

Sabah TLAS Audit Report Principles 5 & 6

Organisation	Primumi Sdn. Bhd. 200601017259 (737011-X)	Reference #	GFSSBH 004-878
Contact Person	Mr. Mak Dune Cherng (Manager)	Audit Date	09/10/2025
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		Approved By	Dr. Kevin Grace

Statements

Statement of Compliance	GFS 179 WTP		
Issuance Date	13 October 2025	Expiration Date	12 October 2026

Assessment Details

Company Type	Sawmill (moulding/Plant), 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, Selangan batu), <i>Albizia falcataria</i> and <i>Other Timber</i> (OT)
Lead Assessor	Anne Gimbir
Assessor(s)	Eljipy Sualim, Ng Cai Ling
SFD Staff	De-Almeida (ADFO KK), Jepri Brahim (PPD KK)

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:

Primumi Sdn. Bhd. (Primumi) 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). Primumi purchases sawn timber and produces moulding (S4S and Finger joint) and sold them locally and also exports them to Labuan, Hong Kong, South Korea and China.

The previous assessment was conducted in October 2024 that resulted in 2 gap(s) and 3 observation(s) (Report #: GFSSBH 004-743).

Associated Organizations & Subcontractors:

Primumi does not engage any sub-contractor to manufacture products. RM Services (located in Kota Kinabalu) handles export documents.

Description of the Supply Chain:

From October 2024 to September 2025, Primumi purchased raw materials from the suppliers as below:

Supplier	License	Raw Material	Location	GFS WTP # STCC #	Overall Risk *
Bagusimbol Sdn. Bhd.	Not stated	Not stated	Not stated	-	High
Bumi Timber Sdn. Bhd. (DM Cergas Sdn. Bhd.)	JP(N)SO001/16(X17)	Sawn Timber	Keningau	GFS 244 WTP (18/05/2026)	Low
Gold Rank Sdn Bhd	JP(T)TWU001/10(x04)	Sawn Timber	Tawau	GFS 010 WTP (23/02/2026)	Low
Integrated Wood Processing Sdn Bhd	JP(T)TW003/00(x13)R	Sawn Timber	Tawau	GFS 238 WTP (08/06/2026)	Low
Inspiration Furniture Sdn Bhd	FDS (KK)(E)076/2019	Sawn Timber	Kota Kinabalu	GFS 198 WTP (22/06/2026)	Low
Joint Focus Sdn Bhd	Not stated	Not stated	Not Stated	-	High
Labuan Mesra Sdn Bhd	Not stated	Not stated	Not stated	-	High
OAC Trading Sdn Bhd	FDS(KK)(E)030/2019	Sawn Timber	Kota Kinabalu	GFS 200 WTP (19/06/2023)	High
Sogoraya Sdn Bhd	JP(K)KK001/18(M01)	Sawn Timber	Kota Kinabalu	GFS 104 WTP (06/07/2026)	Low
Uni-Lumber Sdn Bhd	FDS(KK)(E)102/2019	Sawn Timber	Kota Kinabalu	GFS 233 WTP (10/08/2026)	Low

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

Summary Results:

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

GAPs: Year 2025				
GAP #	Type	Checklist	Status	Description
001/2024	minor	5.1.3, 5.2.8	Closed	<p>October 2024: No record of Appendix 7 and manual submissions to SFD from January 2022 to September 2024.</p> <p>October 2025: Appendix 7 manual and online submissions from January 2022 to September 2024 was submitted to the SFD.</p>
002/2024	minor	5.2.1, 6.1.1, 6.1.2, 6.1.3, 6.1.4	Closed	<p>October 2024: The current system for purchasing is not according to the CoC procedure.</p> <p>October 2025: The current system uses purchase orders according to the CoC procedure.</p>

*Major = Non-Compliance

Observations: Year 2025		
Obs #	Checklist	Description
001-2024 Addressed	5.2.4	October 2024: Removal Pass was not consistently stamped as "Used" by SFD. October 2025: Removal Pass was stamped as Used consistently by the SFD.
002-2024 Addressed	5.3.6	October 2024: No fire training was conducted from May 2023 to October 2024. October 2025: Fire training was conducted in Dec 2024.
003-2024 Addressed	6.3.3	October 2024: Inconsistent in issuing Sales Contract or Purchase Order for export consignments, as per the CoC procedure. October 2025: Sales contract was issued for export consignments.
001-2025	5.3.1, 5.3.2	October 2025: Work pass for one worker is in the process of renewal.
002-2025	5.3.5	October 2025: JKKP 8 for 2024 was not submitted due to a glitch in the DOSH online portal.

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

Recommendations
<p>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.</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 001-2025 – Checklist 5.3.1, 5.3.2: Primumi should ensure work permit is renewed on time.</p> <p>Observation 002-2025 – Checklist 5.3.5: Primumi should submit JKKP 8 for 2024 annually by 31st of January.</p> <p>The next surveillance visit is scheduled for October 2026.</p>

End of Summary Report