

# Samling Group

Timber and pulp assessment

Total score:

50.5%

Latest update: July 2020

Next scheduled: July 2021

## About this company:

Established in 1963 and headquartered in Malaysia, SamlingGroup owns timber operations in Malaysia, Guyana, New Zealand and China, and is involved in timber production, processing, manufacturing, trading and distribution. It operates across a wide range of other sectors, including palm oil production.

**Landbank** 32,188 hectares

**Thomson Reuters ticker:** Private company

**Bloomberg ticker:** Private company

**Activities:** Timber production; Timber processing and manufacturing; Trading and distribution

**Locations:** Malaysia (Sarawak), Guyana (Georgetown), China, Russia

**Headquarters:** Malaysia

**Related companies:** Glenealy Plantations Bhd (SPOTT palm oil company) is a subsidiary of Samling.

**Website:** <http://www.samling.com>  
**Latest annual report (2011)**

Total:

77.25 / 153

50.5%



## > Sustainability policy and leadership

4.5 / 10 45%

### 1. Sustainable forestry policy or commitment for all its operations?

The company has Environment Policy and Sustainable Forest Management Policy. However, it is not clearly stated that it covers all company operations.

P 0.5 / 1 [Source](#)

### 2. Sustainable forestry policy or commitment applies to all suppliers?

X 0 / 1

### 3. High-level position of responsibility for sustainability?

Chief Operating Officer, Chief Forester.

✓ 1 / 1 [Source](#)

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

This indicator is disabled as the company is private.

### 5. Percentage or number of women in senior management team?

✓ 1 / 1 [Source](#)

### 6. Percentage or number of women board members?

This indicator is disabled as the company is private.

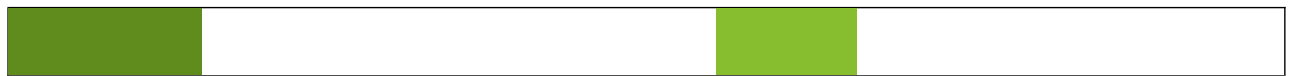
	✓ 1 / 1
<p><b>7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with timber and pulp production?</b></p>	
<p><b>8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with timber and pulp production?</b> The company engages with local communities to understand and provide them with basic facilities such as electricity, clean water, and building materials for their homes, schools, and places of worship. Also, the company collaborates with WWF and ITTO.</p>	✓ 1 / 1 <a href="#">Source</a>
<p><b>9. Sustainability report published within last two years?</b></p>	✗ 0 / 1
<p><b>10. Reports through standardised reporting systems?</b></p>	✗ 0 / 1
<p><b>11. Climate risks assessment available?</b></p>	✗ 0 / 1
<p><b>12. Natural capital assessment available?</b></p>	✗ 0 / 1



> Landbank, maps and traceability

14 75 / 18 81.9%

**4 media reports**



<p><b>13. Lists countries and operations?</b> Malaysia (upstream &amp; downstream), Guyana (downstream), China (downstream), Russia (downstream). Samling has a wood product marketing company in India, Xylos Arteriors India Private Limited, that sells furniture made by Samling Malaysia from Samling's own Sarawak MTCS certified BorneoTeak (R) (aka Acacia mangium) as well as other Group wood based products.</p>	✓ 1 / 1 <a href="#">Source</a>
<p><b>14. Lists countries sourcing from?</b> This indicator is disabled as the company reports that it does not trade wood/wood fibre.</p>	
<p><b>15. Total area of natural forest designated for wood/wood fibre production (ha)?</b> 731,268 - Contradictory figures have been provided to ZSL by the company that are not available on the company website.</p>	P 0.5 / 1 <a href="#">Source</a>
<p><b>16. Total area of forest plantation (ha)?</b> 32,188 - The total planted area is 32,188 ha (the company has no outgrower schemes).</p>	✓ 1 / 1 <a href="#">Source</a>
<p><b>17. Area of plantation/natural forest within outgrower schemes (ha)?</b> This indicator is disabled as the company reports that it doesn't use outgrower schemes for wood/wood fibre production.</p>	
<p><b>18. Unplanted (areas designated for future development as plantation forest) (ha)?</b></p>	✓ 1 / 1 <a href="#">Source</a>

<input type="checkbox"/> <b>19. Conservation set-aside area, including HCV area (ha)?</b>	P	0.5 / 1	<a href="#">Source</a>
258,000 - Contradictory figures have been provided to ZSL by the company that are not available on the company website.			
<input type="checkbox"/> <b>20. Area of Intact Forest Landscape (ha)?</b>	✗	0 / 1	<a href="#">Source</a>
<input type="checkbox"/> <b>21. Number of Forest Management Units (FMUs)?</b>	✓	1 / 1	<a href="#">Source</a>
12 - In addition to 12 FMUs, the company also operates six Licences for Planted Forest (LPF) in Sarawak.			
<input type="checkbox"/> <b>22. Maps of forest management units (FMUs)?</b>	P	0.5 / 1	<a href="#">Source</a>
Some of the company's concession maps are available on GFW.			
<input type="checkbox"/> <b>23. Forest management plans available for all FMUs?</b>	P	0.5 / 1	<a href="#">Source</a>
The company has published Forest Management Plans only for Sarawak region.			
<input checked="" type="checkbox"/> <b>24. Monitoring of forest management plan implementation available?</b>	P	0.75 / 1	<a href="#">Source</a>
[Externally verified] Points for external verification have been awarded on the basis of the company's PEFC-certification. As the International Standard's requirements do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator.			
<input checked="" type="checkbox"/> <b>25. Company has provided valid legal documents to Open Timber Portal on use right (at the time of SPOTT assessments)?</b>			
This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.			
<input checked="" type="checkbox"/> <b>26. Company has provided valid legal documents to Open Timber Portal on forest management (at the time of SPOTT assessments)?</b>			
This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.			
<input checked="" type="checkbox"/> <b>27. Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)?</b>			
This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.			
<input type="checkbox"/> <b>28. Names and locations of all third-party supplying FMUs?</b>	✓	1 / 1	<a href="#">Source</a>
The company states that there are no third party FMU supplying sawmills.			
<input type="checkbox"/> <b>29. Number of company owned sawmills?</b>	✓	1 / 1	<a href="#">Source</a>
<input type="checkbox"/> <b>30. Names and locations of company owned sawmills?</b>	✓	1 / 1	<a href="#">Source</a>
Coordinates for two out of three mills are available.			
<input type="checkbox"/> <b>31. Number of company-owned pulp and paper mills?</b>			
This indicator is disabled as the company reports that it doesn't own pulp or paper mills.			
<input type="checkbox"/> <b>32. Names and locations of company-owned pulp and paper mills?</b>			

This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

✓ 1 / 1 [Source](#)

**33. Reports total volumes (or percentages) sourced by company-owned sawmills that come from company's own operations and/or third-parties?**

The company's sawmills sources 100% of its supply from its own FMUs.

**34. Reports total volumes (or percentages) sourced by company-owned pulp and paper mills that come from company's own operations and/or third-parties?**

This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

**35. Number of third party supplying mills?**

This indicator is disabled as the company reports that it doesn't source from supplying mills.

**36. Names and locations of all third party supplying mills?**

This indicator is disabled as the company reports that it doesn't source from supplying mills.

**37. Reports total volume (or percentages) sourced from third-party supplying mills that come from the supplying mills' own operations and/or third parties?**

This indicator is disabled as the company reports that it doesn't source from supplying mills.

✓ 1 / 1 [Source](#)

**38. Procedures to trace raw materials to country of harvest?**

The company states that it does not source from third party Forest Management Units and that all the raw material for its sawmills is sourced from own Forest Management Units that are located within Sarawak, Malaysia.

✓ 1 / 1 [Source](#)

**39. Percentage of supply traceable to country of harvest?**

100 - The company states that it does not source from third party Forest Management Units and that all the raw material for its sawmills is sourced from own Forest Management Units that are located within Sarawak, Malaysia.

✓ 1 / 1 [Source](#)

**40. Procedures to trace raw materials to FMU level?**

The company states that "100% of log production is traceable to FMU level thru Sarawak government procedures which mandate the issue of log Removal Passes" and through an IT-based Log Tracking System.

✓ 1 / 1 [Source](#)

**41. Percentage of supply traceable to FMU level?**

The company states that "100% of log production is traceable to FMU level thru Sarawak government procedures which mandate the issue of log Removal Passes". The company used a Log Tracking System to ensure all supply is traceable to FMU, mill and specific tree.



> **Certification standards**

0.5 / 9 5.6%

**5 media reports**



P 0.5 / 1 [Source](#)

**42. Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved?**

The company states that it will achieve 100% third party legality verification for natural forest by 2022. However, legality

verification for planted concessions is unclear.

	✘	0 / 1	<a href="#">Source</a>
<b>43. Percentage area (ha) verified as being in legal compliance by a third party?</b> 55.5% - The company states that 100% of natural forest is legally verified by the third party (MTCS/PEFC or STLVs) and the overall percentage of the total certified area (natural forest and plantation) is 55.5%, however certificates could not be found to verify this.			
	✘	0 / 1	<a href="#">Source</a>
<b>44. Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party?</b> The company states that its Natural Forests will be certified by 2022. However, no time-bound plan to source only wood/wood fiber that is in legal compliance verified by a third party is disclosed.			
	✘	0 / 1	
<b>45. Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party?</b>			
	✘	0 / 1	
<b>46. Percentage area (ha) FSC FM certified?</b>			
	✘	0 / 1	
<b>47. Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?</b>			
	✘	0 / 1	
<b>48. Percentage of wood/wood fibre supply (tonnes) from all suppliers that comes from FSC FM certified areas?</b>			
	✘	0 / 1	<a href="#">Source</a>
<b>49. Commitment to source only wood/wood fibre that meets FSC Controlled Wood and/or PEFC Controversial Sources requirements?</b> The company's commitment to source from FSC-CW, PEFC-FM and PEFC-CS areas only applies to logs sourced from plantations.			
	✘	0 / 1	<a href="#">Source</a>
<b>50. Percentage area (ha) PEFC certified (excluding FSC certified area)?</b> The company states that 40,094ha (28%) of its combined natural forest and plantations are PEFC (MTCS) certified. However, the percentage could not be calculated by ZSL using information from the company's website.			



## > Deforestation and biodiversity

11 / 22 63.6%

11 media reports



	✓	1 / 1	<a href="#">Source</a>
<b>51. Commitment to zero deforestation or zero conversion of natural ecosystems?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.			
	✓	1 / 1	<a href="#">Source</a>
<b>52. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004) and the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership and PEFC CoC certification.			

<p><b>■ 53. Criteria for defining deforestation?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.</p>	✓	1 / 1 <a href="#">Source</a>
<p><b>■ 54. Evidence of monitoring deforestation?</b></p>	✗	0 / 1
<p><b>■ 55. Amount of illegal/non-compliant deforestation recorded?</b></p>	✓	1 / 1 <a href="#">Source</a>
<p><b>■ 56. Amount of illegal//non-compliant deforestation recorded in supplier operations?</b></p>	✗	0 / 1
<p><b>■ 57. Commitment to restoration of non-compliant deforestation/conversion?</b></p>	✗	0 / 1
<p><b>■ 58. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?</b></p>	✗	0 / 1
<p><b>■ 59. Implementing a landscape or jurisdictional level approach?</b> [Externally verified] Points for external verification have been awarded on the basis of the company's PEFC-certification. As the International Standard's requirements do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator.</p>	P	0.75 / 1 <a href="#">Source</a>
<p><b>■ 60. Commitment to biodiversity conservation?</b></p>	✓	1 / 1 <a href="#">Source</a>
<p><b>■ 61. Commitment to biodiversity conservation applies to all suppliers?</b> Supplier is FSC-certified and makes this commitment to biodiversity, however it is unclear if all company suppliers are FSC-certified.</p>	P	0.5 / 1
<p><b>■ 62. Identified species of conservation concern, referencing international or national system of species classification?</b> Partial points have been awarded on the basis of the company's PEFC-certification, because species are listed in public summaries on the company's site but public summaries are not available for all operations.</p>	P	0.75 / 1 <a href="#">Source</a>
<p><b>■ 63. Examples of species and/or habitat conservation management?</b> Points for external verification have been awarded on the basis of the company's PEFC-certified landbank. In addition, the company states that it has identified and protected river buffer zones and carried out regular patrols inside FMUs.</p>	✓	1 / 2 <a href="#">Source</a>
<p><b>■ 64. Commitment to no hunting or only sustainable hunting of species?</b></p>	✓	1 / 1 <a href="#">Source</a>
<p><b>■ 65. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?</b></p>	✗	0 / 1
<p><b>■ 66. Commitment to protect forest areas from illegal activities?</b></p>	✓	1 / 1 <a href="#">Source</a>
<p><b>■ 67. Commitment to protect forest areas from illegal activities applies to all suppliers?</b> The company makes this commitment through the PEFC International Standard (PEFC ST 1003:2010). Full points have</p>	✓	1 / 1

therefore been awarded for this indicator as 100% of the company's wood/woodfibre supply is PEFC-certified.

**68. Evidence of protecting forest areas from illegal activities?**

Points for external verification have been awarded on the basis of the company's PEFC-certified landbank.

✓ 1 / 2

**69. Commitment to no use of genetically modified organisms?**

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership. The company is also PEFC/MTC certified.

✓ 1 / 1 [Source](#)

**70. Commitment to no use of genetically modified organisms applies to all suppliers?**

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004) and the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership and PEFC CoC certification.

✓ 1 / 1 [Source](#)



> HCV, HCS and impact assessments

5.5 / 10 55%



**71. Commitment to conduct High Conservation Value (HCV) assessments?**

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.

✓ 1 / 1 [Source](#)

**72. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?**

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.

✓ 1 / 1 [Source](#)

**73. High Conservation Value (HCV) assessments available?**

HCV assessment summaries are available within the company's forest management plans. The company discloses six HCV assessments in six FMPs available on the website. The HCV assessments do not cover all of the company's operations.

P 0.75 / 1 [Source](#)

**74. High Conservation Value (HCV) management and monitoring plans available?**

[Externally verified] HCV management and monitoring plans are publicly available in the Forest Management Plans and are reviewed by stakeholders including Sarawak Forestry department & WWF. Management plans are only available for some of the company's operations.

P 0.75 / 1 [Source](#)

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

✗ 0 / 1

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

✗ 0 / 1

**77. High Carbon Stock (HCS) assessments available?**

✗ 0 / 1

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

✓ 1 / 1 [Source](#)

	✘ 0 / 1
<p>■ <b>79. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?</b></p>	
	✓ 1 / 1 <a href="#">Source</a>
<p>■ <b>80. Social and environmental impact assessments (SEIAs) available, and associated management and monitoring plans?</b> The company has only made EIAs publicly available which are approved by Natural Resources and Environment Board (NREB).</p>	
<p>■ <b>81. Company has provided valid legal documents to Open Timber Portal on impact assessments (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>	



> **Soils, fire and GHGs**

5.75 / 23 25%

<p>⚠ 3 media reports</p>	
	✘ 0 / 1
<p>■ <b>82. Commitment to no planting on peat of any depth?</b></p>	
	✘ 0 / 1
<p>■ <b>83. Commitment to no planting on peat of any depth applies to all suppliers?</b></p>	
	P 0.5 / 1 <a href="#">Source</a>
<p>■ <b>84. Landbank or planted area on peat (ha)?</b> 3,309 - The information disclosed to ZSL differs from the amount publicly available on the website. Therefore, partial points have been awarded.</p>	
	✘ 0 / 1
<p>■ <b>85. Implementation of commitment to no planting on peat of any depth?</b></p>	
	✘ 0 / 1
<p>■ <b>86. Commitment to best management practices for soils and peat?</b></p>	
	✘ 0 / 1
<p>■ <b>87. Commitment to best management practices for soils and peat applies to all suppliers?</b></p>	
	P 0.5 / 2 <a href="#">Source</a>
<p>■ <b>88. Evidence of best management practices for soils and peat?</b> The company gives one example of BMP in that trees are not planted on slopes of 35 degrees or more.</p>	
	✓ 1 / 1 <a href="#">Source</a>
<p>■ <b>89. Commitment to reduced impact logging?</b></p>	
	✘ 0 / 1
<p>■ <b>90. Commitment to reduced impact logging applies to all suppliers?</b></p>	
	P 0.75 / 2 <a href="#">Source</a>
<p>■ <b>91. Evidence of implementing reduced impact logging practices?</b></p>	



The company states that permission 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. However, the information is not externally verified.

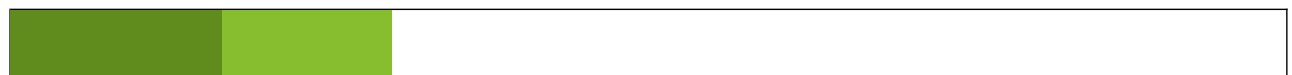
<p><input checked="" type="checkbox"/> <b>92. Commitment to zero burning?</b> Commitment to zero burning is in place, however, it does not cover all operations.</p>	P	0.5 / 1 <a href="#">Source</a>
<p><input checked="" type="checkbox"/> <b>93. Commitment to zero burning applies to all suppliers?</b></p>	X	0 / 1
<p><input checked="" type="checkbox"/> <b>94. Evidence of fire monitoring and management?</b> The Company is PEFC certified. They company also states that In the natural forest &amp; the ITP of the ever wet tropics fire is not usually a major issue. The government manages an active satellite-based hotspot alert system which monitors their operations.</p>	✓	1 / 2
<p><input checked="" type="checkbox"/> <b>95. Details/number of hotspots/fires in company FMUs?</b></p>	✓	1 / 1 <a href="#">Source</a>
<p><input checked="" type="checkbox"/> <b>96. Details/number of hotspots/fires in suppliers operations?</b></p>	X	0 / 1
<p><input checked="" type="checkbox"/> <b>97. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity?</b></p>	X	0 / 1
<p><input checked="" type="checkbox"/> <b>98. GHG emissions intensity?</b> The company reports an average GHG intensity 57kg CO2e/m3 for its natural forest operations, but no figures are available for plantation operations.</p>	P	0.5 / 1 <a href="#">Source</a>
<p><input checked="" type="checkbox"/> <b>99. GHG emissions from land use change?</b></p>	X	0 / 1
<p><input checked="" type="checkbox"/> <b>100. Progress towards commitment to reduce GHG emissions intensity?</b></p>	X	0 / 1
<p><input checked="" type="checkbox"/> <b>101. Methodology used to calculate GHG emissions?</b></p>	X	0 / 1



> Water, chemical and waste management

7 / 15 46.7%

2 media reports



**102. Time-bound commitment to improve water use intensity?**  
This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

**103. Water use intensity?**  
This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

**104. Progress towards commitment on water use intensity?**

This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

■ **105. Time-bound commitment to improve water quality (BOD and COD)?**

This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

■ **106. Progress towards commitment on water quality (BOD and COD)?**

This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

■ **107. Treatment of pulp and paper mill effluent?**

This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

■ **108. Evidence of sawmill run-off containment and wastewater treatment?**

✘ 0 / 1

■ **109. Proportion of processing facilities with closed-loop water treatment system?**

This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

■ **110. Commitment to protect natural waterways through buffer zones?**

✓ 1 / 1 [Source](#)

■ **111. Implementation of commitment to protect natural waterways through buffer zones?**

✓ 1 / 1 [Source](#)

■ **112. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?**

✓ 1 / 1 [Source](#)

■ **113. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers?**

✘ 0 / 1

■ **114. Evidence of eliminating chlorine and chlorine compounds for bleaching?**

This indicator is disabled as the company reports that it doesn't own pulp or paper mills.

■ **115. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?**

✓ 1 / 1 [Source](#)

■ **116. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?**

✘ 0 / 1

■ **117. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?**

✓ 1 / 1 [Source](#)

■ **118. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?**

✘ 0 / 1

■ **119. Chemical usage per ha or list of chemicals used?**

The company reports 70kg/ha of fertiliser and 4 to 5 litres/ha of herbicide use for one of its concessions.

P 0.5 / 1 [Source](#)

	✘ 0 / 2
<p><b>■ 120. Implementation of commitment to reduce chemical usage?</b></p>	
<p><b>■ 121. Integrated Pest Management (IPM) approach?</b> Points for external verification have been awarded on the basis of the company's PEFC-certification. As the International Standard's requirements do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator.</p>	P 0.75 / 2 <a href="#">Source</a>
<p><b>■ 122. Waste management system in place to avoid negative impacts?</b> The company has a waste management policy in place, which states that it follows the best practicable environmental option in the removal, transport, and disposal of all types of waste generated by its operational activities in its forest areas.</p>	P 0.75 / 1 <a href="#">Source</a>



## > Community, land and labour rights

21.75 / 34 64%

⚠ 14 media reports



	✓ 1 / 1 <a href="#">Source</a>
<p><b>■ 123. Commitment to human rights?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.</p>	
	✓ 1 / 1 <a href="#">Source</a>
<p><b>■ 124. Commitment to human rights applies to all suppliers?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.</p>	
	✘ 0 / 1
<p><b>■ 125. Progress on human rights commitment ?</b></p>	
	✓ 1 / 1 <a href="#">Source</a>
<p><b>■ 126. Commitment to respect Indigenous and local communities' rights?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.</p>	
	✓ 1 / 1 <a href="#">Source</a>
<p><b>■ 127. Commitment to Indigenous and local communities' rights applies to all suppliers?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.</p>	
	P 0.5 / 1 <a href="#">Source</a>
<p><b>■ 128. Commitment to respect legal and customary land tenure rights?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). As the Policy for Association's requirements do not fully meet the SPOTT indicator criteria partial points have been awarded on the basis of the company's FSC-certification/FSC membership.</p>	
	✓ 1 / 1 <a href="#">Source</a>
<p><b>■ 129. Commitment to legal and customary land rights applies to all suppliers?</b> The company makes this commitment through the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). Full points have therefore been awarded on the basis of the company's PEFC CoC certification.</p>	

<p><b>130. Commitment to free, prior and informed consent (FPIC)?</b></p>	<p>✗</p>	<p>0 / 1 <a href="#">Source</a></p>
<p><b>131. Commitment to free, prior and informed consent (FPIC) applies to all suppliers?</b></p>	<p>✗</p>	<p>0 / 1</p>
<p><b>132. Details of free, prior and informed consent (FPIC) process available?</b></p>	<p>✗</p>	<p>0 / 1</p>
<p><b>133. Examples of local stakeholder engagement to prevent conflicts?</b></p>	<p>✗</p>	<p>0 / 1</p>
<p><b>134. Details of process for addressing land conflicts available?</b> The company has an engagement and consultation process in place to avoid misunderstanding and to resolve conflicts and disputes in communities. However, land conflict resolution is not mentioned specifically.</p>	<p>P</p>	<p>0.5 / 1 <a href="#">Source</a></p>
<p><b>135. Supports the inclusion of women across forestry operations, including addressing barriers faced?</b></p>	<p>✗</p>	<p>0 / 1</p>
<p><b>136. Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>		
<p><b>137. Commitment to enable sustainable use of non-timber forest products (NTFPs) by local communities?</b></p>	<p>✓</p>	<p>1 / 1 <a href="#">Source</a></p>
<p><b>138. Commitment to provide essential community services and facilities ?</b></p>	<p>✓</p>	<p>1 / 1 <a href="#">Source</a></p>
<p><b>139. Progress on commitment to provide essential community services and facilities?</b> The company has provided multiple examples of facilities and/or services that have been provided to communities such as electricity, clean water, and building materials for their homes, schools, and places of worship.</p>	<p>P</p>	<p>0.5 / 2</p>
<p><b>140. Commitment to provide business/work opportunities for local communities?</b></p>	<p>✓</p>	<p>1 / 1 <a href="#">Source</a></p>
<p><b>141. Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>		
<p><b>142. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.</p>	<p>✓</p>	<p>1 / 1 <a href="#">Source</a></p>
<p><b>143. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?</b> The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.</p>	<p>✓</p>	<p>1 / 1 <a href="#">Source</a></p>
<p><b>144. Progress on commitment to respect all workers' rights?</b></p>		

	P	0.75 / 1	Source
[Externally verified] Points for external verification have been awarded on the basis of the company's PEFC-certification. As the International Standard's requirements do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator.			
■ 145. Commitment to eliminate gender related discrimination with regards to employment?	✓	1 / 1	Source
■ 146. Commitment to eliminate gender related discrimination with regards to employment applies to all suppliers?	✓	1 / 1	Source
■ 147. Progress on commitment to eliminate gender related discrimination with regards to employment?	P	0.75 / 1	Source
The company has established complaint and grievance procedures to address gender-based issues and provides sufficient training to increase awareness, however, the information is not externally verified.			
■ 148. Percentage or number of temporary employees?			
This indicator is disabled as the company reports that it doesn't have temporary employees.			
■ 149. Percentage or number of women employees?	✓	1 / 1	Source
29.4% - The percentage for forestry operations has been disclosed.			
■ 150. Commitment to pay at least minimum wage?	P	0.5 / 1	Source
The company states that in Malaysia, it is a legal requirement to pay minimum wages. The commitment does not cover all operations.			
■ 151. Commitment to pay at least minimum wage applies to all suppliers?	✗	0 / 1	
■ 152. Progress on commitment to pay at least minimum wage?	P	0.5 / 1	Source
The company reports that 100% of its employees in Sarawak and employees in Refor nurseries and offices.			
■ 153. Reporting of salary by gender?	P	0.5 / 1	Source
The company states salaries of female supervisors in its Sarawak downstream operations are 93.8% of the level of their male counterparts and wages of female workers in its Sarawak downstream operations are 88.8% of the level of their male counterparts. However, it is unclear if this covers all operations.			
■ 154. Commitment to address occupational health and safety?	✓	1 / 1	Source
The company has a Health, Safety, and Environment policy, but this does not reference the ILO Code of Practice on Safety and Health in Forestry Work.			
■ 155. Commitment to address occupational health and safety applies to all suppliers?	P	0.5 / 1	Source
The company makes this commitment through the FSC Chain of Custody Certification Standard (FSC-STD-40-004) and the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). As the requirements of these certifications do not fully meet the SPOTT indicator criteria partial points have been awarded on the basis of the company's FSC/PEFC CoC certification.			
■ 156. Provision of personal protective equipment and related training?	P	0.75 / 1	Source
[Externally verified] Points for external verification have been awarded on the basis of the company's PEFC-certification. As the International Standard's requirements do not fully meet the SPOTT indicator criteria limited, externally verified points			

have therefore been awarded for this indicator.

157. Time lost due to work-based injuries?

5.17 - Forestry operation 5.17/1,000,000 man hours. Data as of 2019.

✓ 1 / 1 [Source](#)

158. Number of fatalities as a result of work-based accidents?

1 - The company reports that there was one fatality in its forestry operations as a result of the work-based accident.

✓ 1 / 1 [Source](#)



> Smallholders and suppliers

1 / 5 20%

159. Commitment to support smallholders?

This indicator is disabled as the company reports that it doesn't source wood/wood fibre from smallholders.

160. Programme to support outgrower scheme and/or independent smallholders?

This indicator is disabled as the company reports that it doesn't source wood/wood fibre from smallholders.

161. Percentage of outgrower scheme and/or independent smallholders involved in programme?

This indicator is disabled as the company reports that it doesn't source wood/wood fibre from smallholders.

162. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?

✗ 0 / 1

163. Number or percentage of suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements?

P 0.5 / 1

164. Suspension or exclusion criteria for suppliers?

The company makes this commitment through the FSC Chain of Custody Certification Standard (FSC-STD-40-004). As the Standard's requirements do not fully meet the SPOTT indicator criteria partial points have been awarded on the basis of the company's FSC CoC certification.

P 0.5 / 1 [Source](#)

165. Timebound action plans (including Key Performance Indicators) for suppliers to be in compliance with timber and pulp sourcing commitments?

✗ 0 / 1

166. Proportion of direct and indirect supply that comes from FMUs which are compliant with timber and pulp sourcing policies?

✗ 0 / 1



> Governance and grievances

2 / 7 35.7%

7 media reports

<p>■ 167. Commitment to ethical conduct and prohibition of corruption?</p>	✓	1 / 1 <a href="#">Source</a>
<p>■ 168. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?</p>	✓	1 / 1 <a href="#">Source</a>
<p>■ 169. Progress on commitment to ethical conduct and prohibition of corruption?</p>	✗	0 / 1
<p>■ 170. Company has provided valid legal documents to Open Timber Portal on legal registration (at the time of SPOTT assessments)?</p>		
<p>This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>		
<p>■ 171. Disclosure of the company's management approach to tax and payments to governments?</p>	✗	0 / 1
<p>■ 172. Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)?</p>		
<p>This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>		
<p>■ 173. Whistleblowing procedure?</p>	P	0.5 / 1 <a href="#">Source</a>
<p>The company has whistleblowing policy in place. However, only partial points can be awarded as the description of steps to be taken for reporting violations is not found.</p>		
<p>■ 174. Own grievance or complaints system open to all stakeholders?</p>	✗	0 / 1
<p>■ 175. Details of complaints and grievances disclosed?</p>	✗	0 / 1