

# Kulim (Malaysia) Bhd

Palm oil  
assessment

Total score:

47.7%

Latest update: October 2019

Next scheduled: November 2020

## About this company:

Established in 1933, Kulim (Malaysia) is a subsidiary of the Johor Corporation. Kulim is engaged in oil palm cultivation and processing of fresh fruit bunches into crude palm oil and palm kernel. Its oil palm plantation estates are located Malaysia and Indonesia. Kulim is also involved in a variety of other business activities including oil and gas, property development, cattle rearing, pineapple production, and Intrapreneur Ventures.

Parent company: Johor Corporation

Landbank (oil palm): 65,505 hectares

Bloomberg ticker: Delisted

RSPO member? Yes

Other initiatives: Malaysian Sustainable Palm Oil (MSPO), International Sustainability and Carbon Certification (ISCC)

Activities: oil palm cultivation, milling, palm oil refining, trading and distribution

Locations: Malaysia (Johor, Pahang), Indonesia (South Sumatra)

Headquarters: Malaysia

Related companies: [Sime Darby Plantation](#) completed its acquisition of NBPOL in March 2015, prior to which Kulim had a 48.97% stake.

Parent website: <http://www.jcorp.com.my>

Website: <http://www.kulim.com.my>  
[Latest annual report \(2018\)](#) | [Sustainability report \(2017\)](#)

Total:	94.42 / 198	47.7%
--------	-------------	-------

## > Sustainability policy and leadership

6 / 11 54.6%

⚠ 1 media report



1. Sustainable palm oil policy or commitment for all its operations?

✓ 1 / 1 Source

2. Sustainable palm oil policy or commitment applies to all suppliers?

P 0.5 / 1 Source

The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy.

3. High-level position of responsibility for sustainability?

P 0.5 / 1 Source

The company has a sustainability team but no specific high level manager/executive responsible for sustainability.

4. One or more members within the board of the company have responsibility for sustainability?

	✗	0 / 1
<b>5. Percentage or number of women in senior management team?</b> 1 (10%) - One of the 10 members of the senior management team is female.	✓	1 / 1 <a href="#">Source</a>
<b>6. Percentage or number of women board members?</b> 1 (12.5%)	✓	1 / 1 <a href="#">Source</a>
<b>7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with palm oil production?</b>	✗	0 / 1
<b>8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with palm oil production?</b> The company collaborates with NGOs and governments on the issues of poaching and encroachment.	✓	1 / 1 <a href="#">Source</a>
<b>9. Sustainability report published within last two years?</b> Sustainability report published for 2017.	✓	1 / 1 <a href="#">Source</a>
<b>10. Reports through standardised reporting systems?</b>	✗	0 / 1
<b>11. Verification report on compliance with POIG Charter, if a POIG member?</b> This indicator is disabled as the company is not a POIG member.		
<b>12. Climate risks assessment available?</b>	✗	0 / 1



### > Landbank, maps and traceability

0.59 / 27 35.5%

<b>13. Total land area managed/controlled for oil palm (ha)?</b> 65,505	✓	1 / 1 <a href="#">Source</a>
<b>14. Total oil palm planted area (ha)?</b> 55,604	✓	1 / 1 <a href="#">Source</a>
<b>15. Plasma/scheme smallholders planted area (ha)?</b> 2,683.47 - Figure reported in 2015 ACOP. Data more than two years old. Note: 0 ha is reported in the RSPO ACOP 2017, but the company indicates that it does still have smallholders in its reporting.	P	0.5 / 1 <a href="#">Source</a>
<b>16. Unplanted (areas designated for future planting) (ha)?</b> 4,534.65 - Figure reported in the 2017 ACOP for Johor Corporation (parent company).	✓	1 / 1 <a href="#">Source</a>
<b>17. Conservation set-aside area, including HCV area (ha)?</b>		

5,165	✓	1 / 1	<a href="#">Source</a>
<p><b>18. Area for infrastructure (ha)?</b> 3,503 - Figure reported in 2018 Annual Report. This data covers "reserved land, building, sites etc.", so does not clearly relate only to infrastructure.</p>	P	0.5 / 1	<a href="#">Source</a>
<p><b>19. Maps of estates/management units?</b> Concession boundaries have been made available to the RSPO and the company declares these represent 100% of its concession sites, but not all may be publicly available due to ongoing legal issues. Maps will become available on GeoRSPO.</p>	✓	1 / 1	<a href="#">Source</a>
<p><b>20. Maps of scheme/plasma smallholders?</b></p>	✗	0 / 1	
<p><b>21. Names and locations of all third-party supplying plantations?</b></p>	✗	0 / 1	
<p><b>22. Number of company-owned mills?</b> 5</p>	✓	1 / 1	<a href="#">Source</a>
<p><b>23. Names and coordinates of company-owned mills?</b> Mill locations have been made available on GFW.</p>	✓	1 / 1	<a href="#">Source</a>
<p><b>24. Number (or percentage) of company-owned mills that source from company-owned plantations and/or third-party plantations?</b></p>	✗	0 / 1	
<p><b>25. Total volumes (or percentages) sourced by company-owned mills that come from company-owned plantations and/or third-party plantations?</b></p>	✗	0 / 1	
<p><b>26. Number of supplier mills?</b></p>	✗	0 / 1	
<p><b>27. Names and coordinates of all third-party supplying mills?</b></p>	✗	0 / 1	
<p><b>28. Number (or percentage) of third-party supplier mills that source from their own plantations and/or third-party plantations?</b></p>	✗	0 / 1	
<p><b>29. Total volumes (or percentages) sourced from third-party supplier mills that come from their own plantations and/or third-party plantations?</b></p>	✗	0 / 1	
<p><b>30. Total volume (or percentage) sourced for refineries that comes from intermediary traders and/or refiners rather than directly from mills?</b></p>	✗	0 / 1	
<p><b>31. Time-bound commitment to achieve 100% traceability to mill level?</b></p>	✗	0 / 1	

	✘	0 / 2
<p><b>32. Percentage of supply traceable to mill level?</b></p>		
	✘	0 / 1 <a href="#">Source</a>
<p><b>33. Time-bound commitment to achieve 100% traceability to plantation level?</b> Three of the company's mills have been IP certified, but the company has no commitment to achieve IP certification for its other two mills.</p>		
	P +	0.59 / 1 <a href="#">Source</a> 1 / 1
<p><b>34. Percentage of fresh fruit bunches (FFB) from own mills traceable to plantation level?</b> 58.6% - The RSPO reports the company has three mills that are identity preserved, covering 44,779 ha. This means that approximately 58.6% is traceable to plantation out of a total landbank of 76,391 ha.</p>		
	✘	0 / 2
<p><b>35. Percentage of fresh fruit bunches (FFB) from supplier mills traceable to plantation level?</b></p>		
	✘	0 / 1
<p><b>36. Publishes traceability data at refinery level?</b></p>		
<p><b>37. Publishes traceability data at crusher level?</b> This indicator is disabled as the company does not own crushing facilities.</p>		



## > Deforestation and biodiversity

9.08 / 18 50.4%

⚠ 1 media report



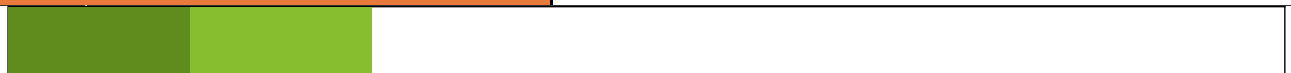
	✓	1 / 1 <a href="#">Source</a>
<p><b>38. Commitment to zero deforestation or zero conversion of natural ecosystems?</b></p>		
	P	0.5 / 1 <a href="#">Source</a>
<p><b>39. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?</b> The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy.</p>		
	P	0.5 / 1 <a href="#">Source</a>
<p><b>40. Criteria for defining deforestation?</b> HCV, HCS, peat. No cut-off date is reported.</p>		
	✘	0 / 2 <a href="#">Source</a>
<p><b>41. Evidence of monitoring deforestation?</b></p>		
	✘	0 / 1
<p><b>42. Amount of illegal/non-compliant deforestation recorded in own operations?</b></p>		
	✘	0 / 1
<p><b>43. Amount of illegal/non-compliant deforestation recorded in supplier operations?</b></p>		
	✘	0 / 1
<p><b>44. Commitment to restoration of non-compliant deforestation/conversion?</b></p>		

	✘ 0 / 1
<p>■ <b>45. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?</b></p>	
	✓ 1 / 1 <a href="#">Source</a>
<p>■ <b>46. Implementing a landscape or jurisdictional level approach?</b>  The company states that it will take into account the conservation of biodiversity and the protection of cultural and customary land use within the context of a sustainably managed landscape. The company also has a Natural Corridor Initiative to plant wildlife corridors. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	✚ 0.79 / 1
	✓ 1 / 1 <a href="#">Source</a>
<p>■ <b>47. Commitment to biodiversity conservation?</b></p>	
	P 0.5 / 1 <a href="#">Source</a>
<p>■ <b>48. Commitment to biodiversity conservation applies to all suppliers?</b>  The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy. The policy also only commits to protection of biodiversity through identification of HCV areas.</p>	
	✓ 1 / 1 <a href="#">Source</a>
<p>■ <b>49. Identified species of conservation concern, referencing international or national system of species classification?</b>  Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	✚ 0.79 / 1
	✓ 1 / 1 <a href="#">Source</a>
<p>■ <b>50. Examples of species and/or habitat conservation management?</b>  National Corridor Initiative linking natural habitats. Work with WCS to address human-elephant conflict and donate to the Orangutan Land Trust. The Company's Wildlife Defenders Programme works with schools and smallholders to promote awareness of conservation issues. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	
	✓ 1 / 1 <a href="#">Source</a>
<p>■ <b>51. Commitment to no hunting or only sustainable hunting of species?</b></p>	
	✘ 0 / 1
<p>■ <b>52. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?</b></p>	



### > HCV, HCS and impact assessments

6 / 14 42.9%



	✓ 1 / 1 <a href="#">Source</a>
<p>■ <b>53. Commitment to conduct High Conservation Value (HCV) assessments?</b></p>	
	P 0.5 / 1 <a href="#">Source</a>
<p>■ <b>54. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?</b>  The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy.</p>	
	✓ 1 / 1 <a href="#">Source</a>
<p>■ <b>55. High Conservation Value (HCV) assessments for planting undertaken prior to January 2015, and</b></p>	

**associated management and monitoring plans?**

There is public availability of the following HCV assessments: Central Kalimantan: PT Harapan Barito Sejahtera, PT Sawit Sumber Rejo, PT Wahana Semesta Kharisma.

✘ 0 / 1 [Source](#)

**56. High Conservation Value (HCV) assessments for all estates planted since January 2015?**

The company states that 307 hectares were planted according to RSPO NPP procedures in Indonesia in 2015, but no HCV assessments could be identified.

✘ 0 / 1 [Source](#)

**57. High Conservation Value (HCV) management and monitoring plans for all estates planted since January 2015?**

The company states that 307 hectares were planted according to RSPO NPP procedures in Indonesia in 2015, but no HCV assessments could be identified.

P 0.5 / 1 [Source](#)

**58. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS)?**

The company does not have an explicit commitment itself, but commits under the RSPO New Planting Procedures (NPP) as an RSPO member.

✘ 0 / 1

**59. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS) applies to all suppliers?**

✘ 0 / 1

**60. Satisfactory review of all High Conservation Value (HCV) assessments undertaken since January 2015 by the HCV ALS Quality Panel?**

P 0.5 / 1 [Source](#)

**61. Commitment to the High Carbon Stock (HCS) Approach?**

The company does not have an explicit commitment itself, but commits under the RSPO New Planting Procedures (NPP) as an RSPO member. The company's policy refers to protection of HCS forest but does not commit to the HCS Approach specifically.

P 0.5 / 1 [Source](#)

**62. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers?**

The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy. The policy also only refers to protection of HCS forest but does not commit to the HCS Approach specifically.

✘ 0 / 1 [Source](#)

**63. High Carbon Stock (HCS) assessments?**

The company did not declare whether it carried out new planting in its 2018 ACOP.

✓ 1 / 1 [Source](#)

**64. Commitment to conduct social and environmental impact assessments (SEIAs)?**

✘ 0 / 1

**65. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?**

✓ 1 / 1 [Source](#)

**66. Social and environmental impact assessments (SEIAs) undertaken, and associated management and monitoring plans?**

There is public availability of the following SEIAs: Central Kalimantan: PT Harapan Barito Sejahtera, PT Sawit Sumber Rejo, PT Wahana Semesta Kharisma.



> Peat, fire and GHG emissions

979 / 20 19%



<p><b>67. Commitment to no planting on peat of any depth?</b></p>	P	0.5 / 1	<a href="#">Source</a>
<p>The company states it has an on-going commitment to no peat development but it does not specify of any depth; however, it commits to no new planting on peat in accordance with the RSPO guidelines.</p>			
<p><b>68. Commitment to no planting on peat of any depth applies to all suppliers?</b></p>	✗	0 / 1	
<p><b>69. Implementation of commitment to no planting on peat of any depth?</b></p>	P	0.75 / 1	<a href="#">Source</a>
<p><b>70. Landbank or planted area on peat?</b></p>	P	0.5 / 1	<a href="#">Source</a>
<p>1,363 - Data as of 2016. Covers only the company's Malaysian operations.</p>			
<p><b>71. Commitment to best management practices for soils and peat?</b></p>	✓	1 / 1	<a href="#">Source</a>
<p><b>72. Commitment to best management practices for soils and peat applies to all suppliers?</b></p>	P	0.5 / 1	<a href="#">Source</a>
<p>The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy.</p>			
<p><b>73. Evidence of best management practices for soils and peat?</b></p>	✓	1 / 1	<a href="#">Source</a>
<p>Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>			
<p><b>74. Commitment to zero burning?</b></p>	P	0.5 / 1	<a href="#">Source</a>
<p>The company only states it has a zero-burning approach for replanting. However, this does not necessarily cover new development.</p>			
<p><b>75. Commitment to zero burning applies to all suppliers?</b></p>	✗	0 / 1	
<p><b>76. Evidence of fire monitoring and management?</b></p>	✗	0 / 2	
<p><b>77. Details/number of hotspots/fires in company estates?</b></p>	✗	0 / 1	
<p><b>78. Details/number of hotspots/fires within surrounding landscape/smallholders?</b></p>	✗	0 / 1	
<p><b>79. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity?</b></p>	P	0.5 / 1	<a href="#">Source</a>
<p>The company has a target to cut the its overall carbon footprint to 58% by 2020. The company states that due to the significant changes in the PalmGHG methodology and its biogas capture plans, it is currently [2016] reviewing this target and will update in future reports. Target does not refer to GHG intensity.</p>			

<p><b>80. Methodology used to calculate GHG emissions?</b> PalmGHG Version 3.0.1.</p>	✓	1 / 1	<a href="#">Source</a>
<p><b>81. Progress towards commitment to reduce GHG emissions intensity?</b> The company reports a GHG emission reduction of 15% (1.08 mt CO2e per mt CPO and PK) in 2017.</p>	P	0.75 / 1	<a href="#">Source</a>
<p><b>82. Percentage of mills with methane capture (100%)?</b> 60 - Three of the company's five mills have biomass plants. The company targets the completion of biogas plants at its remaining mills by 2025.</p>	P	0.5 / 1	<a href="#">Source</a>
<p><b>83. GHG emissions intensity?</b> 1.08 - Data as of 2017. Company is currently compiling a 2019 report.</p>	✓	1 / 1	<a href="#">Source</a>
<p><b>84. GHG emissions from land use change?</b> Most recent data was published in 2016.</p>	P	0.5 / 1	<a href="#">Source</a>



### > Water, chemical and pest management


12.62 / 22 57.4%

<p><b>85. Time-bound commitment to improve water use intensity?</b> Company's reduction target was achieved at 1.10 m3 per tonne FFB in 2018.</p>	✓	1 / 1	<a href="#">Source</a>
<p><b>86. Progress towards commitment on water use intensity?</b> Company's reduction target was achieved at 1.10 m3 per tonne FFB in 2018.</p>	P	0.75 / 1	<a href="#">Source</a>
<p><b>87. Water use intensity?</b> 1.1 - m3 per tonne FFB in 2018.</p>	✓	1 / 1	<a href="#">Source</a>
<p><b>88. Time-bound commitment to improve water quality (BOD and COD)?</b> The company only has a commitment to "maintain the quality of ground and surface waters" and seeks to prevent pollution, but does not have a time-bound commitment.</p>	✗	0 / 1	<a href="#">Source</a>
<p><b>89. Progress towards commitment on water quality (BOD and COD)?</b> Company records improvement in BOD figures relating to POME, however, this figure is given as "8% improvement" with no clear data.</p>	P	0.5 / 1	<a href="#">Source</a>
<p><b>90. Treatment of palm oil mill effluent (POME) and/or palm oil refinery effluent (PORE)?</b> The company only states that organic fertilisers are produced from treated and dried POME, but no further details are given.</p>	P	0.5 / 1	<a href="#">Source</a>



<p><b>91. Commitment to protect natural waterways through buffer zones?</b></p>	<p>✗ 0 / 1 <a href="#">Source</a></p>
<p><b>92. Implementation of commitment to protect natural waterways through buffer zones?</b> Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	<p>✓ 1 / 1 <a href="#">Source</a> + 0.79 / 1</p>
<p><b>93. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?</b></p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><b>94. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers?</b> The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy. The policy also refers only to minimising chemical use and not pesticides or fertilisers specifically.</p>	<p>P 0.5 / 1 <a href="#">Source</a></p>
<p><b>95. Implementation of commitment to reduce chemical usage?</b> Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	<p>✓ 1 / 1 <a href="#">Source</a> + 0.79 / 1</p>
<p><b>96. Chemical usage per ha or list of chemicals used?</b> Herbicide and Paraquat use (active ingredients in litre/hectare).</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><b>97. Commitment to no use of paraquat?</b> The company states that it banned the use of paraquat in 2015.</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><b>98. Commitment to no use of paraquat applies to all suppliers?</b></p>	<p>✗ 0 / 1</p>
<p><b>99. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?</b></p>	<p>✗ 0 / 1 <a href="#">Source</a></p>
<p><b>100. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?</b></p>	<p>✗ 0 / 1</p>
<p><b>101. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?</b></p>	<p>✗ 0 / 1 <a href="#">Source</a></p>
<p><b>102. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?</b></p>	<p>✗ 0 / 1</p>
<p><b>103. Integrated Pest Management (IPM) approach?</b> Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	<p>✓ 1 / 1 <a href="#">Source</a> + 0.79 / 1</p>



		
	P	0.5 / 1 <a href="#">Source</a>
<b>104. Commitment to human rights?</b>		
The company commits to respect human rights but does not commit to the UN Declaration on Human Rights or UN Guiding Principles on Business and Human rights specifically.		
	P	0.5 / 1 <a href="#">Source</a>
<b>105. Commitment to human rights applies to all suppliers?</b>		
The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy. The policy does not commit to the UN Declaration on Human Rights or UN Guiding Principles on Business and Human rights specifically.		
	✓ +	1 / 1 <a href="#">Source</a> 0.79 / 1
<b>106. Progress on human rights commitment?</b>		
Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.		
	P	0.5 / 1 <a href="#">Source</a>
<b>107. Commitment to respect legal and customary land tenure rights?</b>		
The company only states that it takes into account the protection of cultural and customary land use. No reference is made to customary ownership rights or legal land rights.		
	✗	0 / 1
<b>108. Commitment to legal and customary land rights applies to all suppliers?</b>		
	✗	0 / 1
<b>109. Details of process for addressing land conflicts available?</b>		
	✗	0 / 1
<b>110. Commitment to respect indigenous and local communities' rights?</b>		
The company mentions indigenous peoples but does not advance a clear commitment to their rights.		
	✗	0 / 1
<b>111. Commitment to indigenous and local communities' rights applies to all suppliers?</b>		
	✓ +	1 / 1 <a href="#">Source</a> 0.79 / 1
<b>112. Examples of local stakeholder engagement to prevent conflicts?</b>		
Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.		
	✓	1 / 1 <a href="#">Source</a>
<b>113. Commitment to free, prior and informed consent (FPIC)?</b>		
	P	0.5 / 1 <a href="#">Source</a>
<b>114. Commitment to free, prior and informed consent (FPIC) applies to all suppliers?</b>		
The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy.		
	P	0.5 / 1 <a href="#">Source</a>
<b>115. Details of free, prior and informed consent (FPIC) process available?</b>		
The RSPO Principles and Criteria 2018 contain guidance and requirements on the process to conduct free, prior and informed consent (FPIC). Partial points have therefore been awarded on the basis of the company's commitments under the RSPO New Planting Procedures (NPP) as an RSPO member.		

	✘	0 / 1
■ 116. Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced?		
	✘	0 / 1
■ 117. Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced, applies to all suppliers?		
	P	0.5 / 1 <a href="#">Source</a>
■ 118. Commitment to mitigate impacts on food security? The company states that it contributes towards the national food security programme.		
	✘	0 / 1
■ 119. Commitment to mitigate impacts on food security applies to all suppliers?		
	✘	0 / 2
■ 120. Progress on commitment to mitigate impacts on food security?		
	✓	1 / 1 <a href="#">Source</a>
■ 121. Commitment to provide essential community services and facilities?		
	✓ +	1 / 1 <a href="#">Source</a> 0.79 / 1
■ 122. Progress on commitment to provide essential community services and facilities? Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.		
	✓	1 / 1 <a href="#">Source</a>
■ 123. Commitment to respect all workers' rights? The company has a commitment to protect labour rights of all workers.		
	P	0.5 / 1 <a href="#">Source</a>
■ 124. Commitment to respect all workers' rights applies to all suppliers? The policy states "in situations where Kulim has business interest, we will be working closely on the application of the policy with our business partners including our contractors, suppliers, traders and other industry stakeholders" but it is not clear if all suppliers must comply with the policy.		
	✓ +	1 / 1 <a href="#">Source</a> 0.79 / 1
■ 125. Progress on commitment to respect all workers' rights? A 2014/2015 Sustainability Report states that employees are given mandatory human/labour rights training. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume. .		
	✓	1 / 1 <a href="#">Source</a>
■ 126. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles? The company commits to the ILO's Declaration on Fundamental Principles and Rights at Work.		
	✘	0 / 1
■ 127. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?		
	✓	1 / 1 <a href="#">Source</a>
■ 128. Commitment to eliminate gender-related discrimination with regards to employment and occupation?		
	✘	0 / 1
■ 129. Commitment to eliminate gender-related discrimination with regards to employment and		

<b>occupation applies to all suppliers?</b>		
<input type="checkbox"/> 130. Percentage or number of temporary employees?	✗	0 / 1
<input type="checkbox"/> 131. Percentage or number of women employees? 11.52%	✓	1 / 1 <a href="#">Source</a>
<input type="checkbox"/> 132. Commitment to pay at least minimum wage?	✓	1 / 1 <a href="#">Source</a>
<input type="checkbox"/> 133. Commitment to pay at least minimum wage applies to all suppliers?	✗	0 / 1
<input type="checkbox"/> 134. Progress on commitment to pay minimum wage? Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.	✓ +	1 / 1 <a href="#">Source</a> 0.79 / 1
<input type="checkbox"/> 135. Reporting of salary by gender?	✗	0 / 1
<input type="checkbox"/> 136. Commitment to address occupational health and safety?	✓	1 / 1 <a href="#">Source</a>
<input type="checkbox"/> 137. Commitment to address occupational health and safety applies to all suppliers?	✗	0 / 1
<input type="checkbox"/> 138. Reduction of time lost due to work-based injuries? The company recorded a drop from 3.41 days in 2017 to 1.98 days in 2018.	P	0.75 / 1 <a href="#">Source</a>
<input type="checkbox"/> 139. Time lost due to work-based injuries? 1.41 - The company recorded a drop from 3.41 days in 2017 to 1.98 days lost in 2018.	✓	1 / 1 <a href="#">Source</a>
<input type="checkbox"/> 140. Zero fatalities as a result of work-based accidents? 0 - The company reports zero fatalities as a result of work-based accidents in 2018.	P	0.75 / 1 <a href="#">Source</a>
<input type="checkbox"/> 141. Number of fatalities as a result of work-based accidents? 0	✓	1 / 1 <a href="#">Source</a>
<input type="checkbox"/> 142. Provision of personal protective equipment and related training? Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.	✓ +	1 / 1 <a href="#">Source</a> 0.79 / 1



## > Certification standards

8 81 / 16 55 1%



<p><b>143. Member of the Roundtable on Sustainable Palm Oil (RSPO)?</b> 2,004 - Kulim (Malaysia) joined the RSPO in 2004, and its parent company, Johor Corporation, joined in 2009. Kulim is now being reported on under its parent company, Johor Corporation.</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><b>144. RSPO-certified within three years of joining the RSPO or by November 2010 for companies joining prior to finalisation of the RSPO certification systems in November 2007?</b> 2009</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><b>145. Submitted most recent RSPO Annual Communication of Progress (ACOP)?</b> Kulim is now being reported on under its parent company, Johor Corporation.</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><b>146. Listed all countries and regions in which operates in most recent RSPO Annual Communication of Progress (ACOP)?</b> The company reports it operates in Indonesia (Sumatera Selatan) and Malaysia (Johor, Pahang).</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><b>147. Time-bound plan for achieving 100% RSPO certification of estates and mills within five years or achieved 100% RSPO-certification of estates?</b> 2025 - Time-bound plan more than five years away.</p>	<p>✗ 0 / 1 <a href="#">Source</a></p>
<p><b>148. Percentage of area (ha) RSPO-certified?</b> 60,694.6 (0.79%) - Data as of 2017.</p>	<p>P 0.79 / 1 <a href="#">Source</a></p>
<p><b>149. Percentage of scheme/plasma smallholders (ha) RSPO-certified?</b> 0 (0%)</p>	<p>✗ 0 / 1 <a href="#">Source</a></p>
<p><b>150. Percentage of mills RSPO-certified?</b> 5 (100%)</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><b>151. Time-bound plan for achieving 100% RSPO certification of scheme/plasma/ associated smallholders and outgrowers within five years or target already achieved?</b> 2025 - Time-bound plan more than five years away.</p>	<p>✗ 0 / 1 <a href="#">Source</a></p>
<p><b>152. Percentage of FFB supply (tonnes) from independent smallholders/ outgrowers/third-party FFB suppliers that is RSPO-certified?</b> 6,989.37 (2.2%) - The company reports that 317,982.27 tonnes FFB is supplied by outgrower operations, of which 6989.37 tonnes is RSPO certified. Data as of 2017.</p>	<p>P 0.02 / 1 <a href="#">Source</a></p>
<p><b>153. Year expected to achieve 100% RSPO certification of all palm product processing facilities?</b></p>	<p>✗ 0 / 1</p>
<p><b>154. Percentage of all palm oil and oil palm products handled/traded/ processed (tonnes) that is RSPO-certified?</b></p>	<p>✗ 0 / 1</p>
<p><b>155. Sells or processes/trades RSPO-certified palm oil through Segregated or Identity Preserved supply chains?</b> Company sells Identity Preserved palm oil.</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>

■ 156. Indonesia Sustainable Palm Oil (ISPO) certified (100%)?	✗	0 / 1
■ 157. Malaysia Sustainable Palm Oil (MSPO) certified?	✓	1 / 1 <a href="#">Source</a>
■ 158. Certified under voluntary sustainability certification scheme (e.g. ISCC, SAS, RSB, etc.)? ISCC, ISO 14001.	✓	1 / 1 <a href="#">Source</a>



### > Smallholders and suppliers

25 / 16 15.6%		
<div style="width: 15.6%; height: 20px; background-color: #4CAF50;"></div>		
■ 159. Commitment to support smallholders?	✗	0 / 1
■ 160. Programme to support scheme/plasma smallholders?	✓	1 / 1 <a href="#">Source</a>
■ 161. Percentage of scheme/plasma smallholders involved in programme?	✗	0 / 1
■ 162. Programme to support independent smallholders/outgrowers? Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.	✓	1 / 1 <a href="#">Source</a>
■ 163. Percentage of independent smallholders/outgrowers involved in programme? The company reports that two outgrower groups have achieved certification and that it will continue to work with other outgrowers.	P	0.5 / 1 <a href="#">Source</a>
■ 164. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?	✗	0 / 1
■ 165. Percentage of suppliers assessed and/or engaged on compliance with company requirements?	✗	0 / 1
■ 166. Time-bound plan to engage with all high-risk mills within three years?	✗	0 / 1
■ 167. Programme to support high-risk mills to become compliant with sourcing policies?	✗	0 / 1
■ 168. Regularly engages with a subset of high-risk mills?	✗	0 / 1
■ 169. Procedures in place to assess all own and third-party supplying palm oil mills for risk level?	✗	0 / 1
■ 170. Regularly assesses and categorises the risk level of all own and third-party supplying mills?	✗	0 / 1

<p><input type="checkbox"/> 171. Regularly reports the risk level of all own and third-party supplying mills identified in its supply chain?</p>	<p>✗ 0 / 1</p>
<p><input type="checkbox"/> 172. Suspension or exclusion criteria for suppliers?</p>	<p>✗ 0 / 1</p>
<p><input type="checkbox"/> 173. Time-bound action plans (including Key Performance Indicators) for suppliers to be in compliance with palm oil sourcing commitments?</p>	<p>✗ 0 / 1</p>
<p><input type="checkbox"/> 174. Proportion of direct and indirect supply that comes from palm oil plantations which are compliant with palm oil sourcing policies?</p>	<p>✗ 0 / 1</p>



## > Governance and grievances

429 / 8 53.6%

<p><input type="checkbox"/> 175. Commitment to ethical conduct and prohibition of corruption?</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><input type="checkbox"/> 176. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?</p>	<p>✗ 0 / 1</p>
<p><input type="checkbox"/> 177. Progress on commitment to ethical conduct and prohibition of corruption? Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	<p>✓ + 1 / 1 <a href="#">Source</a> 0.79 / 1</p>
<p><input type="checkbox"/> 178. Disclosure of the company's management approach to tax and payments to governments?</p>	<p>✗ 0 / 1</p>
<p><input type="checkbox"/> 179. Whistleblowing procedure?</p>	<p>✓ 1 / 1 <a href="#">Source</a></p>
<p><input type="checkbox"/> 180. Own grievance or complaints system open to all stakeholders? The company has a grievance system, but details of how the system functions are not provided.</p>	<p>P 0.5 / 1 <a href="#">Source</a></p>
<p><input type="checkbox"/> 181. Details of complaints and grievances disclosed?</p>	<p>✗ 0 / 1</p>