

19<sup>th</sup> June 2025

Dear Sir/Madam,

**STAKEHOLDER CONSULTATION INVITATION TO COMMENT ON RSPO (P&C) INITIAL AUDIT**

We are pleased to invite you to provide comments in the stakeholder consultation meeting.

**KLK Sawit Nusantara Berhad – Sabang Palm Oil Mill 1**, has applied to Global Gateway Certifications Sdn Bhd to carryout initial activities in accordance with the Roundtable on Sustainable Palm Oil (RSPO P&C) standards.

The standards that shall be applied in the assessment are as below;

- RSPO Principle & Criteria Certification (RSPO P&C 2018) – Malaysia National Interpretation (MYNI) Nov 2019 – [Mass Balance (MB)]

As scheduled, the initial assessment will be carried out on **28<sup>th</sup> July – 31<sup>st</sup> July 2025**. You are cordially invited to send any comments if applicable within the period from now until the closing meeting on the last day of the assessment.

<b>Applicant</b>	<b>KLK Sawit Nusantara Berhad – Sabang Palm Oil Mill 1</b>
<b>RSPO Membership</b>	1-0014-04-000-00
<b>RSPO Palmtrace (RSPO PO_ID)</b>	RSPO_PO1000003741

<b>Contact details</b>	<p>Mr. Thien Jing Wen <a href="mailto:jw.thien@klk.com.my">jw.thien@klk.com.my</a></p> <p><b>Tel</b> : 605) 2417 844</p> <p><b>Address:</b> Batu 42, Jalan Tawau-Semporna, Beg Berkunci No. 3, 91009 Tawau, Sabah, Malaysia</p>
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<b>Brief business information of applicant</b>	<p>Kuala Lumpur Kepong Berhad (“KLK”) is a company incorporated in Malaysia and listed on the Main Market of Bursa Malaysia Securities Berhad with a market capitalisation of approximately RM22.318 billion at the end of September 2022. KLK is amongst the largest plantation companies in Malaysia, with a land bank of close to 300,000 hectares, spread across Malaysia (Peninsular and Sabah), Indonesia (Belitung Island, Sumatra, Kalimantan) and Liberia.</p> <p>From the RaCP Tracker record, the KLK Sabang Palm Oil Mill 1 Complex does not have ongoing New Planting Procedure (NPP). Under requirement of Remediation and Compensation Plan (RaCP), KSN Sabang POM 1 Complex has submitted Concept Note on 15th December 2023 and acknowledged by RSPO Compensation.</p>
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**PALM OIL MILL (POM) FOR THIS ASSESSMENT**

Name of Palm Oil Mill	Mill Capacity	Supply Chain Model	Location	GPS reference		Forecasted Annual output (MT)	
(POM)	MT/HR		Address	Longitude	Latitude	CPO	Palm Kernel
Sabang POM-1	60	MB	South of Sungai, Sugut, Sugut Region, Beluran, Sabah	117.5289	6.2337	17,040	4,400

**SUPPLY BASE OF FFB TO THE ABOVE POM TO BE INCLUDED IN THIS ASSESSMENT**

Owned Oil Palm Plantation / Association	Address	GPS reference		Area Summary (Ha)		Annual FFB Production (MT)
		Longitude	Latitude	Total	Planted	
Berakan Maju Estate	South of Sungai, Sugut, Sugut Region, Beluran, Sabah	117.4697	6.2410	3,010.45	2,411.50	38,228
Sungai Sabang Estate	South of Sungai, Sugut, Sugut Region, Beluran, Sabah	117.5436	6.2121	4,649.78	3,092.35	51,409
Excellent Challenger 1 Estate	North of Sungai, Sugut, Sugut Region, Beluran, Sabah.	117.4908	6.3077	3,506.37	3,345.00	59,214
<b>TOTAL</b>				<b>11,166.60</b>	<b>8,581.85</b>	<b>148,851</b>

Stakeholder consultation is one of the most important parts in certification process; during which relevant national, regional as well as local stakeholders are asked to give their views and opinions as to whether the applicant's certification units comply with the requirements of the RSPO's requirements.

We invite all stakeholders to take part in this consultation process as you can make a positive contribution to the certification decision. We invite you to raise any issues, both positive and negative, by sending a written response by mail, fax or by e-mail to our Global Gateway Certifications Sdn Bhd .

For your guidance, you may consider the following points:

- Environmental protection.
- Biodiversity conservation.
- Opportunities for employment.
- Provision of housing, sanitation, amenities and educational support.
- Company approach to community development.
- Participation in decision making.
- Any other issue, both positive and negative that you consider may be of relevance to the assessment.

Please direct your comments to:

**Scheme Manager,**  
**Global Gateway Certifications Sdn Bhd,**  
No.10, Jalan Rasmi 7,  
Taman Rasmi Jaya,  
68000 Ampang,  
Selangor Darul Ehsan, Malaysia.

Telephone: +60 3 4256 2689  
Fax: +60 3 4256 2687  
Email: [jamal@ggc.my](mailto:jamal@ggc.my) / [admin@ggc.my](mailto:admin@ggc.my)



Details on the audit team:

**Adnin Aminurrashid Bin Zilah (Lead Auditor)**

Graduate in plantation management with more than 10 years working experience in various plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Also, have more than 7 years' experience as an auditor / Lead Auditor in various schemes such as ISO 9001, RSPO, MSPO and ISCC.

Fully trained in similar agriculture certification programs such as RSPO, MSPO and ISCC. Completed and certified in ISO 9001:2015 Quality Management System, ISO14001:2015 Environmental Management System Lead Auditor course in 2017 and 2018, RSPO Lead Auditor Course, MSPO MS2530:2013 Auditor Training Course, MSPO MS2530:2022 Lead Auditor Training, ISCC EU & Plus Basic Training, ISCC Waste & Residue Training.

Experienced in handling mineral and peat soil oil palm estate. Knowledgeable in chemical in control of weeds and pest & disease in Oil Palm Plantation sector. Understanding in Industrial relation and labour law. Attended OSH Act 1994, Labour and Environment related laws and regulations Training. Also participated in MSPO peer reviewer training conducted by MPOCC. He has experience in handling social issues and Native Customary Right (NCR) land dispute as negotiator during his service with one of the companies in Sarawak from 2015 till 2017. He also has experience conducting Social Impact Assessment (SIA) as team member for few companies. Able to speak and understand Bahasa Malaysia and English.

**Mohd Fadzli bin Bistamam (Auditor)**

Post graduate qualification in Agricultural Engineering with more than 7 years working experience in Oil Palm Plantation Industry. More than 7 years of working experience in Oil Palm Plantation Industry with skills in Good Agricultural Practices (GAP) and Integrated Pest Management (IPM). Experience in managing estate workers, handling of mineral and peat soil and knowledgeable in chemical control of weeds and Pest & Disease in Oil Palm Plantation Sector.

Fully trained in similar agriculture certification programs such as RSPO, MSPO and ISCC. Completed and certified in ISO 9001:2015, RSPO Lead Auditor Course, RSPO Supply Chain Certification Training, MSPO MS2530:2013 and MS 2530:2022 Lead Auditor Training, ISCC EU & Plus Basic Training, ISCC Waste & Residue Training and ISCC Plus Training. Involved in Oil Palm Sustainability Audit since year 2016. Involved in audits conducted in Malaysia, Indonesia, Papua New Guinea, Ivory Coast, India and Singapore. Able to speak and understand Bahasa Malaysia and English.

**Nur Zafirah binti Zulkifli (Auditor)**

Graduated with a Master of Science in Environmental Technology and a Bachelor of Applied Science in Agro Technopreneurship with Honours. Zafirah has over 6 years of working experience in the environmental management and science sector, including 4 years of experience in auditing.

She is fully trained in palm oil certification programs such as the Malaysian Sustainable Palm Oil (MSPO) Scheme, the Roundtable Sustainable Palm Oil (RSPO), and the Supply Chain Certification (SCC). She is qualified as an auditor in several certification programs and has been involved in MSPO audits since 2019 and RSPO audits since early 2023.

Zafirah has completed and attended various training courses, including the Malaysian Sustainable Palm Oil (MSPO P&C) MS 2530:2013 Auditor Training, MSPO 2530:2022 Lead Auditor Training, IMS Lead Auditor Training by Punyam Academy (endorsed by Exemplar Global), MSPO SCCS Auditor Training, Roundtable Sustainable Palm Oil (RSPO P&C) Lead Auditor Course, Roundtable Sustainable Palm Oil Supply Chain (RSPO SCC) Lead Auditor Course, ISO 9001:2015 & 14001:2015 Auditor/ Lead Auditor Training Course in Integrated Management Systems. She is also proficient in both Bahasa Malaysia and English.

**Baskaran Sankaran (Auditor)**

Master of Occupational Safety & Health Risk Management from Open University Malaysia, Diploma in Mechanical Engineering and Management Programme. More than 20 years of working experience in various industries. Involved in RSPO assessment since 2014.

Involved in audits conducted in for many different companies in Malaysia and Indonesia. Completed ISO 9001:2008 and ISO 14001:2004 lead auditor course in 2006 & 2010, MSPO Supply Chain Certification Standard (SCCS) Auditor course (MPOCC Endorsed) by SGS Malaysia Sdn Bhd in April 2019, MSPO 2530:2013 Auditor course (MPOCC Endorsed) by SGS Malaysia Sdn Bhd in May 2019, MSPO MS2530:2022 Lead Auditor Training in 2024 by MAA Training Academy PLT. Also completed RSPO Lead Auditor training in December 2014. Qualified as Lead Auditor/Auditor in several certification programme such as RSPO, MSPO, ISO and etc. Able to speak and understand Bahasa Malaysia and English.

Comments received within 30 days from the date of this letter will be considered in this Assessment. Please include the following information should we need to contact you for clarification on any issues raised:

Name : \_\_\_\_\_  
Address : \_\_\_\_\_  
E-Mail : \_\_\_\_\_  
Phone Number : \_\_\_\_\_  
Summary of Issue : \_\_\_\_\_

Comment:

If you wish your comments to be treated confidentially or remain anonymous, please mark your reply "CONFIDENTIAL".

We thank you for the participation and feedback.

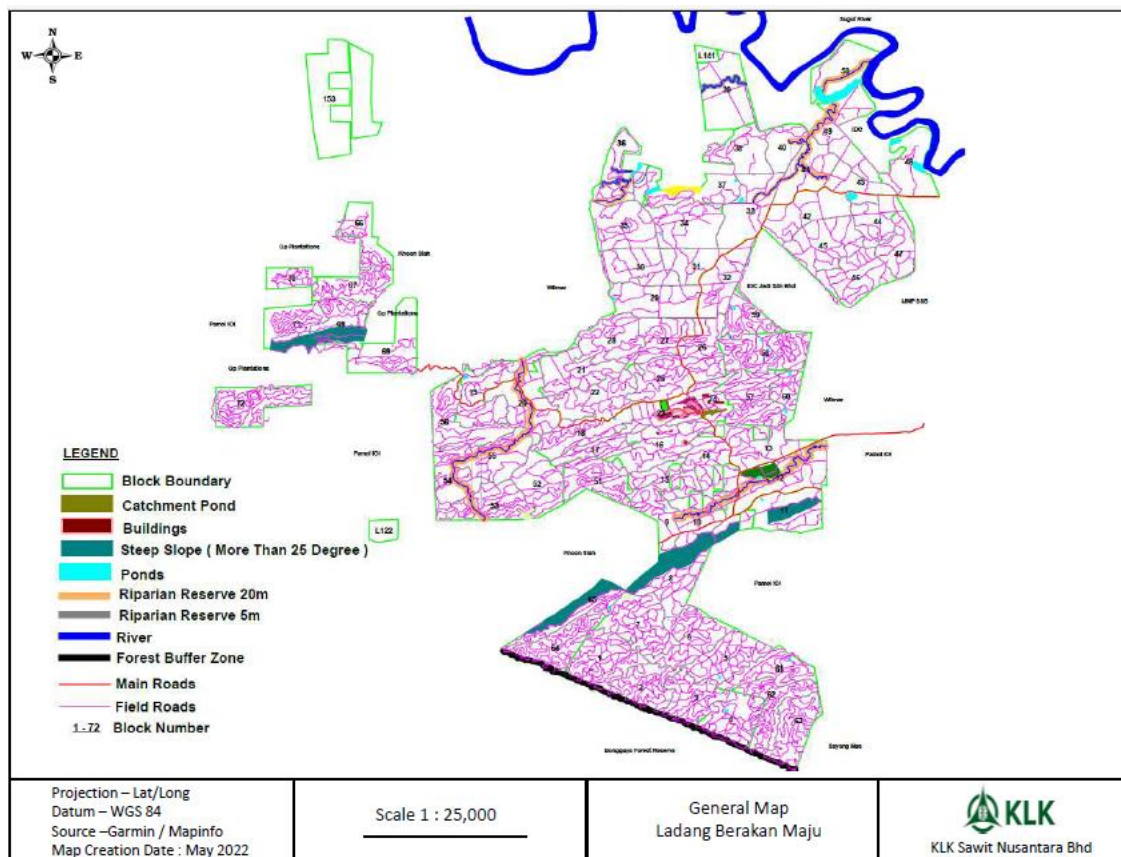
Yours Sincerely,



**Muhd Jamalul Arif,**  
Scheme Manager,  
Global Gateway Certifications Sdn Bhd

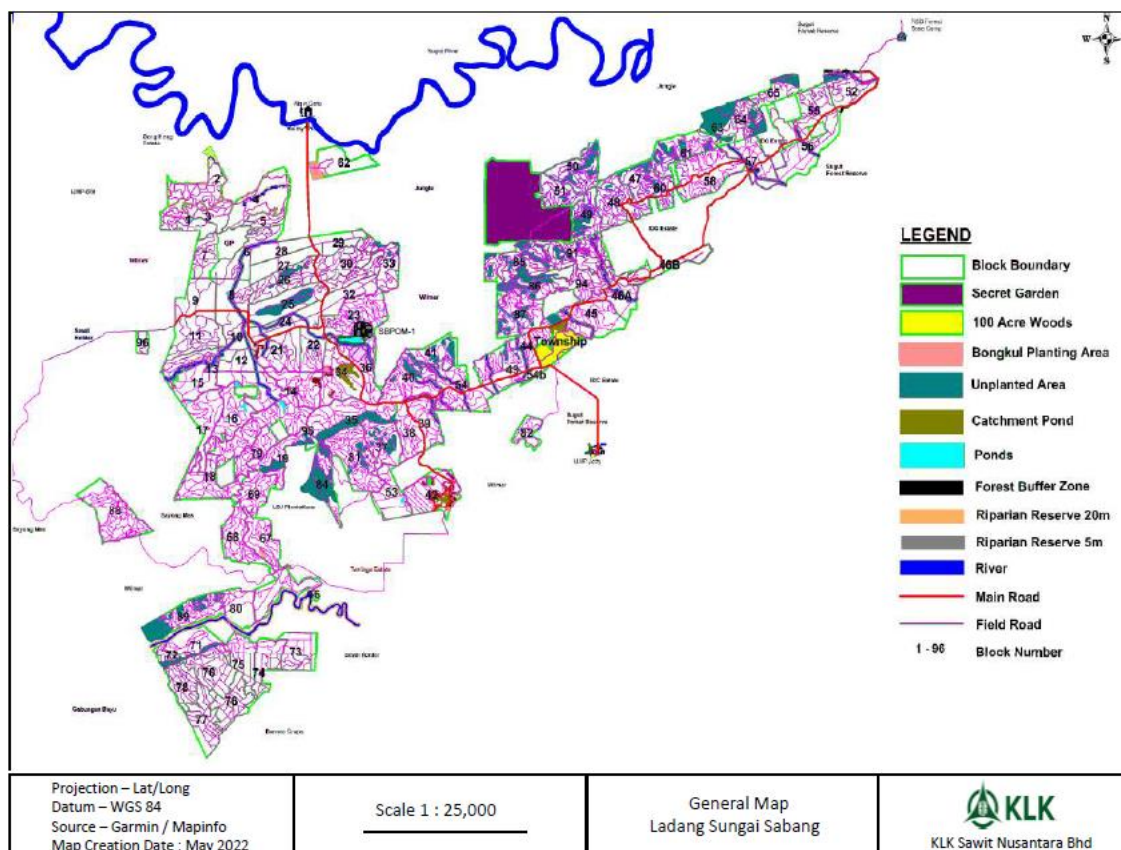
## Annex 1 – Location Maps

### 1. Ladang Berakan Maju





## 2. Ladang Sungai Sabang



## 3. Ladang Excellent Challenger 1

