

Alto Sdn. Bhd. Audit Summary Report

Organization:	Alto Sdn. Bhd.			Alto Sdn. Bhd.					
Address:	Headquarters Lot 2370 – 2371, 1st Floor, Boule Miri, Sarawak, Malaysia.	evard Comm	nercial Centre,	Jalan Pujut – Lutong, 98000					
	Contact person.: Dr. Felix Moh ((019 859 366	68)						
Standard(s):	Alto Sdn. Bhd. Lot 1, Mum Ulu Sg. Klad/Sg Sibuti, Sawai Land District, Miri Bumi Hijau Berkembang Sdn Bhd No. 304/-3/4, Block 3, Sawai Land District, Miri MS2530-3: Part 3: General principles for Oil Palm Plantations and Organized Small Halders								
Representative:	Small Holders Dr Felix Moh								
Site(s) audited: Group Certification	Alto Sdn. Bhd. (4,208 ha) Bumi Hijau Berkembang Sdn Bhd (586.9 ha)	Date(s) o	f audit(s):	7 th -8 th May 2019					
Visit Type:	MSPO Stage 2 Audit	Types of assessme	certification ent:	Main Audit					
Lead auditor:	Abdul Khalik Bin Arbi (AKA)	Additiona member(s Audit Me		Dickens Mambu (DM) Jeffrey Denis Ridu (JDR)					

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1. Audit objectives

The objectives of this audit were:

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

2. Scope of certification

Production of Fresh Fruit Bunches (FFB) for Plantations in compliance to the MSPO Certification Standard MS2530-3:2013 Part 3: General Principles For Oil Palm Plantations And Organized Smallholders

The audit covered the MS 2530:2013 requirements particularly MSPO Certification Standard **MS2530-3:2013 Part 3.**

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Validation of processes for production and service provision Has this scope been amended as a result of this audit? ☐ Yes ✓ No. This is a multi-site audit and an Appendix listing all relevant sites and/or remote ☐ Yes ✓ No locations has been established (attached) and agreed with the client 3. Current audit findings and conclusions The audit team conducted a process-based audit focusing on significant aspects/risks/objectives required by the standard(s). The audit methods used were interviews, observation of activities and review of documentation and records. The structure of the audit was in accordance with the audit plan and audit planning matrix included as annexes to this summary report. The audit team concludes that the organization \(\sum \) has \(\sum \) has not established and maintained its management system in line with the requirements of the standard and demonstrated the ability of the system to systematically achieve agreed requirements for products or services within the scope and the organization's policy and objectives. Number of nonconformities identified: 1 Minor Major 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 / Continued / Withheld / Suspended until satisfactory corrective action is completed. Previous Audit Results The results of the last audit of this system have been reviewed, in particular to assure appropriate correction and corrective action has been implemented to address any nonconformity identified. This review has concluded that: Any nonconformity identified during previous audits has been corrected and the corrective action continues to be effective. The management system has not adequately addressed nonconformity identified during previous audit activities and the specific issue has been re-defined in the nonconformity section of this report. Audit Findings The audit team conducted a process-based audit focusing on significant aspects/risks/objectives. The audit methods used were interviews, observation of activities and review of documentation and records. The management system documentation demonstrated conformity with the requirements 🛛 Yes □ No of the audit standard and provided sufficient structure to support implementation and maintenance of the management system. The organization has demonstrated effective implementation and maintenance / improvement of its management system. Job n°: MY05195 Report date: 7th - 8th May 2019 Visit Type: Main Visit no: 2 Assessment

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The organization has demonstrated the establishment and tracking of appropriate keeperformance objectives and targets and monitored progress towards their achievements.	•	⊠ Yes	∐ No
The internal audit program has been fully implemented and demonstrates effectivened as a tool for maintaining and improving the management system.	ess	⊠ Yes	□No
The management review process demonstrated capability to ensure the continuing suitability, adequacy and effectiveness of the management system.	⊠ Yes	□No	
Throughout the audit process, the management system demonstrated overall conformance with the requirements of the audit standard.		⊠ Yes	□No
Certification claims are accurate and in accordance with SGS guidance	⊠N/A	☐ Yes	☐ No

6. Significant Audit Trails Followed

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

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Address:	Lot 2370 – 2371, 1 st Floor, Boulevard Co 98000 Miri, Sarawak, Malaysia.	Lot 2370 – 2371, 1 st Floor, Boulevard Commercial Centre, Jalan Pujut – Lutong, 98000 Miri, Sarawak, Malaysia.					
	Contact person: Dr Felix Moh						
	Tel :086- 429587						
MPOB License No.:	503191802000	Expiry date:	30 th June 2019				
Scope of Activity:	Menjual dan Mengalih FFB						
Date of certificate is	ssued and validity	Nil (New Application)					
Other Sustainability	y Certification	Nil					
Proposed Date of N	lext Surveillance Audit	April 2019					
Visit Number:	02 (Stage 2)	Actual Visit Date:	7 th -8 th May 2019				
Visit Due by Date:	Nil	For auditor informa	ation only				
Lead Auditor:	Abdul Khalik Bin Arbi (AKA)						
Team Member(s):	Dickens Mambu (DM) & Jeffrey Denis R	idu (JDR)					
Additional	NIL						
Attendees and							
Roles							
Standard(s):	MSPO MS2530-3:2013 Part 3: General organized smallholders	principles for oil palm pl	antations and				
Audit Language:	English & Malay						

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Audit Scope:	1.The audit covered one (1) site performing the following scope:
	Operations, comprising of plantation management systems, production of Fresh Fruit
	bunches (FFB), documentation and field assessment.
	2. The audit covered all the MS2530-3:2013 Part 3 requirements with no permissible
	exclusion of clause in compliance to the MSPO Certification Standard

Date	Time	Auditor	Organizational and Functional Units/ Processes and activities	Key Contact
7 th May 2019	7.00am 8.00am	AKA	Flight Kuching to Miri Arrived at Miri Airport	Estate Personnel
(Day 1)				
7 th May 2019 (Day 1)	8.00 am	AKA	Depart to Alto Sdn Bhd (Stage2) Arrive at Estate Opening Meeting Audit Process (Site Visit) • Principal 1: Management commitment and responsibility • Principle 2: Transparency • Principle 3: Compliance to legal requirements • Principal 4: Social responsibility, health, safety and employment condition • Principal 5: Environment, natural resources, biodiversity and ecosystem services • Principal 6: Best Practice • Principle 7: Development of New Plantings	Estate Personnel
	12.30pm		Lunch	
	1.00pm		Continue Audit Process (Document review, Policies, local law compliances, deduction and pay slip, Safety and health procedures, environment procedure, minimum wages monitoring, social benefits)	
	4.00pm		Preparation for closing	
	5.00pm		Pra - Closing Meeting	
	6.00pm		Depart to Miri Town	

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Date	Time	Auditor	Organizational and Functional Units/ Processes and activities	Key Contact
8 th May 2019 (Day 2)	7.30 am	DM, AKA & JDR	Depart to Alto Sdn Bhd (Stage 2) Arrive at Estate Audit Process (Site Visit) Principal 1: Management commitment and responsibility Principle 2: Transparency Principle 3: Compliance to legal requirements Principal 4: Social responsibility, health, safety and employment condition Principal 5: Environment, natural resources, biodiversity and ecosystem services Principal 6: Best Practice Principle 7: Development of New Plantings	Estate Personnel
	12.30pm 1.00pm		Lunch Continue Audit Process (Document review, Policies, local law compliances, deduction and pay slip, Safety and health procedures, environment procedure, minimum wages monitoring, social benefits)	
	4.00pm 5.00pm		Preparation for closing Closing Meeting	
	6.00pm		Depart to Miri Town	

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Location and Maps

Alto Sdn. Bhd. project is located in the Niah area of Miri Division. The main access to the project area are Miri- Bintulu Road road. The GPS locations of the estate is shown in **Table 1**.

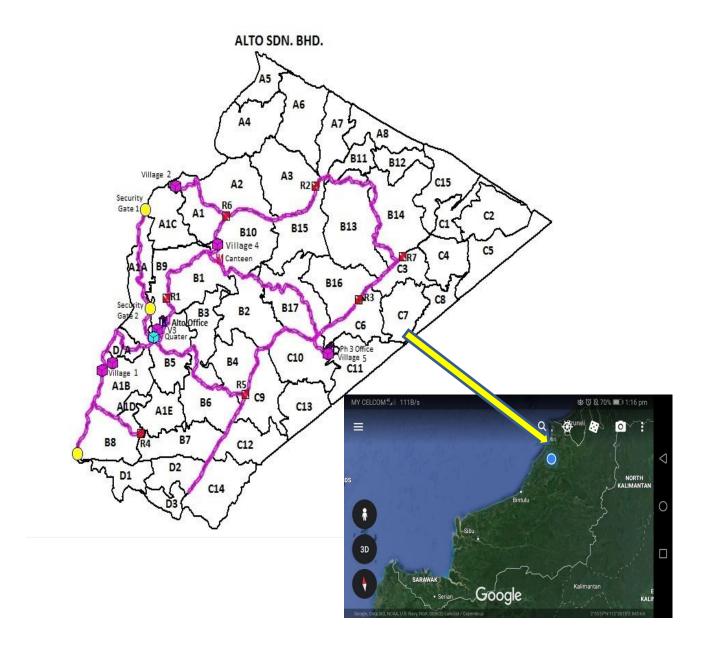
Table 1: Alto Sdn. Bhd. and Bumi Hijau Berkembang Sdn Bhd Plantation GPS Location

Supply Base / Estates:	Location Address:	GPS Coordinate(s):	Area Certified(HA):
Alto Sdn. Bhd.	Lot 1, Mum Ulu Sg. Klad/Sg Sibuti, Sawai Land District, Miri	03º47'30.0"N 113º55'52.0"E	4,208
Bumi Hijau Berkembang Sdn Bhd	No. 304/-3/4, Block 3, Sawai Land District, Miri	03º44'39.0"N 113º53'02"E	540.8

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Alto Sdn. Bhd. Locality Map

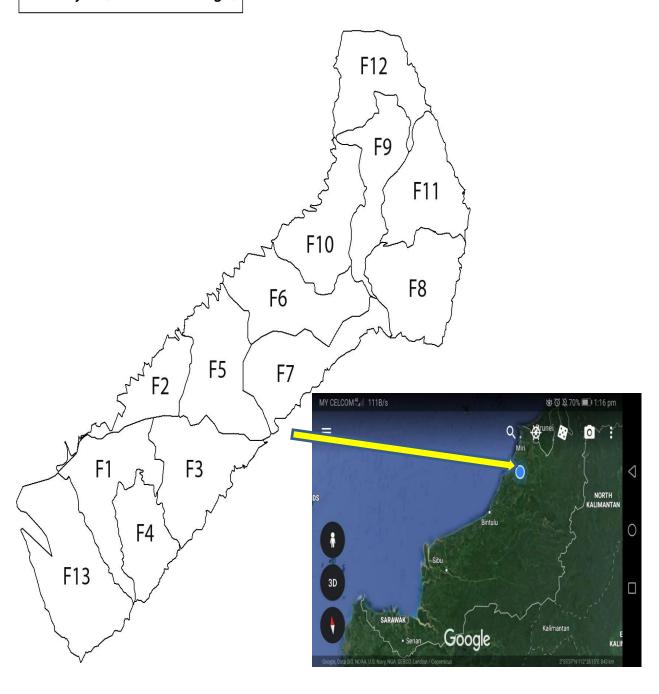


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Bumi Hijau Berkembang Sdn Bhd Locality Map

BumHijau (Block Hectarage)



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Description of Estate Production Capacity

The FFB are sourced from the estate which are directly managed by Alto Sdn. Bhd . The estate have two division with each division monitored by the estate assistant manager. The crop yield from the estate is mention in **Table 2** below.

Table 2: FFB Production (Mt)

	FFB Produ	ction (MT)
Estate	Jan 2018-Dec 2018 (Actual)	Jan 2019-Dec 2019 (Projection)
Alto Sdn. Bhd.	82,358.23	81,077.45
Bumi Hijau Berkembang Sdn Bhd	12,762.41	11,579.69

Area Statement

The operating unit are listed in **Table 3**. Details of production area (mature/immature) are also listed.

Table 3: Area Statement of the Supplying Estates

	Title area		Plantat	ion area	a (ha)	
Name of estate	(ha)	Planted	Conservation	Land Issue	*Others	Undeveloped Area
Alto Sdn. Bhd.	Title: 4,513.3	4,208.00	1.8	Nil	2.6	300.9
Bumi Hijau Berkembang Sdn Bhd	Title: 586.9	540.8	1.0	Nil	0.98	44.12

*Others : Transmission tower, Quarry, Roads, line site, rives, water catchment area, office building ,etc

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Stakeholder Consultation and List of Stakeholders Contacted

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

https://www.sgs.com/en/certified-clients-and-products/fcm/malaysia/alto-sdn-bhd

Stakeholder consultation took place in the form of meetings and interviews. Due to this is the main assessment, meetings with stakeholders were held in the estate office

Comment on MS2530	0-3 Compliance Status:
Comment on Principle 1	It was observed the implementation of MSPO policy was made available in the estate management. It was sign by Dato Sri Lau Hieng Su (Executive Director), 1st September 2018. The policy in the estate list as below:
	i. Sustainability Policy ii. Occupational Safety and Health Policy iii. Environmental & Biodiversity Policy iv. Human Rights Policy v. No Child Labour Policy
	vi. Zero Burning Policy vii. Sexual Harassment Policy
	Based on the Policy it was emphasize commitment to continual improvement. It can be verified in Sustainability Policy. It was sighted the internal audit procedures was made available in the estate management in MSPO file.
	The internal audit was conduct on 26th April 2019.
	Based on the report corrective action was taken. It can be verified in MSPO File.
	It was observed review meeting by top management was done regarding the internal audit. However, the corrective action was taken by the management.
Comment on Principle 2	The management communicate with relevant stakeholders by conduct stakeholders meeting on 30 th November 2018 at Bilik Mesyuarat Kilang (Alam Bumi POM), time: 9.00 am.
	The management was communicating with relevant stakeholders via letter. Sampled letter taken as below: i. Rh. Ranjit Anak Ambas (Tr. Rajit Anak imbas) ii. Pengurus Ladang, Subis 3 iii. Pengurus, Tangbiz Venture.
	All letter dated on 24 th Oct 2018 and invited was done by Mr Thomas Wong (Estate General Manager). List of stakeholders was made available during the audit conduct. The management communicate with relevant stakeholders by conduct stakeholders meeting on 30 th November 2018 at Bilik Mesyuarat Kilang (Alam Bumi POM), time: 9.00 am.

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	Standard Operating Procedures on Traceability was available in MSPO File Principle 1 - Principle 5.
	Based on cross check with document FFB harvested all documents was record in Traceability system inspection sheet. Sample verified on FFB Evacuation Note Serial No.:283607,283345, 283344, 283342 and 283341 dated.: 6 th May 2019 with total 1160 FFB bunches.
	Appointment letter for traceability officer was available in File MSPO Committee, Sign by Dato' Sri Lau Hieng Su, nominate person is Mr Ling Tieng Leh dated 28th October 2018.
Comment on Principle 3	It was observed the comply with applicable local, state, national and ratified international laws and regulations, an example:
	Malaysian Palm Oil Board
	Registration of Alto Sdn Bhd with AKTA LEMBAGA MINYAK SAWIT MALAYSIA 1998 (MPOB), with license Registration No.: 503191802000, with activities " <i>MENJUAL dan MENGALIH FFB</i> ". In period one year start from 1.07.2018 till 30.06.2019.
	With address: Lot 1, Mukim Ulu Sg Klad/ sg. Sibuti Niah, Sawai Land District 98000, Miri, Sarawak
Comment on Principle 4	It was observed the Social Impact Assessement (SIA) report was available during the document assessment.
	The management communicate with relevant stakeholders by conduct stakeholders meeting on 30 th November 2018 at Bilik Mesyuarat Kilang (Alam Bumi POM), time: 9.00 am.
	The Grievance and Complaint form was made available at the front of estate office. SOP for complaints and grievances procedure was made available in the estate.
	 a) It was observed the safety and health policy was display at site office, workshop, store (fertilizer store, scheduled waste) and via morning muster for the workers.
	b) It was sighted HIRARC was made available in estate record. The HIRARC was covered:
	Penuaian buah sawit dan pencantasan
	Penyemburan racun perosak
	Menavur baja
	Meracun baja
	Meracun pokok sawit
	Sungkupan EFB dan Decanter Cake
0. AAVOS405 D	Penghantarab dan pengendalian FFB, Baja, Sampah, Novince Novince
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Alat Ganti dan Pekerja

- Penjagaan Janakuasa
- Penghantaran dan Pengendalaian Diesel dan Minyak Pelincir
- Kerja-Keja mencampur racun rumpai
- Kerja kerja rutin harjan penjaga atau kerana stor
- Kerja kerja penyelengaraan kenderaan, tractor dan mesin dbengkel
- Kerja kerja pengendalian bahan buanagan berjadual
- Bekerja ditempat tinggi
- Bekerja diklinik

The HIRARC was review on January 2018. It will be review once issue raised.

- c) Yearly training plan and programme for year 2019 was sighted. Which cover:
 - Personnel Protective Equipment
 - · Farm Tractor drivers training
 - Safe handling of chemicals
 - Safe handling of fertilizer

As evidence, training on Safety Handling of chemicals by Ancon Crop Care Sdn Bhd on 6th March 2019, time: 9.00 am at Alto main office.

Comment on Principle 5

Environmental & Biodiversity policy was available in the estate record. It was display at notice board at the workshop, site office, fertilizer store. Which commit by Executive Director, Dato' Sri Lau Hieng Su, sign 28th October 2018. In the environment part, several issue need to highlight:

To protect the environment and conservation of biodiversity employ the following initiatives:

- a. To comply with existing and current legislations and regulations and to ensure that our operations are legally complaint.
- b. The company will respect the environment and biodiversity and utilize proven, environmentally-friendly technology in its estate operations.
- c. Establishing, maintaining and continually improving sustainable estate management system both internally and externally.
- d. To set targets and implementation actions to allow the group to become resource efficient on waste utilization, energy and water usage within our day to day operations.
- e. Eliminating any potential adverse impacts on environment and biodiversity arising from our estate activities. Educating and enhancing awareness among stakeholders on environment and biodiversity aspects.

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It was observed Alto Sdn Bhd, Oil Palm Plantation at lot 1, Sawai Land District, Miri Division, Sarawak had obtain Environmental Impact Assessment (EIA) approval from Natural Resources Environmental Board (NREB) dated 13th June 1998 with ref.no.: NREB/6-4/60 which sign by Controller of Natural Resources & Environment Board Sarawak by James Dawos Mamit.

In line with that, the monitoring was conducted to monitor plantation activities on site by provide analyses on pesticides/ weedicides every 6 months in the Environmental Monitoring Report (EMR). The latest report was made available on July – December 2018. Based on the report the estate was comply with mitigating measures required by EIA Approval.

It was observed the Training plan for year 2019 related with environment available.

Based on document review, it was observed there was warning signages sighted of re-entry procedure

It was observed the awareness and training programmed was established and implemented. In line with that, meeting was conduct to communicate with the estate staffs to ensure they understand and follow the vision and mission toward environment commitment. The minutes meeting was conduct on 28th September 2018, 2.00 pm. Which attend by 10 persons.In the meeting issue discuss on air pollution, water pollution and noise pollution.

The training was conduct by Ancon Crop Care Sdn Bhd. Some of the name list of attendee list as below:

- 1. Ribson Ribun
- 2. Radia
- 3. Jintang
- 4. Asmah
- 5. Sunni
- 6. Etc, it can be verified in MSPO file.

The domestic waste for this estate was disposed in dumping site which can be determine in the Alto Sdn Bhd Field Map. It was observed the dumping site was away from habitation and water surface runoff.

Major 1 (4.5.3.5)

Site visit to the dumping site identified some environmental issues.

1. It was sighted scheduled waste (empty chemical containers) thrown inside the garbage pit.

Comment on Principle 6

The Standard Operating Procedure for Oil Palm Plantations edition January 2019 available for Alto Group Sdn Bhd. The SOP was prepared by Mr Thomas Ting, Acting Divisional Manager and approved by Mr Te Seng Whatt, Senior Estate Manager dated 29/01/2019.

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	Contents of SOP include Harvestng, spraying, EFB application, genset, manuring, ramp, creche etc.
Comment on Principle 7	No New planting in the estate.

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7. Nonconformity

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

MS2530-3:2013 Part 3

Non Conformity	N° 1 of 1		Maj	Major 1		
	Date	8 th May	Due Date>	8 th July	Date	17 th June
	Recorded>	2019		2019	Closed>	2019
Department /	Administrativ	/e	Standard Ref	:	MS2530-Pai	rt 3
Function:			Indicator		4.5.3.5	
Document Ref.:	Criteria 3: Wa	aste	Issue / Rev. S	Status:	Closed	
	management and disposal					
Details of	Details of Domestic waste was disposed with the risk of contamination to the environment.					nvironment.
Nonconformity:						
Objective				ome environme		
Evidence:	1. It wa	s sighted sch	neduled waste	(empty chemical	al containers)	thrown
	insid	e the garbag	e pit.			
Close-out				heduled waste		
evidence:				e pit with sched		
				the estate m		This closing
	evidence was reviewed and accepted by the lead auditors.					

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Nonconforming detailed here shall be addressed through the organization's corrective action process, in accordance with the relevant corrective action requirements of the audit standard, including actions to analyse the cause of the nonconformity and prevent recurrence, and complete records maintained. Corrective actions to address identified major nonconforming shall be carried out immediately and SGS notified of the actions taken within 30 days. An SGS auditor will perform a follow up visit within 60 days to confirm the actions taken, evaluate their effectiveness, and determine whether certification can be granted or continued. Corrective actions to address identified major nonconforming shall be carried out immediately and records with supporting evidence sent to the SGS auditor for close-out within 60 days. Corrective Actions to address identified minor non nonconformity shall be documented on a action plan and sent by the client to the auditor within 90 days for review. If the actions are deemed to be satisfactory they will be followed up at the next scheduled visit Corrective Actions to address identified minor non-nonconformity have been detailed on an action plan and the intended action reviewed by the Auditor, deemed to be satisfactory and will be followed up at the next scheduled visit. \boxtimes Appropriate immediate action taken in response to each non-conformance as required Note:- Initial, Re-certification and Extension audits - recommendation for certification cannot be made unless check box 4 is completed. For re-certification audits the time scales indicated may need to be reduced in order to ensure re-certification prior to expiry of current

Note: At the next scheduled audit visit, the SGS audit team will follow up on all identified nonconformities to confirm the effectiveness of the corrective actions taken.

8. General Observations & Opportunities for Improvement

Positive Observations:

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

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Appendix 1: List of Stakeholders Contacted

Stakeholder	Type of Stakeholder	Issues raised	Comments/Action Taken
Welington Serit No: 010 9787147 Rh Jeli Sg Merah, Sibuti	External Stakeholders (Community & Smallholder)	Need more information on MSPO & explanation on grievance procedure	NIL
Luonid Emmer No : 013 3001534 Rh Lingu ak Jilan, Sg Pakut Sibuti	External Stakeholder (Community & Smallholder)	Need more information on MSPO & explanation on grievance procedure	NII
Andrea Chin WWF Malaysia	External Stakeholder (NGO)	NIL	NIL
Monica Mone Malaysia Palm Oil Certification Council (MPOCC)	External Stakeholder (Government)	NIL	NIL
Jumirah Manuring Workers	Internal	MSPO been informed to Mandor but mandor did not explain to the workers	
Sirajudin Saking Kamiseng Kaseng Harvester (Cuttercarrier)	Internal	MSPO been informed to Mandor but mandor did not explain to workers	

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Signed on behalf of Alto Sdn Bhd



Wong Pak Kung Estate General Manager

Signed on behalf of SGS Malaysia Sdn Bhd



Abdul Khalik Bin Arbi Lead Auditor

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