Sabah TLAS Audit Report
Principles 5 & 6

Organisation	Mill Licensee: Kotabox Packaging Sdn. Bhd. 200001009683 (512289-M) Mill Contractor: Mr Loi Teck Yew
Contact Person	Mr. Loi Teck Yew Ms. Arleah Benessa Juliag
Office Address	Lot 2, Jalan 3, KKIP Timur Industrial Zone 13 (IZ13), Kota Kinabalu, Sabah, Malaysia.
Mill Address	Lot 2, Jalan 3, KKIP Timur Industrial Zone 13 (IZ13), Kota Kinabalu, Sabah, Malaysia.
Email	admin@kotabox.com DFO KK: ZuridahNorfarizan.Jeragan@sabah.gov.my PPW KK: MohdNasir.AgSuman@sabah.gov.my

Reference #	GFSSBH 004-977
Audit Date **Date close out**	18/06/2026 -
Telephone	+6018 962 6899 +6017 833 4583
Fax	-
Approved By	Dr. Kevin Grace

Statements			
Statement of Compliance	GFS 313 WTP		
Issuance Date	22 June 2026	Expiration Date	21 June 2027

Assessment Details	
Company Type	Sawmill
Scope of Assessment	Sabah TLAS P5-6: JP(K)KK001/2021(B04), KON(KKK)004/2022(KK)
Product Group	Wood pallets, firewood
Source of Material	Sabah, Malaysia.
Species	Other Timber (OT)
Lead Assessor	Ng Cai Ling
Assessor(s)	Sheanna Kehong
SFD Staff	Louis Endau Kilon (PPD KK)

Terms of Assessment

The scope of the evaluation is to verify compliance with Kotabox Packaging 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:

Kotabox Packaging Sdn. Bhd. (Kotabox Packaging) is, on and from 24/04/2000, incorporated under Companies Act 2016, and is registered in Kota Kinabalu, Sabah, Malaysia, with registration #: 200001009683 (512289-M). Kotabox Packaging is a wholesale and trading company for corrugated boxes, mainly for Sabah, Sarawak, and Brunei market, which is not under the scope of Sabah TLAS.

Mr. Loi is subcontracted by Kotabox Packaging to maintain the boiler and produce wood pallets wood pallets for internal use only.

The previous assessment was conducted in June 2025 that resulted in 5 gap(s) and 2 observation(s) (Report #: GFSSBH 004-845).

Associated Organizations & Subcontractors:

Kotabox Packaging engages Mr. Loi as a subcontractor to produce wood pallets for internal use and maintain the boiler.

Description of the Supply Chain:

From June 2025 to May 2026, Kotabox Packaging purchased raw materials from the suppliers as below:

Supplier	License	Raw Material	Location	GFS WTP # STCC #	Overall Risk *
Apeca Sdn. Bhd. (R & N Timber Sdn. Bhd.)	JP(N)KG019/00(X04)R	Firewood	Nabawan	GFS 118 WTP (20/07/2026) FDS(SCS)054/2025 (20/07/2026)	Low
Kilang Kayu Lohan Sdn. Bhd.	JP(K)RN005/00(X04)R	Firewood	Ranau	GFS 032 WTP (21/12/2026) FDS(SCS)112/2025 (21/12/2026)	Low

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

Summary Results:

(Major gap = 0, Minor gap = 7, Observation = 1)

GAPs: Year 2026				
GAP #	**Type**	**Checklist**	**Status**	**Description**
001/2025	minor	5.1.2	Closed	**June 2025:** Sawmill and mill contractor licenses are expired. **June 2026:** Sawmill and mill contractor licenses have been renewed.
002/2025	minor	5.2.1, 5.2.3, 6.1.1, 6.1.2, 6.1.3, 6.1.4	Outstanding	**June 2025:** The current purchasing system is not according to CoC procedure. **June 2026:** The current purchasing system is not according to CoC procedure.
003/2025	minor	5.3.1, 5.3.2	Outstanding	**June 2025:** Subcontractor (Mr Loi) does not maintain adequate records for employment and COI registration, monthly EPF/SOCSO contribution documents and registration. **June 2026:** Employment agreement and COI for workers under Kotabox Packaging and Mr. Loi was not maintained and JTK to hire foreign workers exceeded the quota.
004/2025	minor	5.3.6	Outstanding	**June 2025:** No fire and work safety training conducted for workers. **June 2026:**

				Training for fire was not conducted for workers.
005/2025	minor	6.4.1	Outstanding	**June 2025:** No summary raw material received, and pallets produced. **June 2026:** Summary for materials purchase, received and finished goods were not established.
001/2026	minor	5.1.3, 5.2.4, 5.2.5	New	**June 2026:** Firewood received was not recorded in Appendix 1 online submission and arrival book was not established. Removal Pass was not stamped as "Used" by the SFD.
002/2026	minor	5.1.6, 5.2.6, 5.2.7, 5.2.10, 5.2.11	New	**June 2026:** The CoC manual does not adequately define the system for production of firewood to wood pallets.
003/2026	minor	5.3.5	New	**June 2026:** Inconsistent in registering and contributing EPF monthly contributions for foreign workers under Kotabox Packaging and Mr. Loi.

*Major = Non-Compliance

Observations: Year 2026		
Obs #	**Checklist**	**Description**
001-2025 Addressed	5.2.8	**June 2025:** Kotabox Packaging did not submit Appendix 1 manual to SFD as required. **June 2026:** Kotabox Packaging submitted Appendix 1 manual to SFD.
002-2025 Outstanding	5.2.9	**June 2025:** Sub-contractor agreement was not established between Kotabox Packaging & Mr. Loi and not registered as a mill contractor with the SFD. **June 2026:** Sub-contractor agreement was not established between Kotabox Packaging & Mr. Loi.

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

Recommendations

Kotabox Packaging 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 002/2025 (minor) Outstanding – Checklist 5.2.1, 5.2.3, 6.1.1, 6.1.2, 6.1.3, 6.1.4: Kotabox Packaging should use a Purchase Order to purchase materials based on the COC procedure.

Gap 003/2025 (minor) Outstanding – Checklist 5.3.1, 5.3.2: Kotabox Packaging and Mr. Loi must maintain adequate records for employment, COI registration and hiring of foreign workers should be within the approved JTK quota.

Gap 004/2025 (minor) Outstanding – Checklist 5.3.6: Kotabox Packaging shall conduct fire training for workers annually and when there are new workers.

Gap 005/2025 (minor) Outstanding – Checklist 6.4.1: Kotabox Packaging should establish the monthly summary raw material received and finished pallets produced.

Gap 001/2026 (minor) – Checklist 5.1.3, 5.2.4, 5.2.5: Firewood received should be recorded in Appendix 1 online submission and arrival book should be established to include materials received and status. Removal Pass should be stamped as "Used" by the SFD.

Gap 002/2026 (minor) – Checklist 5.1.6, 5.1.6, 5.2.7, 5.2.10, 5.2.11: The CoC manual should be

adequately defining the system for production of firewood to wood pallets.
Gap 003/2026 (minor) – Checklist 5.3.5: Kotabox Packaging and Mr. Loi should register and contribute EPF monthly contributions based on statutory requirement.
Observation 002-2025 Outstanding – Checklist 5.2.9: Sub-contractor agreement should be established between Kotabox Packaging and Mr. Loi.

The next surveillance visit is scheduled for June 2027.

End of Summary Report