

Sabah TLAS Audit Report Principles 5 & 6

Organisation	Win Kee Timber (Sole proprietorship)	Reference #	GFSSBH 004-860
Contact Person	Mr. Fong Kin Shak (Director)	Audit Date	29/07/2025
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		Approved By	Dr. Kevin Grace

Statements

Statement of Compliance	GFS 229 WTP		
Issuance Date	04 August 2025	Expiration Date	03 August 2026

Assessment Details

Company Type	Sawmill
Scope of Assessment	Sabah TLAS P5-6: JP(N)KG001/18(X04)
Product Group	Wooden pallet
Source of Material	Sabah, Malaysia
Species	Rejected log: <i>Hevea brasiliensis</i> (Rubber wood)
Lead Assessor	Auther Itin
Assessor(s)	Jick Miki, Ennald Chin
SFD Staff	Clarice Allion (ADFO), Georgey M (PPD KGU)

Terms of Assessment

The scope of the evaluation is to verify compliance with Win Kee Timber 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:

Win Kee Timber is a sole proprietor. Hence, does not require registration with Companies Commission Malaysia. Win Kee Timber purchases rejected rubberwood from local suppliers to produce wood pallets for the local market.

The previous assessment was conducted in September 2024 that resulted in 2 gap(s) and 3 observation(s) (Report #: GFSSBH 004-720).

Associated Organizations & Subcontractors:

Win Kee Timber does not engage subcontractor to produce, manufacture products or provide manpower.

Description of the Supply Chain:

From August 2024 to July 2025, Win Kee Timber purchased raw materials from the suppliers as below:

Supplier	License	Raw Material	Location	GFS WTP # STCC #	Overall Risk *
Payak Sungkulon @ Michael Sungkulon	JPHTN/SO 700-2/5/1/JLD.18/227	Rubberwood	Sook	-	Low
Pelmon Bin Mansiang	JPHTN/SO 700-2/5/1/JLD.19/15	Rubberwood	Sook	-	Low
Kahidin Bin Isin	JPHTN/KGU 700-2/5/2/JLD.39/30	Rubberwood	Keningau	-	Low
Painah@Painom Binti Kasmin Kaipin @ Aipin Bin Rosmin	JPHTN/KGU 700-2/5/2/JLD.39/54	Rubberwood	Keningau	-	Low
Izzul Zaim Bin Patiman	JPHTN/SO 700-2/5/1/JLD.19-287	Rubberwood	Sook	-	Low
Saim Binti Mojim	JPHTN/SO 700-2/5/1/JLD.19/374	Rubberwood	Sook	-	Low
Gansau Bin Kium	JPHTN/SO 700-2/5/1/JLD.19/356	Rubberwood	Sook	-	Low
Alaysius@Alexus B. Paulus	JPHTN/KGU700-2/5/2/JLD.38/58	Rubberwood	Keningau	-	Low
Rima Bin Jonpu	JPHTN/KGU700-2/5/2/JLD.38/66	Rubberwood	Keningau	-	Low
Giung Binti Tinggang	JPHTN/KGU700-2/5/2/JLD.38/74	Rubberwood	Keningau	-	Low
Vincena Binti Lingungud	JPHTN/KGU700-2/5/2/JLD.38/80	Rubberwood	Keningau	-	Low
Asin Sabio	Not stated	Rubberwood	Sook	-	Low

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

Summary Results:

(Major gap = 0, Minor gap = 3, Observation = 4)

GAPs: Year 2025				
GAP #	Type	Checklist	Status	Description
001/2024	minor	5.2.6, 5.2.7, 5.2.11, 5.2.12	Outstanding	September 2024: Inconsistent in implementing the CoC system for traceability. July 2025: Inconsistent in identification of batch number and status on the WIP and FG as per the CoC procedure.
002/2024	minor	5.2.9	Closed	September 2024: Expired tenancy agreement and Pemborong KF Maju has no mill contractor to operate the sawmill. July 2025: Pemborong KF Maju has no longer operated the sawmill. Win Kee Timber is currently operating the sawmill.

001/2025	minor	5.1.2	New	July 2025: Win Kee Timber has not registered as a supplier with the SFD.
002/2025	minor	5.3.6	New	July 2025: No work safety training was conducted for workers.

*Major = Non-Compliance

Observations: Year 2025		
Obs #	Checklist	Description
001-2024 Outstanding	5.1.3, 5.2.8	September 2024: Appendix 1 & 7 manual submissions were not submitted to the SFD. July 2025: Appendix 1 & 7 manual submissions were not recorded and submitted to the SFD.
002-2024 Outstanding	5.2.1, 6.1.1, 6.1.2, 6.1.3, 6.1.4	September 2024: The current system for purchasing is not according to the COC procedure. July 2025: The current system for purchasing is not according to the COC procedure.
003-2024 Addressed	5.3.7	September 2024: PPE record was not developed and maintained. July 2025: PPE record was developed and maintained.
004-2025	6.1.5, 6.4.3	July 2025: The current system for sales is not according to the CoC procedure.
005-2025	6.4.1	July 2025: No summary of material purchased, finished goods and sales records were established.

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

Recommendations
<p>Win Kee Timber 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>Gap 001/2024 (minor) Outstanding – Checklist 5.2.6, 5.2.7, 5.2.11, 5.2.12: Win Kee Timber shall identify batch number and status on WIP and FG based on the CoC procedure.</p> <p>Gap 001/2025 (minor) – Checklist 5.1.2: Win Kee Timber should register as a Supplier with the SFD.</p> <p>Gap 002/2025 (minor) – Checklist 5.3.6: Win Kee Timber shall conduct work safety training annually.</p> <p>Observation 001-2024 Outstanding – Checklist 5.1.3, 5.2.8: Win Kee Timber shall record monthly volume, and submit manual submissions for Appendix 1 & 7 to the SFD.</p> <p>Observation 002-2024 Outstanding – Checklist 5.2.1, 6.1.1, 6.1.2, 6.1.3, 6.1.4: Win Kee Timber should use a Purchase Order as per the CoC procedure.</p> <p>Observation 004-2025 – Checklist 6.1.5, 6.4.3: Win Kee Timber should use an invoice for sales as per the CoC procedure.</p> <p>Observation 005-2025 - Checklist 6.4.1: Win Kee Timber should establish the monthly summary for material purchased, finished goods and sales.</p> <p>The next surveillance visit is scheduled for July 2026.</p>

End of Summary Report