



GLOBAL FORESTRY SERVICES

Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA.
Contact Address: C/O Whitespace Bangsar, No.3.02D (East Wing), Level 3, Menara BRDB,
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Tel: +6012 310 6007 Fax: +603 2724 3207
Email: gfs@gfsinc.biz Website: www.gfsinc.biz

WOOD TRACKING PROGRAM

Chain of Custody Checklist & Assessment Report

| | | | |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------|
| Organization | Komill Corporation Sdn. Bhd. 199001008000 (199570-H) Manufacturer: Bidasari Sdn. Bhd. 198601003210 (152366-K) | Reference # | GFSS 039-014 |
| Contact Person | Alfred Yong (CoC MR) Sarah Joan Johnidu (Administration Officer) | Proposal # | GFSSP23-04-309 |
| Office Address | 40-3, Jalan 28/70A, Desa Sri Hartamas, 50480 Kuala Lumpur, Malaysia. | Assessment # | 03 |
| Mill Address | Lot NT 02312802 Kg. Lanas, Kimanis, P.O. Box 601, 89608 Papar, Sabah, Malaysia. | Assessment Date | 03/05/2024 |
| Telephone | +6088 916 721 +603 2300 0311 | Date of Report | 03/05/2024 |
| Fax | - | Date of close out | - |
| Email | bidasari@komill.com.my export@komill.com.my alfred@komill.com.my | Lead Assessor | Anne Gimbir |
| | | Assessor | Glory Linggou Vanessa Abin |
| | | Approved By | Dr. Kevin Grace |

Statement of Compliance

| | |
|-----------------|-------------|
| GFS WTP # | GFS 035 WTP |
| Issuance Date | 02 May 2022 |
| Expiration Date | 01 May 2026 |

Scope of Assessment

| | |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Company Type | Sawmill, moulding and trading |
| Scope of Assessment | Komill Corporation Sdn. Bhd. / Bidasari Sdn. Bhd. |
| Product Group | Solid wood Products (sawn timber, indoors flooring, desking, chair, door, window components, internal architectural components (skirting & architraves), furniture components. |
| Source of Material | Verified Legal: Sabah & Sarawak, Malaysia. |
| Species | <i>Acacia spp.</i> (Acacia), <i>Alstonia sp.</i> (Pulai), <i>Albizia sp.</i> (Albizia), Hevea brasiliensis (Rubberwood), Other timber (OT). |

Limitations of Assessment

The information presented in this report is based on documents provided by the client and objective evidence observed and recorded as findings during the site assessment. GFS reporting of information presented by the client is taken as accurate, unless evaluated differently through the observations made during the assessment. All information presented in the report is accurate and complete to the best of knowledge of GFS.

Document Control

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| GFS-FORM-006-WTP.3 | Title: WTP Report & Checklist | Issue: 15 | Date: 01 Jan 2023 |
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Background Information:

Komill Corporation Sdn. Bhd. (Komill Corporation) is, and from 18/06/1990, incorporated under the Companies Act 2016 in Kuala Lumpur, Malaysia, with registration #: 199001008000 (199570-H). Komill Corporation cultivated a group of highly-skilled manufacturing work force and developed into a modern factory with strong technical and advanced production machineries.

Bidasari Sdn. Bhd. (Bidasari) is, and from 07/04/1986, incorporated under the Companies Act 2016 in Kuala Lumpur, Malaysia, with registration #: 198601003210 (152366-K). Bidasari is located in Kimanis, Sabah has an FSC CoC certificate #: BV-COC-115332 to sell FSC certified products which is valid through 15/03/2028, PEFC certificate #: SIRIM-PEFC-COC-0093 valid through 29/10/2024 and the GFS WTP #: GFS 035 WTP valid through 01/05/2026.

The previous assessment was conducted in April 2023 that resulted in 0 gap(s) and 0 observation(s) (Report #: GFSS 039-013).

Associated Organizations & Subcontractors:

Bidasari, as a manufacturing plant, specializes in the production and processing of solid wood flooring, multilayer solid wood composite flooring, finger jointed wood products and other wood products. Komill Corporation, as an exporter, exports Verified Legal (VL) timber products to The United States of America, Europe, Japan, Australia, China and other parts of the world.

Description of the Supply Chain:

Komill Corporation / Bidasari purchases materials / products evaluated as low risk through evaluation of Risk based on the GFS Risk Assessment guidelines and Risk Matrix.

Highlights of Assessment

1.0 Legal Requirements

Komill Corporation & Bidasari demonstrated compliance with legal requirements. All permits and labour requirements were maintained. Bidasari rectified issues raised by DOSH during the 2023 inspection visit. Bidasari has a license to hire foreign workers, license #: JTK.H.BFT.600-4/1/20100/1484, with an expiry date of 07/09/2024. All workers are insured under SOCSO.

2.0 Documented Policy & Procedures

Komill Corporation has a signed environmental policy dated 21st November 2012 that referenced compliance with a legal requirement, supports the traceability of forest products through the verification of supply, non-use of GMO (Genetic Modified Organism) timbers, elimination of forest products considered to be controversial or from the converted forest that may have HCV (High Conservation Value) area and non-use of CITES (Centre of International Trade of Endanger Species).

Komill Corporation has a documented chain of custody procedure that clearly defines the process of purchasing and selling VL timber products. The procedure also includes administration process reference to refreshment training and maintaining key records for at least 5 years. In addition, a Corrective Action Request (CAR) form (BSB-ADM-007) is developed for its internal audit addressing gaps issued by external auditors.

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Bidasari has a formal signed policy dated 10th October 2012, shall comply with legal requirements and support environmental protection (CITES), purchase responsibly of legal source raw materials & products and also support Sustainable Forest Management.

Bidasari has formal procedures (dated 06 May 2024) for Purchasing, Receiving & Storage rough-sawn timber, Production Control, and Sales & Administration.

May 2024: Observation 001-2024 – Checklist 2.1.1, 2.3.1

Komill Corporation & Bidasari have yet to update their policy and procedures regarding identifying and segregating material from areas under deforestation for their EU customers since the implementation of EUDR is expected to be effective in 2025.

Komill Corporation has a signed agreement with the sub-contractor. The sub-contractor agrees to receive, handle and onward deliver VL sawn timbers / timber products to Bidasari in a manner that is in line with the GFS WTP Chain of Custody Standard (GFS-WI-006-WTP.3) as outlined in the Chain of Custody Procedures. Komill Corporation has a system to record and address complaints.

3.0 Organisation & Training

Mr. Alfred Yong was appointed as the COC MR for Komill Corporation and Bidasari. Both companies have an organization chart that references the key person's name for each role and department. Training records were maintained, and staff understood their responsibilities in maintaining the chain of custody.

4.0 Purchasing, Importing & Receiving

Sawn timber purchased from VL materials from Sabah TLAS approved suppliers that are identified using Removal Passes and Timber Disposal Permits from Sabah Forestry Department. GFS monitors the Sabah TLAS system and issues a Statement of Compliance in accordance with the Sabah TLAS standard that defines low operational risk.

5.0 Process Controls for Manufacturing

Not applicable for Komill Corporation, as it is a trading company.

Bidasari controls production by using Internal contract # and Stacking List Running # (SLRN). An Internal contract will be issued to produce a defined unit of finished goods based on the buyer's specifications. Raw materials are produced according to a series of Stacking List Running # (SLRN), with specific sizes and volumes. WIP and finished products sampled during the assessment were identified with an SLRN stock card traceable to its production and origin based on the batch # (SLRN). In addition, Bidasari identifies VL materials and finished products with a Blue Stock Card.

6.0 Sales, Exports & Customs

Komill Corporation COC procedure defines the use of sales documents for VL timber products. The sales invoice, packing list and product declaration form shall reference the environmental status and species for sale of VL timber products. Bidasari has a formal procedure for the sales of VL timber products. The exports of finished goods comply with export regulations and are traceable to production units.

7.0 Summary Records & Data

Komill Corporation and Bidasari COC procedure specify key documents for the chain of custody system (purchasing, production, admin and sales) shall be kept for at least 5 years.

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Summary results:
(Major Gap = 0 / Minor Gap = 0 / Observation = 1)

| GAPs | | | | |
|-------|------|-----------|--------|-------------|
| GAP # | Type | Checklist | Status | Description |
| - | - | - | - | - |

**Note: Major Gap = Non-Compliance / Minor Gap = Minor Gap raised can be upgraded to a Major Gap if not adequately addressed by the date of the next surveillance visit.*

| Observations | | |
|--------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Obs # | Checklist | Description |
| 001-2024 | 2.1.1 2.3.1 | May 2024: Komill Corporation & Bidasari have yet to update their policy and procedures regarding identifying and segregating material from areas under deforestation for their EU customers since the implementation of EUDR is expected to be effective in 2025. |

**Note: Observation raised can be upgraded to a Minor Gap if not adequately addressed by the date of the next surveillance visit.*

| Highlights of Close out visit (if applicable) | Date: - |
|-----------------------------------------------|---------|
| Not applicable | |

| Recommendations |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Komill Corporation Sdn. Bhd. / Bidasari Sdn. Bhd. has demonstrated compliance with the Wood Tracking Program requirements (GFS-WI-006-WTP.3) and is recommended to maintain the Statement of Compliance.</p> <p>Gap(s)/Observation(s) identified in this assessment should be addressed before the next surveillance visit. Action required to close the gap(s)/observation(s) include:</p> <p>Observation 001-2024 – Checklist 2.1.1, 2.3.1: Update the company’s policy and procedures regarding identifying and segregating material from areas under deforestation to support EU customers.</p> <p>The next surveillance visit is scheduled for April 2025.</p> |

End of Summary Report

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