Sabah TLAS Audit Report Principles 5 & 6

| Organisation | Innora Sdn. Bhd. 199001004976 (196543-X) | Reference # | GFSSBH 004-623a |
|-------------------|--|------------------------------|--------------------------|
| Contact Person | Lim Yong Kuan (Officer in Charge) | Audit Date Date close out | 05/03/2024 03/05/2024 |
| Office Address | KM 11, Jalan Sinora, Batu Sapi, W.D.T 79, 90009 Sandakan, Sabah, Malaysia. | Telephone | +6011 3397 9520 |
| Mill Address | KM 11, Jalan Sinora, Batu Sapi, W.D.T 79, 90009 Sandakan, Sabah, Malaysia. | Fax | +6089 631 295 |
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| Statements | | | |
|-------------------|-------------|-----------------|---------------|
| Audit Statement # | GFS 175 WTP | | |
| Issuance Date | 06 May 2024 | Expiration Date | 10 March 2025 |

| Assessment Details | | | |
|---------------------|---|--|--|
| Company Type | Sawmill/Moulding and Exporter | | |
| Scope of Assessment | Sabah TLAS P5-6: JP(S)SS003/06(X04), FDS(SS)(E)002/2021(M), FDS(SS)(S)004/2021(M) | | |
| Product Group | Sawn timber | | |
| Source of Material | Sabah, Malaysia. | | |
| Species | Parashorea spp. (White seraya), Shorea spp. (Red seraya, Yellow seraya, Melapi), Duabanga moluccana (Magas), Annonaceae spp. (Karai), Lauraceace (Medang), Lithocarpus & Quercus (Mempening), Parartocarpus or Artocarpus (Terap), Dialium indum (Keranji), Alstonia spp. (Pulai), Neolamarckia cadamba (Laran), Myristicaceae (Darah-darah), Gluta/ Semecarpus/ Melanochyla & Swintonia (Rengas), Eugenia spp. (Obah), Scaphium spp. (Kembang semangkuk), Annonaceae (Pisang-pisang), Sapotaceae (Nyatoh), Hopea sangal (Gagil), Pentace spp. (Takalis), Octomeles sumatrana (Binuang), Dyera spp. (Jelutong), Assam, Sindora beccariana (Sepetir), Dipterocarpus spp. (Keruing), Drybalanops spp. (Kapur), Azadirachta excels (Bawang-bawang), Prerospermum (Bayor), Calophyllum obliquinervium (Bintangor), Other Timber (OT) | | |
| Lead Assessor | Glory Linggou, Aleeza Ho (Acting) | | |
| Assessor(s) | Vanessa Abin | | |
| FDS Staff | Ramlan Atak (PPD Sandakan), Sahari Sakah (PPD Sandakan) | | |

Terms of Assessment

The scope of the evaluation is to verify compliance of Innora Sdn. Bhd. to the criteria within the Sabah Timber Legality Assurance System (TLAS) Principle 5 - Mill Operations and Principle 6 -Trade and Customs standards. Compliance is defined when the organization demonstrates that there is no non-compliance to any applicable criteria. Non-compliance to the Sabah Legality Standard occurs when the organization does not comply with 1 or more criteria. Non-compliance must be formally addressed prior to certification or within 2 months following a surveillance assessment.

Limitations of Assessment

The information presented in this report is based on documentation and other information presented by the client and observations made during the field verification under the assessment. Auditor's reporting of information presented by the client are 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.

Background Information:

Innora Sdn. Bhd. (Innora) is registered with Companies Commission of Malaysia (SSM) in Kuala Lumpur, Malaysia, with registration #: 199001004976 (196543-X). Innora produces and sells sawn timber for the local market.

The previous assessment was conducted in March 2023 that resulted in 5 gap(s) and 0 observation(s) (Report #: GFSSBH 004-478).

Associated Organizations & Subcontractors:

Innora does not engage any other subcontractor to produce or manufacture products.

Innora verbally engages Jimmy Chin as a subcontractor to provide manpower.

Innora is associated with companies under subsidiaries of Priceworth International Berhad and has a group structure:

- Innora Sdn. Bhd.
- Sinora Sdn. Bhd.
- Priceworth Industries Sdn. Bhd.
- Cergas Kenari Sdn. Bhd.
- Beta Bumi Sdn. Bhd.
- Maxland Marine Sdn. Bhd.
- Maju Sinar Network Sdn. Bhd.
- Harvest Element Sdn. Bhd.
- GSR Pte. Ltd.
- Maxland Energy Sdn. Bhd.
- Maxland Bina Sdn. Bhd.

Description of the Supply Chain:

From February 2023 to February 2024, Innora purchased raw materials from Sinora, which Sinora supplied from the suppliers as below:

| Supplier | License | Raw Material | Location | GFS WTP # STCC # | Overall Risk * |
|---|--------------------------------|-----------------|--------------|-----------------------------|-------------------|
| Rakyat Berjaya Sdn. Bhd. (Beta Bumi Sdn. Bhd.) | SFMLA 09/07 | Logs | Tongod | GFS 038 LVS (17/09/2024) | Low |
| Rakyat Berjaya Sdn. Bhd. (Kinetic Journey Sdn. Bhd.) | SFMLA 09/97 | Logs | Tongod | GFS 130 LVS (03/09/2024) | Low |
| Chong Nyet Thiam @ John Chong (Win Win Contractor) | JPHTN/FRM 700- 2/4/1845/19) | Logs | Kinabatangan | Non-Compliance | High |
| Sinora Sdn. Bhd. | JP(S)SS001/00(X06)R | Log core | Sandakan | GFS 212 WTP (06/08/2024) | Low |

Note: *GFS risk evaluation is based on the risk matrix for Sabah TLAS (VL) materials & products.

Summary Results:

(Major gap = 1, minor gap = 3, Observation = 1) May 2024: (Major gap = 0, minor gap = 3, Observation = 1)

| GAPs: Year 2024 | | | | |
|-----------------|-------|-----------|--------|--|
| GAP # | Туре | Checklist | Status | Description |
| 001/2022 | minor | 5.2.4 | Closed | March 2022: Innora has not updated the CoC procedures regarding current personnel and operations to support Sabah TLAS compliance. March 2023: Innora has yet to update the COC procedure regarding the current personnel. March 2024: Innora has updated the information regarding the current personnel and operations in its CoC procedure. |
| 002/2022 | minor | 5.3.8 | Closed | March 2022: |

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| 004/2022 | minor | 5.3.4 | Closed | No evidence or records of training on safety, health or fire from 2021 to February 2022. March 2023: Innora conducted and maintained records on work safety training for workers. However, fire training was not conducted. March 2024: Innora has conducted fire training for workers. March 2022: No evidence of JKKP 8 submission to DOSH. March 2023: The JKKP 8 for 2022 was submitted to DOSH However, JKKP 6 was not submitted to DOSH for major accidents as required. March 2024: |
|----------|--------------------|----------------|-------------|--|
| | | | | Innora has submitted JKKP 8 for 2023 as required. |
| 001/2023 | minor | 5.2.2 | Outstanding | March 2022: Removal passes from several suppliers were not stamped that have been assessed and issued a GFS Statement of Compliance registered on the GFS Database. SFD has yet to register the SFD TLAS-CC on the SFD Certrax database. March 2023: SFD did not stamp the removal passes as "Sabah TLAS" for suppliers that have been assessed under the Sabah TLAS assessment. SFD has yet to update the SFD Certrax database. March 2024: The removal passes were not stamped with "Sabah TLAS CC" stamp for the supplier that are compliant under Sabah TLAS P1-4. |
| 002/2023 | Raised to Major | 5.3.1 5.3.5 | Closed | March 2022: The company was unable to provide evidence of work permits and SOCSO contribution for the workers under their subcontractor, Jimmy Chin. March 2023: No evidence of work permits, SOCSO registration and contribution for the workers under their subcontractor, Jimmy Chin, and for one (1) worker under Innora, Lim Yong Kuan. March 2024: No evidence of the work permits, SOCSO registration and contribution for the workers under subcontractor, Jimmy Chin. May 2024: Innora no longer uses subcontractor Jimmy Chin to provide manpower; workers are provided by Priceworth Industries. |
| 001/2024 | minor | 5.2.1 | New | March 2024: The log core received from Sinora was not accompanied with a valid removal pass. |
| 002/2024 | minor | 5.2.3 | New | March 2024: Sabah TLAS status for log core was not identified in the material arrival book. |

*Major = Non-Compliance

| Observations: Year 2024 | | | | |
|-------------------------|-----------|---|--|--|
| Obs # | Checklist | Description | | |
| 001-2024 | 5.1.2 | March 2024: Inconsistent in recording of log input and sawn timber carry forward stock in Appendix 1 online and manual submission. | | |

Highlights of Close-Out Visit (if applicable)

Date: 03 May 2024

The Major Gap **002/2023** is now closed following the submission of document related to the subcontractor.

Recommendations

Innora Sdn. Bhd. has ndemonstrated compliance with the Sabah Principles 5-6 for Chain of Custody as non-compliance was addressed under Criterion 5.3 and is recommended to receive a GFS Statement of Compliance or Sabah Timber Legality Assurance System Compliance Certificate (TLAS-CC) from SFD.

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:

Gap 001/2023 (minor) Outstanding – Checklist 5.2.2: SFD shall correctly stamp "Sabah TLAS CC" on the removal pass for suppliers that are compliant under Sabah TLAS P1-4.

Gap 001/2024 (minor) – Checklist 5.2.1: The supplier (Sinora) shall ensure materials are accompanied by a valid removal pass.

Gap 002/2024 (minor) – Checklist 5.2.3: Innora shall identify Sabah TLAS status for log core in the material arrival book.

Observation 001-2024 – Checklist 5.1.2: Innora shall correctly record the log input and sawn timber carry forward stock in Appendix 1 online and manual submission.

The next surveillance visit is scheduled for March 2025.

End of Summary Report