

ESG TRANSPARENCY - TIMBER OPERATIONS based on SPOTT indicators

edition: 24 June 2020

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Category	No.	Indicator	Verification of Compliance
Sustainability policy and leadership	1	Sustainable forestry policy or commitment for all its operations	See website: policies
	2	Sustainable forestry policy or commitment applies to all suppliers	
	3	High-level position of responsibility for sustainability	COO, Chief Forester
	4	One or more members within the board of the company have responsibility for sustainability	Deleted Not publicly listed
	5	Percentage or number of women in senior management team	2019 Three - Heads of Legal, Treasury & Business Development
	6	Percentage or number of women board members	Deleted Not publicly listed
	7	Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with timber and pulp production	PEFC/MTCS Sarawak Timber Association Initiatives: NREB's requirements for EIAs; STLVS
	8	Collaboration with stakeholders to reduce negative environmental or social outcomes associated with timber and pulp production	Supplied two members of the Malaysian Timber Certification Council's (MTCC) Stake holder Review Committee for the review of the PEFC Endorsed MTCS's MC&I. Represented on the Sarawak Timber Association's Certification Committee Participates in the State government's STLVS & in the MTCC's MTCS. WWF - collaborator Heart of Borneo – participant with a significant area within the HoB

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			ITTO: informal cooperation with Sarawak base. (Dr Paul Chai)
	9	Sustainability report published within last two years	
	10	Reports through standardised reporting systems	
	11	Climate risks assessment available	
	12	Natural capital assessment available	EIAs are mandatory for all resource based projects. HCVAs are mandatory in the certification process
Landbank, mills and traceability	13	Lists countries and operations	Malaysia (upstream & downstream), Guyana (downstream) , China (downstream), Russia (downstream)
	14	Lists countries sourcing from	Disabled Not a trader
	15	Total area of natural forest designated for wood/wood fibre production (ha)	Gross: 1,145,392 ha; Operable: 726,152 ha (29 May 2020) (from government approved General Harvesting Plans)
	16	Total area of forest plantation (ha)	Planted area: 32,643 ha (9 Jan 2020)
	17	Area of plantation/natural forest within outgrower schemes (ha)	Disabled No outgrower schemes
	18	Unplanted (areas designated for future development as plantation forest) (ha)	Only government sanctioned planting areas of degraded forest: approx. 30,000 ha (June 2019)

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	19	Conservation set-aside area, including HCV area (ha)	Approx. – 258,000 ha (29 May 2020)
	20	Area of Intact Forest Landscape (ha)	Approx 114,173 ha of primary forest (29 May 2020)
	21	Number of Forest Management Units (FMUs)	12 FMUs; 8 LPFs (2019)
	22	Maps of forest management units (FMUs)	All FMUs have detailed mapping (General Harvesting Plans) but availability is restricted. However the website has public summaries for all certified areas & these contain maps & some are on GFW.
	23	Forest management plans available for all FMUs	Yes. All licenced areas must have an FMP. Website – public summaries for all certified areas
	24	Monitoring of forest management plan implementation available	Website – public summaries for all certified areas. All certified areas are subject to 3 rd party CB annual surveillance audits All FMUs & LPFs are required to have quarterly EMRs or 3 x year ECAs (Environmental Monitoring Reports / Environment Compliance Assessments)
	25	Company has provided valid legal documents to Open Timber Portal on use right (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC
	26	Company has provided valid legal documents to Open Timber Portal on forest management (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC
	27	Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC
28	Names and locations of all third-party supplying FMUs	No third party FMU supplying sawmills	

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	29	Number of company owned sawmills	Three (2019 - active)
	30	Names and locations of company owned sawmills	Grand Paragon Sdn Bhd – Bintulu; Samling Housing Products Sdn Bhd – Miri. Samling Wood Industries Sdn Bhd. All located in Sarawak
	31	Number of company-owned pulp and paper mills	Disabled No company-owned pulp and paper mills
	32	Names and locations of company-owned pulp and paper mills	Disabled No company-owned pulp and paper mills
	33	Total volumes (or percentages) sourced by company-owned sawmills that come from company's own FMUs and/or third-party FMUs	100% from own FMUs.
	34	Total volumes (or percentages) sourced by company-owned pulp and paper mills that come from company's own FMUs and/or third-party FMUs	Disabled No company-owned pulp and paper mills & not in pulp & paper business
	35	Number of supplying mills	Disabled Not in pulp and paper business. No supply from third party sawmills.
	36	Names and coordinates of all third party supplying mills	Disabled Not in pulp and paper business. No supply from third party sawmills
	37	Total volume (or percentages) sourced from third-party supplying mills that come from their own FMUs and/or third party FMUs	Disabled Not in pulp and paper business. No supply from third party sawmills
	38	Procedures to trace raw materials to country of harvest	All raw material for sawmills is sourced from FMUs that are located within, Sarawak, Malaysia.

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	39	Percentage of supply traceable to country of harvest	Guyana – 100%; Sarawak – 100%;
	40	Procedures to trace raw materials to FMU level	100% of log production is traceable to FMU level thru Sarawak government procedures which mandate the issue of log Removal Passes
	41	Percentage of supply traceable to FMU level	100% of sawmill supply traceable to FMU via company LDOs & government Removal Passes
Certification standards	42	Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved	Natural forest by 2022. ITP constrained by FSC & PEFC cut-off dates. All operating areas that are not under MTCS are under STLVS
	43	Percentage area (ha) verified as being in legal compliance by a third party	Natural forest: 66% is under either PEFC endorsed MTCS or under STLVS ITP: 50% of the planted area is under PEFC endorsed MTCS
	44	Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party	Natural forest by 2022 – government edict ITP constrained by FSC & PEFC cut-off dates; some currently uncertified areas cannot be certified unless the cut-off dates are revised.
	45	Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party	Plantation -100%
	46	Percentage area (ha) FSC FM certified	0%
	47	Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs	Natural forest licences to be certified by 2022 - government edict. ITP constrained by FSC & PEFC cut off dates
	48	Percentage of wood/wood fibre supply (tonnes) from all suppliers that comes from FSC FM certified areas	0% FSC.

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Category	No.	Indicator	Verification of Compliance
	49	Commitment to source only wood/wood fibre that meets FSC Controlled Wood requirements	
	50	Percentage area (ha) PEFC certified (excluding FSC certified area)	Natural Forest (NF) -31.3% PEFC ITP 39,666ha PEFC (cannot present as a % as full extent of the potentially certifiable but not yet certified (because of cut-off) will not be determined until it is possible to certify.
Deforestation and biodiversity	51	Commitment to zero deforestation or zero conversion of natural ecosystems	The government licenced ITP areas are established on degraded forest. There is zero clearing of natural, undisturbed ecosystems.
	52	Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers	
	53	Criteria for defining deforestation	
	54	Evidence of monitoring deforestation	There is zero clearing of natural, undisturbed ecosystems hence no monitoring is required.
	55	Amount of illegal/non-compliant deforestation recorded	2019 - Nil
	56	Amount of illegal//non-compliant deforestation recorded in supplier operations	Should be 0% in that these are from very small areas of degraded forest licenced by government to be cleared for small scale agricultural state agricultural developments. Suppliers make a negligible contribution to the supply chain.
	57	Commitment to restoration of non-compliant deforestation/conversion	Working with Sarawak Forestry Dept (FDS) in Forest Landscape Restoration: e.g. Kelesa Camp, Tuyut & Lawas log ponds. Significant assistance to WWF with Riverbank Restoration, Lg Semadoh, Upper Trusan, Lawas, Sarawak.

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Category	No.	Indicator	Verification of Compliance
	58	Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers	
	59	Implementing a landscape or jurisdictional level approach	Significant participant in the WWF – inter-government Heart of Borneo (HOB) project
	60	Commitment to biodiversity conservation	Demonstrated with 37% of FMU area excluded from production areas [see #19& 20]. Appointment of Honorary Wildlife Wardens. Work with UPM Bintulu Campus on Payeh Maga Conservation Area ; Supporting work in Proposed Mujan Julan NP. Work with Sarawak Forestry Corp. (SFC) on HCV assessments. See Policy with commitment to uphold international treaties & conventions on biodiversity.
	61	Commitment to biodiversity conservation applies to all suppliers	
	62	Identified species of conservation concern, referencing international or national system of species classification	In place. See Public summaries in website. HCVAs use international and national systems of species classification e.g. Red Book & IUCN
	63	Examples of species and/or habitat conservation management	Various HCV areas (1 to 6) are identified and protected, river buffer zones (mandatory) are established. Regular patrols inside FMUs. Management prohibits hunting by employees & contractors. Specific memo on protection of Pangolin distributed to all upstream operations.
	64	Commitment to no hunting or only sustainable hunting of species	Management fully committed to no hunting policy of all species by company employees & contractors. The law allows locals to hunt those species not specifically protected by law for own consumption.
	65	Commitment to no hunting or only sustainable hunting of species applies to all suppliers	
	66	Commitment to protect forest areas from illegal activities	Committed to protect forest areas from unauthorised or illegal resource use, settlement and other illegal activities. FMUs patrol regularly. This is monitored by 3 rd part CB annual surveillance.

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	67	Commitment to protect forest areas from illegal activities applies to all suppliers	
	68	Evidence of protecting forest areas from illegal activities	This is inspected by 3 rd party CB during annual surveillance. Signage and regular patrols. Boundary patrols undertaken by helicopter. Regular inspection of SPOT-2 satellite imagery.
	69	Commitment to no use of genetically modified organisms	NB Should only be applicable to ITP. GMO cannot be used if FSC or PEFC certified.
	70	Commitment to no use of genetically modified organisms applies to all suppliers	
HCV, HCS and impact assessments	71	Commitment to conduct High Conservation Value (HCV) assessments	These are a requirement for FSC & PEFC certification & we are committed to certification of plantations where the cut-off allows and to the natural forest. Four more natural forest FMUs are in the certification pipeline. [See Public Summaries]
	72	Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers	
	73	High Conservation Value (HCV) assessments available	FMP & FPMP Public Summaries online
	74	High Conservation Value (HCV) management and monitoring plans available	see Public Summaries
	75	Satisfactory review of all High Conservation Value (HCV) assessments undertaken since January 2015 by the HCV ALS Quality Panel	Review undertaken by stakeholders including Sarawak Forestry department & WWF
	76	Commitment to the High Carbon Stock (HCS) Approach	HCS becomes a component of the MTCS' revised MC&I due out in 2020 & company will be required to comply.

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	77	Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers.	
	78	High Carbon Stock (HCS) assessments available	
	79	Commitment to conduct social and environmental impact assessments (SEIAs)	EIAs are mandatory for all FTLs & LPFs before forest operations can start. Similarly with SIAs in our certified areas.
	80	Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers	
	81	Social and environmental impact assessments (SEIAs) available, and associated management and monitoring plans	SIA information is contained in in NF FPMs with stand-alone SIA reports for ITPs
	82	Company has provided valid legal documents to Open Timber Portal on impact assessments (at the time of SPOTT assessments)	Disabled Do not operate in RoC, Cameroon or DRC
Soils, fire and GHGs	83	Commitment to no planting on peat of any depth	
	84	Commitment to no planting on peat of any depth applies to all suppliers	No supplier known to have ITP on peat soil.
	85	Landbank or planted area on peat (ha)	Planted area: 3,344 ha (June 2019) government approved programme
	86	Implementation of commitment to no planting on peat of any depth	

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	87	Commitment to best management practices for soils and peat	Full commitment to RIL practises. Use of log fisher in NF and yarders in ITP
	88	Commitment to best management practices for soils and peat applies to all suppliers	No suppliers operate on peat soils.
	89	Evidence of best management practices for soils and peat	Full commitment to RIL practises. Use of log fisher in NF and yarders in ITP. See Public Summaries (Sections on RIL & Harvesting)
	90	Commitment to reduced impact logging	RIL is a mandatory government requirement to obtain a PEC [permit to enter coupe] for all natural forest FMU operation. Harvesting in ITP is by yarder i.e. rarely by ground based thereby reducing impact of harvesting. Plantation harvesting is yarder based.
	91	Commitment to reduced impact logging applies to all suppliers	
	92	Evidence of implementing reduced impact logging practices	As stated in #90 RIL is mandatory. A Permit to Enter Coupe will not be issued unless all RIL conditions are complied with e.g. 100% enumeration & tagging of trees to be harvested. Plantation harvesting is yarder based.
	93	Commitment to zero burning	
	94	Commitment to zero burning applies to all suppliers	
	95	Evidence of fire monitoring and management	In the natural forest & the ITP of the everwet tropics fire is not usually a major issue. Government manages active satellite based hotspot alert system.
	96	Details/number of hotspots/fires in company FMUs	2019 – Natural forest: nil recorded 2019 - ITP: several minor incidents recorded but, with one exception, these were within shifting agriculture areas burned by locals or in unplanted areas. The exception resulted in a planted area loss of 21.3 ha.

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	97	Details/number of hotspots/fires in suppliers operations	No suppliers to sawmills.
	98	Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity	
	99	GHG emissions intensity	
	100	GHG emissions from land use change	
	101	Progress towards commitment to reduce GHG emissions intensity	
	102	Methodology used to calculate GHG emissions	
Water, chemical and pest management	103	Time-bound commitment to improve water use intensity	Disabled No pulp/paper
	104	Water use intensity	Disabled No pulp/paper
	105	Progress towards commitment on water use intensity	Disabled No pulp/paper
	106	Time-bound commitment to improve water quality (BOD and COD)	Disabled No pulp/paper
	107	Progress towards commitment on water quality (BOD and COD)	Disabled No pulp/paper
	108	Treatment of pulp and paper mill effluent	Disabled No pulp/paper

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	109	Evidence of sawmill run-off containment and wastewater treatment	
	110	Proportion of processing facilities with closed-loop water treatment system	Disabled No pulp/paper
	111	Commitment to protect natural waterways through buffer zones	River Buffer Zones (RBZs) are mandatory & specified in the EIAs for NF & ITP. RBZs area monitored by 3 rd party CB surveillance audits, during mandatory EMRs or ECAs . Establishment of RBZs are an integral part of the mandatory RIL process
	112	Implementation of commitment to protect natural waterways through buffer zones	100% as River Buffer Zones are mandatory & specified in the EIAs. Also monitored by 3 rd party CB surveillance audits, mandatory EMRs or ECAs . They are an integral art of the mandatory RIL process
	113	Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers	See Policy #10 & #14 on website
	114	Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers	
	115	Time-bound commitment to eliminate chlorine and chlorine compounds for bleaching	Disabled No pulp/paper
	116	Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides	See Policy #10 & 14 on website
	117	Commitment to no use of World Health Organisation	.

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		(WHO) Class 1A and 1B pesticides applies to all suppliers	
	118	Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention	Yes: See Policy #10 & 14 website
	119	Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers	
	120	Chemical usage per ha or list of chemicals used	Herbicides: approx. 16 l/ha over the rotation. Fertiliser: 67 to 176 kg/ha depending on species
	121	Implementation of commitment to reduce chemical usage	
	122	Integrated Pest Management (IPM) approach	
	123	Waste management system in place to avoid negative impacts	See Policy #8 In-house waste management plan in place
Community, land and labour rights	124	Commitment to human rights	See Policy #11
	125	Commitment to human rights applies to all suppliers	
	126	Progress on human rights commitment	100% Human rights is actually not an issue as reference to the Department of Labour will confirm.
	127	Commitment to respect indigenous and local communities' rights	100% Complies with the requirements of Principles 2 & 3 of the MC&I of the MTCS. Annual 3 rd party assessment during STLVS & PEFC/MTCS surveillance & re-certification audits.

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Category	No.	Indicator	Verification of Compliance
	128	Commitment to indigenous and local communities' rights applies to all suppliers	
	129	Commitment to respect legal and customary land tenure rights	100% Complies with the requirements of Principles 2 & 3 of the MC & me of the MTCS. Annual 3 rd party assessment during STLVS & PEFC/MTCS surveillance & re-certification audits
	130	Commitment to legal and customary land rights applies to all suppliers	
	131	Commitment to free, prior and informed consent (FPIC)	FPIC is required by the MTCS MC&I Principle3 Criterion 3.1. 3 rd party assessment during STLVS & PEFC/MTCS surveillance & re-certification audits
	132	Commitment to free, prior and informed consent (FPIC) applies to all suppliers	
	133	Details of free, prior and informed consent (FPIC) process available	FPIC is required by the MTCS MC&I Principle3 Criterion 3.1. 3 rd party assessment during STLVS & PEFC/MTCS surveillance & re-certification audits
	134	Examples of local stakeholder engagement to prevent conflicts	Formation of Community Relationship Committees (CRCs) in communities in or neighbouring the FMUs and ITPs. NB not all communities wish to form CRCs.
	135	Details of process for addressing land conflicts available	SOP for conflict resolution available.
	136	Supports the inclusion of women across forestry operations, including addressing barriers faced	A very significant percentage of women are employed in the forest nurseries. Women are eligible to participate in the CRCs (but that is a community controlled matter). Over 23.9 % of employees are female. In past we had trans-gender pruning crew. (After several years they ceased to work on their own accord.)
	137	Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC

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	138	Commitment to enable sustainable use of non-timber forest products (NTFPs) by local communities	Where applicable local communities and indigenous people have their rights of access to the permanent forest estate (for NTFPs) enshrined within the gazette notification. Community grievances on this – or any other matter – may be put to the CB at the time of audit. The CB will require a satisfactory response from FMU management.
	139	Commitment to provide essential community services and facilities	Samling is heavily committed to CSR and outreach directly via the group and the YTS Foundation. Google this for verification: Samling outreach programmes.
	140	Progress on commitment to provide essential community services and facilities	Samling is heavily committed to CSR and outreach directly via the group and the YTS Foundation. Google for verification: Samling outreach programmes.
	141	Commitment to provide business/work opportunities for local communities	Samling employs significant numbers of locals especially in upstream activities.
	142	Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)	Disabled. Does not operate in RoC, Cameroon or DRC
	143	Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles	All upstream camp notice boards specifically address the right of "freedom of association" in respect of trade union formation and /or participation [ILO 87 & 98]. This is also a specific requirement of PEFC FM certification. This is reinforced by annual briefings undertaken by the industrial relations officer from HQ HR. ILOs 29, 87, 98, 100, 105 & 111 are referred to in the MC&I for the PEFC endorsed MTCS
	144	Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers	
	145	Progress on commitment to respect all workers' rights	All camp notice boards specifically address the right of "freedom of association" in respect trade union formation and /or participation [ILO 87 & 98] This is also a specific requirement of FSC & PEFC. This is reinforced by annual briefings undertaken by the industrial relations officer from HQ HR.
	146	Commitment to eliminate gender related discrimination with regards to employment	See Policy # 13

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			Malaysian employment records clearly demonstrate that there is no gender related discrimination. In past we had trans-gender pruning crew. (After several years they ceased to work on their own accord.)
	147	Commitment to eliminate gender related discrimination with regards to employment applies to all suppliers	
	148	Progress on commitment to eliminate gender related discrimination with regards to employment	Malaysian employment records clearly demonstrate that there is no gender related discrimination. In past we had trans-gender pruning crew. (After several years they ceased to work on their own accord.)
	149	Percentage or number of temporary employees	No seasonal or casual employment is offered.
	150	Percentage or number of women employees	Sarawak -23.9%
	151	Commitment to pay at least minimum wage	In Malaysia it is a legal requirement that all employees receive not less than the minimum wage.
	152	Commitment to pay at least minimum wage applies to all suppliers	It is a legal requirement that all employees receive not less than the minimum wage.
	153	Progress on commitment to pay at least minimum wage	100% It is a legal requirement that all employees receive not less than the minimum wage.
	154	Reporting of salary by gender	
	155	Commitment to address occupational health and safety	Active in-house HSE division with departmental HSE committees. See HSE Policy #3. Both DoSH & DoE inspect.
	156	Commitment to address occupational health and safety applies to all suppliers	It is a legal requirement that all employees receive not less than the minimum wage. Overall, suppliers make a negligible contribution to the supply chain
	157	Provision of personal protective equipment and related training	No natural rubber operations but PPE is provided throughout timber operations.

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	158	Time lost due to work-based injuries	2019 Forestry operation 5.17/1,000,000 man hours
	159	Reduction of time lost due to work-based injuries	2018 Forestry operation 5.33/1,000,000 man hours
	160	Number of fatalities as a result of work-based accidents	2019 Forestry operations: one fatality
	161	Zero fatalities as a result of work-based accidents	2019 Forestry operations: one fatality
Smallholders and suppliers	162	Commitment to support smallholders	Disabled No small holders
	163	Programme to support outgrower scheme and/or independent smallholders	Disabled No outgrower or small holder schemes.
	164	Percentage of outgrower scheme and/or independent smallholders involved in programme	Disabled No outgrower or small holder schemes.
	165	Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements	
	166	Number or percentage of suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements	.
	167	Suspension or exclusion criteria for suppliers	
	168	Timebound action plans (including Key Performance Indicators) for suppliers to be	.

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		in compliance with timber and pulp sourcing commitments	
	169	Proportion of direct and indirect supply that comes from FMUs which are compliant with timber and pulp sourcing policies	100% in Malaysia (but Indicator is somewhat unclear)
Governance and grievances	170	Commitment to ethical conduct and prohibition of corruption	See Policy #16 Commitment to both ethical & fair conduct and prohibition of corruption (bribery/fraud).
	171	Commitment to ethical conduct and prohibition of corruption applies to all suppliers	
	172	Progress on commitment to ethical conduct and prohibition of corruption	2019 No case of such misconduct reported
	173	Company has provided valid legal documents to Open Timber Portal on legal registration (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC
	174	Disclosure of the company's management approach to tax and payments to governments	
	175	Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC
	176	Whistleblowing procedure	See Policy #15

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	177	Own grievance or complaints system open to all stakeholders	Grievance procedure with flow chart available to upstream employees.
	178	Details of complaints and grievances disclosed	