
Refer to 4.5.3	<ul><li>for:</li><li>a) Identifying and monitoring</li><li>b) Improving the efficiency of wastes as nutrients or convertional</li></ul>	g sources of waste and pollutio	on. cling of potential	Conformity
Refer to 4.5.3	for: a) Identifying and monitoring b) Improving the efficiency of wastes as nutrients or conver 3.1 The management shall estable of used chemicals that are cla	g sources of waste and pollution of resource utilization and recycl ting them into value-added by- ish Standard Operating Procect assified under Environment Qu vironmental Quality Act, 1974 t	on. Cling of potential products. Jure for handling ality Regulations	Conformity
4.5.3.3	for: a) Identifying and monitoring b) Improving the efficiency of wastes as nutrients or conver 3.1 The management shall estable of used chemicals that are cla (Scheduled Waste) 2005, Env	g sources of waste and pollution of resource utilization and recycl ting them into value-added by- lish Standard Operating Procect assified under Environment Qu vironmental Quality Act, 1974 to d disposal.	on. cling of potential products. dure for handling ality Regulations o ensure proper	Nonconformity
4.5.3.3 Both estates management	for: a) Identifying and monitoring b) Improving the efficiency of wastes as nutrients or conver 3.1 The management shall estable of used chemicals that are cla (Scheduled Waste) 2005, Env and safe handling, storage and	g sources of waste and pollution of resource utilization and recycl ting them into value-added by- lish Standard Operating Procect assified under Environment Qu vironmental Quality Act, 1974 t ad disposal. the documented Handling of U to triple rinsing and puncture er	on. Cling of potential products. dure for handling ality Regulations o ensure proper sed Chemicals, in mpty chemical con	Nonconformity which the tainers prior to
4.5.3.3 Both estates management disposal. The Atlas Pagoh N	for: a) Identifying and monitoring b) Improving the efficiency of wastes as nutrients or conver 3.1 The management shall estable of used chemicals that are cla (Scheduled Waste) 2005, Env and safe handling, storage and had established and maintained of thas expressed commitment to de procedures adequately outline pro-	g sources of waste and pollution of resource utilization and recyc ting them into value-added by- lish Standard Operating Proceed assified under Environment Qu vironmental Quality Act, 1974 t ad disposal. the documented Handling of U to triple rinsing and puncture er rocedures to managing schedu	on. Cling of potential products. lure for handling ality Regulations o ensure proper sed Chemicals, in mpty chemical con Ile waste generate	Nonconformity which the tainers prior to d in the estate.
4.5.3.3 Both estates management disposal. The Atlas Pagoh M The manager fertilizer beg	for: a) Identifying and monitoring b) Improving the efficiency of wastes as nutrients or conver 3.1 The management shall estable of used chemicals that are classified (Scheduled Waste) 2005, Env and safe handling, storage and had established and maintained t has expressed commitment to de procedures adequately outline pro-	g sources of waste and pollution of resource utilization and recycling them into value-added by- lish Standard Operating Proced assified under Environment Quality Act, 1974 to d disposal. the documented Handling of U to triple rinsing and puncture en rocedures to managing schedu d the inventory record on empt	on. Cling of potential products. Aure for handling ality Regulations o ensure proper sed Chemicals, in mpty chemical con ile waste generate	Nonconformity which the tainers prior to d in the estate.
4.5.3.3 Both estates management disposal. The Atlas Pagoh N The manager fertilizer beg empty fertiliz	for: a) Identifying and monitoring b) Improving the efficiency of wastes as nutrients or conver 3.1 The management shall estable of used chemicals that are cla (Scheduled Waste) 2005, Env and safe handling, storage and had established and maintained and thas expressed commitment to de procedures adequately outline pro- Muar Estate ment has maintained and provider record as seen during audit day. A	g sources of waste and pollution of resource utilization and recycling them into value-added by- lish Standard Operating Proced assified under Environment Quality Act, 1974 to d disposal. the documented Handling of U to triple rinsing and puncture en rocedures to managing schedu d the inventory record on empt	on. Cling of potential products. Aure for handling ality Regulations o ensure proper sed Chemicals, in mpty chemical con ile waste generate	Nonconformity which the tainers prior to d in the estate.
4.5.3.3 Both estates management disposal. The Atlas Pagoh N The manager fertilizer beg empty fertiliz	for: a) Identifying and monitoring b) Improving the efficiency of wastes as nutrients or conver 3.1 The management shall estable of used chemicals that are classified (Scheduled Waste) 2005, Environment and safe handling, storage and had established and maintained and thas expressed commitment to de procedures adequately outline pro- Muar Estate ment has maintained and provider record as seen during audit day. A er beg: 10,019 begs	g sources of waste and pollution of resource utilization and recycling them into value-added by- lish Standard Operating Proced assified under Environment Quality Act, 1974 to d disposal. the documented Handling of U to triple rinsing and puncture en rocedures to managing schedu d the inventory record on empt	on. Cling of potential products. Aure for handling ality Regulations o ensure proper sed Chemicals, in mpty chemical con ile waste generate	Nonconformity which the tainers prior to d in the estate.
4.5.3.3 Both estates management disposal. The Atlas Pagoh N The manager fertilizer beg empty fertiliz empty pestici	for: a) Identifying and monitoring b) Improving the efficiency of wastes as nutrients or conver 3.1 The management shall estable of used chemicals that are cla (Scheduled Waste) 2005, Env and safe handling, storage and had established and maintained of thas expressed commitment to de procedures adequately outline pro- Muar Estate ment has maintained and provided record as seen during audit day. A er beg: 10,019 begs ide containers: 63 containers	g sources of waste and pollution of resource utilization and recycling them into value-added by- lish Standard Operating Proced assified under Environment Quality Act, 1974 to d disposal. the documented Handling of U to triple rinsing and puncture en rocedures to managing schedu d the inventory record on empt	on. Cling of potential products. Aure for handling ality Regulations o ensure proper sed Chemicals, in mpty chemical con ile waste generate	Nonconformity which the tainers prior to d in the estate.

management to record empty pesticide container into the SW inventory record.

NC Minor: 4.5.3.3

Atlas Paloh Rubber Estate and Atlas Pagoh Muar Estate

The management has generated Schedule Waste, the empty fertilizer beg as seen during audit day. As seen in the payment voucher provided, the latest disposal was amounted 7600 begs, dated on 10 August 2024. However, the disposal was not made according to the Regulation 8(1) Schedule Waste Regulation 2005.

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 programme on recycling of used HDPE pesticide containers.	Conformity
Poth octator up	and ampty chamical container been rouse for contain water for spraving or contain	in promix posticido

Both estates used empty chemical container been reuse for contain water for spraying or contain premix pesticide.

L			
	4.5.3.5	Domestic waste should be disposed as such to minimize the risk of	
		contamination of the environment and watercourses.	Conformity

Domestic waste generated from the estate complex are disposed at the dedicated landfill area within the estate: located at:

Block 16 (Atlas Paloh Rubber Estate)

Block OP2017 (Atlas Pagoh Muar Estate)

Noted that the landfill has been appropriately managed by the management and seen the signage indicated "Tapak Pelupusan Sampah".

Criterion 4	Reduction of pollution and emission	
Indicator	Requirement	Findings
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent	Conformity

As per 4.5.1.2

4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall	
	be established and implemented	Conformity

The management provided a record of regular maintenance as part of the plan to reduce the pollutants and emissions. Seen the records of inspection as seen in detail below:

Document: inspection record

Estate	Vehicle no	Ref no	Date	Service Provider
Atlaa Dalah Dubbar	MCC 9900	KMLAPR24000557	9 April 2024	K.M Lim Auto Sdn Bhd
Atlas Paloh Rubber Estate	MCC 9900	CSH2404/0122	13 April 2024	Tong Huat Tyre &
Estate				Battery Sdn Bhd
Atlas Pagoh Muar Estate	TS90	07637	23 July 2024	Perniagaan Jaya Jati

Criterion 5	Natura	al water resources			
Indicator	Requi	rement			Findings
4.5.5.1		anagement shall establ ural water resources (su	_		
a) Assessm	ent of wa	ater usage and sources	of supply.		Conformity
Both estates n	nanagem	nent is using water sour	ces from natural water	sources.	
	verified th	ate ne Water Catchment Are ning purposes only.	ea Procedure and water	r usage data. The water	from the catchment is
	g water ex	te xtracts from ground wat e permit from BAKAJ (Re			
		Document	Date	Laboratory	
		Water sampling analysis	5 June 2024	Jabatan Kimia Malaysia	
no natural wat c) Ways to op	terways t	sit and based on the int raverse through the esta vater and nutrient usage	ate e to reduce wastage (e.	g. having in place	
systems for re collection of ra	-	ht application, maintena etc.).	ance of equipment to re	educe leakage,	Conformity
	ient upta	ilt pits in the Estate was ke and soil moisture co	•	-	•
	barian bu	r courses and wetlands, iffer zones at or before p state.		_	Conformity
		o and based on the inter erse through the estate	rview session with the r	nanagement represent	atives confirms that n
		etation in riparian areas ablished and implemen		plan with a timetable fo	r Conformity
		(d), a restoration plan/s		lished	
f) Where bor be measured a		being use for water sup nnually.	ply, the level of the grou	und water table should	Conformity
No bore well is	s used fo	r water supply.			
4.5.5.2		nstruction of bunds, wei ng through an estate.	rs and dams across ma	ain rivers or waterways	Conformity
Per findings in	4.5.7.1	(d), construction of such	n structures was not ob	served.	

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).	Conformity
	nent of the water drainage system in the Estate was dedicated predominantly to tree irrigation, nutrient uptake and soil moisture conservation.	collect rainwater for
Criterion 6	Status of rare, threatened, or endangered species and high biodiversity value	area
Indicator	Requirement	Findings
4.5.6.1	Information shall be collated that includes both the planted area itself and rele landscape-level considerations (such as wildlife corridors). This information sh	
	on of high biodiversity value habitats, such as rare and threatened ecosystems, significantly affected by the grower(s) activities.	OFI
The managen	ent has maintained and documented the "Laporan Biodiversiti" in January 2019,	in which the report
has incorpora	ted the control measures to the HBV area and list of wildlife in the estate, based	on the IUCN Status.
Wildlife identi	fied include:	
1. Wild boar		
2. Squirrel		
3. Long tailed	leaf monkey	
4. Python		
•	bra	
5. Spitting co	bra	
•	bra	
5. Spitting co OFI: 4.5.6.1a	bra nat the Biodiversity report provided by management is expired in 2023. The mana	agement to update
5. Spitting co OFI: 4.5.6.1a It was found t		agement to update
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi	nat the Biodiversity report provided by management is expired in 2023. The mana	agement to update
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi b) Conservation Resources (IU	nat the Biodiversity report provided by management is expired in 2023. The mana ty report for the incoming MSPO 2.0 certification during next assessment. on status (e.g. The International Union on Conservation of Nature and Natural CN) status on legal protection, population status and habitat requirements of	
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi b) Conservation Resources (IU rare, threaten	nat the Biodiversity report provided by management is expired in 2023. The mana ty report for the incoming MSPO 2.0 certification during next assessment. on status (e.g. The International Union on Conservation of Nature and Natural	agement to update Conformity
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi b) Conservatio Resources (IU rare, threaten activities.	hat the Biodiversity report provided by management is expired in 2023. The mana ty report for the incoming MSPO 2.0 certification during next assessment. In status (e.g. The International Union on Conservation of Nature and Natural CN) status on legal protection, population status and habitat requirements of ed, or endangered species), that could be significantly affected by the grower(s)	Conformity
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi b) Conservatio Resources (IU rare, threaten activities.	nat the Biodiversity report provided by management is expired in 2023. The mana ty report for the incoming MSPO 2.0 certification during next assessment. on status (e.g. The International Union on Conservation of Nature and Natural CN) status on legal protection, population status and habitat requirements of	Conformity
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi b) Conservation Resources (IU rare, threaten activities. Referring to th	hat the Biodiversity report provided by management is expired in 2023. The mana ty report for the incoming MSPO 2.0 certification during next assessment. In status (e.g. The International Union on Conservation of Nature and Natural CN) status on legal protection, population status and habitat requirements of ed, or endangered species), that could be significantly affected by the grower(s)	Conformity
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi b) Conservatio Resources (IU rare, threaten activities.	hat the Biodiversity report provided by management is expired in 2023. The mana ty report for the incoming MSPO 2.0 certification during next assessment. In status (e.g. The International Union on Conservation of Nature and Natural CN) status on legal protection, population status and habitat requirements of ed, or endangered species), that could be significantly affected by the grower(s)	Conformity Checklist.
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi b) Conservation Resources (IU rare, threaten activities. Referring to th 4.5.6.2	hat the Biodiversity report provided by management is expired in 2023. The management for the incoming MSPO 2.0 certification during next assessment. On status (e.g. The International Union on Conservation of Nature and Natural CN) status on legal protection, population status and habitat requirements of ed, or endangered species), that could be significantly affected by the grower(s) the Biodiversity Report cited in 4.5.6.1a, the wildlife identified are based on IUCN of If rare, threatened or endangered species, or high biodiversity value, are present.	Conformity Checklist.
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi b) Conservation Resources (IU rare, threaten activities. Referring to th 4.5.6.2 a) Ensuring	hat the Biodiversity report provided by management is expired in 2023. The management for the incoming MSPO 2.0 certification during next assessment. In status (e.g. The International Union on Conservation of Nature and Natural CN) status on legal protection, population status and habitat requirements of ed, or endangered species), that could be significantly affected by the grower(s) The Biodiversity Report cited in 4.5.6.1a, the wildlife identified are based on IUCN of the grower is the species of the speci	Conformity Checklist. ent, appropriate
5. Spitting co OFI: 4.5.6.1a It was found t the Biodiversi b) Conservation Resources (IU rare, threaten activities. Referring to th 4.5.6.2 a) Ensuring Referring to th	hat the Biodiversity report provided by management is expired in 2023. The management for the incoming MSPO 2.0 certification during next assessment. On status (e.g. The International Union on Conservation of Nature and Natural CN) status on legal protection, population status and habitat requirements of ed, or endangered species), that could be significantly affected by the grower(s) are Biodiversity Report cited in 4.5.6.1a, the wildlife identified are based on IUCN of measures for management planning and operations should include:	Conformity Checklist. ent, appropriate Conformity

	ging any illegal or inappropriate hunting, fishing or collecting activities and sponsible measures to resolve human-wildlife conflicts	Conformity
hunting, fishir	interview session with the management representatives, no any discouraging ille ng or collecting activities was carried out in the estate. Seen also the signboard o estate to discouraging illegal hunting,	
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.	Conformity
Refer to 4.5.6	5.2a	
Indicator 7	Zero burning practices	
Indicator	Requirement	Findings
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 specific situations, as identified in regional best practice.	Conformity
The managem	nent's commitment to avoid use of fire for waste disposal and land preparation is	${\mathfrak s}$ evident in within the
Environmenta	I Policy signed by Directors dated 1 July 2018 which stated that:	
"Compliance	with relevance country and state environment laws"	
	nd interview with the sampled external stakeholders confirms that there were no	incident of open
burning sighte		
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.	Conformity
There were no	o request sought by the management for using fire to remedy or re-condition the	land as of this audit
point.		
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.	Conformity
There were no point.	p request sought by the management for using fire to remedy or re-condition the	land as of this audit
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	Conformity
	p request sought by the management for using fire to remedy or re-condition the	land as of this audit
point.		
P6: Best Pra	actices	
Criterion 1	Site management	
Indicator	Requirement	Findings
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	Conformity
Sighted Stand	lard Operating Procedure (SOP) established by the Management available during	g audit. The SOPs
been retained	l on estates and covered all operation including harvesting, transportation of FFE	3, spraying, manuring
etc. The Estat	e established the SOP for the best practices of the palm oil operation activity su	ch as Harvesting,
	eding etc. Sighted Operation procedure as below:	
1. Planting ma		
2. Nursery tec		
-		
э. ганинg, pi	re planting and replanting activities	

4. Supplying and palm replacement

- 5. Harvesting
- 6. Oil palm pest
- 7. Weed management
- 8. Rainfall recording

Site visit sighted all activities are as per Manual and verified the Training Records the SOP training were given to all employee. Verified the activity as below:

It is observed during site visit that all activities are well operated and maintained in acceptable condition during this shortage of worker period.

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						
	erosion as well as siltation of drains and waterways. Measures shall be put	Conformity					
	in place to prevent contamination of surface and groundwater through						
	runoff of either soil, nutrients or chemicals.						
Observed durin	Observed during site visit, it was found that both estates topography is flat area and to undulating area. The estate						

management has maintained good agricultural practices such as:

- 1. Maintenance of soft grass along the harvesting path
- 2. Circle spraying around palm base
- 3. Selective spray in most of the estate area
- 4. Proper frond stacking

+. I Toper Irona	field.       Conformity         s observed during site visit, it was found that both estates fields:       Are marked and identified with detail available on plantation map. There are both painted/marked at the palm         ees and at the plantation road junction. This is observed during the field visit.       Image: Conformity						
4.6.1.3	•	Conformity					
As observed du	s observed during site visit, it was found that both estates fields:						
- Are marked ar	- Are marked and identified with detail available on plantation map. There are both painted/marked at the palm						
trees and at the	plantation road junction. This is observed during the field visit.						
- Clear boundar	- Clear boundary with neighboring estates, traditional villages.						
- No sensitive a	reas around border of every estate.						

Criterion 2		nic and financial	viability plai	1			
ndicator	Require						Findings
4.6.2.1	demon		-		shall be established to sial viability through lor		Conformity
The mana; during auc 1. FFB pro 2. Capital 3. Estate 4. Adminis 5. Upkeep	gement has p lit day. Referring oduction expenditure general charg stration l transport Where	ing to the said do es applicable, an ar	idget planni cument, fol inual replan	ng for Year lowing item ting progra	2024 (October 2023- ns are budgeted to run	the busir	
		erm replanting pro ly, where applica			tablished and review		Conformity
It was note		was no replanting	-	-	f audit		
<ul> <li>4.6.2.3</li> <li>The business or management</li> <li>a) Attention to quality of p</li> <li>b) Crop projection: site yie</li> <li>profile, FFB yield trends</li> <li>c) Cost of production: cost</li> <li>d) Price forecast.</li> <li>e) Financial indicators: cost</li> <li>investment.</li> </ul>				materials a Itial, age ne of FFB.	nd FFB.	n	Conformity
As per 4.6	.2.1						
4.6.2.4	achieve		s and objec	tives shall	lemented and the be regularly monitorec	I,	Conformity
managem	any's perform ent plan desc	ance is monitored ribed in 4.6.2.1 a	d by the estand 4.6.2.3.		er, utilising the annual	budget a	nd business
Criterion 3	· · ·	arent and fair pri	ce dealing				
Indicator 4.6.3.1	Pricing	Requirement         Findings           Pricing mechanisms for the products and other services shall be documented and effectively implemented.         Conformity					Findings Conformity
Both estat					operations. Evidence a	as below:	
[	Ectoto	Contractor	Data of ca	roomant	Evoin data	1-	h offered
Atla	Estate as Paloh	Contractor	Date of ag		Expiry date September 2024		<b>b offered</b> /esting and
	ober Estate	Gan Ser Heng	1 Octobe	er 2023	(12 months period)		spraying
Atlas Pagoh Muar Estate		oh P. Murugan Ate A/LD 1 October 2022 30 September 2023 Harv			vesting and pruning		
4.6.3.2		tracts shall be fai de in timely manr	-	transparer	it and agreed payment	s shall	Conformity
Both estat	es have provi	ded an evidence	of payment	to contrac	tors as shown in evide	nce belov	v:
			1				
	Estate	Contra	otor	Month	Document	Deve	ment date

	Atlas Paloh Rubber Estate Atlas Pagoh Muar Estate		Gan Ser Heng	June 2024	Cheque	5 Ju	uly 2024	
			Q. Murugan A/L D. Paramasivam	July 2024	Cash bill	31 July 2024		
Criterion 4 Contrac		Contractor						
Indica	ator 1	r 1 Requirement Findings						
4.6.4.1			actors are engaged s and shall provide	· · · · · · · · · · · · · · · · · · ·	stand the MSPO Imentation and info	ormation	Conformity	
Atlas	Paloh Rub	ber Estate						
Verified with the contractor has well understanding in the MSPO requirement and prepared the documentation and								
inforn	mation req	uired by stand	ard. Refer to agree	ement between ma	anagement and cor	ntractor, G	an Seng Heng,	
claus	e 11 state	d that:						
" The								

" The contractor shall ensure that its employee will execute the contract work in accordance with MSPO and OSH standards, all PPE will be provided by the contractor."

4.6.4.2	The ma		provide evidence of ag	greed contracts with the		OFI	
Both estates ha			to carry out few estate	e operations. Evidence a	s below:	I	
Esta	ate	Contractor	Date of agreement	ement Expiry date Jo		b offered	1
Atlas Pa		Gan Ser Heng	1 October 2023	September 2024		esting and	
Rubber Atlas Pa		R. Murugan		(12 months period)		praying	-
Muar Es	-	A/L D. Paramasivam	1 October 2022	30 September 2023		esting and pruning	
Paramasivam.	ent has p However	rovided the contr , the agreement v	was found to be expire	e appointed contractor, ed on 30 September 202 ement with the contracto	23. Thou		l no
4.6.4.3		-	accept MSPO approve physical inspection if	-		Conformity	
Refer to 4.6.4.3 Based on interv		sion with the sam	ple contractor, he is re	eady to be assessed if n	ecessary	<i>.</i>	
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						Conformity	
		anagement will ei roved by estate ir		all activities conducted k	by the co	ntractors, chec	cked
P7: Developm	nent of n	ew plantings					
Criterion 1	High bi	iodversity value					
Indicator	Requir					Findings	
4.7.1.1		l out in compliand		n biodiversity value unle nd/or State Biodiversity	ss it is	Select	
Not Applicable							
4.7.1.2	require Sabah License an area	ed under Peninsu Forest Managem e Agreement. For a 500ha or more	lar Malaysia's Nationa ent Unit under the Sa Sabah and Sarawak,	reas (ESAs) to oil palm a Il Physical Plan (NPP) an bah Forest Managemen new planting or replanti reas below 500ha but a MM) is required	id the t ng of	Select	
Not Applicable							
Criterion 2	Peat S	oil					
Indicator	Requir	ement				Findings	
4.7.2.1		s per MPOB guide		ed and implemented on velopment or industry be		Select	
Not Applicable							

Indicator	Requirement	Findings
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.	Select
Not Applicable		
4.7.3.2	SEIA shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders.	Select
Not Applicable		
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.	Select
Not Applicable		
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed.	Select
Not Applicable		
Criterion 4	Soil and topographic information	
Indicator	Requirements	Findings
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation	Select
Not Applicable	1	
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure	Select
Not Applicable		
Croterion 5	Planting on steep terrain, marginal and fragile soils	
Indicator	Requirements	Findings
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws.	Select
Not Applicable		
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation.	Select
Not Applicable		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion	Select
Not Applicable		
Criterion 6		
Indicator	Requirements	Findings
4.7.6.1	No new plantings are established on recognised customary land without the	Select

	system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions	
Not Applicable		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.	Select
Not Applicable		
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available	Select
Not Applicable		
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.	Select
Not Applicable		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented.	Select
Not Applicable		
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.	Select
Not Applicable		
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available.	Select
Not Applicable		
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development.	Select
Not Applicable		