

Sabah TLAS Audit Report Principles 5 & 6

Organisation	Primumi Sdn. Bhd. 200601017259 (737011-X)	Reference #	GFSSBH 004-743
Contact Person	Mr. Mak Dune Cherng (Manager)	Audit Date	30/10/2024
Office Address	Unit 9-10, Lot 25, IZ13, Taman Industri Perabot Sabah, Kota Kinabalu Industrial Park, 88450 Sabah, Malaysia.	Date close out	-
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		Approved By	Dr. Kevin Grace

Statements

Statement of Compliance	GFS 179 WTP		
Issuance Date	04 November 2024	Expiration Date	03 November 2025

Assessment Details

Company Type	Moulding mill, Exporter, Importer
Scope of Assessment	Sabah TLAS P5-6: JP(K)KK003/15(M01), FDS(KK)(E)089/2019(M), FDS(KK)(S)042/2019(M), FDS(KK)(I)018/2019(M)
Product Group	Sawn timber and Moulding (Finger Joint / S4S / Lamination)
Source of Material	Sabah, Malaysia.
Species	<i>Parashorea spp.</i> (White Seraya), <i>Shorea spp.</i> (Red Seraya, Yellow Seraya, Melapi), and <i>Other Timber (OT)</i>
Lead Assessor	Brandon James
Assessor(s)	Anis Andrew (Acting Lead Assessor), Evelyn Chong
SFD Staff	-

Terms of Assessment

The scope of the evaluation is to verify compliance with Primumi 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 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 knowledge of GFS.

Background Information:

Primbumi Sdn. Bhd. (Primbumi) is, on and from 09/06/2006, incorporated under Companies Act 2016, and is registered in Kota Kinabalu, Sabah, Malaysia, with registration #: 200601017259 (737011-X). Primbumi purchases sawn timber and produces moulding (S4S and Finger joint) and sold them locally and also exports them to Hong Kong and South Korea.

Associated Organizations & Subcontractors:

Primbumi engages Fungsi Hebat Sdn. Bhd. as their agent to handle foreign workers' documentation and RM Services (located in Kota Kinabalu) for export document.

Description of the Supply Chain:

From May 2023 to September 2024, Primbumi purchased raw materials from the suppliers as below:

Supplier	License	Raw Material	Location	GFS WTP # STCC #	Overall Risk *
Kalabakan Plywood Sdn. Bhd. (Integrated Wood Processing Sdn. Bhd.)	JP(T)TW003/00(X13)R	Sawn timber	Tawau	GFS 238 WTP (25/06/2025)	Low
Sogoraya Sdn. Bhd.	JP(K)KK001/18 (M01)	Sawn timber	Kota Kinabalu	GFS 104 WTP (29/09/2025)	Low
Bumi Timber Sdn. Bhd. (DM Cergas Sdn. Bhd.)	JP(N)SO001/16(X17)	Sawn timber	Keningau	GFS 244 WTP (21/04/2025)	Low
Waygood Enterprise Sdn. Bhd. (Taman Timber Enterprise)	JP(N)NN002/19(B01)	Sawn timber	Keningau	GFS 304 WTP (21/04/2025)	Low
OAC Trading Sdn. Bhd. *	FDS(KK)(E)030/2019	Sawn timber	Kota Kinabalu	GFS 200 WTP (19/06/2023)	High

*GFS risk evaluation is based on the risk matrix for Sabah TLAS (VL) materials & products. OAC Trading has no operation – confirmed by OAC Trading & SFD.

Summary Results:

(Major gap = 0, Minor gap = 2, Observation = 3)

GAPs: Year 2024				
GAP #	Type	Checklist	Status	Description
001/2024	minor	5.1.3, 5.2.8	New	October 2024: No record of Appendix 7 and manual submissions to SFD from January 2022 to September 2024.
002/2024	minor	5.2.1, 6.1.1, 6.1.2, 6.1.3, 6.1.4	New	October 2024: The current system for purchasing is not according to the CoC procedure.

*Major = Non-Compliance

Observations: Year 2024		
Obs #	Checklist	Description
001-2024	5.2.4	October 2024: Removal Pass was not consistently stamped as "Used" by SFD.
002-2024	5.3.6	October 2024: No fire training was conducted from May 2023 to October 2024.
003-2024	6.3.3	October 2024: Inconsistent in issuing Sales Contract or Purchase Order for export consignments, as per the CoC procedure.

Highlights of Close-Out Visit (if applicable)	Date: -
Not applicable	

Recommendations

Primumi Sdn. Bhd. has demonstrated compliance with the Sabah Standard Principles 5-6 for Chain of Custody and is recommended to receive a GFS Statement of Compliance and 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 001/2024 (minor) – Checklist 5.1.3, 5.2.8: Primumi shall record and submit Appendix 7 manual submissions from January 2022 onwards to the SFD.

Gap 002/2024 (minor) – Checklist 5.2.1, 6.1.1, 6.1.2, 6.1.3, 6.1.4: Primumi shall ensure the current purchasing system is according to the COC procedure.

Observation 001-2024 – Checklist 5.2.4: SFD shall consistently stamp “Used” on the Removal Pass.

Observation 002-2024 – Checklist 5.3.6: Primumi shall conduct fire training for workers annually.

Observation 003-2024 – Checklist 6.3.3: Primumi shall issue Sales Contract or request Purchase Order from the buyer as per the CoC procedure.

The next surveillance visit is scheduled for October 2025.

End of Summary Report