

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment
- Recertification Assessment (RC2)
- Extension of Scope

| |
|---|
| Sime Darby Plantation Berhad |
| Client company Address: Level 3A, Main Block, Plantation Tower, No 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia |
| Certification Unit: Strategic Operating Unit (SOU 9) West Palm Oil Mill Location of Certification Unit: Ladang West 42960 Carey Island Selangor, Malaysia |

TABLE of CONTENTS

Page No

| | |
|---|-----|
| Section 1: Scope of the Certification Assessment..... | 4 |
| 1. Company Details | 4 |
| 2. Certification Information | 4 |
| 3. Other Certifications..... | 4 |
| 4. Location(s) of Mill & Supply Bases | 5 |
| 5. Description of Supply Base | 5 |
| 6. Plantings & Cycle..... | 5 |
| 7. Certified Tonnage of FFB (Own Certified Scope) | 5 |
| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *..... | 6 |
| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | 6 |
| 10. Certified Tonnage | 6 |
| 11. Actual Sold Volume (CPO) | 6 |
| Current License period (Jan 19-Feb 20)..... | 6 |
| 12. Actual Sold Volume (PK) | 7 |
| 13. Actual Group certification Claims | 7 |
| Section 2: Assessment Process | 8 |
| 2.1 Assessment Methodology, Programme, Site Visits..... | 8 |
| 2.2 BSI Assessment Team: | 10 |
| 2.3 Assessment Plan | 11 |
| Section 3: Assessment Findings | 14 |
| 3.1 Normative requirement applied for this assessment:..... | 14 |
| 3.2 Multiple Management Units and Time Bound Plan | 14 |
| 3.3 Progress of scheme smallholders and/or outgrowers | 16 |
| 3.4 Details of Nonconformities | 16 |
| 3.4.1 Status of Nonconformities Previously Identified and Observations | 28 |
| 3.4.2 Summary of the Nonconformities and Status..... | 35 |
| 3.5 Stakeholders and previous land owner / user consultation | 36 |
| 3.6 Impartiality and conflict of interest | 40 |
| Formal Signing-off of Assessment Conclusion and Recommendation | 40 |
| Appendix A: Summary of Findings | 41 |
| Appendix B: Approved Time Bound Plan..... | 115 |
| Appendix C: GHG Reporting Executive Summary | 122 |
| Appendix D: Supply Chain Declaration..... | 124 |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Appendix E: Location Map of Certification Unit and Supply bases.....133
Appendix F: Estate Field Map134
Appendix G: List of Smallholder Sampled.....135
Not applicable135
Appendix H: List of Abbreviations136

Section 1: Scope of the Certification Assessment

| 1. Company Details | | | |
|--|---|---------------------------------|--|
| Parent Company | Sime Darby Plantation Berhad | | |
| RSPO Membership Number | 1-0008-04-000-00 | Membership Approval Date | 06/09/2004 |
| Address | Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia | | |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | Strategic Operating Unit (SOU 9) – West Palm Oil Mill | | |
| Location / Address | Ladang West 42960 Carey Island, Selangor, Malaysia | | |
| Website | www.simedarbyplantation.com | | |
| Management Representative | Shylaja Devi Vasudevan Nair (Head, Sustainability Unit Group Sustainability) Syed Muzharel Azhar bin Syed Mohamad (SOU Chairman) | E-mail | syed.muzharel.azhar@simedarbyplantation.com |
| Telephone | +603-89478888 (HQ) +607-787 5100 (Mill) | Facsimile | 03-78484356 (HQ) |

| 2. Certification Information | | | |
|-------------------------------|--|------------------------------------|------------|
| Certificate Number | RSPO 543594 | Date of First Certification | 19/05/2010 |
| | | Certificate Start Date | 19/05/2020 |
| | | Certificate Expiry Date | 18/05/2025 |
| Scope of Certification | Palm Oil and Palm Kernel Production | | |
| Visit Objectives | <ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. | | |
| Applicable Standards | <input type="checkbox"/> RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 with supply chain Module <input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance | | |

| 3. Other Certifications | | | |
|-------------------------|---|-------------------------------|-------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| Mill: MSPO 682052 | MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills | BSI Services Malaysia Sdn Bhd | 12/02/2023 |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------------------------|--|-------------------------------|------------|
| Plantations: MSPO 690774 | MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders | BSI Services Malaysia Sdn Bhd | 12/02/2023 |
|--------------------------|--|-------------------------------|------------|

4. Location(s) of Mill & Supply Bases

| Name (Mill / Supply Base) | Location | GPS Coordinates | |
|------------------------------|---|-----------------|----------------|
| | | Latitude | Longitude |
| West Palm Oil Mill | KKS West, Carey Island, 42960 Selangor, Malaysia | 2° 54' 20" N | 101° 21' 42" E |
| West Estate | Ladang West, Carey Island 42960, Selangor, Malaysia | 2° 54' 17" N | 101° 21' 13" E |

5. Description of Supply Base

| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
|--------------|--|-------------|-----------------------------------|--------------------|--------------|
| West Estate | 5,064.64 | 157.00 | 691.05 | 5,912.69 | 86.00% |
| Total | 5,064.64 | 157.00 | 691.05 | 5,912.69 | 86.00% |

6. Plantings & Cycle

| Estate | Age (Years) | | | | | Mature** | Immature |
|-------------------|-------------|--------|----------|---------|---------|----------|----------|
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| West Estate | 724.38 | 823.51 | 2,913.40 | 603.35 | - | 4,340.26 | 724.38 |
| Total (ha) | 724.38 | 823.51 | 2,913.40 | 603.35 | - | 4,340.26 | 724.38 |

7. Certified Tonnage of FFB (Own Certified Scope)

| Estate | Tonnage / year | | |
|--------------|--------------------------------|-----------------------------|-------------------------------|
| | Estimated (May 19 – Apr 20) | Actual (Jan 19 – Feb 20) | Forecast (May 20 - Apr 21) |
| West Estate | 149,235.00 | 114,337.51 | 123,967.51 |
| Total | 149,235.00 | 114,337.51 | 123,967.51 |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable * | | | |
|---|--|-------------------------------------|---------------------------------------|
| Estate | Tonnage / year | | |
| | Estimated (May 19 – Apr 20) | Actual (Jan 19 – Feb 20) | Forecast (May 20 - Apr 21) |
| East Estate | 90,507.93 | 74,955.06 | 90,507.93 |
| Dusun Durian Estate | N/A | 3,012.87 | N/A |
| Sepang Estate | N/A | 1,160.27 | N/A |
| Total | 90,507.93 | 79,128.20 | 90,507.93 |

| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | | | |
|---|--|-------------------------------------|---------------------------------------|
| Independent FFB Supplier | Tonnage / year | | |
| | Estimated (May 19 – Apr 20) | Actual (Jan 19 – Feb 20) | Forecast (May 20 - Apr 21) |
| Nil | N/A | N/A | N/A |
| Total | N/A | N/A | N/A |

| 10. Certified Tonnage | | | |
|------------------------------|--|-------------------------------------|---------------------------------------|
| | Estimated (May 19 – Apr 20) | Actual (Jan 19 – Feb 20) | Forecast (May 20 - Apr 21) |
| | Mill Capacity: 50 MT/hr | FFB | FFB |
| | 239,742.93 | 193,465.71 | 214,475.44 |
| SCC Model: IP/MB | CPO (OER: 21.54 %) | CPO (OER: 21.22 %) | CPO (OER: 21.00 %) |
| | 51,640.63 | 41,053.42 | 45,039.84 |
| | PK (KER: 5.50 %) | PK (KER: 5.01 %) | PK (KER: 5.00 %) |
| | 13,185.86 | 9,692.63 | 10,723.77 |

| 11. Actual Sold Volume (CPO) | | | | | |
|---|-----------------------|--------------------------------|---------------|---------------------|--------------|
| Current License period (Jan 19-Feb 20) | | | | | |
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | Others | | |
| CPO (MT) | 25,196.72 | 29.27 | - | 9,287.95 | 34,513.94 |
| Previous License period | | | | | |
| CPO (MT) | | - | - | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| 12. Actual Sold Volume (PK) | | | | | |
|--|----------------|-------------------------|--------|--------------|----------|
| Current License period (Jan19- Feb20) | | | | | |
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | Others | | |
| PK (MT) | 4,182.30 | - | - | 4,094.56 | 8,276.86 |
| Previous License period | | | | | |
| PK (MT) | | - | - | | |

| 13. Actual Group certification Claims | | |
|--|--------|----------------------|
| | Credit | Physical Volume (MT) |
| IS-CSPO | N/A | N/A |
| IS-CSPKO | N/A | N/A |
| IS-CSPKE | N/A | N/A |

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site recertification assessment was initially conducted from 16-17 March 2020 but was put on hold due to COVID-19 Movement Control Order (MCO) and continued on 22-23 June 2020 upon lifting of travelling ban by the government. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on on-site on 11 August 2020. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO P&C MYNI 2019 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment where the stakeholder notification was made on 10/2/2020, through BSI website as per following link:

<https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Summary%20Report/2019/rspo-public-notification-recertification-sou-9-west-pom-english.pdf>

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

| Assessment Program | | | | | |
|--------------------------------------|---------------------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| Name (Mill / Supply Base) | Year 1 (Recertification_2) | Year 2 (ASA2_1) | Year 3 (ASA2_2) | Year 4 (ASA2_3) | Year 5 (ASA2_4) |
| West Palm Oil Mill | ✓ | ✓ | ✓ | ✓ | ✓ |
| West Estate | ✓ | ✓ | ✓ | ✓ | ✓ |

Tentative Date of Next Visit: February 1, 2021 - February 2, 2021

Total No. of Mandays: 6 mandays

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

2.2 BSI Assessment Team:

| Team Member Name | Role <i>(Team Leader or Team member)</i> | Qualifications <i>(Short description of the team members)</i> |
|-------------------------|--|---|
| Hafriazhar Mohd Mokhtar | Team Leader | Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards since 2011 and completed his RSPO P&C and SCCS Lead Assessor courses successfully. He has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During this assessment, he assessed the aspects of Occupational, Health & Safety and mill best practises as well as the RSPO supply chain requirements. Able to communicate in Bahasa Malaysia and English |
| Valence Shem | Team Member | He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English. |
| Elzy Ovktafia | Team Member | She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters. She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English. |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Accompanying Persons:

| Name | Role |
|-------------------------|--|
| Nicholas Cheong | BSI Global Food Scheme Manager (observer-no assessment coverage) |
| Anis Nabihah | BSI Technical Reviewer (observer-no assessment coverage) |
| Haye Semail | ASI Lead Assessor (observer-no assessment coverage) |
| Selvanathan Grapragasem | ASI Technical Expert (observer-no assessment coverage) |

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

RAV 2 assessment plan:

| Date | Time | Subjects | HMM | VS | EO | BSI | ASI |
|--|-------------|--|-----|----|----|-----|-----|
| Sunday, 15/3/2020 | PM | Travel to Telok Panglima Garang & Check-in @ Zone Hotel | ✓ | ✓ | ✓ | ✓ | ✓ |
| Monday, 16/3/2020 West Estate | 0830 – 0900 | Opening Meeting at West Estate: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation) • Verification on previous audit findings | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 0900 - 1230 | West Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc. | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1230 – 1330 | Lunch break | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1330 - 1630 | West Estate: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.) | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1630 - 1700 | Audit team discussion & Interim briefing to operating units | ✓ | ✓ | ✓ | ✓ | ✓ |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Date | Time | Subjects | HMM | VS | EO | BSI | ASI |
|--|-------------|---|-----|----|----|-----|-----|
| Tuesday 17/3/2020 West Estate (AM) | 0830 - 1230 | West Estate: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.) | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1000 – 1200 | West Estate: Stakeholder consultation | - | - | ✓ | ✓ | ✓ |
| | 1200 - 1230 | Audit team discussion & Interim briefing to operating units | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1230 | Lunch & End (Audit to be continued upon MCO lifting) | ✓ | ✓ | ✓ | ✓ | ✓ |
| Sunday, 21/6/2020 | PM | Travel to Telok Panglima Garang & Check-in @ Zone Hotel | ✓ | ✓ | ✓ | ✓ | ✓ |
| Monday, 22/6/2020 West Palm Oil Mill (PM) | 0830 – 0900 | Re-briefing/Re-opening Meeting at West Palm Oil Mill: <ul style="list-style-type: none"> • Re-Opening Presentation by Audit team leader • Re-Confirmation of assessment scope and finalize Audit plan (may include stakeholders’ consultation) • Revisit/resume of Day 1 & Day 2 audit coverage | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 0900 - 1230 | West Palm Oil Mill: Inspection of FFB receiving, warehouse, workshop, wastes management & landfill, effluent treatment ponds, OSH & ERP, POME application, water treatment, lab, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1230 – 1330 | Lunch break | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1330 - 1630 | West Palm Oil Mill: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, mill operational & best practices records, SEIA documents & records, OSH records, review pay documents, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation records of communication with stakeholder/workers representatives, CIP and implementation & etc.) | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1630 – 1700 | Audit team discussion & Interim briefing to operating units | ✓ | ✓ | ✓ | ✓ | ✓ |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Date | Time | Subjects | HMM | VS | EO | BSI | ASI |
|---|-------------|---|-----|----|----|-----|-----|
| Tuesday 23/6/2020 West Palm Oil Mill | 0830 – 1130 | Supply chain audit for West Palm Oil Mill - General COC for supply chain - RSPO rules communication and claim Module D: Identity Preserved | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1130 – 1200 | Audit team discussion & preparation of closing meeting | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 1200 – 1230 | Closing meeting & end of audit | ✓ | ✓ | ✓ | ✓ | ✓ |

On-site Major NC close-out CAP verification plan:

| PRELIMINARY AGENDA | | | | | | | |
|-----------------------|---------------|---|-------|--|--|--|--|
| Date | Time | Subjects | Hafri | | | | |
| Tuesday 11/08/2020 | 08:30 – 09:00 | Opening Meeting: • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). | ✓ | | | | |
| | 09:00 – 12:30 | West Palm Oil Mill & Estate verify the effectiveness of corrective action with evidence of implementation and close of following Major NCs: i) 1895185-202002-M1 ii) 1895185-202002-M2 iii) 1895185-202002-M3 | ✓ | | | | |
| | 12:30 – 13:30 | Lunch break | ✓ | | | | |
| | 13:30 – 17:00 | West Palm Oil Mill & Estate verify the effectiveness of corrective action with evidence of implementation and close of following Major NCs: iv) 1895185-202002-M4 v) 1895185-202002-M5 vi) 1895185-202002-M6 | ✓ | | | | |
| | 17:00 – 17:30 | i) Closing meeting | ✓ | | | | |

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation 2019 for RSPO P&C 2018
- Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

| Requirement | Assessment | Compliance |
|--|---|------------|
| Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company? | Yes. Please refer to appendix B for details on the mills and estates of Sime Darby Plantations Berhad Group. | Complied |
| Have all the estates and mills certified within five years after obtaining RSPO membership? | No, Target to receive certification for two management units [SDP Liberia and PT Mitra Austral Sejahtera (PT MAS)] shifted to end 2020: - SDP Liberia operation has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, the time bound plan of RSPO Certification for SDP Liberia is set to 2019/2020 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. The progress of the above is under management monitoring for readiness towards certification. - SDP has also been addressing the legacy social issues at PT MAS and regularly updating the progress status to resolve this case to RSPO and other relevant stakeholders. | Complied |
| Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available. | Yes, two newly acquired management units under Markham Farming Company Limited are targeted for certification by end 2020. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | |
|--|---|-----------------|
| <p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p> | <p>Yes, changes due to issue in Liberia concession and two newly acquired management units under Markham Farming Company Limited that were targeted for certification by end 2020. This was consistent with RSPO Annual Communications of Progress 2019 reporting.</p> | <p>Complied</p> |
| <p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p> | <p>No, there has not been any isolated lapses.</p> | <p>Complied</p> |
| <p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p> | <p>No, there is no fundamental failure.</p> | <p>Complied</p> |
| Un-Certified Units or Holdings | | |
| <p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. | <p>Replacement took place in newly acquired units in Papua New Guinea, Markham Farms. The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore the Remediation and Compensation Procedure will be required to be fulfilled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit the mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.</p> | <p>Complied</p> |
| <p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p> | <p>As above, the Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit the mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.</p> | <p>Complied</p> |
| <p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. <i>Note:</i> The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-</p> | <p>Based on RSPO RACP tracker, a total of 17 Management Units with potential liability, 15 LUCA submitted, 14 Concept Note approved and 14 Compensation Plan submitted.</p> | <p>Complied</p> |

| | | |
|---|---|----------|
| compensation/racp-tracker . The progress on the Liabilities shall be verified and reported. | | |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3. | No labour dispute reported in the uncertified units. | Complied |
| Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1 | No legal non-compliance reported in the uncertified units. | Complied |
| Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available. | Yes. As part of the RSPO P&C compliance, internal audit has been conducted at the uncertified units. Report of improvement was provided for site's further improvement. | Complied |
| Have there been any stakeholder (including NGO) consultation conducted? | Yes. Stakeholders including NGO were consulted in the uncertified units. | Complied |

3.3 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|--|----------------|------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years. | Not applicable | N/A |

3.4 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were six (6) Critical (Major), four (4) Minor nonconformities and six (6) OFI Opportunity For Improvement raised. The West Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Non-conformity | | | |
|------------------------------------|--|--|---|
| NCR Ref # | 1895185-202002-M1 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 4.2.1 (Critical/Major) |
| Date Issued | 23/6/2020 | Due Date | 20/9/2020 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 11/8/2020 |
| Statement of Nonconformity: | The grievance process is not resolve in an effective, timely and appropriate manner. | | |
| Requirement Reference: | The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. | | |
| Objective Evidence: | In West Estate, Air Hitam housing area was visited and it was found out that House number 12 has reported the issue of broken toilet since 28/02/2020 through WhatsApp but still no solution until to-date. | | |
| Corrections: | To request the respective worker to submit the complaint through form and management has immediately engaged a contractor to attend to the complaint as soon as MCO was lifted and replaced by RMCO which allow the visitor to enter the worker quarter compound. | | |
| Root Cause Analysis: | Cash control for non-essential work was imposed and limitation of activity to be conducted during MCO leads to delay in attending to the complaint reported. | | |
| Corrective Actions: | To plan a briefing session on grievance procedure to the worker and to display the flow chart of grievance procedure at the muster ground. Management will review complaint form/book received twice a month to ensure all complaint are being attended accordingly. | | |
| Assessment Conclusion: | <p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> - Contract form doc. # 4300507474; Date: 2/7/2020 for Contractor Tana Agro Enterprise for Housing Repair Works: Big Tank & Small Tank repair, Clear Clog of Septic Tank, for house # 7-16, 12 & 14, Block A A1 – A10 - Evidence of housing photo: before, during & after - Briefing of Grievance Procedure records (briefing report, procedure & attendance) for West Estate workers dated 24/7/2020 by SAM Muhammad Faiz Ismail & AM Ahmad Faisal Jusoh – earlier meeting conducted with RSQM dated on 23/7/2020 - Evidence management review on complaint form from workers # 139400 dated 5/6/2020 <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Non-conformity | | | |
|------------------------------------|---|--|---|
| NCR Ref # | 1895185-202002-M2 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 6.2.3 (Critical/Major) |
| Date Issued | 23/6/2020 | Due Date | 20/9/2020 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 11/8/2020 |
| Statement of Nonconformity: | The compliance to some of labour requirements is not effectively implemented. | | |
| Requirement Reference: | There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. | | |
| Objective Evidence: | <p>West Estate:</p> <p>During housing visit, it was found that 4 watchmen in Air Hitam Division has work more than 8 hours a day (7 am-7pm) but paid normal rate without overtime. It was sighted the works progress evidence in the 2019 replanting works WhatsApp group. The manager has informed that overtime has been replaced with allowance of RM650 through a voluntary basis. It was communicated through the Mesyuarat Bersama Watchman Malam Cost Saving Initiative Ladang West 01/02/2020. This is not in accordance with the Employment Contract signed between workers and management and MAPA Circular No.12/2019 dated 02/04/2019 effect from 01 January 2019.</p> <p>West POM:</p> <p>Shift allowance entitled for a mill operator (Employee ID # 114898) was wrongly paid for 12 days instead of actual 13 days in pay slip. This is cross-referenced to the punch card for March 2020.</p> | | |
| Corrections: | <p>West Estate :</p> <p>The management has discontinue the allowance as the work for the night watchman is no longer required due to no vandalism and cattle intrusion reported for the past 3 months</p> <p>West POM :</p> <p>To reimburse Roni's one day shift allowance in July 2020 pay and to include additional notes on shift time frame in Daily Input Form in order to facilitate PIC in providing the daily input.</p> | | |
| Root Cause Analysis: | <p>West Estate :</p> <p>The night watchman was engaged to safeguard the replanting area from vandalism and cattle intrusion at night and the management is not aware that the initiative recommended is not in accordance with MAPA circular.</p> <p>West POM :</p> <p>The current system to verify daily input form is inefficient</p> | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|---|
| Corrective Actions: | <p>West Estate :</p> <p>The management has discontinued the allowance as the work for the night watchman is no longer required due to no vandalism and cattle intrusion reported for the past 3 months</p> <p>West POM :</p> <p>To reimburse Roni's one day shift allowance in July 2020 pay and to include additional notes on shift time frame in Daily Input Form in order to facilitate PIC in providing the daily input.</p> |
| Assessment Conclusion: | <p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> - West Estate: Discontinuation of night watchman back to normal overtime work - West Estate: Payslip for Month of June & July 2020 - West POM: Payslip of July 2020 paid the reimbursement for non-paid allowance (1 day) RM3 (Adjustment of wages) - West Estate: Memo from SDP Upstream Malaysia on monetarise initiative - West POM: Checkroll briefing to PIC dated on 7/8/2020 by QA to Checkroll Clerk and Admin & Account Officer (QA) <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> |

| Non-conformity | | | |
|------------------------------------|---|--|--|
| NCR Ref # | 1895185-202002-M3 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 7.10.1 (Critical/Major) |
| Date Issued | 23/6/2020 | Due Date | 20/9/2020 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 11/8/2020 |
| Statement of Nonconformity: | The data reported in the Palm GHG calculator was not consistent with the records on site. | | |
| Requirement Reference: | GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. | | |
| Objective Evidence: | It was found that based on SAP system at West Estate the diesel consumption for 2019 189,735 lt. However, the data reported in Palm GHG calculator was 112,715 lt. | | |
| Corrections: | To extract the correct data and e-mailed to auditor for verification | | |
| Root Cause Analysis: | Wrong data extracted from the SAP system during the audit | | |
| Corrective Actions: | To brief person in-charge at the operating unit on the extraction of data used in Palm GHG calculator | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|--|
| Assessment Conclusion: | <p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> - Corrected data extracted re-emailed to auditor for verification dated on 7/7/2020 - Briefing of Palm GHG data entry to all relevant person in-charge dated on 25/6/2020 <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> |
|-------------------------------|--|

| Non-conformity | | | |
|------------------------------------|---|--|---|
| NCR Ref # | 1895185-202002-M4 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 5.3.2 (Critical/Major) |
| Date Issued | 23/6/2020 | Due Date | 20/9/2020 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 11/8/2020 |
| Statement of Nonconformity: | The root-cause of the for the non-conformity raised from the internal audit was not identified. | | |
| Requirement Reference: | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <p>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>Effectively implements and maintains the standard requirements within its organisation.</p> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p> | | |
| Objective Evidence: | There were 2 NC raised as a result of the internal audit conducted on 16-17/12/2019 and had been closed by the Lead Internal Auditor on 29/1/2020. The records of this activity were documented in the internal audit report. However, the root-cause for both non-conformities was not identified despite the template format has a provision for it to be filled in. | | |
| Corrections: | To communicate with the management to complete the internal audit reply template thoroughly before verification. | | |
| Root Cause Analysis: | The root-cause for the non-conformity has been identified verbally and not recorded in the internal audit reply due to wrong interpretation of the requirement | | |
| Corrective Actions: | To ensure operating unit has complete template prepared during verification of internal audit finding by guiding them throughout the closing of NC process. | | |
| Assessment Conclusion: | <p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|--|---|
| | <ul style="list-style-type: none"> - West Estate: Discontinuation of night watchman back to normal overtime work - West Estate: Payslip for Month of June & July 2020 - West POM: Payslip of July 2020 paid the reimbursement for non-paid allowance (1 day) RM3 (Adjustment of wages) - West Estate: Discontinuation of night watchman back to normal overtime work - West Estate: Payslip for Month of June & July 2020 <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> |
|--|---|

| Non-conformity | | | |
|------------------------------------|--|--|---|
| NCR Ref # | 1895185-202002-M5 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 6.7.3 (Critical/Major) |
| Date Issued | 23/6/2020 | Due Date | 20/9/2020 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 11/8/2020 |
| Statement of Nonconformity: | PPE was not use appropriately by workers to cover potentially hazardous operations. | | |
| Requirement Reference: | (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. | | |
| Objective Evidence: | <p>West Estate:</p> <ul style="list-style-type: none"> - During visit to West Estate Chemical & Fertilizer Store, it was found that the store operator worn a respirator (Model # 2311K-5S) with a torn filter cartridge. - During visit to West Estate field block 06C for harvesting operation activity sampling, it was sighted at the nearby area where there were workers loading/arranging FFB manually into the bin with a worker not wearing proper PPE by wearing motorcycle helmet and standing on motorcycle seat while help loading the FFB into the bin <p>West POM:</p> <p>During visit for West Palm Oil Mill Workshop, it was found that the fitter use the oxy acetylene cutter without proper PPE and the oxy cylinder been used without flashback arrestor.</p> | | |
| Corrections: | <p>West Estate :</p> <p>To brief and give warning to worker without proper PPE while in operation</p> <p>West POM :</p> | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|--|
| | To issue warning letter to worker without proper PPE while in operation and install flashback arrestor to the oxy cylinder |
| Root Cause Analysis: | <p>West Estate : Insufficient monitoring and awareness on the importance of PPE usage</p> <p>West POM : Poor safety awareness amongst worker and management Insufficient monitoring PPE usage during operation</p> |
| Corrective Actions: | <p>West Estate : Management to monitor PPE issuance book on monthly basis and daily check for PPE usage from time to time</p> <p>West POM : Training and campaign on safety awareness. Region SQM to conduct workplace inspection on quarterly basis</p> |
| Assessment Conclusion: | <p>Major NC close out verification: Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> - West Estate: Warning letter to respective workers dated on 19/3/2020 - West POM: Warning letter to respective workers dated on 10/7/2020 - SOU 9 safety awareness townhall program dated on 10/8/2020 - West Estate: PPE monitoring record during daily muster - West POM: Workplace inspection record conducted by RSQM on 24/7/2020 <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> |

| Non-conformity | | | |
|------------------------------------|--|--|---|
| NCR Ref # | 1895185-202002-M6 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 3.6.1 (Critical/Major) |
| Date Issued | 23/6/2020 | Due Date | 20/9/2020 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 11/8/2020 |
| Statement of Nonconformity: | Mitigation plans and procedures documented and implemented for some operations where the risk assessment to identify its H&S issues were found insufficient | | |
| Requirement Reference: | (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. | | |
| Objective Evidence: | Mitigation plans and procedures documented and implemented for some operations where the risk assessment to identify its H&S issues were found insufficient for the following: | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|--|
| | <p>West Estate: It was sighted during visit to field and chemical store that there were workers loading/arranging FFB manually into the bin. Based on HIRARC register latest review dated 2/1/2020, mitigations plan established and recorded shown existing control identified only for Loading Loose Fruit and Loading FFB by Infield Machine activities which were similar but Manual Loading/Arranging of FFB into the bin not fully identified and assessed in HIRARC register.</p> <p>West POM: - It was found that the condensate pit operation within oil room and sterilizer operation. Based on HIRARC register latest review dated 6/4/2020, mitigations plan established and recorded shown existing control identified for oil room operation included with barricade gate installation for sludge pit which is similar but risk and hazard for condensate pit in oil room and sterilizer operation not fully identified and assessed in HIRARC register. - It was found that there is manual nut cracking by lab operator for nut & kernel histogram analysis. The potential risk and hazard of the activity not fully identified and assessed its H&S issues in HIRARC register.</p> |
| Corrections: | <p>West Estate : To identify and conduct risk assessment as well as update the SOP to include manual loading FFB into bin if the machine breakdown</p> <p>West POM : To put signage at modification area and the handrail will be fix to the site once the work is completed. To review risk assessment for lab operation</p> |
| Root Cause Analysis: | <p>West Estate : HIRARC was not access for alternative activity when the machine breakdown</p> <p>West POM : HIRARC assessment mechanism at WPOM is inadequate as the assessment is not been conducted thoroughly including maintenance work.</p> |
| Corrective Actions: | <p>West Estate: To brief to the respective worker on the updated SOP and HIRARC.</p> <p>West POM : To schedule a training on HIRARC procedure and conduct workplace inspection on quarterly basis by RSQM</p> |
| Assessment Conclusion: | <p>Major NC close out verification: Corrective action plan taken was verified as per evidence submitted as following: - West Estate: HIRARC on manual FFB loading dated 21/3/2020 with established control of Training and PPE use</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|--|--|
| | <ul style="list-style-type: none"> - West Estate: HIRARC briefing to workers by SAM Muhamad Faiz dated on 21/3/2020 - West POM: HIRARC on condensate pit operation and nut histogram activity dated on 2/7/2020 with established control of Training and PPE use - West POM: HIRARC briefing to workers and workplace inspection by RSQM dated on 2/7/2020 <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 11/8/2020. Continuous implementation will be further verified in the next audit.</p> |
|--|--|

| Non-conformity | | | |
|------------------------------------|--|--|--|
| NCR Ref # | 1895185-202002-N1 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 4.2.3 (Minor) |
| Date Issued | 23/6/2020 | Due Date | 22/6/2021 |
| Closed (Yes / No) | No | Date of nonconformity Closure | N/A |
| Statement of Nonconformity: | The complainant was not informed of the complaint progress, including against agreed timeframe and the outcome. | | |
| Requirement Reference: | The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. | | |
| Objective Evidence: | <p>West Estate:</p> <p>The complainant will fill in the complaint form and staff will summarize the issue in Rekod Aduan Kerosakan Rumah. The record captured the complainant issue; house no, complainant date, action taken date, contractor, staff and executive house. However, there is no evidence of West Estate keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome.</p> | | |
| Corrections: | Informed the complainant on the status of complaint, action to be taken and a time frame to complete the job. The complainant will need to acknowledge and update in Rekod Aduan Kerosakan Rumah accordingly | | |
| Root Cause Analysis: | The grievance procedure has not been communicated effectively between worker and management | | |
| Corrective Actions: | To plan a briefing session on grievance procedure to the worker and staff and display the flow chart of grievance procedure at the muster ground and division office. Management will review complaint form/book received twice a month to ensure all complaint are being attended accordingly. | | |
| Assessment Conclusion: | The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment. | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Non-conformity | | | |
|------------------------------------|---|--|--|
| NCR Ref # | 1895185-202002-N2 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 6.2.4 (Minor) |
| Date Issued | 23/6/2020 | Due Date | 22/6/2021 |
| Closed (Yes / No) | No | Date of nonconformity Closure | N/A |
| Statement of Nonconformity: | The sanitation for housing condition sighted during site visit is not reflective as per reported in the housing inspection record. | | |
| Requirement Reference: | The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. | | |
| Objective Evidence: | <p>During the housing inspection, it was observed that in housing area (Air Hitam Division) is not in favourable sanitation condition as reflected in the line site inspection.</p> <p>Sampled seen as below:</p> <ol style="list-style-type: none"> 1. House no 12: Broken Toilet, algae at the outside toilet wall and petrol storage at home. 2. House no 45: Blocked drainage, used lubricant oil near dustbin, rubbish scattered in housing compound, and petrol storage at home. 3. Trace of old burning for domestic waste. | | |
| Corrections: | <p>To give notice to clean the house area for the poor housekeeping quarter and informed the workers the Do and Don’t at the housing area.</p> <p>Management has taken all the necessary action to fixed the toilet and clean the compound.</p> | | |
| Root Cause Analysis: | Insufficient monitoring by management to ensure cleanliness at worker quarter area | | |
| Corrective Actions: | <p>The management will enforce on maintaining good sanitation at worker quarter by giving continuous awareness talk on good housekeeping during muster and counselling to the problematic house individually.</p> <p>During linesite inspection, MA will put a remark should there is any issue arise on poor housekeeping, simecard will be issued and the respective worker will be consulted by Assistant In-Charge immediately.</p> | | |
| Assessment Conclusion: | The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment. | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Non-conformity | | | |
|------------------------------------|---|--|--|
| NCR Ref # | 1895185-202002-N3 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 4.2.2 (Minor) |
| Date Issued | 23/6/2020 | Due Date | 22/6/2021 |
| Closed (Yes / No) | No | Date of nonconformity Closure | N/A |
| Statement of Nonconformity: | The grievance procedure (Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues) is not well understood by the workers in West POM. | | |
| Requirement Reference: | Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. | | |
| Objective Evidence: | 8/8 workers interview during site visit didn't aware of the grievance & complaint book usage. They have understood that the complaint box located near the guard at West POM is used for housing repairs complaint only. | | |
| Corrections: | To brief and display simplified grievance flow chart and procedure at operation area | | |
| Root Cause Analysis: | Insufficient information shared during briefing/communication with worker leads to misunderstanding amongst workers on the complaint term where the complaint is only meant for housing | | |
| Corrective Actions: | RSQM will schedule a training on grievance procedure for person in-charge in handling complaint and grievances | | |
| Assessment Conclusion: | The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment. | | |

| Non-conformity | | | |
|------------------------------------|---|--|--|
| NCR Ref # | 1895185-202002-N4 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2019 Indicator 3.3.3 (Minor) |
| Date Issued | 23/6/2020 | Due Date | 22/6/2021 |
| Closed (Yes / No) | No | Date of nonconformity Closure | N/A |
| Statement of Nonconformity: | The was no evidence to show that action have been taken to address the issue of under-ripe FFB harvested. | | |
| Requirement Reference: | Records of monitoring and any actions taken are maintained and available. | | |
| Objective Evidence: | Based on Ripeness Check Form (sampled: #8689, 8690, 8691, 8692, 8685, 8686 for month of November 2019), it was reported that in form #8689, there were 49 | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|--|
| | under-ripe FFB out 50 FFB harvested. This is not consistent with Sime Darby's ARM which threshold is <5%. However, there was no evidence that action have been taken to address the issue. |
| Corrections: | Management issue a letter of 'akujanji' to the respective cutter and refresher training was done to highlight on under ripe issue. Currently estate practise MRS 5 during harvesting operation. |
| Root Cause Analysis: | Due to the cropping pattern during low crop, harvesters' tendency to harvest underripe bunches to increase productivity. Estate Management are meeting the Harvesters every morning during the Daily Muster at 6.30 am. This meeting is basically verbal communication to all the workers on the matters arising such as unripe issue etc and solution for them to follow. The communication and verbal training was not recorded except for the attendance of the Harvesters since this is the daily routine. |
| Corrective Actions: | To conduct SOP training and coaching to the worker from time to time and ensure any action taken is recorded. |
| Assessment Conclusion: | The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment. |

| Opportunity for Improvements | |
|------------------------------|--|
| OFI # | Description |
| 1895185-202002-I1 | 6.2.4: Weekly housing inspection checklist records shown repeated issue of noncompliance related to presence of animals (stray dogs and chicken) and conditions of perimeter drain within housing area |
| 1895185-202002-I2 | 3.2.1: <ul style="list-style-type: none"> - The design of 3 units of oil trap at West Estate (Air Hitam Division) can be further improved so that they can trap oil that accidently spilled into the drains more efficiently. - Information on the assessment of aspects and impacts of the use of used tyre for bunding support could be improved further |
| 1895185-202002-I3 | 7.3.2: The awareness with regards to wastes disposal amongst the workers can be improved as some empty motor oil containers found in the field and less utilization of recycle waste containers. |
| 1895185-202002-I4 | 6.7.3: <ul style="list-style-type: none"> - During visit to West Estate field block 06C for harvesting operation activity sampling, the workers' claimed that they were buying their own safety shoe despite records of PPE issuance shown PPE been issued by estate to the workers. The understanding of workers claiming to buy the safety shoe on their own could lead to discrepancy in PPE issuance responsibility by employer and need to be improved. - During visit to West Estate field block 12A for mechanized P&D spraying (Arbus Spray) operation, it was sighted that the PPE worn by operator was different by normal (backpack sprayer) PPE. It would be better if the PPE worn by the Arbus Spray operator to be specified as other Pictorial Safety Standard (PSS). |

| | |
|-------------------|--|
| 1895185-202002-I5 | <p>3.6.1: West Estate: Information on the mitigation plans of chemical mixing for Arbus Spray Tractor tanks activities could be further improved its identification and assessment in HIRARC register.</p> <p>West POM: It was found that there is use of solvent (Iso-propyl Alcohol - IPA) for FFA determination analysis. SDS for IPA records shown sampling analysis using IPA need to be done in fume hood whilst the CHRA report (CHRA Report Sime Darby Plantations Sdn. Bhd. KKS West, Carey Island, Selangor (SLK 1710); Prepared by The Teong Beng; DOSJH Registration Reference # JKPP HIE 127/171-2(166); Assessment date: 14/5/2015; Report date: 29/7/2015) indicated that sampling analysis using IPA can be done in General Ventilation area only. Information consistency on the mitigation plans of this activity could be further improved its identification and assessment in HIRARC register.</p> |
| 1895185-202002-I6 | <p>6.2.2: Based on consultation with internal stakeholders among workers, the understanding and awareness on information stated in their payslips found to be deficient. Hence, the implementation of programs to increase workers' understanding on information in their payslips as identified in the SIA Management Plan could be improved further for West POM workers.</p> |

| Positive Findings | |
|-------------------|---|
| PF # | Description |
| PF 1 | Good continuous improvement program implementation |
| PF 2 | Good social contributions as per external stakeholders' feedbacks |
| PF 3 | Good documents retrieval |

3.4.1 Status of Nonconformities Previously Identified and Observations

| Non-conformity | | | |
|------------------------------------|---|--|--|
| NCR Ref # | 1737255-201901-M1 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2014 Indicator 4.7.2 (Major) |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 05/04/2019 |
| Statement of Nonconformity: | Hazard Identification Risk Assessment & Determination Control (HIRADC) was not adequately assessed & implemented. | | |
| Requirement Reference: | All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. | | |
| Objective Evidence: | HIRADC for following sampled operations was not carried out: | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|--|
| | West POM: a) Rain water harvesting pond b) Roro bin domestic waste dumping & collection site |
| Correction/containment | To carry out HIRADC for these activities. |
| Cause | The HIRADC failed to be conducted for both rain water harvesting pond and Roro Bin domestic waste due to interpretation that these new activities are not major processing activities to be covered under HIRADC. |
| Corrective Actions: | Any new activities will be discussed during Safety Committee meeting to ensure these activities will be captured in HIRADC. |
| Assessment Conclusion: | Audit team have reviewed the evidence submitted and the major NC is satisfactorily closed. Continuous implementation of corrective action taken will be further verified in the next assessment visit. The major NC was closed out on 05.04.2019. Evidence reviewed: Newly revised HIRARC. RAV 2 verification: Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed. |

| Non-conformity | | | |
|------------------------------------|---|--|--|
| NCR Ref # | 1737255-201901-M2 | Clause & Category (Major / Minor) | RSPO SCCS 2017 Indicator 5.4.1 (Major) |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 05/04/2019 |
| Statement of Nonconformity: | The incoming document is having insufficient information as per requirement. | | |
| Requirement Reference: | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|--------------------------------------|--|
| <p>Objective Evidence:</p> | <p>West POM have a Mill Weigh System to verify at the weighbridge However, for incoming document, the information is not include the minimum traceability requirement as below: West Estate, Carey Island Code : E-152, Consignment note# 162451, Field no: 09B, Div. Bangkok Mill tonnage: 9020 kg Transport: BDM5241W20 Date: 26.01.2019 RSPO Cert: Nil</p> <p>East Estate, Carey Island (Crop Diversion) Code : E-167, Consignment note# 039361, Field no: 05, Div. C Mill tonnage: 8980 kg Transport: PAG5878E54 Date: 26.01.2019 RSPO Cert: SPO 543543 (wrong certificate number)</p> |
| <p>Correction/containment</p> | <ol style="list-style-type: none"> 1. To immediately inform supplying estates to ensure correct/ valid Certificate Number on the DNs. 2. SQM to conduct SCCS on-the-job training based on the SOP to the weighbridge operator |
| <p>Cause</p> | <p>Insufficient communication with the supplying estate on the SCCS requirement and insufficient on-the-job training for the effective implementation/monitoring of the requirements of RSPO SCCS by the person-in-charge.</p> |
| <p>Corrective Actions:</p> | <ol style="list-style-type: none"> 1. Assignment of PIC for continuous monitoring of the adequacy of relevant info required on the DNs based on certificate details published on RSPO website: https://www.rspo.org/certification/search-for-certified-growers & Palmtrace. 2. To establish and emphasize on manual stamping if the SIME WEIGH system is not in place. 3. SQM to conduct evaluation for the effective implementation of the RSPO SCCS requirements at the mill at least twice a year. |
| <p>Assessment Conclusion:</p> | <p>Audit team have reviewed the evidence summited and the major NC is satisfactorily closed. Continuous implementation of corrective action taken will be further verified in the next assessment visit. The major NC was closed out on 05.04.2019.</p> <p>Evidence reviewed: The revised incoming document having the correct RSPO certification number verified and further interview session online with weighbridge clerk, Ms Inthumadi and Ms Zurina on 03.04.2019, it was confirmed that both of them attended the RSPO SCC training on 29.03.2019 and shown awareness on the RSPO SCC implementation on their workscope.</p> <p>RAV 2 verification: Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Non-conformity | | | |
|------------------------------------|--|--|--|
| NCR Ref # | 1737255-201901-M3 | Clause & Category (Major / Minor) | RSPO SCCS 2017 Indicator 5.6.1 (Major) |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 05/04/2019 |
| Statement of Nonconformity: | The outgoing document is having insufficient information as per requirement. | | |
| Requirement Reference: | <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number | | |
| Objective Evidence: | <p>West POM have a Mill Weigh System to verify at the weighbridge However, for outgoing document, the information in the sales contract and invoices is having insufficient information as below:</p> <p>CSPO Despatch Ticket: 017695 Buyer: SDP Joma Ref – Sime Darby Plantation Sdn Bhd Address: Teluk Panglima Garang Industrial EAS Contract No: S/C-PSD/1812/CPO0719H Shipment date: 02/01/2019 Quantity: 38,170 KG Product: PQ RSPO CPO IP Transport: Jasa Bumi Logistics Sdn Bhd Supply chain cert no: SPO 543594 (SC MODEL IP) (wrong certificate number)</p> <p>CSPK Despatch Ticket: 017521 Buyer: SDP KCP – Sime Darby Plantation Berhad Address: KCP-Pulau Carey Contract No: S/C-PSD/1811/PK0651B Shipment date: 19/11/2018 Quantity: 28,420 KG Product: Palm Kernel RSPO IP Transport: STB Maju – STB Maju (M) Sdn Bhd Supply chain cert no: SPO 543594 (SC MODEL IP) (wrong certificate number)</p> | | |
| Correction/containment | 1. To liaise with GSQM & IT Dept. to update the latest/ valid certificate number on Sime Weigh System. | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|---|
| | 2. SQM to conduct SCCS on-the-job training based on the SOP to the weighbridge operator. |
| Cause | Insufficient communication with the supplying estate on the SCCS requirement and insufficient on-the-job training for the effective implementation/monitoring of the requirements of RSPO SCCS by the person-in-charge. |
| Corrective Actions: | <ol style="list-style-type: none"> 1. Assignment of PIC for continuous monitoring of the adequacy of relevant info required on the DNs based on certificate details published on RSPO website: https://www.rspo.org/certification/search-for-certified-growers & Palmtrace. 2. To establish and emphasize on manual stamping if the SIME WEIGH system is not in place. 3. SQM to conduct evaluation for the effective implementation of the RSPO SCCS requirements at the mill at least twice a year. |
| Assessment Conclusion: | <p>Audit team have reviewed the evidence submitted and the major NC is satisfactorily closed. Continuous implementation of corrective action taken will be further verified in the next assessment visit. The major NC was closed out on 05.04.2019.</p> <p>Evidence reviewed: The revised outcoming document having the correct RSPO certification number verified and further interview session online with weighbridge clerk, Ms Inthumadi and Ms Zurina on 03.04.2019, it was confirmed that both of them attended the RSPO SCC training on 29.03.2019 and shown awareness on the RSPO SCC implementation on their workscope.</p> <p>RAV 2 verification: Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p> |

| Non-conformity | | | |
|------------------------------------|---|--|--|
| NCR Ref # | 1737255-201901-N1 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2014 Indicator 6.1.4 (Minor) |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 16/03/2020 |
| Statement of Nonconformity: | The SIA management plan is inadequately reviewed. | | |
| Requirement Reference: | The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. | | |
| Objective Evidence: | The issues captured in the stakeholder meeting for West POM were not included in SIA management plan for West POM. Example were list for paint from Jega, using ash for levelling the school field and requesting the resource for school tuition class. | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|--|
| Correction/containment | To immediately follow up and review all issues highlighted during stakeholder meeting to be summarised into the social management plan for next action. |
| Cause | Incomplete follow up process upon completion of stakeholder meeting to identify and translate relevant social issues into the social management plan. |
| Corrective Actions: | To include SIA agenda into management review to ensure development of social management plan is comprehensive (capture issues highlighted in stakeholder/gender committee meetings and any social related issues). |
| Assessment Conclusion: | <p>RAV 2 verification:</p> <p>The social action plan is produced yearly and the issues captured with the timeframe and person in charge. Sighted the sampled as below:</p> <ul style="list-style-type: none"> - West Estate: Gender committee (Travel for Holiday, increase the monthly fees and complaint/grievance issues), union (wild boar slaughtering, worker's conflict and gender equality). - West POM: Workers underpaid; briefing to worker on salary mechanism during MCO which is the issue derived from union meeting. - Updating of the progress of plan is carried out by the assistant managers and the results of the monitoring effectiveness are reviewed in the management units operating meetings. Mitigation measures were included in the environmental management plan and reviewed from time to time. <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Minor NC has been closed on 16/3/2020.</p> |

| Non-conformity | | | |
|------------------------------------|---|--|--|
| NCR Ref # | 1737255-201901-N2 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2014 Indicator 2.1.3 (Minor) |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 16/03/2020 |
| Statement of Nonconformity: | The monitoring of external party's legal compliance is not effectively demonstrated. | | |
| Requirement Reference: | A mechanism for ensuring compliance shall be implemented. | | |
| Objective Evidence: | <p>The monitoring of compliance was made through the internal audit by SQM team annually however, the monitoring is not effective as below:</p> <p>West POM:</p> <ol style="list-style-type: none"> 1. In West POM, it was found that the contractor's workers for Lotus Two in West POM are having different work permit contractor worker: Md Alim (Passport no: BK0979582) hired for A&M manpower Sdn Bhd. 2. Through the interview session with the contractor and contractor's worker, it is made understand that the worker also has paid half of the Levi cost to the contractor in 2018. 3. The employment contract mentioned that that for overtime, it is according to the Bangladesh Labour Laws. | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|--|
| | <p>West Estate:</p> <p>1. In West Estate, it was found that the contractor's workers for YGNT Enterprise, Sobhan Talukder (Passport no: BL0057497) is receiving the normal rate for work in rest day/public holiday as sighted in pay slip for October 2018 (28 days) and November 2018 (27 days).</p> |
| Correction/containment | To immediately conduct a briefing session with contactors on relevant requirement specifically on labour and immigration as stated in the contract agreement, to rectify the issues stated above. |
| Cause | Legal compliance in relation with contractor's worker were not emphasized in the internal audit exercise due to the understanding by the estate management that the mechanism for ensuring legal compliance is mainly for the operations handled/managed directly by the management unit. |
| Corrective Actions: | Internal Audit to monitor the compliance of contractors' engaged on the relevant requirement stated in the contract agreement. |
| Assessment Conclusion: | <p>RAV 2 verification:</p> <p>A list of contracted parties was maintained as per stakeholder list for categories under vendors and contractors. that West POM maintained the particulars of its contracted parties as List of Stakeholders (Suppliers/Contractors); SOU 9; Date: 17/12/2019 with sample contractors following:</p> <ul style="list-style-type: none"> - MH Millenium Resources; Registration date: 16/7/2019 - Lotus Two Enterprise; Registration date: 13/1/2020 <p>Implemented mechanism i.e. due diligence done through Sime Darby Plantation Online Vendor Registration (OVR) System sample for recruitment agencies as per Agreement For Supervision of Electrical Installation and Facilities for Sime Darby Estates – Selangor West Zone; Date: 1/10/2020 and Due diligence as per E-Procurement System Online Vendor Registration (OVR).</p> <p>Sighted sample of agreements as per following:</p> <ul style="list-style-type: none"> - Lotus Two Enterprise; Certificate of Registration as Sime Darby Approved Vendor # SD01564; Validity period: 25/9/2018 – 25/9/2020; Contract agreement # KKSWEAT/OPEX/FY2020 CONTRACT LABOUR; Date: 13/1/2020 <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Minor NC has been closed on 16/3/2020.</p> |

| Non-conformity | | | |
|------------------------------------|--|--|--|
| NCR Ref # | 1737255-201901-N3 | Clause & Category (Major / Minor) | RSPO P&C MYNI 2014 Indicator 5.3.3 (Minor) |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 16/03/2020 |
| Statement of Nonconformity: | The mill has not established the EFB monthly disposal distribution for 2018. | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|-------------------------------|---|
| Requirement Reference: | A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. |
| Objective Evidence: | There was no record available during the audit for the distribution of EFB disposal in West POM. |
| Correction/containment | 1. To immediately submit EFB application report to DOE on monthly basis. 2. Person in charge to review the waste management and disposal plan to ensure all relevant compliance matters is addressed and implemented. |
| Cause | No mechanism to include this requirement in the waste management and disposal plan for effective implementation |
| Corrective Actions: | To conduct periodical comprehensive review of the waste management disposal plan (on all aspects) in the coming EPMC meeting onwards. |
| Assessment Conclusion: | RAV 2 verification: EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from West POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha. Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Minor NC has been closed on 16/3/2020. |

| Opportunity for Improvement | |
|-----------------------------|-------------|
| OFI# | Description |
| OFI 1 | -Nil- |

3.4.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-----------|--------------------------|---------------|-------------|--|
| 1151638M1 | 5.3.2 | Major | 6/3/2015 | Closed out on 20/04/2015 |
| 1151638M2 | 2.1.1 | Major | 6/3/2015 | Closed out on 20/04/2015 |
| 1304223M1 | 7.1.1 | Major | 9/3/2016 | Closed out on 10/6/16 |
| 1304223M2 | 7.3.2 | Major | 9/3/2016 | Closed out on 10/6/16 |
| 1304223M3 | 7.8.1 | Major | 9/3/2016 | Closed out on 10/6/16 |
| 1304223N1 | 7.1.2 | Minor | 9/3/2016 | Closed out on 28/2/2017 |
| 1304223N2 | 7.8.2 | Minor | 9/3/2016 | Closed out on 28/2/2017 |
| 1304223N3 | 4.7.5 | Minor | 9/3/2016 | Upgraded to Major Closed out on 14/4/2017 |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | |
|-------------------|-------------|-------|------------|--------------------------|
| 1443573-201702-M1 | 2.1.1 | Major | 28/02/2017 | Closed out on 14/04/2017 |
| 1443573-201702-M2 | 6.5.1 | Major | 28/02/2017 | Closed out on 14/04/2017 |
| 1443573-201702-M3 | 6.5.2 | Major | 28/02/2017 | Closed out on 14/04/2017 |
| 1443573-201702-M4 | SCCS 4.2 | Major | 28/02/2017 | Closed out on 14/04/2017 |
| 1443573-201702-M5 | 4.7.5 | Major | 28/02/2017 | Closed out on 14/04/2017 |
| 1443573-201702-N1 | 2.1.2 | Minor | 28/02/2017 | Closed out on 14/2/2018 |
| 1590312-201801-M1 | 2.1.1 | Major | 14/2/2018 | Closed out on 15/4/2018 |
| 1590312-201801-M2 | SCCS 5.3.2 | Major | 14/2/2018 | Closed out on 15/4/2018 |
| 1590312-201801-M3 | SCCS 5.13.1 | Major | 14/2/2018 | Closed out on 15/4/2018 |
| 1590312-201801-M4 | SCCS 5.13.2 | Major | 14/2/2018 | Closed out on 15/4/2018 |
| 1590312-201801-M5 | SCCS 5.13.3 | Major | 14/2/2018 | Closed out on 15/4/2018 |
| 1590312-201801-M6 | SCCS D 5.1 | Major | 14/2/2018 | Closed out on 15/4/2018 |
| 1737255-201901-M1 | 4.7.1 | Major | 30/01/2019 | Closed out on 05/04/2019 |
| 1737255-201901-M2 | SCCS 5.4.1 | Major | 30/01/2019 | Closed out on 05/04/2019 |
| 1737255-201901-M3 | SCCS 5.6.1 | Major | 30/01/2019 | Closed out on 05/04/2019 |
| 1737255-201901-N1 | 6.1.4 | Minor | 30/01/2019 | Closed out on 16/03/2020 |
| 1737255-201901-N2 | 2.1.3 | Minor | 30/01/2019 | Closed out on 16/03/2020 |
| 1737255-201901-N3 | 5.3.3 | Minor | 30/01/2019 | Closed out on 16/03/2020 |
| 1895185-202002-M1 | 4.2.1 | Major | 23/6/2020 | Closed out on 11/8/2020 |
| 1895185-202002-M2 | 6.2.3 | Major | 23/6/2020 | Closed out on 11/8/2020 |
| 1895185-202002-M3 | 7.10.1 | Major | 23/6/2020 | Closed out on 11/8/2020 |
| 1895185-202002-M4 | 5.3.2 | Major | 23/6/2020 | Closed out on 11/8/2020 |
| 1895185-202002-M5 | 6.7.3 | Major | 23/6/2020 | Closed out on 11/8/2020 |
| 1895185-202002-M6 | 3.6.1 | Major | 23/6/2020 | Closed out on 11/8/2020 |
| 1895185-202002-N1 | 4.2.3 | Minor | 23/6/2020 | Open |
| 1895185-202002-N2 | 6.2.4 | Minor | 23/6/2020 | Open |
| 1895185-202002-N3 | 4.2.2 | Minor | 23/6/2020 | Open |
| 1895185-202002-N4 | 3.3.3 | Minor | 23/6/2020 | Open |

3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss West Palm Oil Mill and Supply Base Certification Unit’s environmental and social performance, legal and any known dispute issues.

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

| List of Stakeholders contacted | |
|--|---|
| <p>Internal Stakeholders</p> <p>General workers Mill operators Harvesters Sprayers Gender committee representative</p> | <p>Local communities/Union/Contractors</p> <p>Kampung Orang Asli Kepau Laut Kampung Orang Asli Sungai Judah Mill vendors (contractors & suppliers) Estate vendors (contractors & suppliers) Estate sundry shop operators NUPW Branch Secretary for Selangor representatives</p> |
| <p>Government Departments</p> <p>JTK Officer Pelabuhan Klang SJK(T) Ladang Pulau Carey Barat DOSH/DOE/JTK/SPAN/KPDNHEP/Fire Service Department/Forestry/Wildlife (via stakeholder consultation email dated 26/2/2020 – no feedback)</p> | <p>NGO</p> <p>Tenaganita/Wetlands/WWF/Amnesty/SAM (via stakeholder consultation email dated 26/2/2020 – no feedback)</p> |

| Stakeholders comment | |
|-----------------------------|---|
| 1 | <p>Feedbacks: <u>Contractors & Suppliers (Canteen Owner at West POM, MPM Global, DNRJ Resources, FFB transporter)</u></p> <p>- No complaint raised by the contractors & suppliers. They signed agreement and Vendor Integrity Pledge. Some of contractors & suppliers attended the stakeholder meeting conducted by estate & mill. They are aware of RSPO & MSPO.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p> |
| 2 | <p>Feedbacks: <u>Gender Committee Representatives</u></p> <p>Meeting conducted quarterly as per Gender Committee Handbook. No sexual harassment or domestic violence case reported. New mother need assessment been conducted if there is a new mother in each unit.</p> <p>Management Responses: Noted on the information.</p> |

| | |
|---|---|
| | <p>Audit Team Findings: No other issue.</p> |
| 3 | <p>Feedbacks: <u>NUPW Representatives (Branch Secretary for Selangor)</u> The selection of the representative is through the election from the workers. It was held between NUPW and members only, without the company interference. Any complaints will be solved in the NUPW meeting with management. Minute of meeting and letter of appointment sighted. NUPW has not aware on the issue on the overtime has been converted to other allowance for watchmen in West Estate. They will ask the workers during the next NUPW meeting.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p> |
| 4 | <p>Feedbacks: <u>Kampung Orang Asli Kepau Laut & Kampung Orang Asli Sungai Judah</u> - Orang Asli Communities has a good relationship with Sime Darby Management. They were given the job opportunity. Since RSPO certification, they were not given access to the estate for fishing and hunting. No land encroachment from Sime Darby management and West Mill did not receive outside crop from the villager’s estate.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p> |
| 5 | <p>Feedbacks: <u>SJK(T) Ladang Pulau Carey Barat</u> The school management would like to extend their appreciation to Sime Darby Management for the full support and assistance such as grasscutting, cleaning services, donation, etc. The attendance of students were good and no child labour issue.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p> |
| 6 | <p>Feedbacks: <u>Foreign & Local Workers at Housing Complexes</u></p> <ol style="list-style-type: none"> 1. There were burglary cases in Bangkong Division housing complex where the workers has lose personal belonging in Dec 2019 at House no A02. Although it has been reported to the management, the issue is still not solved. 2. Some of workers mentioned management would withhold their salary of RM500 as a guarantee if the worker were going back to their hometown for holiday. 3. A worker complaint on the toilet broken at his house no 12 at Air Hitam Division since December to management through WhatsApp but no action taken. He has to poop on plastic bags and throw it to field since then. <p>Four watchmen has reported that their overtime hours has been changed to other allowance in February 2020 which obviously less rate than normal overtime if they work after working hours.</p> <p>Management Responses:</p> <ol style="list-style-type: none"> 1. There were drug addict cases in Bangkong Division and Estate management security team is in progress to work with Agensi Dadah Kebangsaan (AADK) to overcome the burglary issue. 2. The worker misunderstood on RM500 as a salary withhold because it is the salary of the few working day in the early month. The normal payday is before seventh of next month and worker may wait for the next month for the salary. 3. The complaint procedure been briefed to workers earlier and WhatsApp medium is not the correct channel. It is the only worker that has this problem and no other worker. <p>It is clearly brief to them earlier that this is optional for them, as estate management has instructed by HQ not to give overtime at all. Watchmen has agreed to try first at February 2020 instead of only getting</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | |
|---|---|
| | <p>the basic pay. If they do not want to accept this offer of rm650 of fix allowance/month for full attendance, it will be offered to other workers.</p> <p>Audit Team Findings:</p> <ol style="list-style-type: none"> 1. Noted on the issue. 2. During the first audit before MCO in March 2020, from a few interviews to the workers, RM500 for salary withhold just newly implemented. But so far, none of the workers back from hometown has been withhold the salary. Further verification been made during the second audit after MCO in May 2020, the same worker and other worker has been called for interview and further verified on the forced labour issue as well as the situation during MCO. There is no withhold of RM500 to the workers and they clarified that it was misunderstand during previous interview. They can go back to hometown after 2 years contract completed and review on pay slip for newly returned workers, confirmed that no RM500 of salary being hold and not informed on this issue. 3. Although WhatsApp is not accepted as the proper channel for complaint, the staff who received the complaint did not explain the correct channel to the worker. The WhatsApp communication has been sighted during the housing visit and it showed that the staff is respond the complaint through WhatsApp where the effectiveness of the training is an issue. An NC raised under clause 4.2.3. <p>The replacement of overtime hours to fix allowance is not adhered to the Employment Act 1955 and employment contract under working hours. An NC is raised under clause 6.2.3.</p> |
| 7 | <p>Feedbacks: <u>JTK Officer Pelabuhan Klang</u></p> <p>Auditor has made verification with the JTK Officer on below:</p> <ol style="list-style-type: none"> 1. Daily rate of minimum wage/day for outside town area is RM 42.31/day excluded any other allowance. The salary deduction for loan under union needs the approval permit from JTK. <p>Management Responses: Management is able to demonstrate the calculation of daily minimum wage is adhered in the Sime Darby payment system. For the salary deduction, MAPA has the approval from JTK on the loan (under cooperative) and the deduction is lawful.</p> <p>Audit Team Findings: No other issue.</p> |

| List of land owner / user contacted | | | | | |
|--|---------------------------|----------------|----------------------|---------------------------------|---|
| Name | Years of ownership / used | Land area (ha) | Agreement (Yes / No) | Agreement base on FPIC (Yes/No) | Compliance on the agreement terms and conditions |
| The Pataling Rubber Estates Limited (Golden Hope Plantation) | Until 2008 | 5,912.69 | Yes | No | Yes, ownership changed due to company merging as Sime Darby |

| Previous land owner / user comment | |
|---|----------------------------------|
| Nil | Feedbacks: N/A |
| | Management Responses: N/A |
| | Audit Team Findings: N/A |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

3.6 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team consist of Hafriazhar Mohd. Mokhtar as Audit Team Leader, Valence Shem and Elzy Ovktafia as Audit Team Members.

| Formal Signing-off of Assessment Conclusion and Recommendation | |
|---|---|
| <p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that West Palm Oil Mill and Supply Base has complied with the RSPO P&C MYNI 2019, RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of West Palm Oil Mill and Supply Base is continued.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Hafriazhar Mohd. Mokhtar | Name: SYED MUZHAREL AZHAR SYED MOHAMAD |
| Company Name: BSI Services Malaysia Sdn. Bhd. | Company Name: SIME DARBY PLANTATION BERHAD |
| Title: Lead Auditor | Title: SENIOR MANAGER |
| Signature:  | Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)  SIME DARBY PLANTATION BERHAD WEST ESTATE SYED MUZHAREL AZHAR BIN SYED MOHAMAD SENIOR MANAGER |
| Date: 13/8/2020 | Date: 15.8.2020 |

Appendix A: Summary of Findings

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| <p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p> | | | |
| <p>Criteria 1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p> | | | |
| 1.1.1 | (C) Documents that are specified in the RSPO P&C are made available to the public. | Documents required for all unit of certification available in West Certification Unit: <ol style="list-style-type: none"> 1. Land titles/user rights <ul style="list-style-type: none"> • Occupational health and safety plans • Plans and impact assessments relating to environmental and social impacts • HCV documentation • Pollution prevention and reduction plans • Details of complaints and grievances • Continuous improvement plans • Public summary of certification assessment report • Group Sustainability Policy • Record of contributions to community development | Complied |
| 1.1.2 | Information is provided in appropriate languages and accessible to relevant stakeholders. | SOU 8 & 9 has conducted combined meeting with the stakeholder to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders has raised some issue and discussed with the management during the meeting. Sighted the latest minutes meeting conducted on 20/02/2020 at Kelab Seri Kamuning, Kamuning Estate. It was attended by 77 representatives from contractors, government officer and local community representatives. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------------|--|---|-----------------|
| <p>1.1.3</p> | <p>(C) Records of requests for information and responses are maintained.</p> | <p>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The mill and estates maintain the records of all request and response. Sighted the records of request from the stakeholders as follows:</p> <p>West Estate:</p> <ol style="list-style-type: none"> 1. Request to conduct the health screening for Malaria from Pejabat Kesihatan Daerah Kuala Langat on 02/03/2020 (Division 4), 03/03/2020 (Division 6), 04/03/2020 (Division Bangkong) and 05/03/2020 (Division Air Hitam). 2. Request to install the culvert in Sri Maha Mariamman Temple (Ladang Ayiram Ekar-LMT 2018) on 16/11/2019. 3. Request on transportation aid for Hari Kecemerlangan Murid Tahun 2019 rehearsal on 16/11/2019. <p>West POM:</p> <ol style="list-style-type: none"> 1. Request to contribution of school wall paint aid, maintaining school field, kursus latihan kerjaya, etc. from SMK Pulau Carey. 2. Complaints about the transporter tractor (FFB lorries and pesticides) does not equipped with vehicles light and this is dangerous for the road users in the early morning and night time. | <p>Complied</p> |
| <p>1.1.4</p> | <p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> | <p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p> <p>This has been communicated to workers and stakeholders through:</p> <ol style="list-style-type: none"> 1. Stakeholder meeting on 05/02/2020 at Ballroom 6, Sime Darby Plantation Academy for SOU 9. | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|--|---|----------|
| | | <p>2. The new Group Sustainability Policy was communicated through the muster briefing to workers on 25/02/2020 at West Estate and 16/01/2020 at West POM.</p> <p>The person in charge for social issues (communication and consultation) is as below:</p> <p>1. West Estate: Senior Assistant Manager (Azlee Bin Sahat) on 01/01/2020. 2. West POM: Assistant Mill Manager (Nur Syafiqah Binti Rayme) on 06/01/2020.</p> | |
| 1.1.5 | There is a current list of contact and details of stakeholders and their nominated representatives. | <p>The latest stakeholders list updated as at January 2020. Stakeholder's details available included person in charge, address, e-mail and contact number.</p> <p>Example as below:</p> <p>1. West Estate: (EFB Transporter) YGNT Enterprise, West Estate, Carey Island, Selangor. 2. West POM: (Local community head) Kampung Sungai Kurau (Mr. Nengkak Anak Mat).</p> | Complied |
| Criteria 1.2 | | | |
| The unit of certification commits to ethical conduct in all business operations and transactions. | | | |
| 1.2.1 | A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. | <p>Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.</p> <p>The latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019'. It was communicated to the workers on 21/06/2020 at West Estate during muster briefing and 16/01/2020 at West POM.</p> | Complied |
| 1.2.2 | A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. | <p>Sime Darby Plantation has establish the Vendor Integrity Pledge and Vender COBC as a due diligence for external parties engaged by Operating Units.</p> <p>Sighted sampled for YGNT Enterprise Sdn Bhd and DNRJ Resources Sdn Bhd (West Estate) and Lotus Two Enterprise (West POM) has been signed.</p> | Complied |

| | | | |
|---|--|---|-----------------|
| <p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p> | | | |
| <p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p> | | | |
| 2.1.1 | <p>(C) The unit of certification complies with applicable legal requirements.</p> | <p>As per sample permits and licences West Estate:</p> <ul style="list-style-type: none"> - Schedule Controlled Goods Permit; Serial #B002821; Ref. # B.PGK.SEL/5857; Diesel volume: 20,000 litres; Petrol volume 10,000 litres; Validity: 12/12/2019 – 11/12/2020 <p>As per sample permits and licences West POM:</p> <ul style="list-style-type: none"> - Electricity Supply Act 1990; Registration Acknowledgement Form B; Installation # ST(TKL)P/S/SGR/-1648; Power Aggregate: 2062.75 kW; Date issued: 20/6/2019 (Validity 1 year) – renewal pending due to MCO## - Renewal Application ref. # OTKL1404202001215P; Reg. # 64766V; Energy Commission file ref. # ST(TKL)P/S/SGR/01648; Date: 30/4/2020 - Measurement & Weighing Act 1972; Measurement & Weighing Determination Acknowledgement Form D Ref. # B 1600920; Weighbridge # B 813601316; Date: 24/7/2019 -- renewal pending due to MCO## - Renewal arrangement by Teras Integrasi Sdn. Bhd. for yearly verification by Metrology Corporation application letter dated 4/2/2020; Date of appointment: 15/7/2020 - MPOB License # 533238004000; Processing capacity: 240,000 mt/year; Validity: 1/10/2019 – 30/9/2020 - Fire Service Act 1988 Form II Sub-regulation 3(1); Fire Certificate Serial # 312484; Validity: 28/2/2019 – 27/2/2020 – renewal pending due to MCO ## - Renewal (on-line) submission # BL2019049026; Approved date: 28/12/2019 | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---------------------|---|--|----------|
| | | <ul style="list-style-type: none"> - Clean Air Regulations 2014 Contravene DOE License # 003765; Compliance Schedule Ref. # (B) B 31/152/000/086; Validity period: 5/6/2019 – 4/6/2020 – renewal pending due to MCO ## - EQA 1974 Contravene DOE License # 003180; Compliance Schedule Ref. # (B) B 31/152/000/086; Validity period: 1/7/2019 – 30/6/2020 – renewal pending due to MCO ## - Schedule Controlled Goods Permit; Serial #B002821; Ref. # B.PGK.SEL/5857; Diesel volume: 20,000 litres; Petrol volume 10,000 litres; Validity: 12/12/2019 – 11/12/2020 | |
| 2.1.2 | A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and regulations. | <p>West Estate:</p> <p>As per records of Sime Darby Plantation Berhad Estate/Mill – Upstream Malaysia Legal & Other Requirements Register (LORR) by Group Sustainability & Quality Management; Updated 30/1/2020. Sighted latest inclusion of Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019 dated on 24/1/2020.</p> <p>West POM:</p> <p>As per Plantation Summary Quality Management System (PQMS) Summary of Compliance latest revision:</p> <ul style="list-style-type: none"> - Rev. date: 17/12/2010; New Inclusion: Auxiliary Police Regulations 1970 - Rev. date: 14/4/2020; Perintah Pencegahan dan Pengawalan Penyakit Berjangkit (Pengisytiharan Kawasan Tempatan Jangkitan) (Pelanjutan Kuat Kuasa) (No. 2) 2020 | Complied |
| 2.1.3 | Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. | As per boundary pegs and mapping (GPS Survey Map) of estate as per sample GPS Surveyed Map for West Estate. | Complied |
| Criteria 2.2 | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|--|---|----------|
| All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | | | |
| 2.2.1 | A list of contracted parties is maintained. | <p>A list of contracted parties was maintained as per stakeholder list for categories under vendors and contractors. that West POM maintained the particulars of its contracted parties as List of Stakeholders (Suppliers/Contractors); SOU 9; Date: 17/12/2019 with sample contractors following:</p> <ul style="list-style-type: none"> - MH Millenium Resources; Registration date: 16/7/2019 - Lotus Two Enterprise; Registration date: 13/1/2020 | Complied |
| 2.2.2 | <p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> | <p>Due diligence done through Sime Darby Plantation Online Vendor Registration (OVR) System sample for recruitment agencies as per Agreement For Supervision of Electrical Installation and Facilities for Sime Darby Estates – Selangor West Zone; Date: 1/10/2020 and Due diligence as per E-Procurement System Online Vendor Registration (OVR).</p> <p>Sighted sample of agreements as per following:</p> <ul style="list-style-type: none"> - Lotus Two Enterprise; Certificate of Registration as Sime Darby Approved Vendor # SD01564; Validity period: 25/9/2018 – 25/9/2020; Contract agreement # KKSWEEST/OPEX/FY2020 CONTRACT LABOUR; Date: 13/1/2020 | Complied |
| 2.2.3 | <p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> | <p>As per Sime Darby Plantation Berhad Group Vendor Integrity Pledge (VIP) sample as following:</p> <ul style="list-style-type: none"> - Hip Huat Excavator Works dated January 2020 - Packley Corporation Engineering & Trading dated January 2020. - Chin Tat Metal Engineering dated November 2019 | Complied |
| Criteria 2.3 | | | |
| All FFB supplies from outside the unit of certification are from legal sources. | | | |
| 2.3.1 | <p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins | <p>West POM processed own crops only and no FFB sourced from third party. All FFB sent to West POM are from own supply base among West Estates. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|---|--|----------|
| | <ul style="list-style-type: none"> Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/ smallholder One or more supporting documents for claims Valid MPOB license | and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. | |
| 2.3.2 | For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. | This indicator is not applicable since FFB is strictly and only sourced from Sime Darby owned estates. | N/A |
| <p>PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.</p> | | | |
| <p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p> | | | |
| <p>Criteria 3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p> | | | |
| 3.1.1 | <p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> | <p>The business plan for the mill is reflected in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilisation rate and CAPEX.</p> <p>The business or management plan for the estate was presented in the form of annual budget with 4 years projection (2021 – 2024). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p> | Complied |

| 3.1.2 | An annual replanting programme projected for a minimum of five years with yearly review, is available. | <p>West Estate has prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below is the details of the programme:</p> <table border="1" data-bbox="1039 539 1476 890"> <thead> <tr> <th>Year</th> <th>Ha to be replanted</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>229.78</td> </tr> <tr> <td>2020</td> <td>323.29</td> </tr> <tr> <td>2021</td> <td>234.16</td> </tr> <tr> <td>2022</td> <td>164.38</td> </tr> <tr> <td>2023</td> <td>198.50</td> </tr> <tr> <td>2024</td> <td>286.88</td> </tr> </tbody> </table> | Year | Ha to be replanted | 2019 | 229.78 | 2020 | 323.29 | 2021 | 234.16 | 2022 | 164.38 | 2023 | 198.50 | 2024 | 286.88 | Complied |
|--|---|--|----------|--------------------|------|--------|------|--------|------|--------|------|--------|------|--------|------|--------|----------|
| Year | Ha to be replanted | | | | | | | | | | | | | | | | |
| 2019 | 229.78 | | | | | | | | | | | | | | | | |
| 2020 | 323.29 | | | | | | | | | | | | | | | | |
| 2021 | 234.16 | | | | | | | | | | | | | | | | |
| 2022 | 164.38 | | | | | | | | | | | | | | | | |
| 2023 | 198.50 | | | | | | | | | | | | | | | | |
| 2024 | 286.88 | | | | | | | | | | | | | | | | |
| 3.1.3 | The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. | <p>Management review meeting for the estate was last conducted on 7/1/2020. It was chaired by the Sr. Manager and attended by 11 key-persons. Among the agenda discussed were:</p> <ul style="list-style-type: none"> i) Results of internal audit ii) Customer feedback iii) Status of preventive and corrective actions iv) Follow-up actions from previous management review v) Changes that could affect management system vi) Recommendations for improvement | Complied | | | | | | | | | | | | | | |
| <p>Criteria 3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p> | | | | | | | | | | | | | | | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|---|---|----------|
| 3.2.1 | (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. | <p>SOU 9 has the continuous improvement plan categorized for social and environmental impacts. It was captured in the Social Action Plan for West Estate SOU 9 FY 2020. Sighted the sampled as below:</p> <ol style="list-style-type: none"> 1. West Estate: Gender committee (Travel for Holiday, increase the monthly fees and complaint/grievance issues), union (wild boar slaughtering, worker's conflict and gender equality). 2. West POM: Workers underpaid; briefing to worker on salary mechanism during MCO which is the issue derived from union meeting. <p>However an OFI has been raised on the following:</p> <ul style="list-style-type: none"> - The design of 3 units of oil trap at West Estate (Air Hitam Division) can be further improved so that they can trap oil that accidently spilled into the drains more efficiently. - Information on the assessment of aspects and impacts of the use of used tyre for bunding support could be improved further | OFI |
| 3.2.2 | As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template. | Report of the PalmGHG Version 4, ACOP latest dated 2019 were verified available. | Complied |
| <p>PROCEDURAL NOTE for 3.2.2: THE RSPO metrics template is awaiting decision/ agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> | | | |
| <p>Criteria 3.3 Operating procedures are appropriately documented, consistently implemented and monitored.</p> | | | |
| 3.3.1 | (C) Standard Operating Procedures (SOPs) for the unit of certification are in place. | <p>West Palm Oil Mill and Estate adopted the following manuals / guidelines for the day-to day operations of the estates and mill. It includes the operation activities in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security.</p> <ol style="list-style-type: none"> i) Agriculture Reference Manual (ARM) dated 01/07/2011. ii) Estate Quality Management System (EQMS) Manual dated 01/11/2008, | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|---|--|----------|
| | | <p>iii) Safety Standard Operating Procedures (SSOP) dated 25/02/2015, iv) Sustainable Plantation Management System Manual (SPMS), v) Guidelines on River Management” Manual, vi) ESH Management System Manual dated 01/07/2012, vii) Occupational Safety and Health Manual dated 03/03/2008, viii) Pictorial Safety Standards and Security Guidelines (PSS).</p> <p>Both the estate and mill operations are guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and trainings. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs.</p> <p>The SOPs included the operation activities in the estates and the mills from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and dispatch of CPO & PK and security in the Certification Unit.</p> | |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place. | <p>The mechanisms to check the implementation of procedures were carried out through the following mechanism among others:</p> <p>a) Routine operation supervision of the estate’s staff b) Internal audit, safety and health meeting and routine inspection (workplace inspection) by Assistant manager, Field staff and Hospital Assistant.</p> <p>Team from SQM (quality assurance) from HQ conduct quarterly monitoring - on quality of implementation procedure such as loose fruit collection</p> | Complied |
| 3.3.3 | Records of monitoring and any actions taken are maintained and available. | <p>The records of monitoring were documented in various documents such as:</p> <ul style="list-style-type: none"> - MSPO & RSPO internal audit report – last conducted on 18-19/12/2019 - Ripeness Check Form (sampled: #8689, 8690, 8691, 8692, 8685, 8686 for month of November 2019 – generally more than 90% ripe). It was reported that in form #8689, there were 49 under-ripe FFB out 50 FFB harvested. This is not | Minor NC |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|--|---|----------|
| | | consistent with Sime Darby's ARM which threshold is <5%. However, there was no evidence that action have been taken to address the issue. Thus, a non-conformity report was assigned due to this lapse. | |
| Criteria 3.4 | | | |
| A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations. | | | |
| 3.4.1 | (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented. | <p>No new planting at SOU 9 West Estate in 2019-2020. The latest SEIA was conducted on 18 April 2018. The Internal SEIA report for RSPO-New Planting Procedure at OP81R1 (previous field), P2011A (current field) area of 15.00 Ha in expected month pf felling is Nov 2018. The social aspect sighted were:</p> <ul style="list-style-type: none"> - Security to surrounding. - Safety and health. - Communication. - Economic livelihood. <p>The assessment of environmental impact of its existing activities is documented in the following documents:</p> <ul style="list-style-type: none"> - Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register - Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI - Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE | Complied |
| 3.4.2 | For the unit of certification, a SEIA is available and social and environmental management and monitoring | <p>As per SEIA report, the social action plans:</p> <ul style="list-style-type: none"> - To conduct a meeting with workers and explain to them on estate's plan to reclaim the area for oil palm planting. | Complied |

| | <p>plans have been developed with participation of affected stakeholders.</p> | <ul style="list-style-type: none"> - To produce a planting/replanting memo to workers so that they have enough time to harvest the cash crops and relocate their livestock to a proper place. To provide an alternative site/green book area for workers to plant cash crops. <p>Environment Aspect and Impact Identification for various activities- construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop.</p> <p>After the EAI is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental Impact Evaluation Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.:</p> <table border="1" data-bbox="958 791 1843 959"> <tr> <th colspan="2">Guidance of Action required</th> </tr> <tr> <td>100 ~ 199</td> <td>No action required</td> </tr> <tr> <td>200 ~ 249</td> <td>To initiate corrective and preventive actions</td> </tr> <tr> <td>250 and above</td> <td>To develop environmental objective and programme</td> </tr> </table> <p>Mitigation measures were documented in Pollution Preventive Plan (PPP).</p> | Guidance of Action required | | 100 ~ 199 | No action required | 200 ~ 249 | To initiate corrective and preventive actions | 250 and above | To develop environmental objective and programme | |
|-----------------------------|--|--|-----------------------------|--|-----------|--------------------|-----------|---|---------------|--|--|
| Guidance of Action required | | | | | | | | | | | |
| 100 ~ 199 | No action required | | | | | | | | | | |
| 200 ~ 249 | To initiate corrective and preventive actions | | | | | | | | | | |
| 250 and above | To develop environmental objective and programme | | | | | | | | | | |
| <p>3.4.3</p> | <p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> | <p>The social action plan is produced yearly and the issues captured with the timeframe and person in charge. Sighted the sampled as below:</p> <ul style="list-style-type: none"> - West Estate: Gender committee (Travel for Holiday, increase the monthly fees and complaint/grievance issues), union (wild boar slaughtering, worker’s conflict and gender equality). - West POM: Workers underpaid; briefing to worker on salary mechanism during MCO which is the issue derived from union meeting. <p>Updating of the progress of plan is carried out by the assistant managers and the results of the monitoring effectiveness are reviewed in the management units</p> | <p>Complied</p> | | | | | | | | |

| | | | |
|--|---|---|----------|
| | | operating meetings. Mitigation measures were included in the environmental management plan and reviewed from time to time. | |
| Criteria 3.5 | | | |
| A system for managing human resources is in place. | | | |
| 3.5.1 | Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented and made available to the workers and their representatives where applicable. | <p>SDPSB has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities.</p> <p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) Sua Betong, Careline and estate are available upon request.</p> | Complied |
| 3.5.2 | Employment procedures are implemented and records are maintained. | <p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) Sua Betong, Careline and estate are available upon request. This procedure been explained to worker during the induction training on their first time arrival.</p> <p>Seen the training certificates for the workers who has attended the induction training/records as below:</p> <p>West Estate:</p> <ol style="list-style-type: none"> 1. Shahen Mia (09/06/2014). 2. Budhika Daminda Priyanath Chandra (02/05/2011) 3. Priyo Santosa Widowo (27/11/2010) | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|---|--|-------------------------|
| | | <p>4. Heri Usman (10/05/2019)</p> <p>West POM:</p> <ol style="list-style-type: none"> 1. Roni (Employee ID: 114898) 2. Dedi Saripudinn (Employee ID: 122121) 3. Rinadi (Employee ID: 137035) 4. Harisman (Employee ID: 137036) | |
| <p>Criteria 3.6 An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p> | | | |
| <p>3.6.1</p> | <p>C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> | <p>The risk assessment to identify H&S Issues established based on documented information as following:</p> <ul style="list-style-type: none"> - Sime Darby Plantation ESH Management System Manual; Doc. # SD/SDP/SQM(ESH)/001-1; Rev. 0; Date: 1/7/2012 - Sime Darby Plantation SOP of Incidents, Accidents & Non-Conformance Agreement; Doc. # SDP/SQM(ESH)/001-2-9; Rev. 1; Date: 30/5/2019 - Plantation Sustainability and Quality Management (PSQM) Environment Safety & Health Procedure; Title: ESH Risk Management Procedure – HIRADC & EAI; Doc. # SD/SDP/PSQM(ESH)/201OS24; Rev. 1; Date: 1/7/2015 – 7.4 Monitoring and Review b. Develop a plan to monitoring and review the risk assessments and control measures for each year. As a general guide, formal reviews should be done at a minimum of at least once a year <p>Mitigations plan established and recorded in HIRARC register as per sample sighted</p> <ul style="list-style-type: none"> - West Estate: Previous HIRARC registered on 5/1/2019. Latest review dated 2/1/2020 sighted only for specific department: Harvesting; Section: Loading Loose Fruit | <p>Major NC OFI</p> |

**RSPO P&C Public Summary Report
Revision 10 (Mar 2020)**

| | | | |
|--|--|---|--|
| | | <ul style="list-style-type: none"> - West POM: HIRARC register dated 6/4/2020 only for specific department: Process; Operation: Technical Grade Oil (TGO) tank handling <p>West POM additional ESH Management Plan SOU 9 West Oil Mill Year 2020; Date: 5/3/2020 includes the following samples:</p> <ul style="list-style-type: none"> - ESH Risk Management - ESH Structure - Incident Reporting - Emergency Preparedness & Response - Chemical Safety Management - Contractor Safety Management - Health & Hygiene Monitoring Program - Awareness & Competency Training <p>However, mitigation plans and procedures documented and implemented for some operations where the risk assessment to identify its H&S issues were found insufficient for the following:</p> <p>West Estate:</p> <p>It was sighted during visit to field and chemical store that there were workers loading/arranging FFB manually into the bin. Based on HIRARC register latest review dated 2/1/2020, mitigations plan established and recorded shown existing control identified only for Loading Loose Fruit and Loading FFB by Infield Machine activities which were similar but Manual Loading/Arranging of FFB into the bin not fully identified and assessed in HIRARC register.</p> <p>West POM:</p> | |
|--|--|---|--|

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|---|--|----------|
| | | <p>- It was found that the condensate pit operation within oil room and sterilizer operation. Based on HIRARC register latest review dated 6/4/2020, mitigations plan established and recorded shown existing control identified for oil room operation included with barricade gate installation for sludge pit which is similar but risk and hazard for condensate pit in oil room and sterilizer operation not fully identified and assessed in HIRARC register.</p> <p>- It was found that there is manual nut cracking by lab operator for nut & kernel histogram analysis. The potential risk and hazard of the activity not fully identified and assessed its H&S issues in HIRARC register.</p> <p>Hence, a critical (major) noncompliance has been raised on the matters.</p> <p>Furthermore, information on the mitigation plans of chemical mixing for Arbus Spray Tractor tanks activities could be further improved its identification and assessment in HIRARC register.</p> <p>It was found that there is use of solvent (Iso-propyl Alcohol - IPA) for FFA determination analysis. SDS for IPA records shown sampling analysis using IPA need to be done in fume hood whilst the CHRA report (CHRA Report Sime Darby Plantations Sdn. Bhd. KKS West, Carey Island, Selangor (SLK 1710); Prepared by The Teong Beng; DOSJH Registration Reference # JKPP HIE 127/171-2(166); Assessment date: 14/5/2015; Report date: 29/7/2015) indicated that sampling analysis using IPA can be done in General Ventilation area only. Information consistency on the mitigation plans of this activity could be further improved its identification and assessment in HIRARC register.</p> <p>Hence, an OFI has been raised on the matters.</p> | |
| 3.6.2 | (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. | The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that were conducted by West POM and West Estate in each of the | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|---|---|----------|
| | | operations. Site visits around the mill and estate indicated the Control measures of the HIRARC were followed and ensured by the respective management. | |
| Criteria 3.7 | | | |
| All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained. | | | |
| 3.7.1 | (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training. | Programme that provides training sighted in place been developed as Sime Darby Plantation Berhad Training Matrix – SOU 9 West Estate FY 2019 & Training Requirement for Operating Units (Mills) as per following samples: <ul style="list-style-type: none"> - OSH Act & Regulations 1994 training - Environmental Quality Act & Regulations 1974 training - Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000 training & etc. | Complied |
| 3.7.2 | Records of training are maintained. | All workers involved in operation has been provided with adequate training in safe working practice as per program in the training plan. Sighted the training record as follows: <ul style="list-style-type: none"> - SoHelp Training; Date: 11/6/2020 - 5S coaching; Date: 20/1/2020 - SCCS Training; Date: 17/6/2020 | Complied |
| 3.7.3 | Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. | Relevant personnel to supply chain implementation as defined by the SOU 9 are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators. At West POM case, 4 personnel were identified. RSQM conducted the SCCS Training; Date: 17/6/2020. The latest RSPO training was carried out on 17/6/2019 at Sime Darby Plantation Academy by GSQM and during stakeholders meeting as sighted in minutes meeting dated 4/12/2019 attended by other operating unit representative and contractors. Both training was given by GSQM personnel. | Complied |
| Criterion 3.8 | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

Supply chain requirement for mills (**note: all supply chain requirements are considered as critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle**)

| Definition | | | |
|------------|--|---|----------|
| 3.8.1 | <p>Definition Identity Preserved Mill D.1: A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, then only Module E is applicable.</p> | <p>FFB were obtained from all Sime Darby certified estates only. There was no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.</p> | Complied |
| 3.8.2 | <p>Definition Mass Balance Mill E.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB</p> | <p>Not applicable as West POM applied Identity Preserve (IP) supply chain module.</p> | N/A |
| 3.8.3 | <p>Explanation (Volume and product integrity) – D.2, E.2 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public</p> | <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. RSPO Membership of West Palm Oil Mill is under Sime Darby Plantation Berhad with RSPO Membership # 1-0008-04-000-00.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------------|---|--|-----------------|
| | <p>summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p> | <p>RSPO Palmtrace Member ID: RSPO_PO1000000103 (West Oil Mill) which license expires on 18/9/2020.</p> | |
| <p>3.8.4</p> | <p>Documented procedures – 5.3.1, D.3, E.3</p> <p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: Complete and up-to-date procedures covering the implementation of all the elements of the supply chain model requirements.</p> | <p>SOU 9 has a written procedure for supply chain entitled Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019 to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. The following subjects were included in the procedure:</p> <ul style="list-style-type: none"> 4.0 Responsibilities 5.0 Control of Documents & Records 6.0 Delivery of FFB from the Estate 7.0 Receiving FFB at the Mill 9.0 Process Monitoring 10.0 Products Dispatch 11.0 Non-conforming Products and/ or Documents 12.0 Product Claims 13.0 Outsourced Contractor 14.0 Training 15.0 Reclassification of Mill’s Supply Chain Model 16.0 Production Volume | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|--|--|----------|
| | | 17.0 Conversion Factors 18.0 Internal Audit 19.0 Complaints 20.0 Management Review | |
| | Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). | Among the records included in the procedures are: i. Weighbridge tickets ii. Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document iii. Daily production summary report iv. Record and balance v. Training records for SCCS All the records were found to be up-to-date. | Complied |
| | Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation’s procedures for the implementation of this standard. | Based on Sime Darby’s RSPO SCCS procedure, clause 4.0, the Head of Operating Unit shall have the overall responsibility for the implementation of the procedure. In this case, the Mill Manager is the Head of the Operating Unit. Based on interview with the mill manager, it can be concluded that he is able to demonstrate a good knowledge in implementing the supply chain procedure. | Complied |
| | The site shall have documented procedures for receiving and processing certified and non-certified FFBS. | Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019 to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. | Complied |
| 3.8.5 | Internal Audit – 5.3.2 The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. | Sime Darby Plantation Berhad has established the Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 1/11/2017. Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Section 18.0 where the annual internal audit is to determine the mill conforms to the requirements of RSPO and MSPO SCCS. The frequency of the internal audit was at least annually. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|---|--|----------|
| | Effectively implements and maintains the standard requirements within its organisation. | The last internal audit was carried out on 16-17/12/2019 by Sustainability Unit, GSQM. Based on the internal audit report, the coverage was found to be satisfactory. | Complied |
| | Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. | There were 2 NC raised as a result of the internal audit and had been closed by the Lead Internal Auditor on 29/1/2020. The records of this activity were documented in the internal audit report. However, the root-cause for both non-conformities was not identified. Thus, a non-conformity was assigned due to this lapse. The internal audit results were one of the agendas discussed in the mill management review meeting. The management review was last conducted on 6/2/2020, chaired by the mill manager and attended by 17 key personnel. Based on the minutes of meeting, the results of internal audit were recorded in agenda no. 4. | Major NC |
| 3.8.6 | Purchasing Goods In – 5.4, D.4.1/ D.4.2, E.4.1/E.4.2 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. | Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. West POM have a Mill Weigh System to verify at the weighbridge However, for incoming document, the information is not include the minimum traceability requirement as below: East Estate, Carey Island (Crop Diversion) Code : E-153, Consignment note: 409855, Field no: P05C2, Div. C Mill tonnage: 9700 kg Transport: PAG5878E57 Product: FFB Date: 17.04.2020 RSPO Cert: RSPO 543543 West Estate, Carey Island (Own supply estate) | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|--|--|----------|
| | | Code : E-152, Consignment note: 409855, Field no: P05C2, Div. C Mill tonnage: 8150 kg Transport: WBR6887W09 Product: FFB - Date: 18.05.2020 | |
| | The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. | As per SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4, the oil mills shall inform PSQM complete with justification immediately if there is a projected overproduction of certified tonnage. PSQM shall upon verification notify the respective CB accordingly for any updates in the RSPO-IT (PalmTrace) system. | Complied |
| | The site shall have a mechanism in place for handling non- conforming oil palm products and/or documents. | There is procedure for handling non-conforming products and/or documents as per SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4. Where there is contamination of RSPO/MSPO certified material during receiving, processing, storage and dispatch, the mill/estate shall downgrade the materials following the downgrade order: RSPO: IP -> MB -> Non certified | Complied |
| 3.8.7 | <p>Outsourcing Activities – 5.5</p> <p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements</p> | <p>The list of outsourced contractor was sighted, “list of stakeholder” as at January 2020 include the transport contractor for CPO and PK. eg: Jasa Bumi Logistics Sdn Bhd for CPO transporter dated 19 December 2017 valid for 3 years.</p> <p>As per contract agreement between West POM and Jasa Bumi Logistics Sdn Bhd, there is Annexure 5, RSPO Supply Chain Certification Standard for contractor’s agreement mentioned the site has legal ownership of all input material to be included in outsourced processes.</p> <p>Agreement on the transportation of CPO for Jasa Bumi Logistics Sdn Bhd dated 19 December 2017 with validity of 3 years contract is available during the audit.</p> <p>The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within West Palm Oil Mill.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|--|---|-----------------|
| | <p>are controlled by the certified organisation (not the tank farm manager).</p> | | |
| | <p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p> | <p>The list of outsourced contractor was sighted, "list of stakeholder" as at January 2020 include the transport contractor for CPO and PK. eg: Jasa Bumi Logistics Sdn Bhd for CPO transporter dated 19 December 2017 valid for 3 years.</p> <p>Agreement on the transportation of CPO for Jasa Bumi Logistics Sdn Bhd dated 19 December 2017 with validity of 3 years contract is available during the audit.</p> <p>The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within West Palm Oil Mill.</p> | <p>Complied</p> |
| | <p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p> | <p>As per contract agreement between West POM and Jasa Bumi Logistics Sdn Bhd, there is Annexure 5, RSPO Supply Chain Certification Standard for contractor's agreement mentioned the site has legal ownership of all input material to be included in outsourced processes.</p> | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|--|--|----------|
| | The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products. | So far, no new contractor used for the processing or physical handling of RSPO certified oil palm products. The contractor used only for CPO transportation. | Complied |
| 3.8.8 | Record keeping – 5.9 The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. | All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible. | Complied |
| | Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. | The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019. Verified the weighbridge ticket #015026 for CPO delivery on 21/6/2017 including the collection order. | Complied |
| | The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months. | Not applicable. The product of the facility is containing 100% palm oil. | N/A |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------------|---|---|-----------------|
| | <p>D.5.1 – The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>Or</p> <p>E.5.1 –</p> <ul style="list-style-type: none"> a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/or three-monthly basis. b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) | <p>West POM has the real time basis report through the monthly record in using Sime Weigh system adapted in mill. The information is then documented in "Daily Production Summary Report" and "RSPO & MSPO Mass Balancing Records for Oil Mills". For e.g. on 20/6/2020, West Oil Mill has processed 593.10 mt of FFB, produced 113/713 mt of CPO & 32.116 mt of PK and delivered 70.33 mt of CPO and 37.70 mt of PK.</p> <p>All the inventory records are maintained and updated on daily basis and monthly. Daily records are prepared at the entry point at the weighbridge.</p> | <p>Complied</p> |
| <p>3.8.9</p> | <p>Conversion Factors – 5.10</p> <p>Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org)</p> | <p>Conversion factor of CPO and PK production is depending on the actual OER and KER as portrayed in Table 10 above.</p> | <p>Complied</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------|---|---|----------|
| | Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. | The facility is using the actual extraction rate and therefore updating of rates is not necessary. | Complied |
| 3.8.10 | <p>Processing – D.6</p> <p>The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.</p> | All FFB received and processed are from certified sources, which are from own estates. If the demand is for conventional CPO and PK, the 1:1 downgrade is used. | Complied |
| 3.8.11 | <p>Sales and goods out – 5.6</p> <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • Information shall be complete and can be presented either on a single document or across | <p>West POM have a Mill Weigh System to verify at the weighbridge However, for outgoing document, the information in the sales contract and invoices is having insufficient information as below:</p> <p><u>CSPO</u> Despatch Ticket: 019712 Buyer: SDP Oils Langat Refinery – Sime Darby Plantation Sdn Bhd Address: Batu 9, Jalan Banting Klang Contract No: S/C-PSD/2005/CPO0705B Shipment date: 20/05/2020 Quantity: 39,170 KG Product: STD-RSPO CPO IP Transport: Jasa Bumi Logistics Sdn Bhd Supply chain cert no: SPO 543594 (SCCS MODEL IP)</p> <p><u>CSPK</u> Despatch Ticket: 019715 Buyer: SDP KCP – Sime Darby Plantation Berhad Address: KCP-Pulau Carey Contract No: S/C-PSD/2005/PK0646 Shipment date: 21/05/2020 Quantity: 29,040 KG</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------|---|---|----------|
| | <p>a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p> <ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. | <p>Product: Palm Kernel RSPO IP Transport: STB Maju – STB Maju (M) Sdn Bhd Supply chain cert no: SPO 543594 (SCCS MODEL IP)</p> | |
| 3.8.12 | <p>Registration of Transactions – 5.7 Supply chain actors who:</p> <ul style="list-style-type: none"> Are mills, traders, crushers and refineries; and Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. | <p>The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit’s Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p> | Complied |
| | <p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures.</p> | <p>Based on the announcement (transaction) summary, all the registrations were found to be in order.</p> | Complied |

| | | | |
|--|--|--|----------|
| | <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p> | | |
| 3.8.13 | <p>Claims – 5.11</p> <p>The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p> | RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. | Complied |
| <p>Principle 4: Respect community and human rights and deliver benefit</p> <p>Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p> | | | |
| <p>Criteria 4.1</p> <p>The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p> | | | |
| 4.1.1 | <p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain</p> | SDPSB has the implemented a Sime Darby's Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|---|--|----------|
| | and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. | They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. The policy was communicated through the muster briefing to workers on 25/02/2020 by Assistant Manager at West Estate. | |
| 4.1.2 | The unit of certification does not instigate violence or use any form of harassment in their operations. | SDPSB has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society: <ol style="list-style-type: none"> 1. Respecting, upholding & no-exploitation of fundamental human rights. 2. Providing safe and healthy workplaces, and protecting workers' welfare. 3. Engaging and empowering communities. This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers. | Complied |
| Criteria 4.2 | | | |
| There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties. | | | |
| 4.2.1 | (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. | The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing. In West Estate, Air Hitam housing area was visited and it was found out that House number 12 has the issue of toilet broken since 28/02/2020 through whatsapp but still no solution until todate. This indicated that the grievance process is not resolve in an effective, timely and appropriate manner. Hence, a Major NC has been raised on the matter | Major NC |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|---|---|----------|
| 4.2.2 | Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. | <p>The policy was communicated through the muster briefing to workers on 25/02/2020 by Assistant Manager at West Estate.</p> <p>8/8 workers interview during site visit didn't aware of the grievance & complaint book usage. They have understood that the complaint box located near the guard at West POM is used for housing repairs complaint only. This indicated that the grievance procedure (Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues) is not well understood by the workers in West POM. Hence, a minor NC has been raised on the matter</p> | Minor NC |
| 4.2.3 | The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. | <p>Sighted the Buku Kerosakan Rumah and External Complaint Book have the agreed resolution within timeframe.</p> <p>There were no other complaint other than housing maintenance issues.</p> <p>Sample taken as below: West Estate:</p> <ol style="list-style-type: none"> 1. Complainant name: P. Ambika (Workers quarters division 4), door lock, wash room door on 13/02/2020 and 25/02/2020. 2. Complainant name: Purnamo (Set lamp repair 2 sets) on 05/02/2000 and 12/02/2020. <p>The complainant will fill in the complaint form and staff will summarize the issue in Rekod Aduan Kerosakan Rumah. The record captured the complainant issue; house no, complainant date, action taken date, contractor, staff and executive house. However, there is no evidence of West Estate keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome. This indicated that the complainant was not informed of the complaint progress, including against agreed timeframe and the outcome. Hence, a minor NC has been raised on the matter.</p> | Minor NC |

| | | | |
|---|---|---|----------|
| 4.2.4 | The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. | The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. | Complied |
| Criteria 4.3 The unit of certification contributes to local sustainable development as agreed by local communities. | | | |
| 4.3.1 | Contributions to community development that are based on the results of consultation with local communities are demonstrated. | <p>West POM certification unit have contributed to the internal and external stakeholders.</p> <p>As a group, the CSR was included in: http://www.yayasansimedarby.com/our-projects/community-health</p> <p>For example, the management has contributed and supported the activities such as request as below:</p> <p>West Estate:</p> <ol style="list-style-type: none"> 1. Collaboration with Forest Department Selangor (JPNS) to visit the Mangrove Research Centre on 02-03/03/2020. 2. International Women’s Day on 08 March 2020. 3. Kuil Sri Maha Mariamman-request to install culvert in Jambatan on 16/11/2019. <p>West POM:</p> <ol style="list-style-type: none"> 1. Contribution/donation to PIBG SMK Pulau Carey (RM1,000) on 07/03/2019. <p>Contribution/donation to Kelab Polis Kuala Langat (RM 300) on 19/04/2019.</p> | Complied |

| Criteria 4.4 | | | |
|---|--|---|----------|
| Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. | | | |
| 4.4.1 | (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available. | For West Estate documents showing legal ownership, a total of 4 land titles (# 46219, 46220, 44294 and 47697) available to demonstrate the right to use the land. The land title 47697 was shared with East estate. West POM located within Grant Title # 44294; Lot # 2697; Area: 1753297.7625 m ² (433 acres); Daerah: Klang; Mukim: Klang; Registered date: 22/6/2001 and its operation is on freehold land and no restriction on the land use right. | Complied |
| 4.4.2 | Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: a) Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. | Complied |
| | b) Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---------------------|--|--|----------|
| | c) Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. | |
| 4.4.3 | (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. | Complied |
| 4.4.4 | All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. | Complied |
| 4.4.5 | (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. | N/A |
| 4.4.6 | There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes. | N/A |
| Criteria 4.5 | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|--|---|----------|
| No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions. | | | |
| 4.5.1 | (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the West SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.2 | (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the West SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.3 | Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the West SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---------------------|--|---|----------|
| 4.5.4 | To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the West SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.5 | Evidence is available that the affected communities and rights holders have had the option to access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the West SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.6 | Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the West SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.7 | New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the West SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| 4.5.8 | (C) Newlands are not acquired in areas inhabited by communities in voluntary isolation. | It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the West SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. | Complied |
| Criteria 4.6 | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|--|---|----------|
| Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. | | | |
| 4.6.1 | (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. | There is no customary rights in West Certification Unit. Sighted the old land title mentioned that previous landowner for West Estate is 'The Pataling Rubber Estates Limited'. | Complied |
| 4.6.2 | (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. | There is no customary rights in West Certification Unit. Sighted the old land title mentioned that previous landowner for West Estate is 'The Pataling Rubber Estates Limited'. | Complied |
| 4.6.3 | Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings. | There is no customary rights in West Certification Unit. Sighted the old land title mentioned that previous landowner for West Estate is 'The Pataling Rubber Estates Limited'. | Complied |
| 4.6.4 | The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. | There is no customary rights in West Certification Unit. Sighted the old land title mentioned that previous landowner for West Estate is 'The Pataling Rubber Estates Limited'. | Complied |
| Criteria 4.7 | | | |
| Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements. | | | |
| 4.7.1 | (C) A mutually agreed procedure for identifying people entitled to compensation is in place. | SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|--|---|----------|
| 4.7.2 | (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. | There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Complied |
| 4.7.3 | Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. | SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. | Complied |
| Criteria 4.8 | | | |
| The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights. | | | |
| 4.8.1 | Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. | SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. | Complied |
| 4.8.2 | (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. | There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Complied |
| 4.8.3 | Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using | SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|--|--|----------|
| | the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4) | | |
| 4.8.4 | For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable) | There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Complied |
| Principle 5: Support smallholder inclusion | | | |
| Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships. | | | |
| Criteria 5.1 | | | |
| The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. | | | |
| 5.1.1 | Current and previous period prices paid for FFB are publicly available and accessible by smallholders. | West Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders. Nonetheless, current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary By Region (RM/Tonne); January 2020; Central Region; Grade A (OER 20%). | Complied |
| 5.1.2 | (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders (at least once a year or upon request). | West Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders. | N/A |
| 5.1.3 | (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. | West Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders. | N/A |
| 5.1.4 | (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price | West Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders. | N/A |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|--|---|----------|
| | reductions for replanting and or other support mechanisms where applicable. | | |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe. | West Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders. | N/A |
| 5.1.6 | (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. | West Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders. | N/A |
| 5.1.7 | Weighing equipment is verified by an independent third party on a regular basis (this can be government). | Weighbridge was verified as per records of latest calibration sighted by Metrology Corporation Malaysia Sdn. Bhd. calibration Borang D (Timbang dan Sukat) Perakuan Penentuan Timbang Dan Sukat; Akta Timbang Dan Sukat 1972; Perakuan # B 1643196; Weighbridge Serial # 0444 8556LM; Calibration date: 8/8/2019; Weighbridge capacity: 60,000kg; Brand: Mettler Toledo Kingbird | Complied |
| 5.1.8 | The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. | West POM processed own crops only and no FFB sourced from third party. All FFB sent to West POM are from own supply base i.e. West Estates. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB. | Complied |
| 5.1.9 | (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. | West POM processed own crops only and no FFB sourced from third party. All FFB sent to West POM are from own supply base i.e. West Estate. Nonetheless, they have the Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling. | Complied |

| Criteria 5.2 | | | |
|---|--|---|----------|
| The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains. | | | |
| 5.2.1 | The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. | <p>West POM processed own crops only and no FFB sourced from third party. All FFB sent to West POM are from own supply base i.e. West Estate. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> | Complied |
| 5.2.2 | The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder or RSIS). | <p>West POM processed own crops only and no FFB sourced from third party. All FFB sent to West POM are from own supply base i.e. West Estate. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> | Complied |
| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. | <p>West POM processed own crops only and no FFB sourced from third party. All FFB sent to West POM are from own supply base i.e. West Estate. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary,</p> | Complied |

| | | | |
|-------|--|---|----------|
| | | <p>Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> | |
| 5.2.4 | (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. | <p>West POM processed own crops only and no FFB sourced from third party. All FFB sent to West POM are from own supply base i.e. West Estate. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> | Complied |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. | <p>West POM processed own crops only and no FFB sourced from third party. All FFB sent to West POM are from own supply base i.e. West Estate. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> | Complied |

| Principle 6: respect workers' rights and conditions | | | |
|--|---|---|----------|
| Protect workers' rights and ensure safe and decent working conditions. | | | |
| Criteria 6.1 | | | |
| Any form of discrimination is prohibited. | | | |
| 6.1.1 | (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. | SDPSB has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02nd December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. | Complied |
| 6.1.2 | (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. | Migrant workers are recruited with (2 +1) and 3 years contract. Local workers are on a long-term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, subsidized water and electric supplier (connect to national water and electricity supply) and medical care (panel clinic) are given to all employees without discrimination. Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for < 5 years and 16 days for > 5 years. Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1. | Complied |
| 6.1.3 | The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. | There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste. | Complied |

| | | | |
|-------|--|--|----------|
| 6.1.4 | Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. | There is no pregnancy test conducted in West Certification Unit. Confirmed through the interview session to workers, Medical Assistant and Gender Committee Minute of Meeting. | Complied |
| 6.1.5 | (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. | <p>The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p> <p>The last meeting were conducted on 17/01/2020 for West Estate and 18/01/2020. The activities such as Zumba test, fishing at Carey Island, etc.</p> <p>No sexual harassment case been report and confirmed through interviewed with the chairman and female workers.</p> | Complied |
| 6.1.6 | There is evidence of equal pay for the same work scope. | <p>There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.</p> | Complied |

Criteria 6.2

Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).

| | | | |
|--------------|---|---|-----------------|
| <p>6.2.1</p> | <p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> | <p>All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract.</p> <p>Sighted the employment contract for employees as below:</p> <p>West Estate (July 2019 and Oct 2019, January 2020):</p> <ol style="list-style-type: none"> 1. Employee id: 150501 (Heri Usman) 2. Employee id: 102061 (Shahen Mia) 3. Employee id: 65636 (Buddhika Daminda Priyanath Chandrasekara) 4. Employee id: 57866 (Priyo Santosa Wibowo) 5. Contractor: DNRJ <p>West POM (Mar, Apr May 2020):</p> <ol style="list-style-type: none"> 1. Roni (Employee ID: 114898) 2. Dedi Saripudinn (Employee ID: 122121) 3. Rinadi (Employee ID: 137035) 4. Harisman (Employee ID: 137036) <p>It is explained to the workers in the workers with the assistance of the senior worker from the same country during arrival through the induction training. Sighted the certificates of attendance from MAPA & MPOA titled "Kursus Induksi Pekerja Asing" and record of induction training to foreign workers on 03/032020 to workers a West Estate.</p> <p>MAPA Circular No.12/2019 dated 02/04/2019 effect from 01 January 2019 for 3 years were explained to workers through the NUPW meeting.</p> | <p>Complied</p> |
|--------------|---|---|-----------------|

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------------|---|---|-----------------|
| <p>6.2.2</p> | <p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> | <p>All workers have the employment contract stated the regular working hours (8 hours for daily rate) and piece rates by works as per MAPA Circular No.12/2019 dated 02/04/2019 effect from 01 January 2019 for 3 years.</p> <p>Sighted the employment contract for employee for July 2019 and Oct 2019, January 2020 as below:</p> <ol style="list-style-type: none"> 1. Employee id: 150501 (Heri Usman) 2. Employee id: 102061 (Shahen Mia) 3. Employee id: 65636 (Buddhika Daminda Priyanath Chandrasekara) 4. Employee id: 57866 (Priyo Santosa Wibowo) 5. Contractor: DNRJ <p>West POM (Mar, Apr May 2020):</p> <ol style="list-style-type: none"> 1. Roni (Employee ID: 114898) 2. Dedi Saripudinn (Employee ID: 122121) 3. Rinadi (Employee ID: 137035) 4. Harisman (Employee ID: 137036) <p>However, based on consultation with internal stakeholders among workers, the understanding and awareness on information stated in their payslips found to be deficient. Hence, the implementation of programs to increase workers' understanding on information in their payslips as identified in the SIA Management Plan could be improved further for West POM workers. Hence, an OFI has been raised on the matter.</p> | <p>OFI</p> |
| <p>6.2.3</p> | <p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> | <p>The paid salary sighted for Dec, Oct and Aug 20019 for West Estate and Mar, Apr May 2020 for West POM were complied with the Minimum Wage Order 2018 (for all workers) and Minimum Wage Order 2019 (for workers in town, if applicable).</p> <p>Sighted the employment contract for employee as below:</p> <ol style="list-style-type: none"> 1. Employee id: 150501 (Heri Usman) 2. Employee id: 102061 (Shahen Mia) | <p>Major NC</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|---|---|-------------------------|
| | | <ol style="list-style-type: none"> 3. Employee id: 65636 (Buddhika Daminda Priyanath Chandrasekara) 4. Employee id: 57866 (Priyo Santosa Wibowo) 5. Contractor: DNRJ <p>West POM (Mar, Apr May 2020):</p> <ol style="list-style-type: none"> 1. Roni (Employee ID: 114898) 2. Dedi Saripudinn (Employee ID: 122121) 3. Rinadi (Employee ID: 137035) 4. Harisman (Employee ID: 137036) <p>West Estate: During housing visit, it was found that 4 watchmen in Air Hitam Division has work more than 8 hours a day (7 am-7pm) but paid normal rate without overtime. It was sighted the works progress evidence in the 2019 replanting works WhatsApp group. The manager has informed that overtime has been replaced with allowance of RM650 through a voluntary basis. It was communicated through the Mesyuarat Bersama Watchman Malam Cost Saving Initiative Ladang West 01/02/2020. This is not in accordance with the Employment Contract signed between workers and management and MAPA Circular No.12/2019 dated 02/04/2019 effect from 01 January 2019.</p> <p>West POM: Shift allowance entitled for a mill operator (Employee ID # 114898) was wrongly paid for 12 days instead of actual 13 days in pay slip. This is cross-referenced to the punch card for March 2020.</p> <p>These indicated that the compliance to some of labour requirements is not effectively implemented. Hence, a major NC has been raised on the matter.</p> | |
| 6.2.4 | <p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws or in their</p> | <p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were connected with the national infrastructure facilities. The us age of electricity and water is provided with subsidize rate as per employment contract.</p> | <p>Minor NC OFI</p> |

| | | | |
|-------|--|---|----------|
| | <p>absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years)is allowed to upgrade the infrastructure.</p> | <p>Seen the Budget for housing repairs, sanitation, garden upkeep and CAPEX from all operating units.</p> <p>Seen the record for weekly linesite inspection done by Medical Assisant in Weekly basis. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p> <p>During the field assessment, it was observed that in Air Hitam Division that the housing area in favourable sanitation condition as reflected in the linesite inspection. Sampled seen as below:</p> <ol style="list-style-type: none"> 1. House no 12: Broken Toilet, algae at the outside toilet wall and petrol storage at home. 2. House no 45: Blocked drainage, used lubricant oil near dustbin, rubbish scattered in housing compound, and petrol storage at home. 3. Trace of burning for domestic waste. <p>These indicated that the sanitation for housing condition sighted during site visit is not reflective as per reported in the housing inspection record. Hence, a minor NC has been raised on the matters.</p> <p>An OFI also has been raised on the weekly housing inspection checklist records that shown repeated issue of noncompliance related to presence of animals (stray dogs and chicken) and conditions of perimeter drain within housing area.</p> | |
| 6.2.5 | <p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> | <p>The housing area were located in Carey Island (West POM & West Estate) and Banting where the accessibility to the grocery and shops is available in housing area.</p> | Complied |

| | | | |
|-------|---|---|----------|
| 6.2.6 | A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. | <p>Sime Darby Plantation Berhad-East POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2018 and the decent living wage set up by the group.</p> <p>Note: Until housing basket can be determine (work in progress-data type need to pulled from various departments and further segregated), in the interim SDP will refer to CA amount of RM125.</p> | Complied |
|-------|---|---|----------|

PROCEDURAL NOTE:

RSPO STANDARD STANDING COMMITTEE
 14th of October 2019

STATEMENT FROM THE RSPO STANDARD STANDING COMMITTEE REGARDING THE INDICATOR 6.2.6 ON DECENT LIVING WAGE

With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist¹

Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.

In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks¹. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.

For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment

of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage¹.

Once the benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:

- Updated assessment on prevailing wages and in-kind benefits
- There is annual progress on the implementation of living wages
- Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment
- The UoC may choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.

¹ As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam. These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate.

² Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country.

³ RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country.

| | | | |
|-------|---|---|----------|
| 6.2.7 | Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. | There are no casual workers hired in West POM and supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2 | Complied |
|-------|---|---|----------|

| Criteria 6.3 | | | |
|---|---|--|----------|
| <p>The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> | | | |
| 6.3.1 | <p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> | <p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>During the interview with workers, there are no evidence received that there are restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p> <p>Sighted the letter from NUPW to Estate Manager, Biennial General Meeting on 03/03/2020 and sminar for estate union committee members to be held on 12th & 13th March 2020.</p> | Complied |
| 6.3.2 | <p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> | <p>Minit Mesyuarat Antara Pihak Ladang Dan Wakil NUPW 2020 dated 05/06/2020 involved the representative from employer and employee available. Issues discussed as below:</p> <ol style="list-style-type: none"> 1. The salary for March 2020 for West POM is less but being explained by AAO on the calculation from MAPA to workers representative. | Complied |

| | | | |
|---|---|--|----------|
| | | 2. Changes on the crop processing time. This is because of the crop receive late and mill want to optimize the working time. | |
| 6.3.3 | Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. | Based on the worker’s interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting. | Complied |
| Criteria 6.4: | | | |
| Children are not employed or exploited. | | | |
| 6.4.1 | A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. | <p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. • Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. • Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. • Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|----------------------|---|---|----------|
| | | <ul style="list-style-type: none"> Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p> | |
| 6.4.2 | (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. | The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old). | Complied |
| 6.4.3 | (C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work. | There is no young worker employed in West POM and Estate certification unit. | Complied |
| 6.4.4 | The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. | The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing. | Complied |
| Criteria 6.5: | | | |

| | | | |
|--|---|---|----------|
| There is no harassment or abuse in the workplace, and reproductive rights are protected. | | | |
| 6.5.1 | (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. | <p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. • Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. <p>The policy was communicated through the Gender Committee meeting conducted quarterly.</p> | Complied |
| 6.5.2 | (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. | SDPSB has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office. | Complied |
| 6.5.3 | Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. | In West POM and Estate, there is no new needs for new mother since there is no new mother. | Complied |
| 6.5.4 | A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. | Gender committee has been formed in each unit for the medium of sexual harassment grievances by female. | Complied |

| Criteria 6.6: No forms of forced or trafficked labour are used. | | | |
|---|---|---|----------|
| 6.6.1 | <p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages | <p>The recruitment cost were declared by the labour agent from source country for the applicable fees. Sampled for Tenaga Kerja Indonesia (TKI) Kepada Agensi (PL) Dan Sponsor (PL) for Indonesia effective date on 01/06/2017 (IDR 6,150,000) and Amoza Travels for India (INR 50000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.</p> <p>Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage they can anytime request for it.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Overtime was given voluntarily. Sighted the overtime request form where employer offer work to worker after working hour/rest day/public holiday for Muhammad Reza on 15/03/2019 at West POM.</p> <p>The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> 1. The company is not satisfied with your performance 2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. 3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime. 4. You have breached any express or implied terms of your employment. <p>Fail medical examination based on FOMEMA result.</p> | Complied |

| | | | |
|--|--|---|---------------------|
| 6.6.2 | (C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented. | SDPSB has implemented a Sime Darby's Human Rights Charter on where they committed as below: a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favorable working conditions e. Enhancing Safety and Health They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights as included in the Group Sustainability Policy on 10 & 17/02/2020. For e.g.: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia. | Complied |
| Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health. | | | |
| 6.7.1 | (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. | Person responsible identified as per ESH Organization Chart FY2020 West Estate consists of Estate Manager as Chairman, Assistant Managers as Secretary, Workers Representatives, Management Representatives and Contractor Representatives. Also established the Emergency Response Team FY 2020. Latest Safety Committee Meeting conducted on 18/6/2020. Previous meeting conducted on 17/1/2020. No meeting conducted during MCO period due to prevention of gathering. Last meeting prior to MCO was conducted on 25/10/2019. | Complied |
| 6.7.2 | Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and | Procedures are in place such as per Sime Darby Plantation SOP of Incidents, Accidents & Non-Conformance Agreement; Doc. # SDP/SQM(ESH)/001-2-9; Rev. 1; Date: 30/5/2019. Accident records available as per samples sighted as following: | Minor noncompliance |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------------|--|--|-------------------------|
| | <p>explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> | <p>- JKPP 8 as per Akuan Penerimaan Pendaftaran JKPP 8; Ref. # JKPP 8/4391/2020; Date received: 11/1/2020. - JKPP 4 Appendix 14-5.</p> | |
| <p>6.7.3</p> | <p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> | <p>All workers were provided with appropriate PPE where the cost are bared by the management. Interviews conducted during the site visit at the Mill and Estate showed understanding and approval from the workers that:</p> <ul style="list-style-type: none"> • The management bares the cost of all PPEs and the workers are entitled to valid PPE.3 • The importance of using required PPE at all times during work. • Proper storage and disposal methods of PPE. <p>However, during visit to West Estate Chemical & Fertilizer Store, it was found that the store operator worn a respirator (Model # 2311K-5S) with a torn filter cartridge. During visit to West Estate field block 06C for harvesting operation activity sampling, it was sighted at the nearby area where there were workers loading/arranging FFB manually into the bin with a worker not wearing proper PPE by wearing motorcycle helmet and standing on motorcycle seat while help loading the FFB into the bin During visit for West Palm Oil Mill Workshop, it was found that the fitter use the oxy acetylene cutter without proper PPE and the oxy cylinder been used without flashback arrestor.</p> <p>These indicate that PPE was not use appropriately by workers to cover potentially hazardous operations. Hence, a major NC has been raised on the matters.</p> <p>The estates provided adequate Emergency Shower, Shower Rooms, Changing Area and PPE Storage Area for the workers especially chemical handlers for them to change out of PPE, wash and put on their personal clean clothing. However, during visit to West Estate field block 06C for harvesting operation activity sampling, the</p> | <p>Major NC OFI</p> |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|---|---|----------|
| | | <p>workers' claimed that they were buying their own safety shoe despite records of PPE issuance shown PPE been issued by estate to the workers. The understanding of workers claiming to buy the safety shoe on their own could lead to discrepancy in PPE issuance responsibility by employer and need to be improved.</p> <p>During visit to West Estate field block 12A for mechanized P&D spraying (Arbus Spray) operation, it was sighted that the PPE worn by operator was different by normal (backpack sprayer) PPE. It would be better if the PPE worn by the Arbus Spray operator to be specified as other Pictorial Safety Standard (PSS).</p> <p>Hence, an OFI has been raised on the matters.</p> | |
| 6.7.4 | <p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> | <p>All workers are given medical care as the mill workers obtain medical care from the Klinik Hartati in Telok Panglima Garang. In the event of major injuries or accidents, the workers will be given appropriate medical care at the hospital under the expenses of the management.</p> <p>All workers are covered under the Social Security Organisation (SOCSO). Sample of SOCSO Contribution via Form 8a were sighted in both mill and estate respectively.</p> <p>Specific annual medical surveillance was conducted to relevant workers based on the recommendation by Chemical Health Risk Assessor as per report of Chemical Health Risk Reassessment at West Estate Sime Darby Plantation, Selangor; Prepared by NIOSH Malaysia; Report # 03-04/02/CHRA/2015/3 dated 27/1/2016 for the assessment conducted on 13/7/2015. Assessor name: Daud Adam; Assessor Reg. # JKPP HIE 127/171-2(353).</p> <p>Additionally, all workers are given medical care as the estate workers obtain medical care from the Clinic in the estate. In the event of major injuries or accidents, the workers will be given appropriate medical care at the hospital under the expenses of the management.</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|--|---|----------|
| 6.7.5 | Occupational injuries are recorded using Lost Time Accident (LTA) metrics. | <p>In West Estate, records of accident and incident statistic review indicated summary of accident FY 2019 total 9 number of occupational accidents with total LTI =72 man hours</p> <p>For West POM, records available as per records of JKPP 8 Submission Ref. # JKPP 8/47465/2019; Date: 13/1/2020 for KKS West Sime Darby Plantation Berhad total 0 LTA.</p> | Complied |
| <p>Principle 7: Protect, conserve and enhance ecosystem and the environment.</p> | | | |
| <p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p> | | | |
| 7.1.1 | (C) IPM plans are implemented and monitored to ensure effective pest control. | Implementation of IPM is guided by the ARM, Section 15, Plant Protection. Major pest at the visited estate is mainly rats. IPM implemented to suppress the rat population is by rearing barn owl (<i>tyto alba</i>). The barn owl's population status is monitored through census done annually. Rat baiting is done by using first generation bait, warfarin. There has been no outbreak of leaf eating pest at the visited estates. Nonetheless, it was noted that beneficial plant such as antigonon leptopus and turnera subulata were planted along some of the field roads to host the predators. | Complied |
| 7.1.2 | Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. | Based on field visit, there was no species referenced in the Global Invasive Species Database and CABI.org was used by the management. | Complied |
| 7.1.3 | There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. | The use of fire for pest control is not practised by the certification unit. | Complied |
| <p>Criteria 7.2:</p> | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | | | |
|---|--|---|----------|
| 7.2.1 | (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. | The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. | Complied |
| 7.2.2 | (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. | West Estate continues to maintain the records that show the types of pesticides used with active ingredients, LD50 information, the location of these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available for verification. All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II, class III and class IV pesticides. | Complied |
| 7.2.3 | (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. | The estate has implemented a Continuous Improvement Plan which intention is to reduce the usage of chemical through implementation of Integrated Pest Management Plan. It was observed in the field that the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic places. | Complied |
| 7.2.4 | There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. | The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. There was no prophylactic use of pesticides observed. | Complied |
| 7.2.5 | Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when | Based on the chemical register 16/12/2019, the pesticides use are mostly of Class III and IV. Paraquat and monocrotophos were no longer in use. Much safer chemical such as glyphosate and acephate were used as alternative. | Complied |

| | | | |
|-------|---|---|----------|
| | <p>authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. | | |
| 7.2.6 | <p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> | <p>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees including the store keeper. This is also in-line with the recommendation by the CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained for verification.</p> | Complied |
| 7.2.7 | <p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> | <p>Storage of all pesticides was made in confined area with installed exhaust fan. Base on Chemical Health Risk Reassessment at West Estate Sime Darby Plantation, Selangor; Prepared by NIOSH Malaysia; Report # 03-04/02/CHRA/2015/3 dated 27/1/2016 for the assessment conducted on 13/7/2015. Assessor name: Daud Adam; Assessor Reg. # JKPP HIE 127/171-2(353). Chapter 8. Recommendations; 8.2 Local Exhaust Ventilation System (LEV) or Engineering Control Equipment;</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--------|--|--|----------|
| | | <p>Storekeeper. Specific recommendation made by assessor to conduct monitoring as following:</p> <ul style="list-style-type: none"> - To inspect and test GEV system - Inspection by in-house technician (monthly) <p>Monitoring records available been conducted accordingly.</p> | |
| 7.2.8 | All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes. | All pesticide containers are triple rinsed and punctured before being collected by authorized vendors Department of Agricultural i.e. SS Setia Teknologi Enterprise as per sample records of latest disposal on 1/2/2020; Collection chit # 1601. | Complied |
| 7.2.9 | (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. | The estates do not conduct aerial spraying. | Complied |
| 7.2.10 | (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. | <p>West Estate:</p> <ul style="list-style-type: none"> - Based on the recommendation by Chemical Health Risk Assessor as per report of Chemical Health Risk Reassessment at West Estate Sime Darby Plantation, Selangor; Prepared by NIOSH Malaysia; Report # 03-04/02/CHRA/2015/3 dated 27/1/2016 for the assessment conducted on 13/7/2015. Assessor name: Daud Adam; Assessor Reg. # JKPP HIE 127/171-2(353). - Previous as per records of Summary Report for Medical Surveillance; USECHH 4; Conducted by Klinik Hartati; Datin Dr. Hartati Suhaimi; OHD (NIOSH) MPM # 30926; JKPP # HQ/08/DOC/00/709. - Latest arrangement for this year was sent on 28/2/2020 – 7/3/2020 total 76 workers. Employee Medical Record Book USECHH 2. Sample Test Result Report; Client Patient ID: 19046321. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|---|--|----------|
| | | <p>West POM:</p> <ul style="list-style-type: none"> - Based on the recommendation by Chemical Health Risk Assessor as per report of Chemical Health Risk Assessment (CHRA) Report; Sime Darby Plantations Sdn. Bhd. KKS West, Carey Island, Selangor (SLK 1710); Prepared by The Teong Beng; DOSJH Registration Reference # JKPP HIE 127/171-2(166); Assessment date: 14/5/2015; Report date: 29/7/2015 - Latest medical surveillance report dated 15/2/2020 for medical surveillance conducted on 16-24/1/2020 as per records of Summary Report for Medical Surveillance; USECHH 4; Conducted by Klinik Hartati; Datin Dr. Hartati Suhaimi; OHD (NIOSH) MPM # 30926; JKPP # HQ/08/DOC/00/709. Sampled results for Manganese Level Baseline Screening & Urine Manganese show 10 workers from maintenance examined, 9 normal, 1 abnormal to repeat test immediately, sent for repeat test on 6/3/2020; Result dated 15/3/2020 – Normal & Fit - Renewal of CHRA planned to be conducted end June 2020 as per Non-Essential Items Purchase Approval and Quotation received from GATConst Sdn. Bhd.; Ref. # CHRA/B/POM/1/20; Date: 9/6/2020; Chemical Health Risk Assessor: Haji Shaari Chin; DOSH Reg. # JKPP HIE 127/171-2(124) | |
| 7.2.11 | (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. | West estate prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on January 2015. The estate has prohibited the confirmed pregnant or breast-feeding women to work with chemicals through memo signed by the Estate Manager dated 1/7/2016. | Complied |
| <p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p> | | | |
| 7.3.1 | A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and | Wastes management plan is developed through the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|---|---|--|----------|
| | hazardous characteristics, is documented and implemented. | wastes were disposed through the municipal council and recyclable wastes were sent to recycle centres. | |
| 7.3.2 | Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. | <p>Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean condition. Wastes were properly disposed as mentioned in Indicator 7.3.1.</p> <p>Competent person for SW handling is the Mill Manager (ref.: #CePSWaM/01415, since 7/2/2017)</p> <p>SW disposed through licensed contractors which were verifiable through eSwis. Examples of Consignment notes verified:</p> <p>#20200617178XZULF – SW305-dated 17/6/2020</p> <p>#2020061717Y72AL1 – SW410-dated 17/6/2020</p> <p>#2020061717VEROCQ – SW322 (chemical wastes from lab)-dated 17/6/2020</p> <p>#2020061717XIVRSF – SW409-dated 17/6/2020</p> <p>Nonetheless and OFI has been raised on the awareness with regards to wastes disposal amongst the workers can be improved as some empty motor oil containers found in the field and less utilization of recycle waste containers.</p> | OFI |
| 7.3.3 | The unit of certification does not use open fire for waste disposal. | There was no wastes disposal by using open fire observed during the site visits. | Complied |
| <p>Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p> | | | |
| 7.4.1 | Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. | ARM Section 8 covers the procedure for fertiliser application for both immature and mature. The procedure gives the guideline type of fertilisers to be used, timing to apply, dosage and placement. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|--|---|----------|
| 7.4.2 | Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health. | Periodic foliar sampling analysis was last conducted in April 2019 and soil sampling analysis in September 2018 to monitor the changes in nutrient status was available. The results of the analysis were used by the agronomist for their recommendation for fertilisers applications programme (ref.: West Estate 2020 Agronomic & Fertiliser Recommendations Report – Oil Palm, dated 14/10/2019, by Chief Agronomist). Latest Soil Analysis Test Report #S62/2018 by Chief Chemist II dated 12/9/2018. | Complied |
| 7.4.3 | A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. | EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from West POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha. | Complied |
| 7.4.4 | Records of fertiliser inputs are maintained. | Fertilisers input is recorded in store issue notes and manuring record book, which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number. | Complied |
| Criteria 7.5: | | | |
| Practices minimise and control erosion and degradation of soils. | | | |
| 7.5.1 | (C) Maps identifying marginal and fragile soils, including steep terrain, are available. | There is no marginal or fragile soils at the estate. Based on soil map prepared by the R&D-Plantation Research and Advisory Dept., Precision Agriculture Unit, dated April 2015. The soil series are as follows: <ul style="list-style-type: none"> - Carey (31.61%) - Jawa (20.86%) - Jugra (27.09%) - Linau (1.75%) - Nagor (1.94%) - Sedu (1.87%) - Selangor (9.23%) - Tualang (5.65%) | Complied |
| 7.5.2 | No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of | There is no steep terrain at West Estate. The terrain is generally flat. | Complied |

| | | | |
|--|--|---|----------|
| | replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. | | |
| 7.5.3 | There is no new planting of oil palm on steep terrain. | There is no steep terrain at West Estate. The terrain is generally flat. | Complied |
| Criteria 7.6: | | | |
| Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations. | | | |
| 7.6.1 | (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. | There is no peat soil or soil categorized as marginal or fragile soil at West Estate. No new planting established as well. | Complied |
| 7.6.2 | Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. | There is no peat soil or soil categorized as marginal or fragile soil at West Estate. No new planting established as well. | Complied |
| 7.6.3 | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. | Soil surveys are done and available in a soil map at both estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. | Complied |
| Criteria 7.7 | | | |
| No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. | | | |
| 7.7.1 | (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. | There is no peat soil or soil categorized as marginal or fragile soil at West Estate. | Complied |
| 7.7.2 | Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. | There is no peat soil or soil categorized as marginal or fragile soil at West Estate. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|--|---|----------|
| PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance. | | | |
| 7.7.3 | (C) Subsidence of peat is monitored, documented and minimised. | There is no peat soil or soil categorized as marginal or fragile soil at West Estate. | Complied |
| 7.7.4 | (C) A documented water and ground cover management programme is in place. | The water and ground cover management programme is documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peatlands) issued on 01.07.2011. | Complied |
| 7.7.5 | <p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> | There is no peat soil or soil categorized as marginal or fragile soil at West Estate. | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|--|--|----------|
| 7.7.6 | (C) All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance. | There is no peat soil or soil categorized as marginal or fragile soil at West Estate. | Complied |
| 7.7.7 | (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance. | There is no peat soil or soil categorized as marginal or fragile soil at West Estate. | Complied |
| Criteria 7.8 Practices maintain the quality and availability of surface and groundwater. | | | |
| 7.8.1 | A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. | Water management plan is in place and implemented as per sighted records of Water Management Action Plan West Estate FY 2020: - Line site water usage - Water leakage - Workshop – rain water harvesting Identification and management of wastewaters: - Chemical mixing area - Sprayer PPE washing area - Workshop - Line site & office | Complied |

| | | - Washrooms | | | | | | | | | | | | | |
|-----------------|--|--|-------------|-------------|-------------|-----------|-----------------|-----------|-----------------|-----------|----------------|-----------|------------|----------|----------|
| | b) Workers have adequate access to clean water. | Workers have adequate access to clean water which were supplied through public domain. | | | | | | | | | | | | | |
| 7.8.2 | (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). | <p>Water courses and wetlands are protected as per documented Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/ rivers, version 1, year 2008, issue no. 1, dated 1/11/2008.</p> <p>Rainfall was monitored as per sample for West Estate for period of Jan – Dec 2019 rainfall: 2,452 ml for 135 days.</p> | River width | Buffer zone | > 40 meters | 50 meters | 20 to 40 meters | 40 meters | 10 to 20 meters | 20 meters | 5 to 10 meters | 10 meters | < 5 meters | 5 meters | Complied |
| River width | Buffer zone | | | | | | | | | | | | | | |
| > 40 meters | 50 meters | | | | | | | | | | | | | | |
| 20 to 40 meters | 40 meters | | | | | | | | | | | | | | |
| 10 to 20 meters | 20 meters | | | | | | | | | | | | | | |
| 5 to 10 meters | 10 meters | | | | | | | | | | | | | | |
| < 5 meters | 5 meters | | | | | | | | | | | | | | |
| 7.8.3 | Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. | Mill effluent is treated to be in compliance with national regulations and monitored adequately as per following samples: | Complied | | | | | | | | | | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|---|---|----------|
| | | <ul style="list-style-type: none"> - Water Analysis Test Report # IE22/2020; Date sampled: 19/12/2019; Date tested: 24/12/2019; Date issued: 7/1/2020; Water sample before (BOD = 50 mg/l) and after (BOD = 48 mg/l) monsoon drain by Sime Darby Research Sdn. Bhd. Lab Services Laboratories R&D Centre – Carey Island; - Effluent Analysis Test Report # EP14/2020; Date sampled: 19/12/2019; Date tested: 20/12/2019; Date issued: 9/1/2020; Anaerobic Pond 2 (Final Discharge) BOD = 520 mg/l - Quarterly return form 3rd Quarter 2019 dated 14/10/2019; File ref. # 31/152/000/067 - Quarterly return form 4th Quarter 2019 dated 15/1/2019; File ref. # 31/152/000/067s - Rainfall (effluent compound): 1,427.15mm; 119 days <p>Competent person for ETP is the Mill Manager as per certificate # CePPOME/00036 since 19/7/2016.</p> | |
| 7.8.4 | Mill water use per tonne of FFB is monitored and recorded. | <p>Mill water use per tonne of FFB is monitored and recorded as following:</p> <ul style="list-style-type: none"> - Jan – Dec 2019: Water used = 320,886 mt - FFB processed: 118,065.76 mt FFB - Mill water used/tonne FFB: 2.72 - Electricity used: 1,128,033 kWh ~ 9.55 kWh/Mt FFB processed\ | Complied |
| <p>Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p> | | | |
| 7.9.1 | A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is implemented, monitored and documented. | <p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler.</p> <p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through</p> | Complied |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|--|--|----------|
| | | <p>steam turbine and coiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively. Average of 36.34 kWh/CPO recorded from January to December 2019.</p> <p>Power generation facilities including electrical installation been monitored by competence person as per records of Visiting Electrical Engineer: Ir. Kannan (Kawalan Teknikal Sdn. Bhd.); Date: 4/1/2020; Penjaga Jentera; No. Perakuan: PJ-T-1-B0153-2002; Serial # 00648; Rahim Bin Misro; Category: A0; Date: 12/7/2002; Limitation: Low Voltage System (Tanpa Talian Aerial dan Stesen Janakuasa).</p> | |
| <p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p> | | | |
| 7.10.1 | <p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> | <p>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>Bio gas is now under construction as part of the plan to reduce GHG emission. The project owner is Engineering Department, Sime Darby Plantation Berhad.</p> <ul style="list-style-type: none"> - The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4. Nonetheless, it was found that based on SAP system at West Estate the diesel consumption for 2019 189,735 lt. However, the data reported in Palm GHG calculator was 112,715 lt. Thus, a non-conformity was assigned due to this lapse. | Major NC |
| 7.10.2 | <p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize</p> | <p>Not applicable since no new development by the certification unit.</p> | N/A |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|--|--|---|----------|
| | them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). | | |
| 7.10.3 | (C) Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored. | Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate. | Complied |
| Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area. | | | |
| 7.11.1 | (C) Land for new planting or replanting is not prepared by burning. | Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting field no. 2019A, there was no trace of burning observed. Palm trunks were chipped and windrowed. | Complied |
| 7.11.2 | The unit of certification establishes fire prevention and control measures for the areas under its direct management. | SDPB monitors any fire incident within its directly managed certification unit through hotspot application and report can be seen in http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/ . West Estate has its emergency response team should any fire incident occurs. In term of any fire incident, SDPB has established its emergency response plan. The estate has its own emergency response team that responsible to handle the situation. Contact numbers of authorities such as fire department, ambulance and police were also in place. Training on fire fighting in the field was conducted in 13/12/2019, attended by 6 person identified in the ERT – pictorial report was available. | Complied |
| 7.11.3 | The unit of certification engages with adjacent stakeholders on fire prevention and control measures. | Engagement of adjacent stakeholders on fire prevention and control measures was done through stakeholder meeting conducted on 5/2/2020. Attendance list and slides presentation of fire prevention were available for verification. Kg Orang Asli (KOA) Kurau, KOA Kepau Laut, East Estate, SMK Pulau Carrey, KOA Sg Judah and Yayasan Selangor Estate were among the adjacent stakeholders attended. | Complied |
| Criteria 7.12: | | | |

| Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced. | | | | | | | | | |
|--|--|---|----------|----|--------------|--|--|--|----------|
| 7.12.1 | <p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protector enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> | <p>There is a 15 Ha area within the certified area which previously planted with oil palm in the 90's. In 2011, the OP was felled in order to construct housing complex but abandoned ever since. Based on the SEIA report conducted by PSQM Department in May 2018, some part of the area was used by estate workers to plant cash crops and breed livestock, while the remaining area was covered with shrubs and Termanilia catappa. No RTE species of flora & fauna were sighted or reported by the estate management within the project site and surrounding. The necessary mitigation measures on environmental impacts</p> | Complied | | | | | | |
| 7.12.2 | <p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> | <p>The HCV re-assessment was compiled by PSQM team on May 2016 for West Estate SOU 9. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <p>a) Overview of HCV assessment b) Description of assessment area - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values c) HCV criteria & application to agriculture - Visual observation & supporting information - Wildlife in plantation - decision on HCV status d) HCV management / Monitoring.</p> <p>The report is given in details to provide the existence of HCV, complete with photo and description. The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the West Estate within SOU 9 are given below:</p> <table border="1" data-bbox="958 1332 1742 1380"> <thead> <tr> <th>Area</th> <th>Ha</th> <th>HCV presence</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | Area | Ha | HCV presence | | | | Complied |
| Area | Ha | HCV presence | | | | | | | |
| | | | | | | | | | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | | | | | | | | | | | | | | | |
|---|--|--|---------------|------|-------|---------------|--------|-------|------------------|------|-------|------------------|-------|-------|----------------|------|-------|--|
| | | <table border="1"> <tr> <td>Natural ponds</td> <td>4.79</td> <td>HCV 4</td> </tr> <tr> <td>Agro forestry</td> <td>102.11</td> <td>HCV 4</td> </tr> <tr> <td>Asboretum (herb)</td> <td>9.14</td> <td>HCV 4</td> </tr> <tr> <td>Fringe mangroves</td> <td>39.84</td> <td>HCV 4</td> </tr> <tr> <td>Hatters castle</td> <td>1.12</td> <td>HCV 6</td> </tr> </table> <p>All the HCVs were maintained by SDP special projects whilst the mangrove areas are under the jurisdiction of the state government. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. Map verification and site visit confirmed that West Estate is surrounded by river/straits and villages. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p> | Natural ponds | 4.79 | HCV 4 | Agro forestry | 102.11 | HCV 4 | Asboretum (herb) | 9.14 | HCV 4 | Fringe mangroves | 39.84 | HCV 4 | Hatters castle | 1.12 | HCV 6 | |
| Natural ponds | 4.79 | HCV 4 | | | | | | | | | | | | | | | | |
| Agro forestry | 102.11 | HCV 4 | | | | | | | | | | | | | | | | |
| Asboretum (herb) | 9.14 | HCV 4 | | | | | | | | | | | | | | | | |
| Fringe mangroves | 39.84 | HCV 4 | | | | | | | | | | | | | | | | |
| Hatters castle | 1.12 | HCV 6 | | | | | | | | | | | | | | | | |
| <p>PROCEDURAL NOTE for 7.12.2: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> | | | | | | | | | | | | | | | | | | |
| 7.12.3 | <i>Indicator is not applicable in Malaysia context.</i> | Not applicable | N/A | | | | | | | | | | | | | | | |
| 7.12.4 | (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with | Not applicable since there is no land clearing after November 2005. | N/A | | | | | | | | | | | | | | | |

| | | | |
|--------|---|--|-----|
| | relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). | | |
| 7.12.5 | Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. | Not applicable since there is no land clearing after November 2005. | N/A |
| 7.12.6 | All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. | Education programme is mainly carried out through display of various signage at strategic places such as estate entrance and administration office. The information available in the signage is among others the RTE species in Malaysia and the penalty enforced should offence is committed. | N/A |
| 7.12.7 | The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. | Not applicable since there is no land clearing after November 2005. | N/A |
| 7.12.8 | (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. | Not applicable since there is no land clearing after November 2005. | N/A |

Appendix B: Approved Time Bound Plan

Details of Time Bound Plan as submitted by Sime Darby Plantation Berhad (30th June 2019)

Table 1: Initial Timebound Plan and Summary of RSPO Certification Status

| Financial year (July – June) | Targeted | Achieved/Status | Attachments |
|------------------------------|--|---|---|
| Jun-08 | 5 SOUs | <p>Achievement of Timebound Plan Sime Darby Plantation has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets).</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. A new mill in Liberia is planned to be commissioned.</p> <p>Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015</p> | <p>For details please refer to Attachments:</p> <p>i) SDP - RSPO Certification Status for Malaysia Operations</p> <p>ii) SDP- RSPO Certification Status for Indonesia Operations</p> <p>iii) Updates on PT MAS</p> <p>iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)</p> |
| 2008/2009 | 20 SOUs (from Malaysia and Indonesia) | | |
| 2009/2010 | 20 SOUs (from Malaysia and Indonesia) | | |
| 2010/2011 (End Dec 2011) | 17 SOUs (from Malaysia and Indonesia) | | |

Note: SOU - Strategic Operating Units (consisting of one oil mill and supplying estates)

Table 2: Details of RSPO Certification Status as at June 2019

| Status | Malaysia | Indonesia | Liberia | Total | Remarks |
|--|----------|-----------|---------|-------|---|
| RSPO Certified | 33 | 23 | 0 | 56 | <p>Malaysia * Effectively 33 Mills (Excluding Bintang Oil Mill) - Note: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down, and Pekaka POM is being mothballed.</p> <p>*SDP acquired Bintang Palm Oil Mill, Talisman Estate, and Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, while Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut. Lian Seng will be incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018, whilst Talisman Estate has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2017. For Bintang Oil Mill, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold as at Dec 2017.</p> <p>Indonesia *Effectively 23 Mills *Note: <i>Angsana Mini POM closed down in 2016. Selabak POM is being mothballed.</i></p> |
| Planned for Certification / Undergoing Stage 1 or Stage 2 Assessment/ RSPO EB Review | 0 | 1 | 1 | 2 | <p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia PT MAS has undergone RSPO Main assessment and is delayed due to some social disputes. The target date for certification is by 2017 subject to the progress of the matter being resolved.</p> |

| | | | | | |
|-------------------|----|----|---|----|--|
| | | | | | <p>Smallholders</p> <p>As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebanban, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613.</p> <p>Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2020.</p> <p>—</p> <p>Liberia</p> <p>Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification Stage 2 Assessment in March/April 2018. RSPO NPP process has been completed in 2011.</p> |
| Total SOUs | 33 | 24 | 1 | 58 | <p>Other remarks:</p> <p>In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p> |

SDP - RSPO Certification Status for Malaysia Operations

| SOU NO | Name of SOU | Location | Date of Certification | End Date of Certification | Certificate Number | Remarks |
|--------|-----------------|-------------------------------|-----------------------|---------------------------|--|---|
| 1 | Sg. Dingin | Karangan, Kedah | 12 Aug '11 | 11-Aug-20 | SPO 550179 | |
| 2 | Chersonese | Kuala Kurau, Perak | 5 Oct '11 | 4-Oct-21 | CU-RSPO-815148, RSPO 590800 | |
| 3 | Elphil | Sg Siput, Perak | 18 Jun '11 | 17-Jun-21 | RSPO 550180 | |
| 4 | Flemington | Teluk Intan, Perak | 5 Oct '11 | 4-Oct-21 | CU-RSPO-819144, RSPO 590802 | |
| 5 | Seri Intan | Teluk Intan, Perak | 3 Mar '11 | 2-Mar-21 | CU-RSPO-811218, RSPO 0015 | |
| 5 | Selaba | Teluk Intan, Perak | 3 Mar '11 | 2-Mar-21 | CU-RSPO-819142, RSPO 0016 | |
| 5a | Sg Samak | | 3 Mar '11 | NA | NA | |
| 6 | Tennamaram | Bestari Jaya, Selangor | 3 Mar '11 | 2-Mar-21 | CU-RSPO-819143, RSPO 0014 | |
| 7 | Bkt Kerayong | Kapar, Selangor | 15 Apr '11 | 14-Apr-21 | RSPO 550181 | |
| 8 | East | Carey Island, Selangor | 19 May '10 | 18-May-20 | SPO 543543 | |
| 9 | West | Carey Island, Selangor | 19 May '10 | 18-May-20 | SPO 543594 | |
| 9a | Sepang | Sepang, Selangor | 19 May '10 | NA | NA | |
| 10 | Bukit Puteri | Raub, Pahang | 7 Jul '11 | 6-Jul-21 | CU-RSPO-815147, 18502206 001, 824 502 14020 | |
| 11 | Kerdau | Temerloh, Pahang | 7 Jul '11 | 6-Jul-21 | CU-RSPO-819155, 18502207 001, 824 502 14019 | |
| 12 | Jabor | Kuantan, Pahang | 7 Jul '11 | 6-Jul-21 | CU-RSPO-819156, RSPO 928288, 824 502 16049 | |
| 13 | Labu | Nilai, Negeri Sembilan | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819163, SGSRSP/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480 | |
| 14 | Tanah Merah | Port Dickson, Negeri Sembilan | 19 May '10 | 18-May-20 | SPO 541905 | |
| 15 | Sua Betong | Port Dickson, Negeri Sembilan | 18/2/2014 | 17-Feb-24 | SGS-RSOPM-MY14/01364, 824 502 16032 | Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011. |
| 16 | Kok Foh | Bahau, Negeri Sembilan | 7 Jul '11 | 6-Jul-21 | CU-RSPO-819157, RSPO 928188, 824 502 16051 | |
| 17 | Kempas | Jasin, Melaka | 20 May '15 | 19-May-20 | RSPO-PC 00101 | |
| 18 | Diamond Jubilee | Jasin, Melaka | 5 Oct '11 | 4-Oct-21 | CU-RSPO-819146, RSPO 591224 | |

| | | | | | | |
|-----|--------------|----------------------|------------|-----------|---|--|
| 19 | Pagoh | Muar, Johor | 28/1/2014 | 27-Jan-24 | RSPO 600305 | Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011. |
| 19a | Yong Peng | Yong Peng, Johor | 20 Oct '10 | 19-Oct-15 | NA | |
| 20 | Chaah | Chaah, Johor | 18 Nov '10 | 17-Nov-20 | RSPO 548299 | |
| 21 | Gunung Mas | Kluang, Johor | 19 May '10 | 18-May-20 | RSPO 901888 | |
| 22 | Bukit Benut | Kluang, Johor | 5 Oct '11 | 4-Oct-21 | CU-RSPO-819147, RSPO 591229 | |
| 23 | Ulu Remis | Layang-layang, Johor | 11 Apr '11 | 10-Apr-21 | SGS-RSPO/PM-00722, 824 502 16042 | |
| 24 | Hadapan | Layang-layang, Johor | 29 Mar '11 | 28-Mar-21 | SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01 | |
| 25 | Segaliud | Sandakan, Sabah | 20 May '10 | 19-May-15 | NA | |
| 26 | Sandakan Bay | Sandakan, Sabah | 1 Oct '08 | 30-Sep-23 | RSPO 537872 | |
| 27 | Melalap | Tenom, Sabah | 21 Jan '11 | 20-Jan-21 | RSPO 547124 | |
| 28 | Binuang | Kunak, Sabah | 16 Jan '09 | 12-Jul-20 | RSPO 001 | |
| 29 | Giram | Kunak Sabah | 16 Jan '09 | 12-Jul-20 | RSPO 002 | |
| 30 | Merotai | Tawau, Sabah | 16 Jan '09 | 12-Jul-20 | RSPO 004 | |
| 30a | Jeleta Bumi | Kunak, Sabah | 24/5/2010 | NA | NA | |
| 30b | Mostyn | Kunak Sabah | 16 Jan '09 | NA | NA | |
| 31 | Lavang | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819166, MUTU-RSPO/053 | |
| 32 | Rajawali | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819167, RSPO 0020 | |
| 33 | Derawan | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-819169, RSPO 0019 | |
| 34 | Pekaka | Bintulu, Sarawak | 30 Dec '11 | 29-Dec-21 | CU-RSPO-815150, MUTU-RSPO/054 | Mill is mothballed, supply base merged into Lavang effective Dec 2017. |

Legends:

Certification
Withdrawal

SDP- RSPO Certification Status for Indonesia Operations

| NO | Name of PT | Name of Mill | Location | Date of Certification | End Date of Certification | Certificate Number | Remarks |
|----|---------------------|--------------|---|-----------------------|---------------------------|---|------------------|
| 1 | PT LAHAN TANI SAKTI | ALUR DUMAI | Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau | 16-Jan-12 | 15-Jan-22 | MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005 | |
| 2 | PT SAJANG HEULANG | ANGSANA MINI | Sebamban, Indonesia | 6-Jul-11 | 6-Jul-16 | MUTU-RSPO/006b | Mill closed down |
| 3 | PT SAJANG HEULANG | MUSTIKA | Sebamban, Indonesia | 3-Jul-13 | 2-Jul-23 | MUTU-RSPO/027 | |

| | | | | | | | |
|----|------------------------------|----------------|--|------------|-----------|----------------|---|
| 4 | PT LADANGRUMPUN SUBURUBADI | ANGSANA | Sebamban, Indonesia | 9-Nov-16 | 8-Nov-21 | MUTU-RSPO/006a | |
| 5 | PT LANGGENG MUARAMAKMUR | BEBUNGA | Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur | 16-Mar-12 | 3-Aug-22 | MUTU-RSPO/014 | Recertification of Bebunga POM is in progress. |
| 6 | PT KRIDATAMA LANCAR | SUKAMANDANG | Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah | 2-Sep-16 | 1-Sep-21 | MUTU-RSPO/003 | |
| 7 | PT BAHARI GEMBIRARIA | LADANG PANJANG | Kumpeh Ulu, Jambi, Muaro Jambi, Jambi | 9-Jul-12 | 28-Nov-22 | MUTU-RSPO/019 | |
| 8 | PT TUNGGAL MITRA PLANTATIONS | MANGGALA | Riau, Indonesia | 25-Nov-10 | 24-Nov-20 | MUTU-RSPO/002 | |
| 9 | PT PARIPURNA SWAKARSA | PONDOK LABU | Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan | 16-Mar-12 | 19-Jul-22 | MUTU-RSPO/016 | Recertification of Pondok Labu POM is in progress. |
| 10 | PT BERSAMA SEJAHTERA SAKTI | GUNUNG ARU | Sebamban, Indonesia | 21-Oct-16 | 20-Oct-21 | MUTU-RSPO/005 | |
| 11 | PT GUTHRIE PECCONINA | RANTAU PANJANG | Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan | 16-Mar-12 | 19-Nov-22 | MUTU-RSPO/017 | Recertification of Rantau Panjang POM is in progress. |
| 12 | PT LAGUNA MANDIRI | RANTAU | Sungai Durian, Kotabaru, Kalimantan Selatan | 30-Dec-11 | 05-Feb-22 | MUTU-RSPO/009 | |
| 13 | | BETUNG | | 1-April-14 | 31-Mar-24 | MUTU-RSPO/035 | |
| 14 | PT INDOTRUBA TENGAH | SEKUNYIR | Kalimantan Tengah, Indonesia | 23-Nov-10 | 22-Nov-20 | MUTU-RSPO/001 | |
| 15 | PT SWADAYA ANDIKA | SELABAK | Sungai Durian, Kotabaru, Kalimantan Selatan | 16-Mar-12 | 16-Mar-17 | MUTU-RSPO/015 | Mill is mothballed. |
| 16 | PT BINA SAINS CEMERLANG | SG PINANG | Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan | 11-Sep-12 | 28-Nov-22 | MUTU-RSPO/020 | |
| 17 | PT TEGUH SEMPURNA | PEMANTANG | Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah | 9-Sep-16 | 8-Sep-21 | MUTU-RSPO/004 | |
| 18 | PT BHUMIREKSA NUSA SEJATI | TELUK BAKAU | Pelangiran, Sg. Guntung, Indragiri Ilir, Riau | 01-Dec-16 | 30-Nov-21 | MUTU-RSPO/008 | |
| 19 | | MANDAH | | 1-April-14 | 31-Mar-24 | MUTU-RSPO/036 | |
| 20 | PT ANEKA INTIPERSADA | TELUK SIAK | Tualang, Perawang, Siak, Riau | 8-Dec-16 | 7-Dec-21 | MUTU-RSPO/007 | |
| 21 | PT TAMACO GRAHA KRIDA | UNGKAYA | Witaponda, Kolonodale, Morowali, Sulawesi Tengah | 10-Jul-12 | 28-Dec-22 | MUTU-RSPO/018 | |

| | | | | | | | |
|----|---|-------------|---|-----------|-----------|---------------|--|
| 22 | PT SIME INDO AGRO | BK AJONG | Kalimantan Barat, Indonesia | 18-Jul-16 | 17-Jul-21 | MUTU-RSPO/088 | |
| 23 | PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI | BLANG SIMPO | Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam | 3-May-13 | 2-May-23 | MUTU-RSPO/026 | |
| 24 | PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI | LEMBIRU | Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat | 3-Jul-14 | 2-Jul-24 | MUTU-RSPO/044 | |
| 25 | PT MITRAL AUSTRAL SEJAHTERA | MAS Mill | Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat | NA | NA | NA | |

Legends

| | | |
|-------------------------------|-----------------------------|---------------------|
| Pending Certification by RSPO | Mill closed down/Mothballed | NA - NOT APPLICABLE |
|-------------------------------|-----------------------------|---------------------|

SDP - RSPO Certification for Time Bound Plan - NBPOL Operations

As at end June 2019

| No | Management Unit | Supply Base | Time Bound Plan | Location | Status | Certified Date |
|----------------------------|---|----------------------------|-----------------|--|-----------|----------------|
| | SOU Name | | | | | |
| 1 | Guadalcanal Plains Palm Oil Limited (GPPOL) | Tetere Oil Mill | NA | Guadalcanal Province, Solomon Islands | Certified | 18-Mar-11 |
| | | Tetere Estate | | | | |
| | | Ngalimbiu Estate | | | | |
| | | Mbalisuna Estate | | | | |
| | | Outgrowers – West Zone | | | | |
| | | Outgrowers – Central Zone | | | | |
| | | Outgrowers – MBA East Zone | | | | |
| Outgrowers – MBE East Zone | | | | | | |
| 2 | Milne Bay Estates (MBE) | Hagita Oil Mill | NA | Milne Bay Province, Papua New Guinea | Certified | 15-Feb-18 |
| | | Giligili Estate | | | | |
| | | Waigani Estate | | | | |
| | | Sagarai Estate | | | | |
| | | Padipadi Estate | | | | |
| | | Mariawatte Estate | | | | |
| | | East Gurney Estate | | | | |
| | | West Gurney Estate | | | | |
| | | East Sagarai Estate | | | | |
| | | West Sagarai Estate | | | | |
| 3 | Poliamba (POL) | Poliamba Oil Mill | NA | New Ireland Province, Papua New Guinea | Certified | 19-Mar-12 |
| | | Kara Estate | | | | |
| | | Nalik Estate | | | | |
| | | West Coast Estate | | | | |
| | | Noatsi Estate | | | | |
| | | Madak Estate | | | | |
| | | North Smallholders (613) | | | | |
| | | South Smallholders (863) | | | | |
| West Smallholders (309) | | | | | | |

| | | | | | | |
|---------------|---|---|--------|---|-----------|---|
| 4 | Ramu Agricultural Industries Ltd (RAIL) | Gusap Mill | NA | Morobe Province, Papua New Guinea | Certified | 5-Aug-10 |
| | | Gusap East (Gusap) Estate | | | | |
| | | Gusap West (Paddock) Estate | | | | |
| | | Surinam Estate | | | | |
| | | Dumpu Estate | | | | |
| | | J Estate (Jephcott) Estate | | | | |
| 5 | Higaturu Oil Palm (HOP) | Sangara Oil Mill | NA | Oro Bay Province, Papua New Guinea | Certified | 1-Feb-13 |
| | | Mamba Oil Mill | | | | |
| | | Embi Estate | | | | |
| | | Ambogo Estate | | | | |
| | | Sangara Estate | | | | |
| | | Sumbiripa Estate | | | | |
| | | Mamba Estate | | | | |
| | | Mosa Oil Mill | | | | |
| | | Kumbango Oil Mill | | | | |
| | | Kapiura Mill | | | | |
| | | Numundo Mill | | | | |
| | | Waraston Mill | | | | |
| | | Bebere Estate | | | | |
| | | Kumbango Estate | | | | |
| | | Togulo Estate | | | | |
| | | Dami Estate | | | | |
| 6 | West New Britain (WNB) | Waisisi Estate | NA | Kimbe, West New Britain, Papua New Guinea | Certified | 10-Sep-08 |
| | | Kautu Estate | | | | |
| | | Kararusu Estate | | | | |
| | | Moroa Estate | | | | |
| | | Bilomi Estate | | | | |
| | | Loata Estate | | | | |
| | | Haella Estate | | | | |
| | | Garu Estate | | | | |
| | | Daliavu Estate | | | | |
| | | Sapuri Estate | | | | |
| | | Malilimi Estate | | | | |
| | | Rigula Estate | | | | |
| | | Nomundo Estate | | | | |
| | | Navarai / Karato ME /KDC EU Estate | | | | |
| | | Volupai / Lotomgam / Natupi / Goruru Estate | | | | |
| | | Lolokoru Estate | | | | |
| Ove Estate | | | | | | |
| Tamare Estate | | | | | | |
| 7 | Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd. | Munum Estate | Sep-20 | Markham Farms, | RaCP | The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore the Remediation and Compensation Procedure will be required to be fulfilled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration. |
| | | Erap Estate | Sep-20 | | RaCP | |

Legends
Pending Certification
NA - NOT APPLICABLE

SDP - RSPO Certification for Time Bound Plan - Liberia Operations
As at end June 2019

| No | Management Unit SOU Name | Mill and Supply Base | Time Bound Plan | Location | Status | Remarks |
|----|--|--|-----------------|-------------------------|-------------|---|
| 1 | Sime Darby Plantation (Liberia) Grand Cape Mount | Grand Cape Mount Mill Bomi Estate Lofa Estate Matambo Estate Grand Cape Mount Estate | 2019 | Grand Cape Mount County | Uncertified | <p>In May – September 2011, SDPL has undergone a series of assessment including Social and Environmental Impact Assessment and High Conservation Value Assessment in conformance with the RSPO New Planting Procedures to begin planting. *Note: RSPO NPP Announcements can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</p> <p>SDPL has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security & safety issue.</p> <p>After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process.</p> <p>A letter of Request for Extension of RSPO Certification Time Bound Plan for Sime Darby Plantation dated 22 May was sent to RSPO Secretariat, Head of Certification, and with response to Sime Darby Plantation on 23 May 2019 with no objections on the extension. (Letter and email correspondence as attached)</p> |

Legends
Pending Certification
NA - NOT APPLICABLE

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2019 for West Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2019 for West Palm Oil Mill and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.25 |
| PKO | 1.25 |

| Extraction | % |
|------------|-------|
| OER | 21.09 |
| KER | 5.12 |

| Production | t/yr |
|--------------|-------------|
| FFB Process | 134,749.016 |
| CPO Produced | 28,418.57 |
| PKO Produced | 6,899.15 |

| Land Use | Ha |
|-----------------------------|-----------------|
| OP Planted Area | 6,186.46 |
| OP Planted on peat | - |
| Conservation (forested) | - |
| Conservation (non-forested) | 59.79 |
| Total | 6,246.25 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 61,233.22 | 0.52 | - | - | - | - | 61,233.22 | 0.52 |
| CO ₂ Emission from fertilizer | 6,015.64 | 0.05 | - | - | - | - | 6,015.64 | 0.05 |
| NO ₂ Emission | 4,934.16 | 0.04 | - | - | - | - | 4,934.16 | 0.04 |
| Fuel Consumption | 417.42 | 0.00 | - | - | - | - | 417.42 | 0.00 |
| Peat Oxidation | - | - | - | - | - | - | - | - |
| Sink | | | | | | | | |
| Crop Sequestration | - 58,040.96 | - 0.49 | - | - | - | - | 58,040.96 | - 0.49 |
| Conservation Sequestration | - | - | - | - | - | - | - | - |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | | | | | |
|--------------|-----------|------|---|---|---|---|-----------|------|
| Total | 14,559.49 | 0.12 | - | - | - | - | 14,559.49 | 0.12 |
|--------------|-----------|------|---|---|---|---|-----------|------|

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 23,074.12 | 0.20 |
| Fuel Consumption | 109.13 | 0.00 |
| Grid Electricity Utilization | 757.32 | 0.01 |
| Credit | | |
| Export of Grid Electricity | - | - |
| Sales of PKS | - | - |
| Sales of EFB | - | - |
| Total | 23,940.56 | 0.20 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | - |
| PK from other source | - |
| Fuel Consumptions | - |
| Total Crusher emissions | - |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|-----|
| Divert to Compost (%) | - |
| Divert to anaerobic diversion (%) | 100 |

| POME Diverted to Anaerobic Digestion: | |
|--|-----|
| Divert to anaerobic pond (%) | 100 |
| Divert to methane captured (flaring) (%) | - |
| Divert to methane captured (energy generation) (%) | - |

Appendix D: Supply Chain Declaration

| A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|--|---------------------|---|---|-----------------------------|
| No. | Month - Year | Volume of FFB from certified supply bases (mt) | Volume of FFB from uncertified supply bases (mt) | Total FFB/Month (mt) |
| 1 | January 2019 | 13,585.55 | - | 13,585.55 |
| 2 | February 2019 | 15,460.82 | - | 15,460.82 |
| 3 | March 2019 | 15,818.98 | - | 15,818.98 |
| 4 | April 2019 | 16,593.92 | - | 16,593.92 |
| 5 | May 2019 | 15,848.18 | - | 15,848.18 |
| 6 | June 2019 | 14,112.53 | - | 14,112.53 |
| 7 | July 2019 | 18,099.38 | - | 18,099.38 |
| 8 | Aug 2019 | 14,663.44 | - | 14,663.44 |
| 9 | Sept 2019 | 16,906.82 | - | 16,906.82 |
| 10 | Oct 2019 | 13,734.28 | - | 13,734.28 |
| 11 | Nov 2019 | 12,068.12 | - | 12,068.12 |
| 12 | Dec 2019 | 10,516.86 | - | 10,516.86 |
| 13 | Jan 2020 | 1,832.60 | - | 1,832.60 |
| 14 | Feb 2020 | 14,224.23 | - | 14,224.23 |
| | Total | 193,465.71 | | 193,465.71 |

| B. Monthly Records of Certified CPO & PK since the last audit | | | |
|--|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) |
| 1 | January 2019 | 2,951.86 | 682.74 |
| 2 | February 2019 | 3,399.50 | 738.63 |
| 3 | March 2019 | 3,538.41 | 816.16 |
| 4 | April 2019 | 3,573.85 | 800.25 |
| 5 | May 2019 | 3,305.41 | 722.80 |
| 6 | June 2019 | 2,902.68 | 715.06 |
| 7 | July 2019 | 3,663.73 | 855.88 |
| 8 | Aug 2019 | 3,144.69 | 882.27 |
| 9 | Sept 2019 | 3,509.85 | 889.12 |
| 10 | Oct 2019 | 3,098.84 | 738.98 |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | |
|-------|----------|-----------|----------|
| 11 | Nov 2019 | 2,531.55 | 606.34 |
| 12 | Dec 2019 | 2,076.03 | 463.32 |
| 13 | Jan 2020 | 392.44 | 95.98 |
| 14 | Feb 2020 | 2,964.58 | 685.10 |
| Total | | 41,053.42 | 9,692.63 |

| C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) | | | | | |
|--|--------------------|---------------------------------|---|--------------------------------|-------------------------------|
| No. | Month- Year | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (mt) | Certified PK Sold (mt) |
| | Jan 2019 | Sime Darby Oils Langat Refinery | TR-7d1336c7-a7dd, TR-610d5b16-eaef, TR-9363d5fd-a030, TR-319dcc14-022d, TR-3ce98e3d-bfef, TR-0ff05488-78df, TR-17302719-a2a9, TR-db8ea43a-92b9, TR-2f3b4085-b0fc, TR-5b834294-ce35, TR-42249356-0d5c, TR-91eb8e7f-a86b, TR-69afb818-6fef, TR-f64b2a91-5059, TR-2465346a-e9f8, TR-fa07d7b4-d948, TR-2074c31c-e472, TR-88bba04d-48ad, TR-f0d8cc51-62c7, TR-d9f90b8a-ac0a, TR-4afda32b-b8a7, TR-68f20c73-6d00, TR-5b12f8f3-e7d0, TR-31cf2dbc-10e3, TR-e774336f-90e1, TR-110fad2e-2172, TR-8b352cd2-092c, TR-83c14686-071f, TR-509d92fa-309a, TR-e69d8a8c-337e, TR-7917176e-1567, TR-3272ecd8-3cc7, TR-10fcf993-b534, TR-19d25597-a003, TR-b10e7c68-f365, TR-92e6ec7c-232f, TR-f384e612-b728, TR-7babf263-fdc2, TR-55e59366-165a, TR-57dfd4aa-1311, TR-5257947d-a89c, | 2246.8 | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | | |
|--|-----------|-------------------------------------|--|---------|-----|
| | | | TR-86149eda-8a72, TR-63014168-4e4b, TR-25648228-20e4, TR-29d03ab2-4290, TR-791cd17a-c4ac, TR-1948ba59-853f, TR-c8a93ae8-9afe, TR-5396cc12-54cc, TR-cfadb821-691e, TR-6664987e-700e, TR-3ec58659-258b, TR-cf3d9b7e-b6f2, TR-9d66ce5e-2d38, TR-211c0ce7-bfc8, TR-81904bb1-bd86, TR-062ed42a-b342 | | |
| | Jan 2019 | Sime Darby Oils Port Klang Refinery | TR-bca08d6e-986d, TR-5f52a60c-5fe8 | 470 | |
| | Feb 2019 | Sime Darby Oils Port Klang Refinery | TR-c1b7f90a-b303, TR-b78b069a-62cd | 149.15 | |
| | | Sime Darby Oils Carey Island KCP | TR-6d4127f4-a64c | | 600 |
| | Mar 2019 | Sime Darby Oils Port Klang Refinery | TR-545e5539-2ed3 | 208.75 | |
| | May 2019 | Sime Darby Oils Langkat Refinery | TR-834ded00-36b7, TR-7bf6d4fc-b9a8, TR-3ab1e84b-3326, TR-35b92bf0-f191, TR-633a44b9-e20e, TR-ba523c6b-cc35, TR-0f83d001-b042, TR-2067b2e1-651a, TR-693cdf7f-d407, TR-9e3ff84c-974f, TR-648a2085-de90, TR-e94cb83d-afd1, TR-47d576be-1982, TR-cb13c65b-7f72, TR-c83c55a0-01a5, TR-fe02ecc9-20d8, TR-f809f445-713c | 2418.34 | |
| | | Sime Darby Oils Port Klang Refinery | TR-bf5000a1-76e5, TR-fa615e7b-eae7, TR-fcfeae6c-ceb5, TR-e784c185-5c1f, | 769.96 | |
| | May 2019 | Sime Darby Oils Carey Island KCP | TR-ad164099-01f6 | | 700 |
| | June 2019 | Sime Darby Oils Langkat Refinery | TR-d8b9304f-81cd, TR-006b1e2e-1cbe, TR-2258f4bc-50ed, TR-92e1adf2-e914, TR-551ff337-ed08, TR-d2681c68-8aee, | 5763 | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | | |
|--|-----------|---------------------------------|--|---------|--|
| | | | <p>TR-2b6fd295-f1ac, TR-b0f3cafd-70e1, TR-3b1a81a1-db96, TR-47a709ae-c9e9, TR-5208ef35-3452, TR-0e9a3c87-220a, TR-31e66c69-e663, TR-992e885f-e36e, TR-a870872a-268f, TR-c956c342-5cf2, TR-7ebe09c4-17ce, TR-04fc06d8-60f2, TR-2cf55292-570b, TR-6a81dfee-41c0, TR-bb5a5d66-81f8, TR-9f298692-732b</p> | | |
| | July 2019 | Sime Darby Oils Langat Refinery | <p>TR-5e9bb961-0add, TR-4381ed8b-fa03, TR-31cf417c-10f7, TR-4a73d6cf-c8ff, TR-6598ecf9-75f7, TR-3f3585d9-832c, TR-7623f2bc-f0b2, TR-5f64a997-3472, TR-90cf5e49-9203, TR-175f66b7-dc69, TR-0eda48a5-7e71, TR-4923f67a-6ec9, TR-727a5727-ec37, TR-973d20ad-73db, TR-af2b49f6-2952, TR-07b5b5ca-c365, TR-70a382b6-ff1f, TR-27ba2e73-fa6a, TR-cd34dfab-02c2, TR-071d5567-aebe, TR-8455dcc3-a2ed, TR-c30ca14d-ed58, TR-3bb397a1-bed6, TR-9a00e65a-c9f5, TR-68de846f-61c8, TR-5287ea9b-763c, TR-10c061c0-5854, TR-28396b5d-4a73, TR-132af7c3-11ee, TR-08ef4b9e-4b92, TR-6a7b14a2-e01a, TR-0797faa8-1855, TR-bbdf1c37-65e2, TR-74564667-8b17, TR-8e2cf488-3930, TR-403456ea-e9b9, TR-3a88fa6f-c0f9, TR-396b944c-ceeb, TR-1a731dda-38e5, TR-a80f70bf-f03b, TR-5c487a88-aeff,</p> | 4253.46 | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | | |
|--|--|--|--|--|--|
| | | | <p>TR-02244437-ba52, TR-2ed5453c-0441, TR-84cf4ae0-9ff9, TR-722511d6-3674, TR-65b4863c-8dfa, TR-a09e07fe-59a5, TR-a1be8cd4-15ec TR-357c56b5-3974, TR-32d6e6d9-60e1, TR-7bfa10cd-7185, TR-63503e6e-b890, TR-4c888155-ebec, TR-6f61604f-07a9, TR-51844405-977b, TR-8f42ba0c-fbb3, TR-4bb32be2-7eff, TR-df19c348-3f88, TR-ed2fb4c3-7d57, TR-3be927a5-47af, TR-04c0bb91-1902, TR-2d24f6f6-c712, TR-a330456a-e591, TR-36f6a93d-4255, TR-48665afa-0e64, TR-55a824ca-5c51, TR-f58c6b71-648b, TR-3c49854b-7e88, TR-5b93361b-8740, TR-952f7851-7741, TR-e02abbc4-f645, TR-5b99ee7e-3b3b, TR-0534f459-1eda, TR-829a20ce-de06, TR-521d89f1-122d, TR-52aaa21a-faca, TR-0647a99a-cb95, TR-3d7507e8-c756, TR-39a0da54-bd34, TR-78cb99fb-379e, TR-5216c386-7502, TR-06b7bf2b-4a59, TR-3f648db8-b1e8, TR-21844c6c-3d37, TR-78261dde-9bff, TR-e8f81057-5714, TR-239596bd-ca19, TR-0aa07fd3-13d6, TR-0fce24f9-3ff8, TR-0cc1e63c-37f6, TR-24d1a327-fd90, TR-520376c3-7caf, TR-07e8b9ef-0bbc, TR-21344048-b999, TR-213ada86-a864, TR-29b807e7-212a, TR-26e280c1-0d4b, TR-4afffde3-9502, TR-38da6f8b-4df2,</p> | | |
|--|--|--|--|--|--|

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | | |
|--|-----------|-------------------------------------|---|--------|-------|
| | | | TR-177e8d3a-f2bf, TR-05d31874-36a0, TR-8d7eccdb-09f0, TR-2e3ea444-722b, TR-2416ac3e-1127, TR-4129bf4b-0345, TR-692ca575-4ad8, TR-9d9bb641-159a, TR-b3c9c985-47bd, TR-8e71b60f-9117, TR-318f71ab-89fe, TR-3144f35e-0fdc, TR-0cb26144-e4dd, TR-088175fd-141c, TR-0cd3497b-280f, TR-77c70c82-6cb7, TR-06428470-2e35, TR-8638b8c8-0c6a, TR-070720a6-65be, TR-27bda7e2-956b, TR-8c5852d4-a6aa, TR-ab520e78-4cd6, TR-059a6f43-b3a3, TR-0d87bac3-7caa, TR-461b249e-4065, TR-975d4381-aca3, TR-d1bc3001-3401, TR-939e6320-6536, TR-91fc4196-c3da, TR-a783b959-7b0e, TR-f63bd3b9-c141, TR-9f7cb3bd-d99d, TR-bb7401e8-fda6, TR-609b55f7-861b, TR-ad50a0d6-f69c, | | |
| | July 2019 | Sime Darby Oils Port Klang Refinery | TR-8065f45c-330b, TR-5a0f3708-cc8a | 314.28 | |
| | Aug 2019 | Sime Darby Oils Port Klang Refinery | TR-b0b71968-0ed4 | 78 | |
| | | Sime Darby Oils Carey Island KCP | TR-55577382-65b8 | | 782.3 |
| | Sep 2019 | Sime Darby Oils Langat Refinery | TR-ef9ed38b-cd10, TR-7e1ee828-58e0, TR-c9be3ee6-4fc0, TR-61281f77-4d43, TR-423cc52a-96d5, TR-f9568013-a71b, TR-6021f2a9-0558, TR-b9ec1812-2cc2, TR-72450e16-e1ff, TR-c23371c0-9ddc, TR-1af07ce2-d320, TR-0ed58519-f2ec, TR-57d51b45-1655, TR-ba8e5566-fcc5, TR-679bb3b1-57a8, | 3076.4 | |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | | |
|--|--|--|---|--|--|
| | | | <p>TR-7581d3da-f9ee, TR-99bfd785-da43, TR-2004dc05-d546, TR-69e6e247-c279, TR-90acd7c8-33b3, TR-108865d5-06ed, TR-0a341af0-9ebf, TR-38665877-0660, TR-5ad76382-2736, TR-86feccbc-c2b3, TR-65d4428c-628a, TR-7b0eb5f6-17a9, TR-b197b721-71a8, TR-3b8ac9a8-9191, TR-60eb6643-6993, TR-3fe483da-998e, TR-36360249-eeda, TR-3abe07b3-c8af, TR-1af053f6-5561, TR-22171175-e4bb, TR-4ddf1dc0-16ea, TR-54da27dc-adab, TR-a59ff727-01dd, TR-e0a4d804-467f, TR-6d939d1f-4507, TR-cf24ce1d-9df2, TR-7df7b481-cfa9, TR-78de5a5a-9288, TR-82340ffa-2773, TR-8681cd82-8a00, TR-1202453a-431a, TR-62655861-7411, TR-14ef7b7c-d521, TR-5d7d5315-316d, TR-77d785e7-3f0e, TR-18ca856b-6d32, TR-13b08ef4-d906, TR-95893010-0342, TR-1916da4f-2b42, TR-9ddc51c5-3f64, TR-cd4e7d3b-63ec, TR-edfa0ce4-d755, TR-fdd0c1b6-bcb0, TR-d3e3e480-c808, TR-35745829-a4c7, TR-26975227-a7ae, TR-0f7f9cdf-9da2, TR-05d1ffcc-5aa4, TR-32e72676-b4a5, TR-9a86968c-4473, TR-17a3fa96-fe1a, TR-09e9e469-7969, TR-9dade5f4-d574, TR-1c05fa86-671c, TR-825dd408-c224, TR-85e950fe-0fac, TR-48e674d9-061b, TR-f095f43b-bd1f,</p> | | |
|--|--|--|---|--|--|

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | | | | |
|--|--------------|----------------------------------|--|------------------|-----------------|
| | | | TR-3179851d-848f, TR-26d1f869-573d, TR-b1ab8347-bc70, TR-81794c07-30ff, TR-9cfa32c4-a20c, TR-626e38d2-61b1, TR-d32c9059-8d73, TR-53e8dcb3-477d, TR-1b68f6b8-48c1, TR-71a34047-acd0, TR-1c249bca-cf29, TR-6e2c8089-5a44, TR-ed18e895-c99c, TR-079e7638-7d59, TR-0954970b-3f6b, TR-af7acffc-6bed, TR-64873db9-b024, TR-d4146de7-a1af, TR-9584d549-7877 | | |
| | Sep 2019 | Sime Darby Oils Carey Island KCP | TR-bcad0136-d187 | | 1000 |
| | Oct 2019 | Sime Darby Oils Langat Refinery | TR-5751a7da-6b72, TR-66948ab9-0da9, TR-7eafe1a5-f157, TR-0d31854e-bb07, TR-74bb1fa2-92c5, TR-06f3aec3-ff33 | 2202.88 | |
| | | Sime Darby Oils Carey Island KCP | TR-60eecf2f-a2c8 | | 500 |
| | Nov 2019 | Sime Darby Oils Langat Refinery | TR-2f8e2495-5c8a, TR-7b92725f-1e31, TR-8cb96936-5161, TR-57587ef2-4402 | 1517.75 | |
| | Nov 2019 | Sime Darby Oils Carey Island KCP | TR-3dc6b334-fc11 | | 500 |
| | Dec 2019 | Sime Darby Oils Langat Refinery | TR-842ed47f-ec8f, TR-26bfe300-b284, TR-927f3d16-b1b3, TR-36a02e7b-d202 | 1727.95 | |
| | Jan 2020 | Sime Darby Oils Carey Island KCP | TR-158fc5d6-88c9 | | 100 |
| | TOTAL | | | 25,196.72 | 4,182.30 |

D. Records of CPO & PK Sold under other schemes since the last audit (if any)

| No. | Buyers Name | Scheme Name | CPO Sold (mt) | PK Sold (mt) |
|-----|-------------|-------------|---------------|--------------|
| 1 | Buyer A | ISCC | 29.27 | - |

RSPO P&C Public Summary Report
Revision 10 (Mar 2020)

| | | |
|-------|-------|---|
| Total | 29.27 | - |
|-------|-------|---|

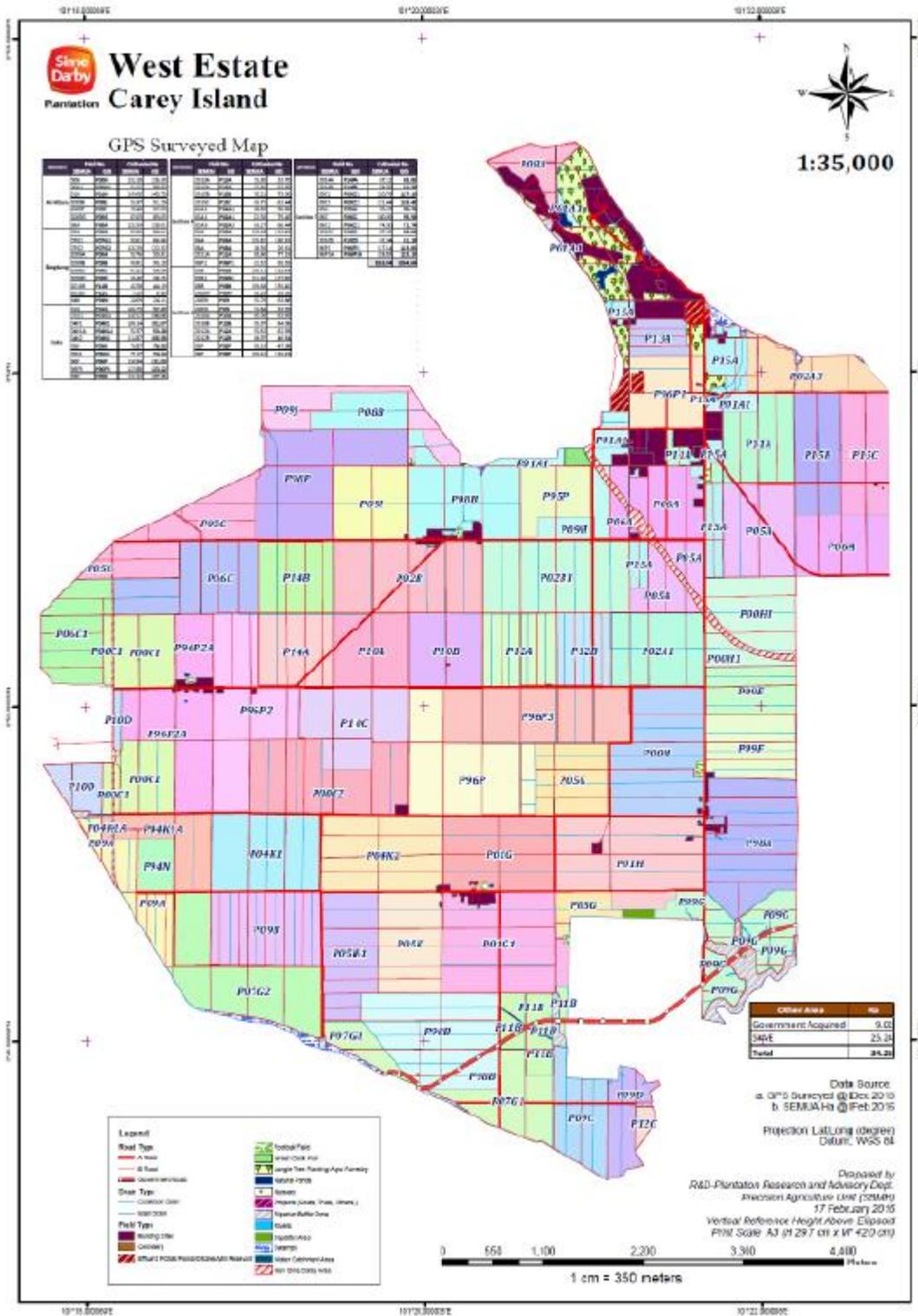
| E. Records of CPO & PK Sold as conventional since the last audit (if any) | | | |
|--|--------------------|----------------------|---------------------|
| No. | Buyers Name | CPO Sold (mt) | PK Sold (mt) |
| 1 | Buyer A | 5,462.91 | - |
| 2 | Buyer B | 1,058.05 | - |
| 3 | Buyer C | 2,766.61 | - |
| 4 | Buyer DA | 0.38 | - |
| 5 | Buyer E | - | 3,695.41 |
| 6 | Buyer F | - | 200 |
| 7 | Buyer G | - | 199.15 |
| TOTAL | | 9,287.95 | 4,094.56 |

| F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) | | | |
|--|--------------------|---|--|
| No. | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold (mt) |
| Nil | n/a | n/a | n/a |

Appendix E: Location Map of Certification Unit and Supply bases



Appendix F: Estate Field Map



Appendix G: List of Smallholder Sampled

Not applicable

Appendix H: List of Abbreviations

| | |
|------------|--|
| a.i | Active Ingredient |
| BOD | Biochemical Oxygen Demand |
| CB | Certification Bodies |
| CHRA | Chemical Health Risk Assessment |
| COD | Chemical Oxygen Demand |
| CPO | Crude Palm Oil |
| CSPO | Certified Sustainable Palm Oil |
| CSPKO | Certified Sustainable Palm Kernel Oil |
| EFB | Empty Fruit Bunch |
| EHS | Environmental, Health and Safety |
| EIA | Environmental Impact Assessment |
| EMS | Environmental Management System |
| FFB | Fresh Fruit Bunch |
| FPIC | Free, Prior, Informed and Consent |
| GAP | Good Agricultural Practice |
| GHG | Greenhouse Gas |
| GMP | Good Manufacturing Practice |
| GPS | Global Positioning System |
| HCV | High Conservation Value |
| IPM | Integrated Pest Management |
| IP | Identity Preserved |
| IS - CSPO | Independent Smallholder Certified Sustainable Palm Oil |
| IS – CSPKO | Independent Smallholder Certified Sustainable Palm Kernel Oil |
| IS – CSPKE | Independent Smallholder Certified Sustainable Palm Kernel Expeller |
| ISCC | International Sustainable Carbon Certification |
| LD50 | Lethal Dose for 50 sample |
| MB | Mass Balance |
| MSDS | Material Safety Data Sheet |
| MT | Metric Tonnes |
| OER | Oil Extraction Rate |
| OSH | Occupational Safety and Health |
| PK | Palm Kernel |
| PKO | Palm Kernel Oil |
| POM | Palm Oil Mill |
| POME | Palm Oil Mill Effluent |
| PPE | Personal Protective Equipment |
| RSPO | Roundtable on Sustainable Palm Oil |
| P&C | Principles & Criteria |
| RTE | Rare, Threatened or Endangered species |
| SCCS | Supply Chain Certification Standard |
| SEIA | Social & Environmental Impact Assessment |
| SEJIA | Social & Environmental Jurisdiction Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |